FEBRUARY 2011

Stanford University Medical Center Facilities Renewal and Replacement

Final Environmental Impact Report - VOLUME II

Prepared for
The City of Palo Alto

SCH # 2007082130

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Prepared by
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SCH # 2007082130

Stanford University Medical Center Facilities Renewal and Replacement Final Environmental Impact Report Table of Contents

VOLUME I

1 INTRODUCTION

1.1 Background 1-1
1.2 Purpose of this Responses to Comments Document 1-7
1.3 How to Use this Report 1-8

2 LIST OF COMMENTORS

2.1 Written Comments 2-1
2.2 Comments Received at the Public Hearings 2-6

3 STAFF-INITIATED TEXT CHANGES AND MASTER RESPONSES

3.1 Introduction 3-1
3.2 Staff-Initiated Changes 3-2
Staff-Initiated Change 1: Quantified SUMC Project Transit Analysis 3-2
Staff-Initiated Change 2: Changes to Intersection Impact Conclusions 3-15
Staff-Initiated Change 3: Changes to Analysis of Cumulative Health Risk from Toxic Air Contaminants (TACs) 3-52
Staff-Initiated Change 4: Changes to Calculation of Greenhouse Gas Emissions and Climate Change Analysis of the SUMC Project and its Alternatives 3-64
Staff-Initiated Change 5: Impacts of the Proposed Hoover Pavilion Renovation and Site Development on the Hoover Pavilion's Potential Status as a Historic Resource 3-99
Staff-Initiated Change 6: Changes to Protected Tree Numbers and Mitigation Measures Under the SUMC Project and the Tree Preservation Alternative 3-102
Staff-Initiated Change 7: Changes to Table 3.13-8, SUMC Project 2025 Indirect Housing Demand by County/City Based on Existing SUMC Employee Zip Code Distribution 3-131
Staff-Initiated Change 8: Changes to Trip Generation and Level of Service Analysis of Alternatives to the SUMC Project 3-133

3.3 Master Responses 3-141
Master Response 1: Viability of the Caltrain GO Pass Mitigation Measure and Alternative Mitigation Measures to the GO Pass 3-141
Master Response 2: Other Traffic Mitigation Measures 3-155
Master Response 3: Background Growth and Cumulative Traffic Impacts 3-165
Master Response 4: Construction Traffic 3-173
Master Response 5: Connection of Pasteur Drive and Roth Way 3-177
Master Response 6: Cost of Transportation-Related Mitigation Measures and Fair Share Calculations 3-179
Master Response 7: Impact on City's Jobs to Employed Residents Ratio and Mitigation Regarding Affordable Housing 3-189
Master Response 8: Range of Alternatives Analyzed and Consideration of Alternatives in the SUMC Project Approval Process 3-199
Master Response 9: Merits of the SUMC Project and Alternatives 3-213
Master Response 10: Response to Comments Not Applicable to CEQA or to the SUMC Project 3-214
Master Response 11: City Process for Reviewing and Deciding on the SUMC Project 3-216
Master Response 12: Development Agreement 3-223

4 WRITTEN COMMENTS AND RESPONSES

4.1 Introduction 4-1
4.2 Responses to Written Comments 4-1

VOLUME II

5 ORAL COMMENTS AND RESPONSES

5.1 Introduction 5-1
5.2 Planning and Transportation Commission Public Hearing Comments 5-1

6 REVISIONS TO DRAFT EIR

6.1 Introduction 6-1
6.2 Changes to Draft EIR Summary 6-1
6.3 Changes to Draft EIR Section 2, Project Description 6-72
6.4 Changes to Draft EIR Section 3, Environmental Analysis 6-73
6.5 Changes to the Draft EIR Section 4, Other CEQA Considerations 6-132
6.6 Changes to the Draft EIR Section 5, Alternatives 6-132

APPENDICES[1]

Appendix S - Transit Calculations
Appendix T - Revised Transportation Figures and Tables
Appendix U - Cumulative Health Risk Analysis
Appendix V - Revised Climate Change Calculations
Appendix W - Expanded VMT Memorandum for the SUMC Project
Appendix X - Revised Alternatives Transportation Impact Analysis
Appendix Y - Stanford Hoover Pavilion Renovation Project Impact Analysis Report
Appendix Z – Hoover Pavilion Historic Site Development and Viewsheds
Appendix AA - Ridership Calculations
Appendix BB - Supplemental Health Risk Assessment Traffic Impacts in the Vicinity of East Palo Alto
Appendix CC - City Authority to Impose Employee Trip Reduction Programs
Appendix DD- Hoover Pavilion Figures

LIST OF FIGURES

Figure 3.3-1 Proposed Shuttle Routes 3-157
Figure 5-1 Welch Road Surface Improvements and Durand Way Encroachments 5-31
Figure 5-2 Existing Assessor Parcels at the SUMC Sites 5-55

LIST OF TABLES

Table 3.2-1 Transit Service at the Palo Alto Intermodal Transit Station 3-3
Table 3.2-2 SUMC Project-Related Bus and Caltrain Trips With and Without the Caltrain GO Pass 3-4
Table 3.2-3 Assignment of SUMC Project Trips to Bus Service 3-4
Table 3.2-4 2010 February Caltrain AM Peak Period Passenger Activity 3-6
Table 3.2-5 List of Draft EIR Figure Changes 3-32
Table 3.2-6 List of Draft EIR Table Changes 3-36
Table 3.2-7 Vehicle Reductions for Year 2025 and 2015 3-66
Table 3.2-8 Protected Trees at the SUMC Sites 3-104
Table 3.3-1 Caltrain Station Parking Supply and Usage 3-145
Table 3.3-2 Route Description 3-158
Table 3.3-3 Maximum Peak Period Ridership 3-159
Table 3.3-4 Comparison of SUMC Project Intersection Impacts Existing and 2025 Conditions 3-167
Table 3.3-5 SUMC Project Contribution for All Study Intersections 3-180
Table 3.3-6 Citywide SUMC Project Contribution 3-182

[1] Appendices are included as a CD in the back of Volume II.

Table 3.3-7 SUMC Project Contribution to Menlo Park Intersections 3-183
Table 4-1 Intersection LOS Analysis of the Oregon Expressway/ Middlefield Road Intersection 4-22
Table 4-2 Level of Service Analysis for the Middlefield Road/Marsh Road Intersection 4-31
Table 4-3 Level of Service Analysis for the El Camino Real/ Cambridge Avenue Intersection 4-96
Table 4-4 Level of Service Analysis for the Willow Road / Durham Road Intersection 4-97
Table 4-5 Freeway Analysis Under the SUMC Project 4-283
Table 4-6 Comparison of SUMC Project 2025 Indirect Housing Demand to Housing Growth per ABAG Projections and Priorities 2009 4-323
Table 5-1 Parcel Size Changes from Widening of Welch Road and Construction of Durand Way 5-32
Table 5-2 SUMC Hospital Patient Transfers 2006-2007 5-33
Table 5-3 Palo Alto Unified School District Enrollment (Number of Students) and Capacity, 2008, 2009, and 2014 5-36
Table 5-4 Leaseholds along Welch Road, Adjacent to the Main SUMC Site 5-42
Table 5-5 Caltrain Service by Hour 5-60
Table 5-6 Attainment of Project Objectives 5-289
Table 5-7 Significant and Unavoidable Impacts of SUMC Project Compared to SUMC Project Alternatives 5-301
Table 5-8 Comparison of SUMC Project Mitigation Measure TR-6.1 and Village Concept Alternative Pedestrian Linkages 5-394
Table 6-1 List of Draft EIR Figure Changes in Section 3.4 6-76
Table 6-2 List of Draft EIR Table Changes in Section 3.4 6-76

Section 5
Oral Comments and Responses

5.1 INTRODUCTION

Oral comments on the Draft Environmental Impact Report (EIR) were made at six Planning and Transportation Commission (Commission) hearings, five City Council hearings, one Architectural Review Board (ARB) hearing, and one Historic Resources Board (HRB) hearing and are reproduced in this section. Discrete comments from the transcripts of the 13 public hearings are denoted in the margin by a vertical line and are numbered. Speakers who provided oral comments at the Planning and Transportation Commission public hearings, City Council public hearings, ARB hearing, and HRB hearing are denoted with a "PTC," "CC," "ARB," or "HRB," respectively. Responses are enumerated to correspond with the comment number. Response to CC1.1, for example, refers to the response for the first comment at the first City Council public hearing; Response to HRB1.3, for example, refers to the response for the third comment at the Historic Resources Board hearing. In addition, the italicized text in the beginning of each response denotes a summary of each distinct comment. Many responses in this section refer to Staff-Initiated Changes and Master Responses, which are found in Section 3 of this document.

5.2 RESPONSES TO PUBLIC HEARING COMMENTS

Transcripts for the six Commission public hearings are reproduced beginning on the next page, followed by responses to the comments. In addition, the transcripts for the five City Council hearings and ARB and HRB hearings are also reproduced, followed by responses to each comment.

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PTC 1

PLANNING& TRANSPORTATION COMMISSION MINUTES

=======MEETINGS ARE CABLECAST LIVE ON GOVERNMENT ACCESS CHANNEL 26=======

Special Meeting of Wednesday, June 2, 2010
Council Chambers, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

ROLL CALL:6:05 PM

Commissioners:	***Staff:***
Daniel Garber - Chair	*Curtis Williams, Planning Director*
Samir Tuma – V-Chair – conflict	*Cara Silver, Senior Assistant City Attorney*
Susan Fineberg	*Julie Caporgno, Chief Plan. & Transp. Official*
Eduardo Martinez	*Steven Turner, Advance Planning Manager*
Arthur Keller	*Lisa Green, Admin. Assoc.*
Lee I. Lippert	
Greg Tanaka	

AGENDIZED ITEMS:
1. Stanford University Medical Center Facilities Renewal and Replacement Project
APPROVAL OF MINUTES: Meeting of May 19, 2010.

AT 6:00 PM

Chair Garber: Welcome to the Wednesday, June 2 Planning and Transportation Commission meeting. Would the Secretary please call roll? Thank you. We will note that Vice Chair Tuma is conflicted on this particular item this evening. The Vice Chair will be taken by Commissioner Lippert.

Now would be the time for those that would like to speak to the Commission on items not on our agenda this evening to speak. I see no cards. Secretary, any? We have none.

ORAL COMMUNICATIONS. Members of the public may speak to any item not on the agenda with a limitation of three (3) minutes per speaker. Those who desire to speak must complete a speaker request card available from the secretary of the Commission. The Planning and Transportation Commission reserves the right to limit the oral communications period to 15 minutes.

AGENDA CHANGES, ADDITIONS AND DELETIONS. The agenda may have additional items added to it up until 72 hours prior to meeting time.

Chair Garber: We will go immediately to our first item, which is the Stanford University Medical Center Facilities Renewal and Replacement Project. This meeting is to accept comments on the Draft Environmental Impact Report for the Stanford University Medical Center

Facilities Renewal and Replacement Project. Including comments focused on the Project Description, Land Use, Population and Housing, and Public Services chapter of the DEIR. Would Staff like to make a presentation?

NEW BUSINESS.
Public Hearing:

1. **Stanford University Medical Center Facilities Renewal and Replacement Project**: Meeting to accept comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including comments focused on the Project Description, Land Use, Population & Housing, and Public Services chapters of the DEIR.

Mr. Steven Turner, Advance Planning Manager: I would thank you Chair Garber. My name is Steven Turner, Advance Planning Manager for the City of Palo Alto and Project Manager for the Stanford projects. Staff is very pleased to be in front of you tonight as essentially our kick-off meeting with the Commission for the Draft EIR for the Stanford University Medical Center Project. It was a long time coming but we are very pleased to now be in the public review process, and please to be able to start taking public comments and questions regarding the Draft EIR.

This is the first of six meetings that the Planning Commission will have with Staff to review the Draft EIR and hear comments from the Commission and from the public. The EIR was released on May 20 for a 69-day review period, which will end on July 27, 2010. We had a kick-off meeting with the City Council last Monday, on May 24 where we essentially introduced the EIR to the public but did not get into any substantial comments regarding the EIR. It essentially was the kick-off meeting to the start of this very robust public process that we will be embarking on starting tonight.

We have a total of 11 public meetings, six with the Commission and five with the Council during the review period where we will accept comments and questions from the public that will ultimately be folded into the Final Environmental Impact Report, which will be presented along with the other Entitlements and Development Agreement near the end of the project near the end of the year.

We have, as I mentioned, a very robust process. You will notice in your Staff Report that Staff included an attachment of a calendar for the next three months. That outlines the meetings that we will be having with the Commission and the Council. Since the document is very large and very complex, Staff thought it best to essentially breakup the review of the EIR into smaller pieces focusing on three to four chapters each meeting to make it essentially more digestible to the Commission, the Council, and the public. Staff will be presenting an overview of those chapters that we have identified at each meeting. It is important to note that we will accept comment on any part of the EIR at any of the 11 public meetings. We chose to focus on three or four chapters at a time to help focus the Commission and public's comments, but by no means should you feel corralled into submitting comments just on those chapters. We certainly will take comments at any time.

The purpose of these meetings is really to collect comments on the Draft EIR. As PBS&J will go into a little bit more detail about what is in a Draft EIR, and what this process is about you will get a better understanding I think of where we will be going over the next 11 meetings. These meetings are not intended to focus on the merits of the project but really just to focus on the Draft EIR. There will be many public meetings once the public review period of the EIR has concluded to discuss the merits of the project. So at these meetings we are focused really on the EIR itself.

The City Council will also be having meetings, as I mentioned there will be a series of five meetings. They are going to overlap the Planning Commission meetings. So if you noticed in your calendars tonight's meeting will be focused on the Project Description, Land Use, Population and Housing, and Public Service chapters. The City Council will be considering those chapters, or will be hearing an overview of those chapters next Monday. So the Planning Commission will hear the series of chapters then followed by a Council Meeting. It will go like that throughout the months of June and July. There is a little bit of a break for Council at the end of June where we will not be bringing Stanford projects to them. They will be focused on the budget. However, throughout the rest of July and through the end of July we will be finishing up with the Council and the public review comments for the Draft EIR.

For tonight's meeting I just wanted to layout a little bit of the framework of what is going to be happening. Once I conclude my remarks I am going to hand it over to Cara Silver just to speak very briefly on the relationships between the Draft EIR, the Development Agreement, and the Entitlements. At that point we will hand it over to our main presenters, PBS&J, who will go through the evening's discussion tonight. After their presentation the project sponsors from Stanford would like to make a brief presentation. They will go ahead and do so. We will hear from Mike Peterson and Bill Philips from Stanford. That would conclude essentially the introduction and Staff Report for this item, and you could open up the item for public comment. So with that I will hand it over to Cara Silver.

Ms. Cara Silver, Senior Assistant City Attorney: Thank you Commissioners, Cara Silver, Senior Assistant City Attorney. I have been the attorney helping move along the environmental review process and entitlement process for this project. So to help frame the discussion tonight and going forward I wanted to just review with you the various aspects of the entitlement process.

Tonight of course we are going to be focusing on the EIR analysis but I thought it would be helpful to go through some of the other processes in order for you to see how they all fit together. There is certainly some overlap but there are also three major categories. Each one of those categories involves a different level of discretion, which is why it is important for you to understand the distinctions.

The first major aspect of any large development process is of course the environmental review process. In this case we have conducted or prepared an Environmental Impact Report, which is the most robust level of environmental review. The EIR examines the physical impacts of the project and suggests feasible mitigation measures. The EIR also examines a range of alternatives to the proposed project including smaller scale projects and a more connected village concept alternative. This will be explained in more detail in PBS&J's presentation this evening.

The EIR it is important to note does not grant any entitlements it is just an informational document. It is designed to discuss mitigation measures and proposed alternatives as I just stated. Developing the effect of mitigation measures is one of the most critical roles of the CEQA process. However mitigation measures must relate to a significant impact identified in the EIR. They must reduce or eliminate the impact, and they must be feasible.

The second major aspect of the Stanford project is the zoning and entitlement process. Since both Stanford projects do not comply with existing zoning, the projects will require a zone change. The Council has broad legislative power to adopt zoning regulations suitable for the area around the projects. The Council can decide what the appropriate land use mix such as hospital, retail, housing, and open space should be for the area. The City's legislative power in this area is very broad. The Council will ultimately decide of course what zoning designation is appropriate and will then act on the zoning request. Staff will be coming to you shortly with a zoning proposal for these projects.

In addition to the Zoning Ordinance itself, given the scope of the project it is likely that the new zoning will include some form of discretionary approval. These discretionary approvals will allow the Council to impose suitable conditions of approval. Conditions of approval involving dedications of land, or payment of an ad hoc fee must have a legal nexus to the development's impact. We will discuss this in greater detail as we go through the entitlement process.

Also, the applicants are seeking a Development Agreement, which will lock in the zoning regulations for a negotiated period of time. Development Agreements are negotiated contracts between the applicant and the City. They confer significant benefits to the applicant and as a result the Development Agreement typically has a community benefit package that contains additional benefits above and beyond the standard conditions of approval or mitigation measures that are found in the Environmental Impact Report.

So those are the three major aspects of the entitlement process. With that I will turn it over to PBS&J who will go into more detail in terms of the topical areas that we are covering tonight.

Mr. Turner: Before we head off to PBS&J just a couple of housekeeping items. Number one, Curtis is not here at this moment. He had a prior engagement but will be here at seven o'clock. So we can expect him at that time.

Also, at your places Staff distributed a document that was produced by Stanford called A Guide to Key Community Issues for the Stanford University Medical Center Renewal Project. That was just received at the City today. Stanford in their presentation may speak a little bit about this document. With that I will now hand it over to PBS&J, including Rod Jeung and Trixie Martelino.

Mr. Rod Jeung, PBS&J Consultants: Chairperson Garber, Members of the Commission, members of the public it is a pleasure to be here tonight. It is truly a major milestone for us to be here relishing the moment and enjoying the spotlight with Staff. This is a rather voluminous document and we do hope as Steven indicated, to give you a quick overview to help you in your decision-making.

What I would like to do tonight is in a very quick summary fashion highlight for you the purpose of a Draft Environmental Impact Report. I realize many of you already understand this but it may be for the benefit of public who are listening in or watching. It really is to underscore something that Attorney Silver just mentioned and that is this is a document that is required by the California Environmental Quality Act. It does focus singularly on physical environmental changes. Noteworthy about the legislation is that this type of information is germane, necessary, and critical before you can actually take any action on the project. So it is forcing you and compelling you to think about and deliberate about the physical environmental changes associated with the potential adoption of this project. As your attorney said, when we do identify particular impacts associated with the project it is the major mission of the environmental document to try to identify ways to reduce those impacts. Those can be done either through mitigation measures or through alternatives.

So in terms of the content of Draft Environmental Impact Report, why does it take 900 pages or more to describe what it is that I have just talked about? First off there is a description of the project. This is a very large project and you have to be able to understand, the public has to understand all the facets associated with this project, all its phases, all the nuances, all the different components. Then you have to be able to understand what the existing conditions are. What is on the ground today? How many trips are on the local streets? Are there sensitive resources, historic resources, significant trees, etc.? Then the analysis really focuses on to what extent the project changes those physical environmental conditions. To what extent does it generate more trips? Does it change the cultural heritage of the area? Does it affect the air quality? Those are the impacts and the fundamental analysis that is performed as part of the Environmental Impact Report.

When a draft environmental document is produced as we have before us tonight we are really seeking public comments. We want to make sure from the public and from the decision-makers such as yourselves whether or not the document adequately addresses the potential environmental impacts that you anticipate, that you believe are out there. So have we identified the impacts? Have we reached conclusions about their significance? Have we used appropriate methodologies? Are there mitigation measures that maybe we have not considered that should be acknowledged or recognized? The types of comments that are going to be most beneficial are really in the discharge of the local jurisdiction's responsibilities in preparing this type of document. As was mentioned earlier comments regarding the merits of the project, whether it is a good idea, a bad idea those are certainly welcome but they are not really germane to the discussions tonight. So with that as kind of a quick overview I am going to turn the presentation over to Trixie who is going to go into the specifics of the project.

Ms. Trixie Martelino, PBS&J Consultants: Thank you and good evening. I am going to first touch upon the Project Description and describe briefly what constitutes a Project Description, what the purpose of a Project Description is. A Project Description is an integral component of an Environmental Impact Report because it defines the proposed action, which is the basis for determining environmental impacts. It must provide enough information to ascertain the project's environmentally significant effects, assess ways of mitigating them, and consider project alternatives. According to the California Code of Regulations a Project Description must include certain technical components including location and boundaries of the project, and a regional location map showing it from a regional perspective. It should include a Statement of Project Objectives. The objectives for this particular project are provided in the Staff Report as

well as the Project Description in the EIR. A Project Description should contain a general description of the project's characteristics with an adequate level of detail to be able to determine impact. It should also list the agencies expected to use the EIR. These agencies include the lead agency, the City of Palo Alto, and responsible agencies, which are those that have discretionary approval power over the project. It also lists approvals for which the EIR will be used.

In order to better understand the resulting change in development from the proposed SUMC project it is helpful to understand the existing development at the SUMC sites. This slide here provides the current SUMC sites plan at the main SUMC site and the Hoover Pavilion site, and some highlights of what is currently on the ground. There is 2.37 million square feet of medical uses, maximum building heights of 50 feet at the main SUMC site, and 65 feet at the Hoover Pavilion site when you consider the rooftop appurtenance of the Hoover Pavilion itself it reaches 110 feet. There is one heliport, one emergency department, approximately 9,880 employees, and 713 beds, which are divided into about 450 beds at the Stanford Hospital and 250 beds at the Lucile Packard Children's Hospital.

This slide provides the proposed SUMC project site plan post-construction, and also provides highlights of the physical changes that would occur onsite. There would be a net addition of 1.3 million square feet, building heights would increase to 130 feet, and the tallest structures would be the hospital modules of the Stanford Hospital. There would be a new heliport at the replacement Stanford Hospital. The existing heliport would be retained for Lucile Packard Children's Hospital functions. Also, a new emergency department would be constructed, it would be an expansion of the existing emergency department, and the existing emergency department would be demolished. Durand Way would be extended between Welch Road and Sand Hill Road to provide access to the new emergency department.

In terms of site activity, employees would increase by over 2,200 employees, and there would be an additional 248 beds, approximately 140 of which would be Stanford Hospital beds and 100 would be Lucile Packard Children's Hospital beds.

The first environmental topic we are going to touch upon is Land Use. The above table provides an impact summary of the findings of the EIR related to Land Use. The column on the left provides the significance criteria against which impacts are based. On the upper row are the various determinations, an I for no impact, LTS for less than significant, S/LTS means the impact was significant but reduced to less than significant through mitigation measures, and the last column is significant and unavoidable meaning significant impacts were not reduced through feasible mitigation measures.

As you can see in the table there were two land use related impacts that were identified. The first is related to consistency with Comprehensive Plan policies. The SUMC project could conflict with Comprehensive Plan policies that protect visual character, historical resources, pedestrian circulation, urban forest resources, water quality, air quality, and noise and compatibility.

The second impact is regarding changes to the overall development character and pattern. Due to the substantial increase in building mass under the SUMC project without requirements to adhere to the City's architectural review process, which would ensure appropriate project design, the project could have a significant impact on existing development character and pattern.

To reduce those impacts various mitigation measures have been identified in the Land Use section. Regarding the first impact, conflicts with Comprehensive Plan policies, various mitigation measures were identified. These are pertaining to the various policies regarding visual quality, air quality, protected trees, historic resources, and water quality. The mitigation measures are also fully defined in their respective sections throughout the EIR and those mitigations will be discussed more in depth in subsequent hearings.

For the second impact, the change to character and development pattern in the area, Mitigation Measure VQ-2.1 has been identified, which requires the project to comply with the City's architectural review process, and adhere to recommendations of the Architectural Review Board.

The second topic is Population and Housing. The above table also shows the impact summary of the Population and Housing section. There are two general significance criteria we look at and those pertain to population growth, will the project exceed growth projections in the region. In this case ABAG 2005 forecasts where applied in the analysis to compare the project against. Also, we look at whether the project would displace housing or residents. In either case the analysis found there to be less than significant or no impact.

However, in addition to the criteria previously identified the EIR also for informational purposes looked at the impact of the project on Palo Alto's jobs to employed residents ratio. This ratio provides a gauge of the City's ability to provide housing near its employment areas. A higher ratio indicates that more employees who work in Palo Alto commute from other jurisdictions. It should be noted that an increase in the ratio is not in and of itself an environmental impact. However, it is related to air pollutants and greenhouse gas emissions from vehicular travel.

In specific the EIR examines whether or not the project would increase the ratio by more than .01 through growth beyond that contemplated in the current Comprehensive Plan and zoning allowances. So as seen in the slide without the SUMC project the jobs to employed residents ratio is estimated to be 2.61, adding in the SUMC project the ratio in 2025 is 2.66. So the project would increase the ratio by approximately .05.

Based on this mitigation has been identified to reduce the impact on the jobs to employed residents ratio. Mitigation Measure PH3.1 has been presented in the EIR for the City's consideration. This measure involves implementation of one or more measures by both the City and applicant. As you can see from the slide it includes dedication of housing units for SUMC employees, zoning code amendments for increased residential uses, and housing fees for affordable housing, and options to help facilitate affordable housing in the new rezoning for the proposed project. These mitigation measures are to be considered in addition to the mitigation measures identified in the Air Quality and Climate Change sections of the EIR, which are going to be discussed in subsequent hearings as well.

The next topic is Public Services. This is the last topic we are discussing tonight. The table in the slide above shows the impact summary for that. Generally, the project would have significant impact if it would result in construction of expanded Fire, Police, recreational or school facilities to maintain standards, and the construction would result in significant environmental impacts. It should be noted that an increase in demand for service itself would not be a significant impact. However if that increased demand would then result in the need to construct new facilities the construction of which would trigger environmental impacts then we

would determine whether or not a significant impact would occur. As shown in the analysis related to Public Services impacts would be less than significant, no new facilities would need to be constructed.

We also look at whether or not the project would result in deterioration of the City's parks and recreational facilities. The analysis showed that there would be a less than significant impact related to deterioration of park facilities. So for Public Services there is no mitigation necessary.

That is the conclusion of the brief presentation on this.

Mr. Turner: Great, thank you Trixie and Rod. At this point we will hear from the project sponsor again from Stanford, Mike Peterson, and Bill Philips. As they make their way up I will load their presentation.

Chair Garber: As you approach the podium if you would identify yourself. Do you know approximately how long your presentation will be?

Mr. Mike Peterson, Vice President, Special Projects, Stanford: I think maybe 15 minutes should do it. By way of introduction I am Mike Peterson, Vice President, Special Projects for Stanford. I have been at Stanford for nine years, and more actively involved in this project for the last year and a half. I will present the first half and then Bill Philips will introduce himself and present the second half. What we are going to do is just try to give you a high-level look at the project. We are going to be doing deep dives into aspects of the EIR, but principally from the description of the project we are going to describe several things for you.

First of all, why are we doing this? Project Objectives, we want to be providing modern, state-of-the-art facilities for high-quality healthcare and related teaching and research. Now imbedded in that are two very important roles we play. The first role is as a community hospital for Palo Alto and the surrounding area. The second is as an academic medical center, which provides the environment within which teaching and research occurs. Both very critical roles.

Our facilities, our oldest facility was built in 1959 and we have a 1973 facility and then a 1989/90 facility. Particularly the older facilities are really not equipped to handle the state-of-the-art practice of medicine today.

Next to comply with the California seismic safety rules. These were passed originally in SB 1953 in the early 1990s. Our buildings will not comply. Our 1959 building does not comply as of the 2030 standards. The approach we are taking with this project is to correct the problems with the building safety and provide a safe and secure building for the future. There is a time limit on that, which we are obligated by the state to meet.

Then we have meeting our projected demand for services. Each hospital has had the experience of turning patients away for lack of facilities to serve them. It is important to note that from 2001 to 2007 there has been a four percent reduction in hospital beds in the State of California at the same time there was a nine percent increase in population over the time period of time. So the demand on facilities for beds is certainly present and we are feeling that.

Next is to meet emergencies and disaster preparedness. We are the critical component of meeting disasters of all kinds. Our facility today is not equipped, it is not large enough. We cannot handle surge capacity when we have an influx of large numbers of people. We want to be able to better handle disasters and just be there for the emergency situations.

Meeting the needs for community physicians. We are a community hospital. We have a large number of community physicians and given the shortage and the limitations on our current facilities for us to serve our community physicians as well rides on this project.

Finally, to provide sustainable design as we modernize our facilities.

A little bit of repetition here but the new facilities were broken out as follows. For Stanford Hospital and Clinics, the adult hospital, there is a net increase of 824,000 square feet, adding 144 beds. That is actually taking us back to slightly below our original license bed capacity. It will take us to 600 beds and then to redo the emergency department. The Children's Hospital has a net increase of 441 beds, adding 104 beds. The School of Medicine there is no net increase in square footage. This will be to modernize the research and academic facilities in the Stone Building, the 1959 building. Then at the Hoover Pavilion we have a net increase of 46,000 feet for clinic practices both community and faculty practices. Parking is increased by about 2,000.

Right sizing is really the expression of trying to do the same amount of services in the proper amount of space. About 34 percent of the space increase is really related to what we call right sizing, private rooms, adequate emergency departments, adequate operating room size, etc.

When you look at what else is happening this is a large project, there are several other large projects in the area such as UC San Francisco. We will ultimately have about 1.78 million square foot project. It is a comparable facility program to ours. Then Cal Pacific in San Francisco also has a large project. So there are several large projects of this size currently being considered in the state and there are several large projects that have been built already.

In November of 2007, Marlene Burkoff who is a consultant engaged by the City to look at our project provided these observations. One is that almost all new projects are looking at single patient rooms, that the size of the patient rooms are pretty much in line with what we have seen with other projects, and that the space in general for the other programs is pretty much in line with what you see in other projects of a similar nature around the country.

Building height is certainly one thing that we will be talking about in the EIR. We range from 60 feet up to 130 feet. Much of the height that we deal with, particularly in the two hospitals, is related in part due to the higher floor to ceiling height now required in modern technology where you have a lot of space required in the interstitial space. That is the space from the false ceiling to the actual ceiling. It gets to be quite large 16, 18, 20 feet alone on one floor. Just comparing it to other facilities in the Palo Alto area you can see 140 feet at 101 Alma and the other building currently in the city. So these were built prior to the establishment of the 50-foot height limitation. Okay, Bill.

Mr. Bill Philips, Vice President, Stanford: Good evening Commissioners. I just wanted to follow Mike's presentation with a few comments and facts about employment housing and my most favorite subject traffic.

The combined projects as they are represented today comprise almost 10,000 employees with about eight percent of those employees living in Palo Alto. Basically, roughly a little under two-thirds of those live within 25 miles of the worksite. The expectation and the traffic impact analysis were assuming that the commute patterns in the future would be similar for the project as to the existing development. The net additional employees are a little over 2,200. That represents, as you can see in the housing analysis that represents the demand for 1,300 housing units on a regional basis. If we continue to presume eight percent of SUMC employees live in Palo Alto that would equate to 104 housing units in Palo Alto. That is both affordable housing and market housing, so that is total housing. Usually your affordable component is about roughly half of that number. The DEIR as was mentioned earlier shows that the housing demand generated would be less than significant.

The number of Average Daily Trips or ADT that we are talking about is 10,000. That is on a 24-hour basis. A calculation utilizing the Go Pass, which we have submitted as an element of TDM for project mitigation and analysis, would be about 8,000 net new daily trips. Just by way of comparison because I have seen it recently, Menlo Gateway, which is about a 900,000 square foot project, has an ADT of a little over 11,000. Most of the daily trips don't add to congestion but new peak hour trips often do add to congestion. So the peak hour trip numbers are a little over 760 in the AM and close to 750 in the PM, with the Go Pass 260 in the AM and 240. The way we have calculated that and submitted information to the City on that calculation is that the Go Pass peak hour riders if we get University level participation would roughly take out all the additional employee trips from the project. Then by way of comparison and having it noted it recently, Menlo Gateway has a peak hour trips, net new, of close to 1,150 in the AM and close to 1,250 in the PM. That is the end of my presentation. Thank you.

Chair Garber: Now would be the time for us to open the public hearing, which we will do, however I am seeing no cards. Is that the case? Looks like there is one coming, if there is anyone else that would like to speak now would be the time, please fill out a card. At the moment we have one speaker. If we have others we can entertain them at that time. Mr. Moss. We are going to give you five minutes.

PTC1.1

Mr. Robert Moss, Palo Alto: Let me just hit on a few points. One of them is the height that a modern hospital requires. Stanford referenced two hospitals two counties away in San Francisco. In the last two years two new hospitals have been built in Santa Clara County. In Santa Clara Kaiser built a new hospital and opened it less than two years ago. Their hospital is four stories high, about 65 or 70 feet. A little closer in Mountain View, El Camino Hospital is also about 65 or 70 feet tall. It is no more than five stories. These are both modern facilities that comply with all of the modern requirements for patient care. So if Kaiser and El Camino Hospital can build hospitals that are modern, and meet all requirements, and they are well under 100 feet Stanford can too.

PTC1.2

In the list of impacts one of the ones I thought was interesting was there was no impact for fire. Building a hospital 130 feet tall is going to put a significant requirement on the Fire Department in order to be able to put out fires and rescue people if there are fires. In fact, one of the mitigations Stanford is being required to perform is to replace the existing 75-foot ladder truck with a 100-foot ladder truck. So if there is no impact why is there a requirement to increase the capacity of the ladder trucks by one-third? That doesn't compute.

PTC1.3

In terms of the peak hour trips, Stanford is predicting the Go Pass will reduce the peak hour trips by over 500 morning and afternoon. That is a nice objective but I am not sure it is actually going to happen. So if it doesn't happen and there is congestion what is the fallback? What is the additional mitigation required? I don't know.

PTC1.4

In terms of the mitigations that Stanford has basically agreed to the preservation of trees and the village development seem to be moving forward. I would certainly go with those. I would say as part of the village development the City should also require that there be a hotel built in the vicinity of the Stanford Shopping Center similar to the hotel that was proposed originally when the shopping center was going to be expanded. Then when the expansion was killed the hotel was killed. So put the hotel back in.

PTC1.5

One of the basic problems with the Development Agreement is that everything is laid out based on what the assumptions are. If the reality doesn't match the assumptions how do we fix it? What is the, let's call it corrective action, which is going to be spelled out in the Development Agreement? How do we improve functionality? Traffic would be a good example. Something has to be stated so that the Development Agreement allows for modifications if things don't work out right.

PTC1.6

On the housing the additional jobs are going to require regionally over 1,300 housing units. When ABAG makes their assignments of housing they base it on the local jobs, and it is the local city, in this case Palo Alto, which is going to be asked to supply the vast majority of those 1,300 units. A significant number of those are going to be BMR units. With the existing ABAG goal of over 2,800 units, over 600 of these I think it is closer to 700, are BMR units. Mayor Burt estimated that if Palo Alto had built all those units it would cost the City close to a quarter of a billion dollars. There is no money for that. So where are we going to find the money for all these BMR units? I don't see that coming down the road either.

PTC1.7

Another concern I have is let's call it the overall congestion that we are going to have from a project of this size. The development is going to go on for decades. There is going to be construction going on over a long period of time. I have not seen anything that really addresses the problems of traffic and noise and other impacts during the construction period. That should be addressed properly. Thank you.

Chair Garber: Thank you. We have one other speaker Sherri Sager. You will have five minutes.

Ms. Sherri Sager, Lucile Packard Children's Hospital: I am with Lucile Packard Children's Hospital. Thank you for the opportunity to speak very briefly tonight.

PTC1.8

I wanted to touch on one issue that has come up before and that is regarding the school district. Packard Children's Hospital actually has a school that is operated by Palo Alto Unified School District located within the hospital. We have met with the school district three times in the last 18 months, and we are pulling additional data for them on what other children's hospitals do regarding school services.

PTC1.8 Con't

We currently have a financial arrangement with the school district. They cover the bulk of the cost of running the school and we have a small share. We are in the process of meeting with them on a regular basis to determine how many new students there will be because of the additional beds and how those costs will be shared between the two institutions. The school district has indicated to us, and we have met with both district staff as well as various Board Members, their main concern is that the hospital school be sufficient to handle the number of new patients that will need education services, and that as long as there is not a requirement for us to build housing that they don't see any direct impacts on them. So we will continue to work with the school district to ensure that the hospital school will meet the needs of both the district as well as the patients we serve. Thank you.

Chair Garber: Commissioners, it is now 6:50. We have somewhat of a limit of time, which is three hours from the beginning of when we started which I believe was around 6:10. So at around 9:10 we need to complete in order for the transcriptionist to do her work in time for the City Council to read that transcription before their meeting on Monday. So let's be succinct if we can. We will do a round here. Why don't we try limiting our comments to five or so minutes, but I will be generous as to when that five occurs. I have lights from Commissioner Tanaka and then Fineberg. Forgive me Commissioner Tanaka we have Commissioner Keller, then Tanaka, and Fineberg. Commissioner Keller.

Commissioner Keller: First I would like to ask the two gentlemen who presented from Stanford to identify themselves with a name, affiliation, and title. It would be helpful for the record. May I ask that?

Chair Garber: Sure. I believe it was Mike Peterson and we will let Mr. Peterson identify himself.

Mr. Peterson: Yes, I did identify myself I believe when I started but I will do it again. Michael Peterson, Vice President for Special Projects at Stanford Hospital and Clinics. I am involved with representing both hospitals in terms of the Stanford University Medical Center Expansion Project.

Commissioner Keller: Thank you. I appreciate it. The reason I wanted clarification is because sir you said from Stanford, and since there is some question as to which piece of Stanford you are from I really wanted clarification of which piece of Stanford you were representing.

Chair Garber: Mr. Philips.

Mr. Philips: Hi, Bill Philips. I identified myself as from Stanford. I am Senior Associate Vice President of Land, Buildings, and Real Estate at Stanford University.

Commissioner Keller: Thank you.

Chair Garber: Thank you. Commissioner Keller.

PTC1.9

Commissioner Keller: Thank you. A couple of first things is that in terms of Hoover Tower it does appear that there is some impact on Hoover Tower in terms of the sight lines and the fact that there are buildings in front of what is considered an historic structure. Those buildings are

PTC1.9 Con't

quite tall and block it, and I am not sure why that is considered a less than significant impact when it should be a significant impact.

PTC1.10

It looks like the charts on page S-98 there seem to be some errors, in particular for the entry regarding conflicts with Comprehensive Plan. There is something wrong here when the conflicts with Comprehensive Plan are S/SU for no project alternative. I don't know how no project alternative can be a significant unavoidable impact with the Comprehensive Plan. Perhaps the SUs and the S/LTs have been swapped. In any event that needs to be corrected.

PTC1.11

Then one question is does the square footage of the site include any roadways or is dedicated roadways excluded from the square footage? That is question that should be clarified in particular with Quarry Road to Roth Way, sorry with Durand Way being added that takes away from site area of some of the parcels there. How does that affect the requirement for parking for those parcels? How does it affect the issue of floor area ratio for those particular parcels? Is the land area of this new piece of Durand Way considered part of the parcel area for the hospital, which would not make sense because it is dedicated roadway as opposed to buildable space? So I understand that dedicated roadway is not considered part of the land area for floor area ratio.

Also, as Welch Road is expanded the question is whether that takes away from the land area either on the outbound side where the medical office buildings are or the hospital side in which case the land area would be reduced correspondingly, which would thereby correspondingly reduce the available for the floor area ratio.

PTC1.12

There is a mention on bullet six of page 2-1 where it says there is an extension of Quarry Road to Roth Way. There is no mention of that anywhere else. I am wondering if that is an error if that is something that needs to be corrected.

PTC1.13

Another question is the extent to which the mitigations are for the life of the Development Agreement or for the life of the project. That is a general question. If the project is expected to last longer than the life of the Development Agreement do the mitigations last as long as the buildings are there?

PTC1.14

In addition, I noticed that Lucile Packard Children's Hospital, which as 77 beds now, turns away 200 per year, which is less than one per day. The Stanford Hospital has 256 bed which turns away 500 per year which is less than two per day. It would be helpful to know the amount of turn-aways peak per day. So is it a maximum of ten peak turn-aways per day, is it maximum one turn-away? I would assume that that would vary. Some days it would be more and some days it would be fewer. It is helpful to know what is the maximum or the peak turn-aways per day for each of those two hospitals. Thank you.

Chair Garber: Thank you. Commissioner Tanaka and then Fineberg.

PTC1.15

Commissioner Tanaka: Thank you Staff, thank you to the applicant for coming out, as well as the public for speaking. I have a quick question that maybe Staff could answer. How many stories is the main building, the 130-foot building?

Mr. Turner: It would be seven stories including the ground floor area.

Commissioner Tanaka: Okay, thank you. Then just to make sure I understand the scope of tonight. Really we are trying to focus on the four topics or chapters of tonight and not necessarily the Development Agreement or other issues, correct?

Ms. Silver: Yes, correct.

Commissioner Tanaka: Okay. Another question is in terms of housing. The Stanford presentation used the eight percent number and the impact report talked about the ABAG numbers. So what is the right way of doing it? Is it using the ABAG numbers or is it using the eight percent?

PTC1.16

Ms. Silver: In terms of the housing analysis in the EIR chapter the jobs/housing balance and the entire housing analysis used the eight percent, which is the current distribution spread of the hospital. So the analysis assumed that the new employment would distribute along the same percentages.

Commissioner Tanaka: So eight percent is the correct way of doing it not necessarily using let's say half, the way ABAG would do it assuming half of the new jobs would be local?

Ms. Silver: That is the analysis that was used in the EIR to assess whether there would be an impact. Now, that needs to be distinguished from ABAG criteria when they assign a RHNA allocation every seven years. There are a number of factors that go into the RHNA assessment, and one of the factors is the total amount of employment not necessarily just the employees that would live in Palo Alto for a variety of reasons.

Commissioner Tanaka: Okay, thank you. One suggestion I saw in the report was that we try to mitigate this with multifamily housing zoning. Is it within our scope tonight to talk about maybe as one of the speakers mentioned, maybe recommending a hotel or condo hotels instead of typical multifamily housing? I think I saw from the City Manager's Report that multifamily housing costs the City money versus some other types of development.

Ms. Silver: Certainly if you think that a hotel style development would serve as a mitigation for some of the impacts that have been identified in the EIR that is an appropriate comment.

Commissioner Tanaka: Okay, thank you. That is all for now.

Chair Garber: Commissioner Fineberg followed by Commissioner Martinez.

PTC1.17

Commissioner Fineberg: I am going to raise two issues in my first round, and I will try and do some speed talking. The first is Comprehensive Plan Policy L-8. I believe that we have the cart before the horse. This project is proposing an amendment to a Comprehensive Plan policy that is also being considered in the total overall Amendment and Update of our Comprehensive Plan citywide. I think it is a grave mistake to craft language to amend our Comprehensive Plan based on a specific project when that whole policy is being reviewed citywide and we don't know the right answers yet for how we want it handled citywide. There was about a minute and a half of discussion at a Study Session on it. There was one comment from a City Council Member who was part of the formative group in the Policies and Services Study back in 1998 when it was adopted, but there has been no concurrence, no outcome of how we should go citywide. So we I

PTC1.17 Con't

believe on L-8 need to know where we want to go citywide before we craft specific language based on any single project let alone the biggest one coming before us in the life of this or our next Comprehensive Plan.

The second thing I want to talk about in this round is school impacts. I believe that the section on school impacts is grossly inadequate. If you look in the document, Table 3.14-1, on page 3.14-8 it is based on demographic capacity data from 2008-2009 school year. That is from two academic school years ago. There is data from 2009-2010. I believe the way this DEIR is using the data is totally misleading and inaccurate. It is saying the school district has a capacity of 457 students that would be accommodated by the growth-inducing impacts of the project. What the district has is a hypothetical capacity because they are renovating schools, they are adding classrooms, they are doing construction projects, they are having parents drive students all over town increasing environmental impacts number one.

PTC1.18

Number two, I got a copy of Lapkoff & Gobalet's report from February 2009 and I would be happy to provide this to Staff. It is says, "During the next five years about 600 additional new students are expected from new housing. During the next fiver years another 500 additional students are anticipated from housing turnover." So that means that within the next five PAUSD is expecting 1,100 new students. The list of where those students are coming from does not include, it does not anticipate anything from the Stanford project. So with 1,100 new students in the next five years where are the new students going to sit? There aren't seats. The district already has a deficit and needs to build more seats. They are doing that this year. They had a contingency meeting. They are doing it through increasing class size, negative impact on the quality of our schools. They are doing it by expanding Ohlone that is a construction project. They are expanding Fairmeadow that is a construction project. They are going to reoccupy Green Meadow, which is going to be a loss of third-party rental revenue that is a negative impact on the quality of our educational system. So to say that there is capacity is just on the face of it wrong.

The last part of that I would like some addition some analysis is I question the methodology of how the DEIR gets a yield of 73 new students from the beginning to the end of the analysis it makes assumptions that I believe are wrong. Number one, on page – it is within a few pages of 3.14-13. It is using a statewide average of .75 students per new household. That is a number used by the state when the local community is not doing its own demographic analysis. It applies to most of the state, which has decreasing enrollment. Palo Alto is special. We have increasing enrollment. We have much higher yields. Our small townhouses yield .75 and our single-family homes yield in excess of one. Can I just finish this thing and then I am done on this one?

PTC1.19

The other thing is I think it is completely a flawed methodology to say that you take the 2,200 some odd new jobs and because we have 1.7 workers per household we basically multiply that number two-thirds, and then multiply it by the zip codes that live in Palo Alto, because we are reducing the number once. What would happen if let's say, I am going to make up a ridiculously exaggerated example. Let's say 90 percent of the Stanford University Medical Center workers live in Atherton, and they have one worker per household. Well, then you would take the 2,200 multiply it by one and then multiply it by the eight percent. You would get a dramatically different result. So I would recommend tweaking that methodology and multiply the factor by if you know that there are ten percent in Palo Alto, fine. You can say that is 1.7 for ten percent. If

PTC1.19 Con't

there is let's say 30 percent in Atherton and that number is one, then for 30 percent of it you multiply it by one. So you have a weighted average and then multiply by the .8. Then you will really know what that yield might be. Also, just on the face of it, and I get that new things can be scary, but to have 2,000 new workers and end up with 73 new students just doesn't fit a common sense test in Palo Alto. I don't think if you ask many people that is a believable number.

Chair Garber: Thank you. Commissioner Martinez, just before we get to you, Commissioner Keller you had the page number for that?

Commissioner Keller: Yes, I believe that Commissioner Fineberg was referring to the entry on page 3.14-16. It says the state has determined the housing units yield approximately 0.7 students per unit, with a footnote 71.

Chair Garber: Thank you. Commissioner Martinez and then we will go to Commissioner Lippert and myself.

Commissioner Martinez: I have ten questions let's see if I can get through most of them in five minutes. Can you put up the Project Description slide, Steve? Thank you.

I understand that what we see in the Project Description is the net add. Is that correct? It doesn't describe the total construction project? Yes?

Ms. Martelino: In the slide yes it is the net additional square footage. However, the EIR in Table 2-4 as well as Table 2-5 provides the entirety, demolished square footage and additional square footage, the gross.

Commissioner Martinez: So is the EIR addressing only the additional impact of the additional square footage or the entire project?

PTC1.20

Ms. Martelino: Yes, we look at the additional square footage. What we are looking at is the change from the existing conditions.

Commissioner Martinez: Because the existing amount of square footage and traffic and air pollution is satisfactory, and therefore we can ignore it and only look at the new impacts, is that the thinking behind this?

Ms. Martelino: The thinking is not that existing conditions are satisfactory but in accordance with the California Environmental Quality Act the measure of an impact is the change from the baseline or the existing setting at the time the Notice of Preparation is released.

Commissioner Martinez: Okay, that is what I wanted to understand. I think it would be helpful though in looking at the project that both numbers be put up and just state that it is addressing the net. There are going to be some construction impacts that are probably going to address everything because there are construction impacts for the entire project.

PTC1.21

I wanted to ask about the way the housing was calculated. The criteria was this is the way it exists today, right? This is the historic number of employees that work in the hospital that live in Palo Alto. Is that true? Yes?

Ms. Silver: Yes, that is correct.

Commissioner Martinez: Is that the only way we can look at this? Can the Environmental Impact Report look at a different way of the housing impact or is this prescribed procedure to follow?

Ms. Silver: The particular thresholds that we use to analyze whether there is a housing impact are thresholds that the City has used in the past. In terms of projecting how many households will be generated from employment there are a number of different methodologies for doing that. In this case we had very solid evidence showing the distribution for the hospital. So that seemed to be the appropriate methodology. If there is other substantial evidence showing that the distribution may be different either up or down that certainly is something that can also be analyzed.

Commissioner Martinez: But you can't consider – well I am sort of answering it. What I am trying to ask is can you consider causal effects or you just have to go by what exists? For example, can you look at the fact that there is a low vacancy rate in Palo Alto, or that housing costs are high for the typical middle-income worker, or that the eight percent that live in Palo Alto are doctors and the rest of the market is sort of pushed to Sunnyvale or San Jose? Can you look at those factors as issues that need to be mitigated or do we have to look at the sort of statistical analysis of this?

Ms. Silver: Those are all factors that go into the current distribution.

Commissioner Martinez: It is?

Ms. Silver: So this methodology takes into account those factors and a variety of other factors.

I would also like to mention that we do have Kate Funk here who actually performed the housing needs analysis. She might be able to provide greater detail on that question.

Commissioner Martinez: Okay, I am going to think about that question and I will come back the next round.

Chair Garber: Commissioner Lippert.

PTC1.22

Commissioner Lippert: Thank you very much. I have a couple of questions trying to understand the presentation in the beginning. I guess I have the cheat sheets here. Talking about the impacts of the jobs to employment ratio, you maybe want to put the slide up there. If I go to your numbers, specifically down at the bottom it looks at the 2005 without the Medical Center project. What? 2025. It says approximately 2.61 and there is the other with the project and it is 2.6. Is that in percents? Would that represent half a percent or what is that number specifically addressing?

PTC1.22 Con't

Ms. Martelino: Well, a 2.61 ratio for instance would indicate that for every employed resident in Palo Alto there are 2.61 jobs.

Commissioner Lippert: Okay, so in other words, it is describing a jobs to residents.

Ms. Martelino: Employed residents.

Commissioner Lippert: Okay. Then going to Stanford's presentation did you get a chance to review their presentation at all? Have you confirmed any of their numbers with regard to the EIR?

Ms. Martelino: We did not review the specific presentation but we have reviewed their application in detail. That is the basis the analysis.

PTC1.23

Commissioner Lippert: I am specifically interested in their commute numbers, their traffic numbers. What it shows is a difference of 500 between people that would be commuting by car versus people that would be able to take advantage of a Go Pass. There was a difference of 500. It would be a reduction of 500 cars. I can tell you which one it is. It is on their PowerPoint presentation slide 8, and it is the number of new peak hour trips. Then it shows peak hour trips 766 in the AM, 746 in the PM, and then with the Go Pass it would be reduced to 261 in the AM and 241 in the PM. So that is a delta of about a 500-trip reduction with the Go Pass. So have those numbers been confirmed or validated by you?

Ms. Martelino: Well, we have not taken a look at this particular presentation. I would need to look to verify the consistency with these numbers against numbers in the Transportation Impact Analysis and Traffic section of the EIR.

Mr. Turner: Yes, we will want to make sure that whatever they have presented tonight is certainly consistent with the EIR so there is no confusion.

PTC1.24

Commissioner Lippert: Then I have another question. I guess this is really directed at the representatives from Stanford. In your presentation on slide number 6 it goes through a number of buildings in Palo Alto that are over 100 feet tall. It doesn't have in here 525 University Avenue. Any thoughts as to how tall that building is? That is probably one of the most significant landmark buildings in the city. It does take into account 101 Alma, Palo Alto Square, City Hall, and the Hoover Pavilion. Anybody from Stanford want to address that?

Mr. Philips: We didn't look at 525 University. That one does standout. We looked at buildings that we knew or that we had information on from other engineers. We were just trying to present a sample that we do have building both in Palo Alto and on Stanford near the site that are over 50 feet.

Commissioner Lippert: Does Staff want to verify that and add 525 to the list at some point? I don't know if you have that number.

Mr. Turner: We don't have that available here tonight, but we certainly will verify that as well and add that to the comments.

Commissioner Lippert: That would be great.

PTC1.25 Chair Garber: Thank you. Just a couple of initial things here. I note on page 2.8 there is a bullet that reads support Stanford's historic campus identity as "a place apart" with a "sense of higher purpose." I am not recalling that language from previous presentations but I am assuming it is referring to the center of the campus, the old quad area, as opposed to perhaps the Hoover Pavilion or some other place on the campus. Is that true? You can get back to me on that. It is the fifth bullet from the bottom. Support Stanford's historic campus identity. I was just curious where that was and what its limits are or boundaries are. It is a question. I don't know if there is a comment that might arise out of it so we will leave it at that for the moment.

PTC1.26 On page 2-25 the fifth bullet from the bottom again is speaker about helicopter pads on top of buildings are excluded from height calculations. I believe there is some discussion some place, but let me confirm that that is a precedent within this community. I know that in other communities it isn't often the case, but is that the case here for Palo Alto? You can get back to me on that one too.

PTC1.27 I would like echo Commissioner Keller's comments particularly about the Hoover Pavilion. I may be mistaken but I believe that the front of the building is on Quarry Road, which is now being covered by a new building. So that is an historic resource that we should probably have a better understanding of what those impacts are, and if there are mitigations that are being established. It seems to me that there would probably also need to be discussion about the new entry and its role in that.

PTC1.28 On page 3.2-20, Goal N-2, Policy N-11 Preserve the integrity of riparian corridors, and N-13 Discourage creek bank instability, etc. It seems to me that we should have some discussion there or acknowledgement of the retention pond that has been mentioned, and whether that can actually serve a mitigation of issues or if it is not relevant. It seems to me that would be the place to address that topic.

PTC1.29 Where the population growth is being discussed another general question. That is, depending on where the City ends up in its conversations with ABAG as to how they want to project their population, and there have been a variety of scenarios proposed. Depending on where the City ends up the question would be how does that impact this document?

PTC1.30 Then I wanted to also thank Commissioner Fineberg for her comments regarding the schools. It seems to me that on page 1.14-7, under the general topic of Schools there some description or acknowledgement potentially of the thresholds, where the limits are that would cause additional buildings, or buildings, or other impacts and where this project is relative to those thresholds. Some conversation about that or discussion would be helpful in addition to addressing Commissioner Fineberg's other comments.

We will do another round. Commissioner Keller.

PTC1.31 Commissioner Keller: Thank you. I am going to follow up on Commissioner Fineberg's comment about the Policy L-8. I observe that this based on something that is titled, The 1989 Citywide Land Use and Transportation Study. Even if I were not to actually read that study, if I just looked at the title of it, my implication is that this would say how much can the city grow

PTC1.31 Con't and not ruin traffic. So it is basically a discussion of how much the impacts of land use on transportation, is my understanding of the document and what it is for. In fact, in reviewing I think that that is the purpose of the document anyway. So it is not clear to me how we can actually expand the Stanford Medical Center by 1.3 million net square feet and say it doesn't count. Do those cars not drive our roads? Somehow the idea that because it comes from a hospital means they are exempt doesn't make any logical sense. It can make legal sense. We an exempt it but the cars don't go away. So I just don't understand that. So I think we need to understand the effect of exempting the proposed project from Policy L-8 and what the impact of that is on our roads. Without doing an adequate traffic study – without redoing the traffic study of the 1989 Citywide Land Use we really can't adjust that except to adjust it downward for the rest. Otherwise you are exempting something without doing an appropriate study.

I am not sure which person at Stanford wishes to answer this. How do we get from the emergency department? Suppose some kid breaks a leg or gets injured somehow and winds up at the emergency department, and then goes from there and gets admitted to the Children's Hospital. I am wondering how one gets from point A to point B. Could somebody please identify that? I mean the path. So maybe we could put the map up there.

Mr. Peterson: Repeat your question.

Commissioner Keller: Great. Also for the record maybe you could describe it verbally so that people who are reading the minutes can figure it out as well.

Mr. Peterson: Yes, the emergency department is right in here.

Commissioner Keller: You are labeling something that is adjacent to Welch Road near Pasture Drive.

PTC1.32 Mr. Peterson: That is correct, yes. There are tunnels and walkways between the new Stanford Hospital, this is the new Stanford Hospital and this is the existing building, and here is Packard. So children would be transferred via tunnel primarily through right there into the Packard Hospital.

Commissioner Keller: So what you are labeling is they would go from the tunnel from the new hospital across to what essentially is replacing where the 1959 hospital is, through the 1973 section, to get to the Children's Hospital. Is that correct?

Mr. Peterson: It looks like they go mainly in the 1989 building I would say. From the new hospital to the 1989 building, through the corridor into the Children's Hospital that is correct.

Commissioner Keller: Thank you. So I am wondering one of the justifications I understood for the building being so tall is you didn't want people wandering through the corridors. You didn't want people going from the emergency room – you wanted them to go in an elevator instead of having to go long distances in a horizontal space.

Mr. Peterson: For adults, correct.

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Commissioner Keller: We are not concerned about children being exposed that long distance. We are only concerned about adults.

Mr. Peterson: No. The problem is this. You only have a certain number of children in terms of the population you take care of. The feasibility of a separate pediatric ED was felt not to be viable because of the volume. So we went through that analysis and we really looked hard at whether we have two emergency departments or we have one. Given the lower volume in the children's size we felt that the only feasible way to have the appropriate staffing and support was to have one. That was jointly discussed and agreed to between the Children's Hospital and the adult. It was not a slam-dunk decision. It was not a quick decision but rather one that we deliberated on at some length.

Commissioner Keller: Since I am running out of time I just want to raise the issue of whether there is a placement of the emergency room adjacent to new Stanford Hospital that would be closer to the Children's Hospital and thereby reduce that distance. I am not sure if that has to be addressed now.

Mr. Peterson: I would ask Mark Tortorich, our Vice President of Planning and Design to address that.

Mr. Mr. Mark Tortorich, Vice President of Planning and Design, Stanford: Commissioner Keller, your question is could we relocate the emergency department in another geographic location. So we looked a number of conditions for the emergency department. Given the square footage needs of the emergency department, we have about 15,000 to 16,000 square feet now, and we will need about 40,000 square feet in the future. The adjacency requirements of placing an emergency department close to your imaging department so that you can have the diagnostic services immediately available make it a very, very large building block to place. So the location here in this quadrant here, as Mike Peterson mentioned, the tunnel and bridge connections to Packard is really the same travel distance for a child going from the emergency department to Packard Hospital as if you put the child here. There really is very, very little effective difference. For ambulance access, for people to find the emergency department when they are coming to the hospital usually in a rather stressful circumstance we felt it was much better to have the emergency department located here because of community visibility and access, and the orientation of the building blocks in the plan.

Commissioner Keller: Thank you.

Chair Garber: Commissioner Fineberg a quick follow up and then we will go to Commissioner Tanaka.

Commissioner Fineberg: I am not sure it would rise to being a mitigation measure for the issue that Commissioner Keller just brought up. Having done that trip twice coming in through the ER and then having two children under the age of eight going into Lucile Packard, I made that trip once at about midnight and once at about 4:00 AM when frankly I was barely coherent. When we were escorted by someone the trip took maybe three or four minutes. When I did it on my own it was unimaginably difficult, and I think I was wandering for about half an hour. So if there can be way-finding signs, something that makes it so a person who doesn't know the hospital can do that without it being difficult I think that would be beneficial.

Chair Garber: Commissioner Tanaka.

Commissioner Tanaka: This is a question for Staff. Since you have the map up can you tell us what are the current uses and who are the owners of the buildings between the shopping center and the planned development? Not the Hoover part but the one on the bottom.

Mr. Turner: The project sponsors may be best able to answer that question with regards to leases and uses.

Commissioner Tanaka: Okay, can someone from Stanford answer it then?

Mr. Peterson: Commissioner Tanaka, I think you are referring to what we call the Barn where Wells Fargo is and California Café also has a location, is that the building?

Commissioner Tanaka: Yes, that is the one that is between Welch and Vineyard, basically that strip.

PTC1.33

Mr. Peterson: That is the Stanford Barn. In the history of Stanford it was a storage area for various farm equipment and things related to agricultural production in the area. I think it was probably in the early 1960s it became a retail facility. It continues to be primarily a retail facility on the ground floor today. It is under a PC designation. Stanford is the owner of the land and now also controls and operates and manages the facilities in the Barn area, which basically for the most part is office space on the upper floors.

Commissioner Tanaka: What about the other three buildings?

Mr. Peterson: Those buildings?

Commissioner Tanaka: Yes.

Mr. Peterson: The one just to the left of the Barn is 730 Welch. It is occupied as clinics building by Lucile Packard Children's Hospital. That is under lease until I think about 2011 and then the buildings on down the way towards Durand are under ground lease to other entities until anywhere between 2012 and 2014, I believe.

Commissioner Tanaka: Do you know what entities are leasing it right now?

Mr. Peterson: I don't know it off the top of my head, but I do have a list of them.

Commissioner Tanaka: Thank you.

Chair Garber: Commissioner Fineberg and then Martinez.

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Commissioner Fineberg: I have a question for the City Attorney getting back to the schools. On page 3.14-11 of the DEIR it talks about the regulatory setting and it calls out California Senate Bill 50, which basically provides for level two and level three impact fees. Where level two fees require the developer to provide half the cost of accommodating students in a new school and the

PTC1.34 Con't

PTC1.35

state provides the other half. Level three fees require the developer to pay the full cost of accommodating the students in the school. Then it goes on to say however, with Prop 55 approved in 2004 it precludes the imposition of level three impact fees for the foreseeable future. Therefore once qualified the district may only impose level two fees as calculated per SB 50. So if we are only able to impose level two fees and because PAUSD is a basic aid district that means the state provides no funding for additional students that means that the impacts are only half mitigated. Must we consider that fully mitigated because of Golleta under project review, or may we consider it half mitigated?

Ms. Silver: I think in terms of the data in the EIR in terms of the EIR providing accurate information that if you can make appropriate findings that that distinction can and should be clarified. In terms of the legal limits you are not able to impose additional mitigations regardless of whether you make the distinction of half mitigated or fully mitigated under that distinction.

Commissioner Fineberg: Okay. We are not able to impose additional mitigations but in a Development Agreement are items in the Development Agreement mutually agreeable between two parties, and would it be possible for the Development Agreement to include the other half of the mitigation? Then that would assume that we get potentially more accurate projection numbers on the student yield.

Ms. Silver: Yes, you have much more discretion in the Development Agreement to require that. Actually, it wouldn't be a requirement it would be a negotiated term, and both parties would have to agree to that term.

Commissioner Fineberg: Okay, thank you. So to reiterate, the Development Agreement could include additional funds for PAUSD to fully mitigate the impact, but it would be something that is voluntary between the applicant and the City.

Ms. Silver: That is correct.

Commissioner Fineberg: I would like to talk a little bit about the logic of the consistency with our Zoning Ordinance. On page 3.2-29 it talks about whether or not the project is consistent with our Comprehensive Plan. Without getting into detail I am troubled that we are saying well, it is not consistent so let's just change our Comprehensive Plan. We are doing that at a time when our Comprehensive Plan is at the end of its life. It was intended to run through 2010 and we are there. We have not done our update. The analysis that underlies the Comprehensive Plan is based on data from the mid-1980s and early 1990s. So it is quite stale. The base conditions have changed. So where the project does not comply with our Comprehensive Plan, height, the zoning, development criteria we are just going to change the Comprehensive Plan and make it work. Just as a matter of logic that doesn't yield compliance with the Comprehensive Plan it just yields a different Comprehensive Plan.

So I am not necessarily sure that that's an appropriate approach. I think we need to carefully take some time, I don't know if it is going to happen tonight or it will happen in future public meetings, but we need to look at what the potential unintended consequences might be of a hospital zone. Where else might it happen? What kinds of gatekeepers are in place that we won't get hospital zones in the future where we don't want them? How easy would it be for it to

PTC1.35 Con't

PTC1.36

be applied in other places? Otherwise we don't know the impact of changing and introducing that new zone.

The last piece of that is it might be that the changing the Comprehensive Plan to fit the project makes it legal, but it doesn't address the real-world problems of the project like it is high, and we have a Comprehensive Plan that says we don't want that height. We will talk about visual later in another section. So we are making it not conflict but then we are avoiding dealing with what those conflicts are. I think we need to make sure we do a good job of that.

Chair Garber: Commissioner Martinez followed by Lippert.

Commissioner Martinez: Thank you. I think I want to kind of build on that. I think it was our last Commission meeting we had an interesting discussion about growth-inducing development. Is this a potential issue to be addressed in the EIR or has it been addressed?

Mr. Jeung: Yes, it is a required element of an Environmental Impact Report. We have a section titled Other CEQA Considerations that include some discussion of that. It is also found in the indirect discussions of Indirect Population and Housing. So growth inducement is considered and is required.

Commissioner Martinez: What are the components of that not in Housing but in other areas?

Mr. Jeung: Let me give you an example of how typically it arises. Occasionally when we are doing other projects questions about what constitutes growth-inducement come up. It could be for example the expansion of a wastewater treatment facility that allows for additional capacity and thereby allows the additional development to occur using that capacity. It could be from an extension of a road to an area that is currently underserved. It could be the extension of a utility line to an area that is currently underserved thereby allowing additional development to occur.

Commissioner Martinez: Okay. How about Stanford is building a state-of-the-art hospital, other doctors in Northern California want to benefit from that. They move their practices to Palo Alto. They generate a need for medical office space. Is that considered growth-inducing? Are there ramifications of the project which are growth-inducing like that, or to the contrary the project includes medical office building onsite, does it impact the commercial office space that exists in Palo Alto in a negative way, and is that considered as an item that needs to be mitigated?

Chair Garber: Commissioner, if I am understanding you what you are asking is does real estate gravity theory apply here, in that if you are creating the opportunity for more of something do you get more of something?

Commissioner Martinez: Yes, and is that considered growth-inducing?

Chair Garber: Perhaps your suggestion is that the EIR should include discussion of that topic and the limits of it.

Commissioner Martinez: Yes, if it is not adequately addressed I believe it should be addressed, because there are growth impacts to that that as you suggested affect housing.

Mr. Curtis Williams, Director of Planning and Community Environment: I think we should take that primarily. It is a broad issue, but primarily looking at the type of impacts that are specific to a large hospital in terms of the medical office, medical clinic type thing. The section 4.3 I guess it is of growth-inducing impacts in here does talk about housing, and talks about increased job growth in the region because there is economic stimulus from people that come to the hospital, spend money, employees, etc. So there is some of that discussion. I am not sure whether it addresses the clinic space but we will look at that.

Commissioner Martinez: Okay, thanks Curtis. I will look at that and see if it helps me understand it.

PTC1.37

Finally, and this sort of builds on what Commissioner Fineberg was saying as well, we are looking at what has been described as the biggest project in Palo Alto history. We are looking at a $4.0 billion development and 2,000 new cars added. How is it possible as the Staff Report says that the land use impacts are "less than significant?"

Mr. Williams: We will respond to that in the document.

Mr. Jeung: One way to take a look at that just to understand the context is that yes, this is a large project and yes you can envision it changing the character, the appearance, the functioning of the activities in the vicinity. When we have to do the impact analysis in an Environmental Impact Report we follow the significance criteria, the thresholds that are identified. So when we talk about how the land use is going to change as a result of the project we are specifically looking at, as Commissioner Fineberg brought up a little bit earlier, the consistency and the conflicts with your applicable Comprehensive Plan policies. We are taking a look at the extent to which it conflicts with existing residential, recreational uses in the vicinity that could be adversely affected by the activities that occur at the hospital. Then there are other that are not particularly relevant like farmland conversion.

So the one thing that you have brought up that I think is important to understand is that when you take a look at the changes to the surrounding character or the development the environmental document does acknowledge that there is a significant impact. So it is not to say that this is brushed under the rug or it is not dismissed. It is acknowledged as a significant impact and there are mitigation measures then that are suggested as ways to reduce those impacts to less than significant. So it is important to take a look at those mitigation measures and see if you feel comfortable that they reduce those impacts to less than significant.

PTC1.38

Commissioner Martinez: I appreciate that and I acknowledge that you have put a lot of hard work into this. This is my last comment. I am looking for ways to support the project. To me, the best way to support it is to really be tough on ourselves about mitigation. When I read the impact on the Comprehensive Plan I look at something that says Historic Resources, I forget the Comprehensive Plan number, and it makes a comment like the Hoover Pavilion will be restored. Well, that is true. There is some credit for that. Also, we are demolishing the Edward Durell Stone Building. I think that is a simple example of how we have to put all our cards on the table and say we have some tough decisions here i.e., this is feasible to do and this is not a good practice to try to restore this. This is how we are going to commemorate the open-heart surgery for the first time in America. This is how we are going to acknowledge the lives that were saved there. This is how we are going to acknowledge this piece of Palo Alto's history. We have to

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kind of put all the facts on the table in terms of land use, in terms of historic resources, in terms of the schools, in terms of housing, and let sort it out so we can support the project knowing that the mitigation is significant enough that we are doing the best job we can. I don't think we are quite there yet. Thank you.

Chair Garber: Thank you. Commissioner Lippert.

PTC1.39

Commissioner Lippert: I would like to pick up with my line of questioning where I left off. I was talking about the height of buildings, and one other building I want to add to that is 600 Welch Road. It is the one that is directly across the street from the hospital and I think we should understand what the height of that building is, and possibly the outpatient surgery building that is part of the complex already.

Mr. Williams: Commissioner Lippert, if I could just go back. Our Fire Department advised me that the 525 University building is 220 feet.

PTC1.40

Commissioner Lippert: Great, I appreciate that. In fact my next line of questioning was for the Fire Marshall. In terms of the impacts here on your last slide it was Public Service. It has with regard to fire and emergency services less than significant impacts. What I want to understand from the Fire Marshall is what are the challenges of fighting fires on large structures and tall structures. Are we going to need special equipment, etc. to deal with those fires?

Mr. Gordon Simpkinson, Acting Fire Marshall: Good questions, Commissioner Lippert. As you are aware we have several tall buildings in Palo Alto already. So the types of fire scenarios that we would anticipate for this type of structure that is proposed would be very similar to the high-rise structures that we already have at 101 Alma, 525 University, and there is also Escondido Village on the Stanford Campus, which we provide emergency services to as well. So as was stated earlier, I think Mr. Moss mentioned the upgrade of the fire truck is one of the suggested mitigations, which would not give us the ability to reach the roof, but would certainly give us the ability to protect portions of the structure farther above grade then what we are currently capable of doing.

The design of the building is essentially its own best friend in terms of protection. That is one of the things that the Building Code establishes as you are aware from your career. As the building height increases the robustness of construction and compartmentalization of the building are factors that are brought to bear to improve the survivability of the structure for fire. The buildings are going to have fire sprinkler protection throughout and fire pumps to provide the additional pressure for the building height. So there are engineering solutions basically that are being brought to bear to mitigate the additional heights being proposed.

Commissioner Lippert: With regard to the siting of the building as well, are there any issues associated with that in terms of being able to fight a fire? We have a series of buildings on the parcel itself.

Mr. Simpkinson: Right, and that was one of the things that we were very concerned with from the beginning of the project was making sure that we worked closely with the design team to provide for fire access roads in locations that would allow us to get the best proximity for our emergency vehicles to the building. So each of the phases of the various designs have

PTC1.40 Con't

incorporated fire access road layout and they have been consulting with the Fire Department each step of the way so that wherever possible we can get our equipment situated to the most advantageous locations for fighting fire onsite.

Commissioner Lippert: My last question for you is again with regard to the less than significant impact here. How does mutual aid from surrounding communities feed into us not having to enlarge or increase the number of firefighters we have?

Mr. Simpkinson: The standard response that we have for this type of a structure is going to be if there is smoke or flame showing it will immediately go to a second alarm, which would activate response from Menlo Park via automatic aid. So we would automatically get additional personnel and additional Chief Officers responding to the scene in the event of a fire. Again this is the same type of strategy that we already have for high-rise structures located in the vicinity, 101 Alma for example is on the Menlo Park-Palo Alto border. So we already have as I said the response capabilities in place and the mutual aid agreements in place. So a high-rise fire is what is considered – there is a high potential in terms of what can go wrong, but the probability of that happening is relatively low. So it is something where because we already have several specimens of high-rises within Palo Alto this additional high-rise complex is not going to change the complexion of our Fire Department to facing hazards that we have no experience or background in dealing with. It is basically adding to the inventory of potential places where a problem can occur but the challenges that we would face there are similar to challenges that we already face elsewhere in the jurisdiction.

Commissioner Lippert: We don't have any single building that has the square footage.

Mr. Simpkinson: Yes, it is large, and we would definitely need additional resources to respond in the case of a large-scale event. The nature of emergency response is that the worse case anticipated scenario in high-rise is not actually dependent on the height of the building. It is actually dependent on the square footage of the largest individual floor. So if it is looked at from that standpoint there is enough compartmentalization within the design that you are not creating an enormous building layout that is going to create an additional challenge that way. I would point out that the Classic Residents by Hyatt actually presents a greater challenge in that respect because there we have very long wings that are full of residents with less ability to protect themselves, and reduced staff. At least with the hospital you have staff that is capable of moving people to other side of fire barriers, and the layout again as I said is smaller when you look at the footprint of the floor in each of the individual modules with this project. It is smaller than some of the other buildings we already have.

Commissioner Lippert: I am going to have another question for you but my time is up. Are you going to stay?

Mr. Simpkinson: I will be here to the end of the meeting. So if there are additional question I would be more than happy to answer them.

Commissioner Tanaka: Through the Chair, could I add just a small tidbit?

Chair Garber: Please.

PTC1.41

Commissioner Tanaka: Commissioner Lippert just brought up a really, really excellent point. It is a conundrum that CEQA practitioners have to deal with quite a bit. It has to do with Public Services and the demand for public services particularly employees, firefighters, police officers, new equipment, and things like that. Those are all critically important things that the decision-makers and the community need to understand in order to understand the merits of the project and what sort of fiscal demand it is going to place on the local jurisdiction. The challenge for us in preparing the CEQA document is to relate everything back to a physical environmental impact. So the document right now tries to make very explicit that there is going to be increased demand for firefighters, for new equipment, and there is going to be a need to go from a 75-foot ladder to a 100-foot aerial ladder. However, in order to translate that into a physical environmental impact that becomes germane under CEQA, the California Environmental Quality Act, we have to examine whether that additional staff resources or the additional equipment triggers a need for expanded facilities, or a new fire station, or a new police station. Then the affects of that physical construction triggers the physical impact that we would identify as a significant impact. It is a really important distinction because there have been court cases, and I am not going to step into the legal basis here. You can see that if every time a project came along, big or small, and it resulted in demand for additional Staff resources or equipment the only way to mitigate those types of increased demands on a local jurisdiction would be to either charge a parcel tax, raise revenue some how, alter the project. Those begin to get into the realm of fiscal planning and fiscal evaluations. So again CEQA has to come back to the fiscal environmental challenges and changes. So thank you for bringing that up.

Chair Garber: Commissioners, it is eight o'clock. I would like to simply suggest we push on for another hour unless anyone needs to take a quick break. Let's keep going, very good. I am going to pass at the moment and we will go back to Commissioner Keller and then Tanaka again.

PTC1.42

Commissioner Keller: Thank you. So with respect to Policy L-8 and the 1989 Citywide Land use and Transportation Study my suggestion is perhaps we should exclude the amount of square footage that is used for right sizing and include in that the amount of square footage that is used for expansion. That seemed to be an appropriate division there to consider.

PTC1.43

With respect to we should consider the transportation impacts and the land use impacts if Hoover Pavilion new building and parking that is proposed around Hoover Pavilion were instead moved into what I would call the hospital super block instead of being separated by a certain distance. Would there be reduced trips from having the adjacency there? Would there be better synergies by locating that proximate?

PTC1.44

I notice that page 2-53 indicates that the project approval is assumed to be mid 2009. Last time I checked my calendar that was about a year ago. My guess is probably we are talking about approval sometime 18 months after mid 2009. That puts a question on the schedule on Table 2-13, page 2-57, which seems to have a very tight schedule for finishing 2015. So I am not sure how you are going to handle that but that is going to need to be addressed.

PTC1.45

I notice a very amusing Freudian slip on page 2-56, Table 2-12, which indicates a 456-bed replacement hospital. I assume that is not what was intended but instead as a 600-bed replacement hospital. Oh that it would be 456 beds but I don't think that is what is intended.

PTC1.46 On page 3.2-2 there is an interesting thing that makes people try to wonder how to put these together. It refers to 66 acres of land and some 2 million plus square feet of development. I would suggest that you also indicate how many square feet of land. My calculation says it comes out to about 2.9 million square feet of land, but it helps to have comparable numbers.

PTC1.47 In terms of page 3.2-18, Policy T-27 let me find that. It doesn't seem to make sense to me what is going on there. The last sentence makes no sense. It says we are talking about avoiding major increases in street capacity unless necessary to remedy severe traffic congestion or critical neighborhood traffic patterns. The last sentence of the right hand side referring to the Welch Road and Sand Hill Road connection of Durand Way, and the widening of Welch Road says, neither of these improvements would enhance capacity for anticipated vehicle movement including ambulance access. I don't think that makes any sense. I think maybe you mean that that is intended to fix those problems not intended to – I assume that you mean both of those are intended to.

PTC1.48 In terms of Policy N-6, which is view of the foothills on page 3.2-19, the people who are on 101 Alma would lose some of their view of the foothills and they would gain a nice view of the hospital. That should be mentioned. I don't know whether they like looking at hospitals but it is not a view of the foothills. Losing the view of the foothills and it doesn't say anything about hospitals.

PTC1.49 In terms of Policy N-49, which is on pages 3.2-25 through 3.2-26, there is a mention there of noise and the noise reference is with respect to Sand Hill Road. However, there is housing on Welch Road in the vicinity of Pasture Drive. So therefore we can consider that housing and the proximity of that housing instead of merely the proximity to Sand Hill Road because there is closer housing to the hospital.

It indicates that 66.3 decibels in the A scale, or dBA, is not above threshold, but it indicates elsewhere on the left hand side that an increase from below 60 to above 60 is considered an increase in significance threshold. So I don't understand that statement, and that doesn't make any sense. I will continue later.

Chair Garber: Commissioner Tanaka.

PTC1.50 Commissioner Tanaka: Thank you. I have been listening to my fellow Commissioners in regard to whether these buildings are too high, 130 feet. There are buildings taller, and there are a lot of buildings that are a lot shorter. I do think the first question we have to ask ourselves is is the square footage correct? Is this hospital being expanded at the right size? Is it too big? Is it too small? Is it just right? I don't know the answer to that but I have not heard much feedback from my fellow Commissioners on that. So maybe the square footage of it is correct.

If the square footage of this expansion is correct given the requirements of our city and of the region then I think the question is either you go up or you sprawl out. So that is something we have to tradeoff. Is it better to have sprawl or is it better to have height? When I was looking at the maps of the shadows for the buildings, whether you look in December or March, and whatever they have in the morning or the evening it looks like given where it is it is pretty isolated from other especially residential areas. So perhaps it is an okay location for a building of that height.

PTC1.51 I think to prevent this from becoming Manhattan I think one thing that we could think about perhaps is preserving some of the open space around this area as kind of a mitigation factor. So there are not going to be five skyscrapers right next to it. So that you do have some open space as a mitigation factor. So that is something for possible consideration.

PTC1.52 On page 3.13-19, this goes back to the point I made earlier this evening. The City shall explore amending the zoning code to prevent more residential uses particularly multifamily residential uses. I think here and every other place where it mentions multifamily residential use given how according to our City Manager we are losing money every time we build one of these I can't imagine us advocating this or trying to get more of these if that is truly the case.

Rather, given our City finances and how that is number one priority this year I think we really should be pushing for something that Mayor Burt has been pushing for which is basically kind of like a hotel/condo situation where we have hotels built with condos that could be purchased or perhaps rented out or perhaps purchased and rented out later. That would encourage seniors, which Palo Alto is going to have a lot of seniors. Perhaps having a hotel near a hospital makes a lot of sense if you are a senior or young professionals that would have impacts on schools. So maybe smaller condos or studio type of units would make a lot sense, especially given the proximity to retail and restaurants and all that in that location. So I think encouraging that kind of development to help mitigate some of the jobs impact from ABAG makes more sense then looking for multifamily residential use, which given our finances doesn't make a lot of sense.

The other thing is that in terms of hospitals, I mentioned this before, I think when you have a medical school nearby, and a hospital then patient families need somewhere to stay. Hotels tend to be very busy because of that and you also have medical conferences and seminars. So those also tend to create high occupancy. So I think some sort of hotel near there makes a lot of sense. I don't know exactly where and we don't have the information tonight to figure out where, but I think that is something that we should spend some time, or maybe Staff can spend some time to really think about that and figure out as part of a longer-term planning, as part of this project how do we help mitigate some of these factors and actually make a better overall project.

PTC1.53 So onto page 3.14-3 that talks about the agreement that Stanford has with Palo Alto for the fire protection. I notice that the agreement is terminating in 2026. If it is terminating in 2026 it may make sense, given that the Development Agreement may span much further than 2026, to contemplate the renewal and the terms of those renewals soon rather than waiting until 2026 given the Development Agreement will span beyond that. I will continue later. Thank you.

Chair Garber: Commissioner Fineberg and then Commissioner Martinez.

PTC1.54 Commissioner Fineberg: I would like to talk a little bit about cumulative impacts. On page 3.2-33 it has section on Land Use 6, I guess that is a Program. When it basically says is that the Stanford University Medical Center Project in combination with other reasonably foreseeable probable future developments in the area would have a less than significant cumulative impact on the overall existing or planned land uses in the vicinity of the Stanford University Medical site. That is the oddest way of defining cumulative impact. What you are basically saying is we are going to take the entire city, we are going to consider only a very small section of it, not an entire planning area, not the neighborhoods that surround it, and we are

PTC1.54 Con't

going to say that this project is not going to have cumulative impacts because we are saying it won't. We are not going to consider anything beyond the scope of this project. So it is odd logic for me. It saying the geographic context for the cumulative land use is the project vicinity, which is a distinct planning area in the city and the other reasonably foreseeable probable developments in the context include development of 777 Welch Road. Why is it that we are only considering cumulative impacts, and this doesn't have to be answered now, but is it a requirement that we only consider cumulative impacts of the project site? Would it be more proper to include cumulative development in the area? If we are looking out towards 2025 we are going to have potentially millions of square feet of noncommercial development and we are going to have thousands of units of residential development. So we know it is going to happen. We may not able to put addresses on it but given that our current Comprehensive Plan, which we have to use as our measuring stick says that we build 2,400 homes. There is no cap but it says beyond that there are significant impacts. We are then exceeding that. We are not exceeding the cap on nonresidential and I understand we are going to re-class this it wouldn't be considered as nonresidential, it would be sort of a third category. I don't see how this even acknowledges that there will be other growth. I believe that some of that other growth should be considered.

That same logic is used, I won't go into detail, on VQ-7, on page 3.3-51, under Cumulative Impacts of Visual Quality. It is the same just blanket dismissal of any legitimate analysis of cumulative impacts by saying it is only going to be what is here and we will mitigate it therefore nothing exists. Then on Cumulative Impacts on the Housing and Jobs in Section 3.13 it dismisses cumulative impacts by saying housing will be built in several communities and over time. I don't know if Staff wants to answer it, but by saying it is spread over several communities over time does that allow us to not consider cumulative impacts? Then the same thing in Public Services in Section 3.14.20 in the same paragraph it is saying that there will be cumulative growth that will increase demand for fire protection. But because no fire station needs to be built it is less than significant cumulative Impact. Does Golleta apply to fire also? Or if there are cumulative impacts on the Fire Department one doesn't have to have a construction project for it to be a legitimate cumulative impact? I don't know the answer on that one. I think it would be good to better understand that. Thank you.

Chair Garber: Commissioner Martinez.

PTC1.55

Commissioner Martinez: Thank you. I have kind of already done my soapbox thing so I am just going make a couple of small points. One is really to touch on the Comprehensive Plan a bit. I think in a large degree this project is sort of overwhelming the Comprehensive Plan. It is only going to work if some of the most significant policies are revised to make it work. Policy L-8 has been mentioned several times and the historic 50-foot height limit. In updating the Comprehensive Plan as we are now in the middle of we are looking at new policies that probably should be applied to this project. Workforce housing, housing near transportation, housing near where you work, I think that should be seriously considered in mitigating the impacts of this.

The second thing is the Staff Report says that the Comprehensive Plan provides for land use mitigation through the ARB's scrutiny. That is putting a lot of pressure on our poor old ARB to try to make a significant change based on the tools that they have to look at design quality, and massing, and materials, and like that. The project is pretty well defined as 130-foot tall building, with significant uses already established where the hospital would like to see them. I think

PTC1.55 Con't

trying to fall back on architectural review as a way of implementing Comprehensive Plan policies or being sort of our last refuge is really sort of a false hope. I

think the way in which we want to sort of look at this project is with the ideas that have come forth as we begin to talk about and analyze what is working in the Comprehensive Plan, what needs to be revised, what our green initiative goals are. I know that is in there. But especially related to where people work, where people live, where people shop, where the kids go to school I think if we don't put those measures to reinforce what our Comprehensive Plan needs to be doing over the next ten years, and by when this project is completed, we will have failed to really serve the needs of the city and of Stanford as well in going through this process. Thank you.

Chair Garber: Commissioner Fineberg, you had a follow up?

Commissioner Fineberg: Just a quick follow up on this one. Last week the Planning Commission had a discussion on the differences between ARB's role with the use of land, and that language is what is used in our Comprehensive Plan, versus land use, which I understand from the City Attorney's Office, the ARB has no purview with land use as it is legally defined with Zoning Ordinances and Comprehensive Plan policies. So I would absolutely concur with Commissioner Martinez that having the cumulative impact on changes to overall and existing or planned land use in an area is not adequately safeguarded by having the ARB doing a review where they have no purview over land use but do have purview, I believe the language is like, the optimal use of land, which has been described to me as picking where the house sits on the site and where the landscaping goes on a site, but not the land use as opposed to use of land. So just to stress I think we need to look at that 3.2.33 and make sure that the reasons that we are saying there are no cumulative impacts don't relay on the ARB where they have no purview.

Chair Garber: Commissioner Lippert.

Commissioner Lippert: So I would like to continue my line of questioning with regard to the Fire Marshall. I think this is probably my last question for you. This is with regard to exiting a building when you have a fire. The buildings have already been compartmentalized into several buildings or structures.

Mr. Simpkinson: Right.

PTC1.56

Commissioner Lippert: You have a fire, evacuation of the buildings, do you evacuate all the buildings or do you evacuate only those sections of the buildings that there is an event, or do you evacuate the single building? Then with regard to open space, do we have enough room to be able to deal with the people that are leaving the building and have enough room for the firefighters to maneuver around?

Mr. Simpkinson: The approach to institutional occupancies where you have a lot of patients that are bedridden or rendered incapacitated for surgeries typically those buildings are designed with a high degree of compartmentalization. There are smoke compartments with separate ventilation systems so you have isolation between floors within the building. Each individual floor has several different zones that are established to essentially allow you to protect the patients and the staff, and move them from one portion of the floor to another portion of the floor. So it is very

unusual to actually implement an evacuation of a hospital. It takes a tremendous amount of resources.

One of the scenarios that we were looking at when we had our power failure was the potential for the need to evacuate portions of the hospital. You would have to have ambulances lined up for a considerable distance just to handle moving patients if you can't accommodate them onsite. So the hospital is designed with a high degree of fire resistance, a high degree of compartmentalization, and a high degree of redundant backup systems. So they have emergency power supply, they have tremendous reserves of all the essential materials they need like oxygen for the patients.

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So it is something where if we do execute an evacuation of other portions of the building where you have medical offices or other areas of the building that are more administrative in nature then yes you do have an additional space that is required. Essentially, the evacuation is something where it typically is designed width wise to handle the number of occupants of the building, and then that width is maintained to the public way. Then beyond that point the public ways are usually public roads, adjacent parking structures, and there are usually plenty of areas onsite to accommodate that. All of those are going to fall under the Building Code that is in effect at the time that the building permits are applied for so it is hard to say exactly what the requirements will be, but yes, that is one of the elements that they will have to design into it.

Commissioner Lippert: My only concern, and again I want to state this is for the basis of the EIR, the design of the hospital is going to be reviewed by OSHPD, and basically they are the lead agency in terms of reviewing the construction documents. In fact, it is the local police and fire, emergency services that will have to deal with the consequences. So perhaps with regard to the EIR that our own Fire Department review the EIR to make sure that it is adequate in terms of them being able to address the demands that are going to be put on them.

Mr. Simpkinson: OSHPD has a policy of implementing locally adopted ordinances or requirements and standards. So if we have particular local standards in place they will pay attention to those and the plan check as well, and will consult us for clarification.

PTC1.57

Commissioner Lippert: Okay. Thank you Gordon. Then I want to talk a little bit about the land here. One thing that is missing, even though we have the site area and the site area is defined pretty well, what we are really missing here I think is any sort of parcel report. I guess what we have in our database is a parcel report and it actually shows property lines and how they relate to adjacent properties. Because Stanford is a single entity in terms of a landowner it is difficult to understand what the project boundaries are realistically. The project may encompass several parcels, or it might be one big parcel. It is difficult to understand, and I think one of my fellow Commissioners brought it up earlier I think it was Commissioner Keller, whether those are dedicated streets or street easements that cross the property. So I really think that it needs to show what the proper boundaries of the site are, and whether it is several parcels or one parcel that this is going to hangover.

PTC1.58

Then Commissioner Tanaka had mentioned something with regard to open space. I will make this my final question and then I will pass it on. We are talking about really a large amount of square footage, and we are talking about increasing the height of the building. So between the density, the height, the massing, etc. is the question of whether this parcel is really the right size

PTC1.58 Con't

to sustain such a development. So I guess the issue is since it is all Stanford land and it runs on seamlessly even though there might actually be different parcels that are put together, perhaps we might want to look in this EIR at other parcels that might be counted towards the maximum floor area here being offset by other areas that are set aside as open space. It doesn't have to be contiguous or attached. What I am thinking is that maybe it is better served that that open space, what we call open space, be actually in the Open Space and attached to Palo Alto, the Arastradero Preserve, or the Foothill Park. I am just thinking of this another way. All that I really am interested in is finding again, as Commissioner Martinez said, finding a way to justify or balance the project so that you don't wind up with an inordinate amount of FAR and massing dedicated to a site that is too small, and really pieces of that site might be located elsewhere.

Chair Garber: I am going to mention one thing that I have been trying to get my arms around here and have been mentioned in a couple of different ways by some of the other Commissioners. In general the chapters that I have read for this evening go fairly light in terms of regional impacts, and there is an obvious reason for that. That is because CEQA documents have to be focused on the nexus of what those impacts are. So trying to talk about cumulative impacts has sort of limited reach.

PTC1.59

At the very least, perhaps under Project Objectives and Program Objectives for the SHC and the Lucile Packard Children's Hospital it say meet regional needs for emergency and disaster preparedness. We should probably also include trauma in there as is mentioned in of the sub-bullets. Elsewhere in the document it talks about the projection for increased helicopter trips, etc. We have often focused on the service benefits, and I am using the word benefits here not in its mitigation use here but in terms of the services. We have really focused on the services that the institution gives to Palo Alto intended to not ignore but not speak directly to the benefits that it bring regionally, because we are focused on what the immediate impacts of those benefits are to our community. I don't think that we should ignore them and I don't know where else those issues and those topics in our community get rolled up unless they are part of this document in some way. There isn't a part of the CEQA process, or a part of the planning process anywhere that I know of that talk about those sorts of issues. So although the impacts may not reach thresholds that require mitigation I think we need to find a place in the document where they can be addressed so that it does not appear as though we are trying to avoid them. That may also begin to help us understand how to better balance and understand what the reactions and mitigations are or lack of mitigations are to some of the cumulative impacts that might otherwise seem pretty obvious, or should be. I may build upon this in later meetings but I am going to leave it at that for the moment.

Commissioners, we have 30 minutes until nine o'clock. Let me encourage you to get your final comments in and then we will try and wrap things up. Commissioner Keller.

PTC1.60

Commissioner Keller: Thank you. Another way to deal with Policy L-8 is to have a no new net trips requirement that all trips be mitigated either onsite or elsewhere in the city. Then the traffic doesn't exist because there is no additional traffic.

PTC1.61

In terms of Figure 2-11, page 2-36 it would be nice to have heights of the other buildings not just the selected ones that are identified. There are a lot of other buildings there for which there are no heights identified.

PTC1.62 On page 3.13-5 is Table 3-3.13-3 use a specific end date, not present. This document has a life and it is nice to know what the date is corresponding to that.

PTC1.63 With respect to 3.13-12 there is a mention that this is done by employee zip code distribution. Was 94303 considered Palo Alto or East Palo Alto? I am not going to ask you to answer that but I happen to live in the Palo Alto portion of 94303. So therefore your calculation might have been erroneous if it considered all of 94303 as East Palo Alto. There certainly is East Palo Alto listed here on Table 3.13-8.

PTC1.64 With respect to schools you have copied over the project housing number of 104 for Palo Alto to be the school impact but the schools include Standard for University Campus as well as parts of Los Altos Hill, as well as parts of Portola Valley that have a Portola Valley zip code but are actually within the Palo Alto Unified School District such as on Alpine Road. Those need to be included in the school calculation not merely that which is within the City of Palo Alto proper.

PTC1.65 I note that there are an additional 2,053 parking spaces. I am assuming that Stanford doesn't build any more parking spaces than it has to because they are awfully expensive. The traffic analysis then has a question because it indicates that there are 8,000 net new daily trips with Go Passes filling those 2,053 parking spaces. Yet with the Go Pass in the AM rush hour there are only 500 additional trips. Somehow that doesn't jive very well so I am kind of confused about that. I also have more questions about the Go Passes later because the schedule of the hospital does not exactly match the schedule of the rest of the university. It is typically a 7:00 AM to 3:00 PM I understand, which doesn't correspond very well with Caltrain, especially with the proposed reductions in Caltrain ridership outside of the rush hours.

PTC1.66 With respect to Commissioner Tanaka's point about putting a hotel I wish we had put one at Hoover Pavilion.

PTC1.67 With respect to the fire agreement there is a lot of development on the Stanford Campus. I hope the fire agreement takes into account the great amount of development in the Stanford General Use Permit.

PTC1.68 With respect to the Welch Road development it was mentioned that on Welch Road from Quarry Road to Durand Way the building leases are up from 2011 to 2014. To what extent does the cumulative impact include any redevelopment on any of those buildings, or are we just considering one of those sites possibly being redeveloped? So the question is whether there are plans for redevelopment during the life of this. The question is what is the timeframe for redevelopment? Do we not expect the Stanford Shopping Center to be expanded at all during the 15-year life of the build out or the 50-year life of the project? That seems kind of odd to me.

PTC1.69 With respect to the Fire Department issues it seems to me a very likely time for a fire is during an earthquake. Evacuations in an earthquake should take into consideration that there are probably going to be a lot of injured people, and people being brought onto the site, and access. There is also the potential that bridges that bring adjacent firefighters to help with mutual aid may be at question during an earthquake. They may need to satisfy their own needs. So I think that the issue of earthquakes and the potential for hazardous material spills, potential for flammable gas releases I think that needs to be studied a lot more carefully and how much staff the Palo Alto Fire Department needs to have to handle that peak need.

PTC1.70 I note that with respect to the number of net new trips in the Stanford document it says that the number of net new peak hour trips which add to congestion. I am wondering what the amount of net new peak trips are period whether they add to congestion or not, or are you assuming that only some of them add to congestion or all of them add to congestion.

PTC1.71 Finally, with respect to the comments in terms of the land use comments it says impact the changes in development pattern is for the Architectural Review Process and recommendations. I for one don't consider that the ARB is sufficient to handle all those issues as was brought up by other Commissioners.

PTC1.72 I think that the idea of additional open space being set aside for mitigation of intensity at this site should be considered. In particular with respect to that when you set aside land in the foothills that should be more land set aside than if you set aside land in the flat lands. Thank you.

Chair Garber: Thank you. Commissioner Tanaka.

PTC1.73 Commissioner Tanaka: Thank you. So I would like to follow up on Commissioner Lippert's comments about having open space in other places as part of a mitigation factor. I would support that as well. I think that does make sense. Of course I think to what Commissioner Martinez earlier in terms of this project kind of overwhelming the Comprehensive Plan that is unfortunately true. I think that is something we need to think about and figure out how everything fits together.

PTC1.74 Onto that point, I am not sure how in this development, I am sure there is going to be a hospital cafeteria and probably a gift shop, but I don't know if patients or workers would want to each hospital food every day, or whether there are going to be competitive restaurants in the area, or some sort of mixed use concept going on. If not, I would encourage that just because that could also help reduce the amount of traffic that people have to create to get lunch or to buy presents for their wife who just had a baby, or for whatever. So that might be something to consider. If not that then because it is near a shopping center to actually have very good pedestrian access so people do not have to drive their cars over a couple of blocks to get food or whatever.

PTC1.75 Back to the Draft EIR, page 3.14-13, the second bullet down to the bottom talks about the longer ladder truck that we have discussed earlier, the 100-foot ladder truck. This truck is being stored in Mountain View right now. I don't know if they store these trucks outside or if the driveway is long enough or whatever. I just make sure also that we don't suddenly need to get a bigger building. Can you address it?

Mr. Simpkinson: We have looked at the apparatus housing capabilities that the fire stations and the current facilities are capable of handling any new equipment. The additional staff that is talked about in terms of going from a 12-hour medic van to a 24-hour medic van our existing fire stations are capable of handling that additional staff as well.

PTC1.76 Commissioner Tanaka: Great, thank you. Then to our packet on S-42. I think to really make the Go Passes work, and I know this is getting into Transportation a little bit, but to make the Go Passes work you don't want just the linkages to Downtown Palo Alto, although the Caltrain station is kind of near there. I think you really want to emphasize on the mitigation measure to

PTC1.76 Con't

have very, very good pedestrian and bicycle linkages, and if not very good Marguerite service to Caltrain to make sure people can utilize the Go Passes as much as possible.

My last comment for this evening is a question actually for Staff about Menlo Park. How much authority does Menlo Park have on this project?

PTC1.77

Mr. Williams: Menlo Park will certainly have the ability to comment on the project. We have been working with them on what they believe would be appropriate mitigation for traffic impacts. Cara can correct me if I misstate this but they don't have authority, they don't have an approval component of this project. So they could ultimately challenge the City's approval based on environmental or some other grounds maybe. It doesn't go before Menlo Park in any way for its own separate approval.

Commissioner Tanaka: Thank you, Curtis. I was looking at page S-45 of our packet, and it talks about the Menlo Park shuttle bus and how they get a little bit over ten cents per square foot of this building to pay for the shuttle fee. I was just wondering how that was negotiated and whether that is something we want as well, or in place of. I don't know if Staff has any insight on that. No? Okay, thank you that is it.

Chair Garber: Commissioner Fineberg.

Commissioner Fineberg: Would it be possible for the Commission members to get new sets of plans for the project? The last plan sets we got were dare I say several major revisions ago, and I think as we go forward it would help us answer some of the questions that we have had tonight about how things are being sited if we can look at where the final buildings are, what shape they are. Obviously we are not doing an architectural review but it just makes it easier to understand much of the project.

Mr. Turner: That is a reasonable request. We will certainly work with the applicant to provide you with I think kind of a preliminary packet as we go through the Draft EIR review, just to give you a sense of context and things like that. You certainly will be getting a much larger, more detailed set of plans as we look at the entitlements for the project a little bit later on in the year. In the meantime I think we can come up with something that will work.

Commissioner Fineberg: Great, that would be helpful. Then I have a question about public participation. The forum at a Planning Commission meeting or City Council includes public participation where the public can get up and speak to the body for two minutes or five minutes. It is not an iterative process. There is no opportunity when a question is asked for the question to receive an answer. There is no opportunity for the public to learn other than what they are told. They don't really participate other than commenting.

We have our calendar for June and July with all the Planning and Transportation Commission, ARB, and Council meetings, but will there be any meetings where members of the public can get up and ask questions and have them answered, and learn?

Mr. Turner: There are no meetings scheduled as you describe. Certainly at the beginning of this process we actually had a very comprehensive public participation plan where we focused on discussion topics such as land use, and housing, and transportation, and the like. During those

meetings we provided kind of an overview of the project as it relates to those topics, and certainly had a forum for discussion whereby members of the public and any other interested parties could ask questions of Staff, ask questions of the project applicant, and get some responses with regard to those questions.

We are in a public review period right now where we will be answering all of the questions that we receive related to the Draft EIR not in an immediate sense because we want to make sure that we prove the best and most correct answer in response to those questions. So that is why the process is such that we take in comments and then respond in writing at a later date during the Final EIR process.

So to summarize, we have had a pretty good public review plan at the very beginning of the project. We don't have anything scheduled now.

Commissioner Fineberg: Okay. I wouldn't want a teach-in or a town square format to necessarily replace the formal comment that would be given in the formal process. What I am thinking is let's say we have a member of the public who doesn't know what the Comprehensive Plan is that probably is the majority of our citizenry, but they are interested in the project. They read something in the newspaper, they show up at City Council or they show up at the Planning Commission, and if they knew there was a Comprehensive Plan they could have better educated themselves. If they knew that CEQA regulated certain aspects of the project and they had a chance to get even the most basic understanding of it it would allow them to frame their questions in a meaningful way to get at what they are really wanting to say, and have significance rather then just be an opinion that then may not matter because they didn't know there was some other thing regulating the response. So I think it would be invaluable to have some kind of session where the public could ask questions, not so much here are my comments on the project, but a discussion and a learning format where misperceptions could be corrected, where they could be pointed at resources as iterative process, and then the public comments could go forward.

Chair Garber: Commissioner Lippert.

Commissioner Lippert: Well, one of the most significant impacts I see here is the impact on Steven Turner. Between I would say the Comprehensive Plan Update and the Stanford Project he is only working 23 hours a day. So I think Stanford has two choices. One is to have Steven cloned, which I think our Planning Staff is already working on that.

PTC1.78

Actually what I wanted to talk about is the Comprehensive Plan impacts that are described in here and where the Comprehensive Plan has been impacted or is in variance. When we went into this project it wasn't explicitly said that we would be going through a rezone. With rezoning I know that there is usually a Comprehensive Plan Amendment or a Comprehensive Plan Update when we go through that process. So perhaps what needs to happen is with the rezone, and I don't know if this has already been considered, is that there has to be suitably, adequately addressed writing a new chapter for the Comprehensive Plan that we can review concurrent with this EIR that addresses these concerns, and does it in a way that solves a lot of these issues. So maybe the Director wants to talk about it or maybe the City Attorney wants to talk about what your thoughts are.

PTC1.78 Con't

Ms. Silver: Yes. Our current thinking on this is that there will be discreet Comprehensive Plan Amendments that there will not be a separate chapter that just deals with the hospital district in the EIR. The reason for that is that we want to keep the flow of the existing Comprehensive Plan, which is divided into topic categories, and where appropriate feed the amendments into those existing categories. That is what we typically do for other projects and there doesn't appear to be a reason to do otherwise for this project.

In terms of the zoning plan amendments those probably will exist in a separate zoning chapter under hospital district or some appropriate designation. So the zoning requirements will be compiled in a single chapter.

Commissioner Lippert: Okay. What I am concerned about is this. We could go into the Comprehensive Plan and we could tweak it a little bit here, and tweak it a little bit there. Already what has been explicit is that the City Council for instance with regard to High-Speed Rail has already said we need to look at our Comprehensive Plan in terms of how High-Speed Rail is going to impact our Comprehensive Plan. In this case, this being one of the largest developments that we have in Palo Alto, I think it is important that we look at what has already been identified in the Draft EIR. With Steven Turner's time being so severely impacted perhaps what needs to happen is through the Development Agreement or through some other means an appropriate amount of time be apportioned to actually addressing technically the Comprehensive Plan in terms of this development and the issues that are raised in the Draft EIR.

I am just bringing that up. I want it done in an appropriate way not necessarily just sort of a tweaking. I think that is sort of going to be sort of the rub here in terms of us being able to adequately review this and sort of bundle it up and pass it onto the City Council. So maybe the City Council, once they get our draft minutes, will chime in and they will have similar feelings about it, but is already and I think you have heard it Curtis that they want adequate resources in the Comprehensive Plan to address High-Speed Rail. So I think that this is not dissimilar.

Mr. Williams: I guess we will see. I think the Comprehensive Plan, as we move through that, there will be elements of that that may be affected by this project. That doesn't require the Comprehensive Plan to be changed to accommodate this project right now. In terms of looking at the Comprehensive Plan and sort of the bigger picture there may be things around that that we want to look at in the general vicinity, and the Inter-modal Station and how that is affected, and those kinds of things too. So I do anticipate that some of those would come up in any event through the Comprehensive Plan process, however, I think the fundamental sort of land use designation is already in the Comprehensive Plan. It is going to need to be tweaked a little bit and then there are other things that need to be addressed, but it is already there. Whereas with High-Speed Rail, we are dealing with something that goes from one end of the city to the other potentially and impacts of which, and the whole concept of which, was never addressed in the Comprehensive Plan at all previously. So this is an intensification of an area that is appropriately designated Public Facilities. The other one is kind of wide open to what do we want the corridor to look like.

Commissioner Lippert: Okay, well that will be my final comment for this evening.

Chair Garber: Commissioner Keller, a final comment.

PTC1.79

Commissioner Keller: Yes, two things. One is that page 3.13-11 has a whole discussion about how only eight percent of Stanford University Medical Center employees live in Palo Alto, and therefore we are going to extrapolate to the new employees that live in Palo Alto. This seems kind of strange to me, and let me illustrate the strangeness. Suppose we had an island with ten equal size jurisdictions, each of which was to have a new project. So we have ten new projects on each of these jurisdictions. Each of them would essentially mean that they would have to mitigate only ten percent of that growth because the other 90 percent would occur in each of the other nine jurisdictions. So essentially all the growth would happen but only ten percent of it would be mitigated by housing. That is clearly ludicrous.

I think the fact that it is an objective of ABAG that we house the employees, and that we try to reach a jobs/housing balance means that just as we are mitigating other cities' jobs increases and they are mitigating ours we should really think about mitigating all of our own in this sense. So this eight percent figure doesn't take into account the fact that there is reciprocation going on there. I think that is kind of silly.

PTC1.80

The next point is the idea of Comprehensive Plan compatibility. I am reminded by a saying that says that just because a hamburger calls itself caviar doesn't make it so especially if you think that it takes better with ketchup. What we are essentially doing is making changes to the Comprehensive Plan to make it compatible with the project. That basically says that we are going to define away the problem as opposed to understanding what these changes mean and what the impact of these changes are, and understand what the impact of those changes and evaluate those impacts. That is not defining away the problem that is evaluating the problem and making the changes to correspond with that evaluation. So I think that understanding the impacts of these changes and what they mean makes a big difference.

One final point is that the 101 Alma is going see – I did talk about 101 Alma. So I covered that.

I appreciate the patience that everybody has had in listening to this. I appreciate the fact that Staff and Stanford are going to be here through a lot of these meetings. I look forward to a good spirit of cooperation in trying to get the best project that most meets Stanford's needs and minimizes the impacts to the residents and other employees and visitors to Palo Alto and surrounding communities.

Chair Garber: All right Commissioners let's wrap it up. I will close the public hearing. Let me remind both the Commissioners as well as members of the public that comments on any part of the Draft Environmental Impact Report can be given at any of the meetings regardless of the particular focus of that meeting.

Just before we close this wanted to review the calendar if I could with Staff. Next week we have Visual Quality and Architectural Design, Biological Resources, and Cultural Resources. Commissioner Tanaka will be our Vice Chair for that. Then the week after that, June 16, we talk about Transportation and Commissioner Keller is the Vice Chair for that one. On June 23 we have Climate Change and Air Quality, and Commissioner Fineberg will be our Vice Chair for that. Then on June 30 we have Noise, Geology, Soils, and Seismicity, Hydrology, Hazardous Materials, and Utilities. I don't think I have an assignment yet for the Vice Chair.

A question though on the July schedule, you had on July 7 Alternative Mitigation Measures. Did I understand in the pre-Commission meeting that that is actually going to be on July 28?

Mr. Turner: No, that is still scheduled for the 7th of July.

Chair Garber: Okay. Then were there no Stanford presentations on July 14, 20, or 28? Or are those just not scheduled yet?

Mr. Turner: Yes, that is it.

Mr. Williams: That is the last one we have scheduled.

Chair Garber: On July 7th?

Mr. Williams: Yes.

Chair Garber: Okay. Commissioner Keller, a question?

Commissioner Keller: Will there be an opportunity for the Planning Commission to review the public comments that have been given during the period that were not only given to us? Usually we review things at the end of a project and there is no review for us at the end of the project. Perhaps that might be done on the 28th for a very short period of time.

Mr. Williams: The end of the review period is the 27th. We could certainly provide you h the comments but to have a meeting to go over them I am not sure what the benefit of that would be. I think we should probably get through the 7th and sort of see where we are with everything. Then at that point, before we go to the Council, we can give you probably what we have up to them just for your information and then look at it. We don't have that planned and we can talk about it later.

Chair Garber: Commissioner Fineberg.

Commissioner Fineberg: Commissioner Keller what would the purpose of having us review public comments after the public comment period is closed be? Do you want a chance to respond where our comments could bounce off of the public's comments so the meeting would have to be before the close of the comment period, or do you just want to read them after we can't comment on them?

Commissioner Keller: Perhaps it should be before, but typically we review the public comments whether they have been given at a meeting or some other way, and give our feedback on those comments. Related to that is sometimes there are the interactions of different items. So some sort of analysis of that is worthwhile.

Chair Garber: Presumably Staff is collecting these as you go.

Mr. Williams: Right.

Chair Garber: Presumably they are being kept in a single document and you are adding onto that document as you go. Perhaps that could be issued in draft form as part of the minutes as the minutes for each meeting go forward.

Mr. Williams: I am sure that periodically we could get them to you. I think that is fine. We will work something out. We are just collecting them all as we go along.

Chair Garber: Yes, just like in any other EIR document.

Mr. Williams: Right. I did also want to point out that the Council's last meeting is the 26th.

Chair Garber: July 26. Okay, we will close this item. I would like to thank the project sponsors as well as consultants. Thank you for the clarification. We are completing this particular focus session. We will continue the item to next week when we will continue with the next set of chapters. Thank you for the correction.

We have a couple of things to take care of here. We have some minutes from May 19. Do I hear a motion to approve them?

APPROVAL OF MINUTES: Meeting of May 19, 2010.

MOTION

Commissioner Lippert: So moved.

Chair Garber: Moved by Commissioner Lippert. Do I hear a second?

SECOND

Commissioner Fineberg: Second.

MOTION PASSED (6-0-0-1, Commissioner Tuma absent)

Chair Garber: Seconded by Commissioner Fineberg. All those in favor say aye. (ayes) All those opposed? The motion passes unanimously with Commissioners Tanaka, Martinez, Fineberg, Garber, Lippert, and Keller voting yea and Commissioner Tuma absent.

COMMISSION MEMBER QUESTIONS, COMMENTS, AND/OR ANNOUNCEMENTS.

Chair Garber: I will note that the representation at City Council for May was Commissioner Lippert, and for June is Commissioner Martinez, and in July it will be Chair Garber.

Are there any reports from Commission representatives? Commissioner Lippert.

REPORTS FROM OFFICIALS/COMMITTEES.

Commissioner Lippert: There will be no Board meeting for the Palo Alto Housing Corporation but I did want to remind you about the anniversary party on June 15, and you all should have received email invitations for the celebration.

I wanted to clarify two things on previous City Council meetings. At the May 10 City Council Meeting they did have the Site and Design Review and Record of Land Use Action on the new greenhouse and shed located in the Baylands. I did not report on that. That was on Consent and was pulled off Consent and there was significant discussion but it did move forward, correct?

Mr. Williams: It did move forward. I am trying to remember if it was actually pulled off Consent. No, it wasn't on Consent it was a Public Hearing item.

Commissioner Lippert: Was it a Public Hearing item.

Mr. Williams: Yes, it has to be a Public Hearing item because it is a Site and Design Review.

Chair Garber: I believe Commissioner Fineberg has some memory of some of the additional conditions that were placed on it. Commissioner Fineberg.

Commissioner Fineberg: I believe there were some additional conditions of approval that were added. Council Member Holman added conditions that would restrict light, ventilation, noise, and I think there were a couple of other minimal things like that.

Chair Garber: Anything else, Commissioner?

Commissioner Lippert: Yes. I previously brought the recommendation regarding the infrastructure and blue ribbon commission. I think that the City Clerk has actually started to circulate or post a notice for public members that would be selected by the City Council. Part of the City Council's discussion included representation from our Commission. So we are going to probably need to begin to think about an appointment for that.

Chair Garber: Planning Director.

Mr. Williams: I apologize I thought Lisa was going to get you a revised agenda to have that on the meeting tonight. So we will post it on your meeting next week.

We need to have one appointment from the Commission and several other Boards and Commissions are going to have appointments too. There is also allowance however that even if you are not appointed as the representative from the Commission you are still eligible to apply separately if you would like to through the Clerk's Office. So I think it is through close to the end of this month to get those. We will have that for you next week when we have it on your agenda. You will be able to appoint one person and then if somebody else wants to apply for it they can apply just like anyone else from the public. It is not prohibiting any Commissioner or Board member from doing that.

Chair Garber: Now this is for the public infrastructure blue ribbon task force or committee. Do I understand that it is not actually an appointment but we need to vote on it?

Commissioner Lippert: My understanding from the City Council Meeting is that it is not a Chair appointment. It is an appointment by your colleagues. So it would be a nomination process and then it would be voted on by us.

Mr. Williams: I will find out. I don't know.

Chair Garber: Yes, if you could clarify that.

Commissioner Lippert: The procedure is a little different then the way they have been handling other blue ribbon committees. The City Clerk's Office had mentioned that it was diverging from…

Chair Garber: Yes, if you could just clarify that and get that to us next week. Commissioner Fineberg.

Commissioner Fineberg: Does one need to be present to win?

Chair Garber: No, in fact …. All right, if there is nothing else? Commissioner Keller, a final word.

Commissioner Keller: I noticed that some of our surrounding communities, namely Mountain View, are dealing with potential issues of pot clubs. I don't know the status of whether pot clubs are legal in Palo Alto, or whether they need a Conditional Use Permit, and whether we should also be considering the restrictions on their locations.

Mr. Williams: We have an ordinance that already prohibits them. We have had it for ten or 15 years. It is an uncodified ordinance however. So the City Attorney's Office is looking into whether to bring that forward and actually codify it and put it in some portion of the code. It was done some time ago and it outright prohibits them currently.

Commissioner Keller: Thank you. Does that mean that would come before us or not?

Mr. Williams: I would imagine that if it went that direction it would be a zoning amendment and if it is a zoning amendment it would come before you.

Commissioner Keller: Thank you. I also notice that there is a lawsuit involving Bodies Club in Mountain View where they have a moratorium on them. So it would be helpful to hear about that.

Mr. Williams: I am not sure about that. There is also apparently a lawsuit in Anaheim that is very relevant to our situation, and I think our attorney's are monitoring that to see how that goes.

NEXT MEETING: Special Meeting on June 9, 2010 at 6:00 PM

Chair Garber: Okay, with that we will adjourn. Thank you all very much. See you next week.

ADJOURNED: 9:12

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PTC 1. Planning and Transportation Commission, June 2, 2010

PTC1.1 *The commentor states that the height of the SHC Hospital building towers is unnecessary.* This comment pertains to the design of the SUMC and does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the SHC Hospital tower height, as explained by the SUMC Project sponsors. The Building Code itself does not specify the height or square footage of hospitals; these details are dictated by the hospital program envisioned by the SUMC Project sponsors in order to meet the future demands. The SHC Hospital building would need to be built vertically for efficiency purposes, thereby requiring the building heights as proposed. The upright alignment of the new SHC Hospital building would allow for vertical circulation in the form of elevators, rather than requiring patients to move through lengthy public corridors. The immediate adjacency between the floors would organize patient movement privately and safely in the most efficient way possible through vertical transportation.[1] In addition, Building Code ventilation and structural requirements result in a greater floor-to-floor height for a hospital than a commercial office building. The typical floor-to-floor height of an office building is 10 to 12 feet, while in a modern hospital it is 16 to 20 feet.[2] As such, the height of the SHC Hospital building is necessary for the functionality of the hospital.

As outlined on page 3.3-39, Mitigation Measure VQ-2.1 would be implemented to reduce the impacts to visual character and quality at the SUMC Sites. This mitigation measure would require the SUMC Project sponsors to adhere to the City's Architectural Review process and would reduce the impacts to less than significant.

PTC1.2 *The commentor questions the impact conclusion for fire services and why measures are required if the impacts are less than significant.* Under CEQA, the need for additional equipment and/or staff to support a public service is not considered a significant impact unless new facilities would need to be constructed to house them, resulting in physical impacts. For example, if a project would require an increase in the level of staffing at the fire department, and the existing fire house was not large enough to support this increase, then a new, larger fire facility would have to be constructed. This new construction would result in potentially significant environmental impacts. However, the SUMC Project would not increase the need for fire services to the extent that new fire facilities would need to be constructed, thereby resulting in a less-than-significant impact.

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[1] Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children's Hospital, City Council Hearing, June 14, 2010.

[2] Stanford University Medical Center, "Guide to Key Community Issues for the Stanford University Medical Center Renewal Project," June 2010, accessed on October 14, 2010 at: http://www.stanfordpackard.org/sites/default/files/pdfs/report_0610.pdf

Nonetheless, the SUMC Project would require additional fire services, but not to the degree that would result in the construction of new buildings. These additional services would have an impact on the Palo Alto Fire Department (PAFD) itself; however, under CEQA, this is not considered a physical environmental impact. Improvement measures are proposed in the Draft EIR to reduce the impacts on the PAFD, as presented on page 3.14-14 of the Draft EIR. Since the impacts are not large enough to trigger the construction of new facilities, which would result in a significant impact, mitigation measures are not required through the environmental review process. Consideration over whether to include the improvement measures as Conditions of Approval would occur during the entitlement process rather than the environmental review process. Therefore, for the purposes of CEQA review in the EIR, the improvement measures are provided as supplemental information and are not mandated, but encouraged.

One of the improvement measures, as outlined on page 3.14-14 of the Draft EIR, includes providing the PAFD with a 100-foot ladder to replace the existing 75-foot ladder. The 130-foot SHC Hospital towers would be significantly taller than the existing buildings at the SUMC Sites. Therefore, in order for the PAFD to reach the upper floors of the buildings in the event of an emergency, a new ladder truck would need to be purchased. Although more space would be needed at the fire station to house a 100-ladder truck, the PAFD has looked at the apparatus housing capabilities at the fire stations and has determined that the current facilities are capable of handling any new equipment.[3] Therefore, the need for new fire facilities would not be triggered and a less-than-significant physical environmental impact would occur.

PTC1.3 *The commentor questions what would happen if the GO Pass would not reduce Peak Hour trips by over 500 trips in the morning and afternoon.* Please see Master Response 1 for a discussion of the effectiveness of the GO Pass, monitoring, and steps to be taken in the event mode splits are not achieved.

PTC1.4 *The commentor expresses support for the Tree Preservation Alternative and the Village Concept Alternative.* This comment concerns the merits of the SUMC Project alternatives and does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

In addition, the commentor requests that one of the alternatives includes a hotel component. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

[3] Gordon Simpkinson, Acting Fire Marshall, Palo Alto Fire Department, Planning and Transportation Commission Hearing, June 2, 2010.

PTC1.5 *The commentor identifies issues with the Development Agreement as proposed.* Please refer to Master Response 10 for an explanation of non-CEQA issues that are not pertinent to this document. In addition, see Master Response 12, which explains that a conditional use permit would provide a better vehicle for establishing appropriate enforcement mechanisms, rather than negotiating such conditions as part of the Development Agreement. However, the Development Agreement may also be used to incorporate such mechanisms, to the extent the City and the SUMC project sponsors can reach a negotiated agreement. With respect to ensuring compliance with mode split standards, see Master Response 1.

PTC1.6 *The commentor asserts that the SUMC Project would require 1,300 housing units, mostly below market rate units, and that the Association of Bay Area Governments (ABAG) will require the City to provide those units.* As shown in Table 3.13-8 of the Draft EIR, the SUMC Project's indirect housing demand for 1,303 units would be a small percentage of projected housing growth for each community within the region. Eight percent of the housing demand, or 104 units, would occur in Palo Alto and would comprise a small 1.7 percent of the projected housing growth in Palo Alto. As such, impacts would be less than significant. The data in Table 3.13-8 is based on historical evidence, comprised of SUMC's data on the residential distribution of their employees. As indicated on page 3.13-11 of the Draft EIR, the distribution of where SUMC Project employees would live is based on existing SUMC employee zip code data provided by the SUMC Project sponsors (see Appendix L of the Draft EIR).[4] Per CEQA Guidelines Section 15126.4(3), mitigation measures are not required for effects which are not found to be significant. Also, see Master Response 7 for a discussion of the resulting indirect demand for affordable housing in Palo Alto. Lastly, fiscal implications of the indirect affordable housing demand are not environmental impacts that warrant discussion under CEQA. Please see Master Response 10 for a discussion of non-CEQA issues.

PTC1.7 *The commentor states that there will be overall congestion from the SUMC Project because development will continue for decades. The commentor also questions where traffic and noise and other impacts during the construction period were addressed in the Draft EIR.* Traffic-related construction impacts are addressed on pages 3.4-40 through 3.4-45 of the Draft EIR. Implementation of Mitigation Measures TR-1.1 through TR-1.9 would reduce construction-related traffic impacts to less than significant. Please see Master Response 4 for a further discussion of construction traffic. Construction noise is addressed on pages 3.7-21 through 3.7-24 of the Draft EIR. Implementation of Mitigation Measure NO-1.1 would reduce construction noise; however, this impact would remain significant and unavoidable. Please see the other technical sections of the Draft EIR for construction-related impacts related to the other topics.

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[4] Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.

PTC1.8 *The commentor states that the LPCH will continue to work with the Palo Alto Unified School District (PAUSD) to ensure that the hospital school would continue to meet the needs of both the PAUSD and the patients.* This comment is noted. Since the comment does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA, no further response is necessary.

PTC1.9 *The commentor expresses concern that the proposed medical office building and the parking structure at the Hoover Pavilion Site would impact views of Hoover Pavilion.* It is important to note that the City's Comprehensive Plan was used in the Draft EIR as a threshold for determining resources that are considered to be visually distinctive in the City. Within the Comprehensive Plan, there is a distinction between a visually protected resource and a historically significant resource. Since the Hoover Pavilion is not listed as a visual resource in the Comprehensive Plan, this building was not treated as a visual resource in the Draft EIR. Page 3.3-41 of the Draft EIR acknowledges that while the Hoover Pavilion is a visually distinctive structure in the vicinity of the SUMC Project, it is not a visually protected resource under the Comprehensive Plan and obstruction of this building would not comprise a significant visual quality impact. Nonetheless, Figure 3.3-11 on page 3.3-35 of the Draft EIR shows that most of the Hoover Pavilion, including the north façade where the main entry is located, would still be visible from Quarry Road even after construction of the proposed medical office building and parking structure.

Although the Hoover Pavilion is not considered visually significant under CEQA, the building is considered to be historically significant, as explained in Section 3.8, Cultural Resources, of the Draft EIR. As stated on pages 3.8-20 through 3.8-21 of the Draft EIR, the proposed medical office building and parking structure would be in close proximity to the Hoover Pavilion; however, significant views would be retained. Architectural Resources Group (ARG) concluded that the construction of the new medical office building and parking structure would not significantly alter the physical characteristics that convey Hoover Pavilion's historical significance such that it would no longer be eligible for inclusion in the National and California Registers. Therefore, the SUMC Project would not result in a substantial adverse change in the significance of this historical resource and the impact under CEQA would be less than significant. For further analysis, please refer to Staff-Initiated Change 5 and Appendix Y of this document for a discussion of potential impacts to Hoover Pavilion.

PTC1.10 *The commentor states that there is an error on the alternatives impact comparison table, Table 5-8, in Section 5 of the Draft EIR, regarding conflicts with Comprehensive Plan policies.* As shown in this table on page 5-51 of the Draft EIR, No Project Alternative A, No Project Alternative B, and Reduced Intensity Alternative A would result in significant and unavoidable conflicts with the Comprehensive Plan. As explained on page 5-50, No Project Alternative A would conflict with Comprehensive Plan Policy L-7, which requires new development to address regional needs and overall City welfare and objectives. Since

additional floor area would not be added to the SHC and LPCH hospitals under this alternative, the Hospitals' combined daily capacity for inpatients would be reduced by up to 456 patients. By failing to meet local and regional demand for medical services, No Project Alternative A would conflict with Policy L-7, a significant and unavoidable impact.

No Project Alternative B and Reduced Intensity Alternative A, as discussed on pages 5-71 and 5-90, respectively, would have similar significant and unavoidable impacts, although to a lesser extent than No Project Alternative A. Both alternatives would not increase the number of hospital beds over existing conditions, thereby not meeting the demand for increased medical services. As such, Table 5-8 is correct in summarizing that these alternatives would result in significant and unavoidable conflicts with Comprehensive Plan policies.

PTC1.11 *The commentor questions if the square footages of the SUMC Project site plan includes the proposed roadway expansion of Durand Way and Welch Road reconfiguration*. The term "square footage" refers to the floor area within occupiable structures. As such, square footage of roadway extensions are not included in the square footage calculations. However, the site acreage as defined on page 2-2 and other areas in the Draft EIR includes the areas in which roadway extensions are proposed. The commentor is correct in saying that roadway extensions are not accounted for in determining floor area ratio (FAR), which means the maximum ratio of gross floor area on a site to the total site area.[5]

The commentor also points out that the proposed roadway expansion (Durand Way) and reconfigurations (Welch Road) would encroach on parcels both inboard and outboard of Welch Road, and asks how the encroachment would affect parking requirements and FAR at the affected parcels. The encroachments would not affect existing structures, and since parking requirements are based on square footage the roadway expansions would not affect parking requirements of existing structures at the affected parcels. However, the roadway expansions could reduce parcel size both inboard and outboard of Welch Road. As such, the roadway expansion and reconfiguration could increase existing FAR at each parcel.

As shown in Figure 5-1 and Table 5-1, the reconfiguration of Welch Road would encroach on properties located on both sides of the street. However, as shown Table 5-1, encroachments would range from 0.01 to 0.47 acres (not including the Hospital Zone parcel) and would comprise a minor impact on the overall acreage on the parcels. Although the property at 900 Welch Road would have the largest reductions due to the construction of Durand Way (approximately 0.47 acres), the parcel would still be able to accommodate the existing building at 900 Welch Road within the Medical Office and Research (MOR) FAR of 0.5.[6]

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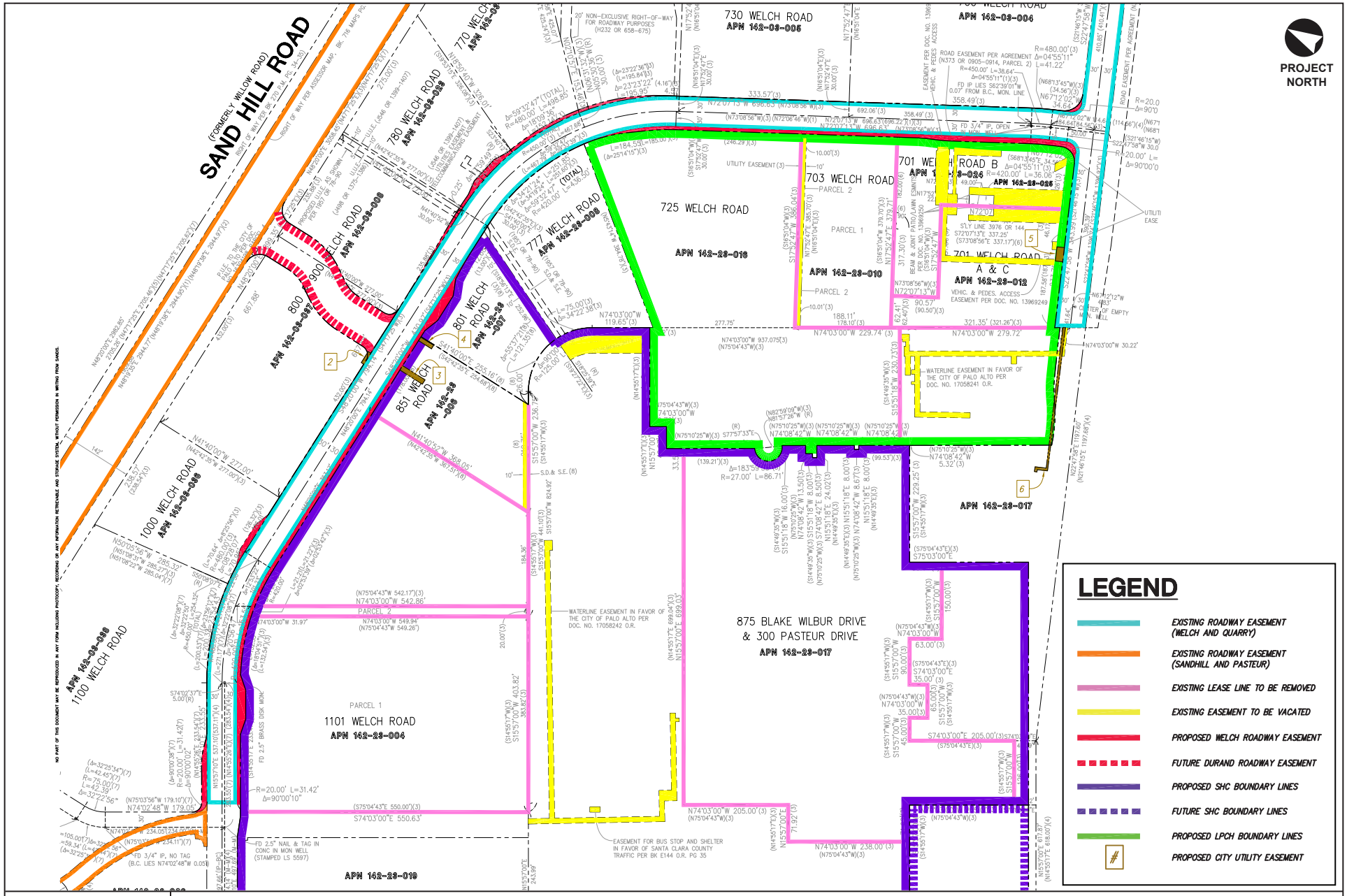
[5] City of Palo Alto Municipal Code, Chapter 18.04.
[6] SUMC, email correspondence to Whitney McNair, October 28, 2010.



Source: Sandis, 2010.

PBS&J

FIGURE 5-1
Welch Road Surface Improvements and Durand Way Encroachments

Table 5-1
Parcel Size Changes from Widening of Welch Road and Construction of Durand Way

Welch Road Address	Existing Area (acres)	Revised Area (acres)	Change from Existing (acres)
Outbound of Welch Road			
700	4.00	3.99	-0.01
730	2.83	2.83	0.00
750	2.03	2.02	-0.01
770	2.25	2.22	-0.03
780	1.41	1.37	-0.04
800[a]	1.50	1.45	-0.05
900[b]	2.75	2.28	-0.47
1000	1.39	1.37	-0.02
1100	4.32	4.29	-0.03
Inbound of Welch Road (not included in Main SUMC Site)			
777	1.62	1.62	0.00
Future Hospital Zone Parcel			
HZ Parcel	55.71	55.00	-0.71

Source: SUMC, 2010.
Notes:
a. 800 Welch Road would be impacted by the expansion of Durand Way only.
b. 900 Welch Road would be impacted by the expansion of both Durand Way and Welch Road.

PTC1.12 *The commentor questions the extension of Quarry Road to Roth Way*. The inclusion of this design feature on page 2-1 of the Draft EIR is correct and an extension would be included as part of the SUMC Project. The Roth Way extension is described in more detail in other portions of the Draft EIR, most notably on pages S-22, 2-45, and 3.4-49. As explained, the existing Quarry Road extension to Roth Way would be improved, and a new loop driveway would be constructed near the proposed SHC clinic/medical office building to provide enhanced access to this building. The Roth Way extension would be a two-lane roadway with on-street bicycle lanes. In addition, ingress/egress into the SHC underground clinic garage would be off the Quarry Road extension. As such, the inclusion of the extension in the Draft EIR is not an error and no edits are necessary.

PTC1.13 *The commentor questions the life of the mitigation measures presented in the Draft EIR*. The mitigation measures are separate from the Development Agreement and would be implemented as instructed in the Mitigation Monitoring and Reporting Program (MMRP). As explained on page 1-5 of the Draft EIR, if the SUMC Project is approved, then the City of Palo Alto must adopt an MMRP, which would ensure that the mitigation measures presented in the Draft EIR are being implemented. Please see Master Response 11 for a description of an MMRP and the SUMC Project review and approval process.

Some of the mitigation measures would last for the duration of the SUMC Project; however, most would only be implemented for a specific period of time. For example, any construction or design mitigation measures would need to be performed once or only during the construction period. However, some measures would be required to last throughout the life of the SUMC Project. The MMRP will contain a detailed mitigation measure implementation timeline.

PTC1.14 *The commentor requests data regarding how many patients are turned away from the LPCH and SHC Hospitals per day*. In order to correspond with the data provided in the Draft EIR, the years 2006 and 2007 are used as recent examples for patient transfers. As shown in Table 5-2, below, the SHC transferred an average of 51 patients per month in 2006 and 50 patients per month in 2007. This averages approximately 1.65 patients per day. Also shown in Table 5-2, the LPCH transferred an average of 24 patients per month in 2006 and 25 patients per month in 2007. This averages approximately 0.81 patients per day.

Table 5-2
SUMC Patient Transfers 2006-2007

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Annual	Average/ Month
SHC														
2006	-	47	52	38	72	36	51	45	65	61	47	51	565	51
2007	94	78	78	39	50	38	17	11	8	56	87	48	604	50
LPCH														
2006	14	19	49	20	15	15	8	23	18	40	31	38	290	24
2007	23	36	26	13	5	21	11	35	8	34	65	27	304	25

Source: SUMC, 2010.

In addition, when considering patient turn-aways, it is important to examine the number of hours that the Emergency Department (ED) was on a called ambulance diversion. During an ED ambulance diversion, only non-trauma ambulance arrivals are diverted; trauma and walk-in patients continue to arrive. The SHC does not capture data on the number of patients diverted to other facilities. The County of Santa Clara permits the ED to go on diversion for up to 90 minutes per instance; however, no other hospital in the pod can be on diversion at that time. Once the hospital goes off diversion, a mandated 90-minute rule goes in place before the SHC can call another diversion. In fiscal year 2006, the ED was on an ambulance diversion for a total of 136 hours and in fiscal year 2007, the ED diversion was on an ambulance diversion for 233 hours.

Since SHC and LPCH are in close proximity to the County line, the Hospitals can also go on ambulance diversion for San Mateo County. For this County, diversion is permitted for 3 hours per instance with 1 hour between diversions. The daily diversion maximum is 6

hours. In 2006, the diversion hours were not counted; however, in fiscal year 2007, the ED was on an ambulance diversion for San Mateo County for a total of 329 hours.[7]

PTC1.15 *The commentor questions how many floors would be in the SHC Hospital building modules.* The modules would be 130 feet in height and would include seven stories, including the ground floor.

PTC1.16 *The commentor seeks clarification on the basis for the distribution of housing demand.* Impact PH-1 from page 3.13-10 through 3.13-14 of the Draft EIR addresses indirect housing demand from new employees of the SUMC Project. The analysis first identifies the housing demand, and then distributes the housing demand among the various jurisdictions within commuting distance. The distribution of the housing demand is based on historical evidence, comprised of SUMC's data on the residential distribution of their employees (see Appendix L of the Draft EIR). According to historical evidence, eight percent of SUMC employees live in Palo Alto, and so this assumption is carried forward in the analysis. There is no basis for assuming that half of the SUMC employees would seek to live in Palo Alto. Table 3.13-8 of the Draft EIR compares the distributed housing demand against the projected household growth in all jurisdictions, as determined in the ABAG Projections 2005. For additional information on the demand for housing, please see Master Response 7.

For a response to the suggestion to construct hotel uses, please see Master Response 8 for a discussion of variations on the alternatives.

PTC1.17 *The commentor disagrees with changing the City of Palo Alto Comprehensive Plan (Comprehensive Plan) Policy L-8 specifically for the SUMC Project while the larger Comprehensive Plan Amendment is ongoing.* The Comprehensive Plan amendment that is being proposed would clarify the existing language in Policy L-8 in order to be more consistent with Land Use Map L-6 "Commercial Growth Monitoring Areas from Citywide Study." Land Use Map L-6, in part, identifies those areas that are public facilities within or near monitoring areas that are not monitored for non-residential development. Facilities such as the Veteran's Hospital, Palo Alto Medical Foundation, SHC, LPCH, and Hoover Pavilion are all located on sites that are currently not monitored in the Citywide Land Use and Transportation Study. The amendment to Policy L-8 is intended to clarify that the sites within the proposed Hospital District, with boundaries consistent with the area surrounding the SUMC Sites, are not monitored. This clarification and the change to Map L-6 to include the site of the expanded LPCH, would not introduce any new policy that has not already been followed. Also, it should be noted that this change in Policy L-8 is proposed as part of the SUMC Project.

[7] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

PTC1.18 *The commentor does not agree with the Palo Alto Unified School District (PAUSD) data and analysis presented in the Draft EIR.* The analysis in the Draft EIR is based on existing conditions, and not on future, projected capacity. As shown in Table 3.14-1 on page 3.14-8 of the Draft EIR, the additional capacity available in the PAUSD during the 2008-2009 school year was 457 students. Therefore, the tertiary impacts of the SUMC Project on the PAUSD were based on the capacity information available after the release of the NOP, rather than future capacity.

The Lapkoff & Gobalet Report, as cited by the commentor, addresses district-wide enrollment projections for the PAUSD. The forecasts incorporate fall 2009 enrollments, 2008 birth data, and updates on new housing developments.[8] As explained above, the Draft EIR does not look at future school district projections, but rather existing enrollment and capacity data.

Table 5-3, below, is provided as a comparison between existing capacity,[9] enrollment in 2008,[10] enrollment in 2009,[11] and projected enrollment in 2014.[12] As shown in the table below, and explained on pages 3.14-16 through 3.14-17 of the Draft EIR, the additional capacity of the PAUSD in 2008 was 457 students. According to the Lapkoff & Gobalet Report, student enrollment in the PAUSD increased in 2009. Middle schools exceeded capacity by approximately three students; however, in total, the PAUSD still had capacity for 128 additional students in 2009. By 2014, students at the PAUSD would increase to such an extent that capacity would be surpassed by over 1,000 students.

Regardless of whether the school district is at existing or projected capacity, and whether the SUMC Project would increase enrollment over the existing or projected capacity, payment of the school impact fees by the SUMC Project sponsors would mitigate impacts to less than significant. As discussed on page 3.14-17 of the Draft EIR, payment of the school impact fees enabled by the Leroy F. Greene School Facilities Act of 1998 is deemed to constitute full and complete mitigation for school impacts. As such, fulfillment of this requirement would mitigate the tertiary impacts of the SUMC Project to less than significant.

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8 Lapkoff & Gobalet Demographic Research, Inc., District-Wide Enrollment Forecasts: Palo Alto Unified School District, December 2, 2009.

9 Robert Golton, Interim Co-Chief Business Officer, Palo Alto Unified School District. Electronic communication to PBS&J, December 12, 2008.

10 Palo Alto Unified School District, Board of Education, Agenda, Regular Meeting, September 23, 2008.

11 Lapkoff & Gobalet Demographic Research, Inc., District-Wide Enrollment Forecasts: Palo Alto Unified School District, December 2, 2009.

12 Lapkoff & Gobalet Demographic Research, Inc., District-Wide Enrollment Forecasts: Palo Alto Unified School District, December 2, 2009.

Table 5-3
Palo Alto Unified School District Enrollment (Number of Students) and Capacity, 2008, 2009, and 2014

	Existing Capacity[a]	2008 Enrollment	2008 Additional Capacity	2009 Enrollment	2009 Additional Capacity	2014 Projected Enrollment[b]	2014 Additional Capacity
Elementary Schools[c]	5,286	5,163	123	5,267	19	5,599	-313
Middle Schools[c]	2,600	2,505	95	2,603	-3	3,072	-472
High Schools[c]	3,900	3,661	239	3,788	112	4,152	-252
Total	***11,786***	*11,329*	***457***	*11,658*	***128***	*12,823*	***-1,037***

Sources:

PAUSD Board of Education, Agenda, Regular Meeting, September 23, 2008.

Robert Golton, Interim Co-Chief Business Officer, Palo Alto Unified School District. Electronic communication, December 12, 2008.

Lapkoff & Gobalet Demographic Research, Inc., *District-Wide Enrollment Forecasts: Palo Alto Unified School District,* December 2, 2009.

Notes:

a. Capacity numbers are from Table 3.14-1, page 3.14-8 of the Draft EIR, since existing capacity information is not provided in the Lapkoff & Gobalet Report.

b. The 2014 Projected Enrollment is from Table 1 of the Lapkoff & Gobalet Report and represents the "Medium" forecast assumption.

c. Table 3.14-1 of the Draft EIR lists the individual elementary, middle, and high schools in the PAUSD. However, the Lapkoff & Gobalet Report does not analyze PAUSD projections by school. Therefore, this table only reflects the break-down as provided in the Lapkoff & Gobalet Report.

In addition, it is important to note that the PAUSD submitted comments on the Draft EIR and did not contest the PAUSD capacity and enrollment numbers used in the Draft EIR. The PAUSD also did not request that the Lapkoff & Gobalet Report be incorporated into the Draft EIR. Please see Letter 10, in Section 4, for a list of the PAUSD concerns.

The commentor also states that the assumption that housing units yield approximately 0.7 students per unit is incorrect. The Draft EIR uses the 0.7 generation factor based on Statewide statistics. As the commentor points out, the Lapkoff & Gobalet Report includes local generation rates. As included on page 11 of the Lapkoff & Gobalet Report, student yields were distributed by the type of housing unit, as follows: 0.9 for single family units, 0.5 for townhouse or townhouse-style units, 0.25 for condominium-style units, 0.15 for apartment units, and 0.7 for below-market rate units.[13]

At this time, the type of housing units that the SUMC Project employees would occupy is unknown. Therefore, assuming that the SUMC Project employees would be equally distributed among the different types of housing units, the average student generation rate

[13] Lapkoff & Gobalet Demographic Research, Inc., District-Wide Enrollment Forecasts: Palo Alto Unified School District, December 2, 2009.

would be 0.5 students per household. At this rate, the SUMC Project would indirectly generate approximately 52 students in Palo Alto. As stated on page 3.14-16 of the Draft EIR, the SUMC Project would generate approximately 73 students with the Statewide average generation factor of 0.7. Therefore, the student yield used in the Draft EIR is higher than the generation rates included in the Lapkoff & Gobalet Report. As such, the Draft EIR includes a conservative estimate and does not need to be updated to reflect the yields in the Lapkoff & Gobalet Report.

Given that the SUMC Project sponsors would contribute to school impact fees, which are considered adequate mitigation under CEQA, the SUMC Project would result in less-than-significant school impacts, regardless of which PAUSD statistics are used.

PTC1.19 *The commentor questions the methodology used in determining the SUMC Project's impact on the City's jobs to employed residents ratio.* Although the commentor retracted Comment PTC1.19 in Comment PTC6.95 (see PTC6), a response to this comment is nonetheless provided here. Please see Master Response 7 for a discussion of the methodology used in determining the SUMC Project's impact on the City's jobs to employed residents ratio. The calculations for the analysis of the jobs to employed residents ratio is provided in the table notes for Table 3.13-10 and 3.13-11 of the Draft EIR. As indicated, the 1.72 workers per worker household is based on U.S. Census 2000 data for Santa Clara County. If the 2,242 workers were multiplied by 8 percent directly, then the resulting number would only yield the number of new employees who may chose to live in Palo Alto. This number of employees still needs to be translated into household demand, which is why the 2,242 new employees is multiplied by 1.72 workers per worker household. Also, please see Response PTC1.18 regarding student generation.

PTC1.20 *The commentor questions how the square footages under the SUMC Project were calculated and what the impact analysis in the Draft EIR is based on.* Tables 2-4 and 2-5 on pages 2-30 and 2-32 of the Draft EIR, respectively, provide the existing square footage at the SUMC Sites, the demolished area, the net new square footage, and the total (gross) square footage as a result of the SUMC Project. In general, per the requirements of CEQA, the environmental analysis is based on the change from the existing setting at the time the Notice of Preparation (NOP) was released.

The method used for determining the environmental impacts from the SUMC Project is explained on pages 3.1-9 through 3.1-10 in Section 3.1, Environmental Analysis. As stated, the types of physical effects include: building footprint impacts, impacts to ambient conditions, and indirect environmental impacts. Building footprint impacts are resource based and examine the effects of constructing the replacement and expanded facilities (net impacts) and are mainly analyzed in sections such as Biological Resources, Hydrology, Geology, and Cultural Resources. Impacts associated with changes in ambient conditions include identifying the existing background conditions surrounding the SUMC Sites and

focusing on the change to both the existing condition as well as future or cumulative conditions. Impacts associated with changes in the ambient conditions are typically addressed in the Transportation, Air Quality, and Noise sections of the Draft EIR. Indirect environmental impacts are related to the net increase in developed floor space, employment, or the number of hospital beds and are included in sections such as Utilities, Public Services, and Hazardous Materials. Each technical section in the Draft EIR includes tables, figures, and an impact analysis that explicitly states whether the conclusions are based on changes to the existing conditions, future projections without the SUMC Project, future total impacts with the SUMC Project, or the net impacts of the just the SUMC Project expansion. Please refer to the individual sections in Section 3 of the Draft EIR for a complete analysis of the SUMC Project impacts.

PTC1.21 *The commentor asks how the housing demand was calculated and asks if this issue can be examined differently*. In preparing the Draft EIR, City staff considered two sets of regional distribution patterns for the housing demand from SUMC Project employees. First, the City considered commute patterns based on U.S. Census 2000 data. Second, the City considered SUMC-specific data on where their employees live. Staff determined that the second distribution is more sound and appropriate for this analysis because this data is SUMC-specific (and would thus provide a more accurate distribution relative to this land use) and is more recent. The eight percent distribution in Palo Alto is based on historical evidence, composed of SUMC's data on the residential distribution of their employees. As indicated on page 3.13-11 of the Draft EIR, the distribution of where SUMC Project employees would live is based on existing SUMC employee zip code data provided by the SUMC Project sponsors (see Appendix L of the Draft EIR).[14] It is appropriate to apply this data to the analysis.

Please see Master Response 7 for a discussion of the methodology applied in analyzing the SUMC Project's impact on the City's jobs to employed residents ratio. Also, per CEQA Guidelines Section 15126.4(a)(4)(B), mitigation measures must be "roughly proportional" to the impacts of the project. As indicated on page 3.1-7 of the Draft EIR and per CEQA Guidelines Section 15126.2(a), in assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published. It would be inconsistent with the requirements of CEQA to impose on the SUMC Project mitigation measures that ameliorate existing conditions such as a low vacancy rate in Palo Alto, housing costs, and ability of certain wage earners to live in Palo Alto. Lastly, please see Master Response 10 for a discussion of why fiscal or socioeconomic issues do not warrant discussion under CEQA.

[14] Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.

PTC1.22 *The commentor asks for an explanation of the 2.61 jobs to employed residents ratio*. As stated on page 3.13-6 and Table 3.13-10 of the Draft EIR, in 2025, ABAG estimates that the City would have 2.61 jobs for every employed resident within its sphere of influence.

PTC1.23 *The commentor states that the GO Pass would reduce traffic by 500 cars*. The presentation from the SUMC Project sponsors during the hearing on June 2, 2010 showed the traffic numbers changing from 766 in the AM Peak Hour and 746 in the PM Peak Hour to 261 in the AM Peak Hour and 241 in the PM Peak Hour.

The commentor questions whether these numbers have been verified for the Draft EIR. The numbers used in the presentation were taken directly from the Transportation Impact Analysis prepared for the Draft EIR. These numbers were generated by AECOM Transportation and have been verified. Please refer to Master Response 1 for more details regarding the effectiveness of the GO Pass as mitigation for the SUMC Project.

PTC1.24 *The commentor asks for the height of the building located at 525 University Avenue and requests that this be added to Stanford's list*. The height of 525 University Avenue is 220 feet.

PTC1.25 *The commentor questions the objective of supporting Stanford University's historic campus identity*. As stated on page 2-8 of the Draft EIR, one of the City's objectives is to "support Stanford University's historic campus identify as 'a place apart' with a 'sense of higher purpose' as well as Stanford's commitment to innovative, high quality of design through their 'interpretive approach to contextual design' in the architecture of campus buildings and landscape." This objective is intended to include the entire Stanford University campus, including the SUMC Sites. The purpose of this objective is to ensure that SUMC Project building designs would not be incompatible with the existing historic buildings on campus. Please refer to Section 3.8, Cultural Resources, for more details.

PTC1.26 *The commentor questions whether the helicopter pads on the top of the buildings should be excluded from height calculations and asks if there is a precedent*. There is no known precedent for excluding helicopter pads from height calculations in the City of Palo Alto. However, the proposed Hospital District under the SUMC Project would contain development standards that would exempt helicopter pads from the height requirements.

PTC1.27 *The commentor expresses concern that views of the Hoover Pavilion from Quarry Road would be obstructed by the proposed medical office building and parking structure*. Refer to Response PTC1.9, above, regarding views and visual impacts on the Hoover Pavilion. In addition, please refer to Staff-Initiated Change 5 for an analysis of how the proposed structures at the Hoover Pavilion Site under the SUMC Project would affect the Hoover Pavilion.

PTC1.28 *The commentor suggests that there should be a discussion of a retention pond under Goal N-2 in Section 3.2, Land Use of the Draft EIR.* Please refer to Master Response 12 for a discussion of this item as a potential Development Agreement term. Such a retention pond is not necessary to mitigate any impact of the SUMC Project. Policy N-11 and N-13 are related to construction impacts on streams directly adjacent to the SUMC Project and are addressed in mitigation measures and conditions of project approval.

As explained in Impact HY-4, pages 3.11-37 through 3.11-41 of the Draft EIR, the SUMC Project would have a less-than-significant impact on stormwater runoff and erosion. The SUMC Project would be required to comply with existing regulations and implementation of these requirements would prevent substantial on-site erosion by requiring erosion and sediment controls during construction and operation. In addition, as discussed on page 3.11-41 of the Draft EIR, on-site stormwater detention may be required by the Public Works Department to lessen the SUMC Project's impact on City storm drains, which would further reduce the less-than-significant runoff and erosion impacts. The SUMC Project sponsors would be required to adhere to the requirements of the Public Works Department.

According to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for impacts that are not found to be significant. Per CEQA Guidelines Section 15126.4(a)(4)(B), mitigation measures must be "roughly proportional" to the impacts of the project. Therefore, since less-than-significant stormwater runoff and erosion impacts would occur under the SUMC Project, and since the suggested retention pond is located away from the SUMC Sites, mitigation measures such as the retention pond are not required under CEQA.

PTC1.29 *The commentor refers to City discussions with ABAG.* It is unclear whether or not the commentor is referring to Palo Alto's Regional Housing Needs Allocation (RHNA) as required by ABAG pursuant to State law. It is assumed here that the commentor is referring to Palo Alto's RHNA. Changes in the City's RHNA would not affect this document, which identifies the SUMC Project's impacts based on conditions, projections, and regulations that existed at the time the NOP was issued. Future changes to the RNHA would have no bearing on this analysis. Also, Section 3.13, Population and Housing, applies ABAG Projections 2005. City staff has deemed the ABAG Projections 2005 appropriate for the analysis. As shown in Section 3.13, Population and Housing, the housing demand that would result from the SUMC Project in Palo Alto would comprise a small percentage of the anticipated housing growth from 2005 through 2025, based on ABAG Projections 2005. Any mention of the RHNA in this EIR is based on the current RHNA for Palo Alto from 2007 through 2014, and not any potential future changes to the City's RHNA that may be negotiated with ABAG or other jurisdictions.

PTC1.30 *The commentor requests that additional data regarding the PAUSD be included in the Draft EIR.* Please see Response PTC1.18, above, for more details regarding the PAUSD enrollment and capacity numbers and what constitutes an impact under CEQA.

PTC1.31 *The commentor indicates that the impact of the proposed revision to Policy L-8 on traffic should be made clear.* The transportation-related impact of the SUMC Project as a whole is captured in Section 3.4, Transportation, of the Draft EIR. However, portions of the Draft EIR transportation analysis have been revised. Please see Staff-Initiated Change 1 for a revised and quantified transit analysis; Staff-Initiated Change 2 for a revised intersection LOS analysis; and Staff-Initiated Change 8 for a revised analysis of the alternatives to the SUMC Project. As indicated in the revised analyses, all significant transportation-related impacts of the SUMC Project, except impacts to road segments in Menlo Park, would be reduced to less than significant with the implementation of identified mitigation measures. If the SUMC Project sponsors would seek to further expand the SUMC in the future, then additional environmental review would be required.

PTC1.32 *The commentor questions the layout of the SUMC Project site plans with regards to the ED.* This comment pertains to the design of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the proposed ED as described in the hearing transcript by the SUMC Project sponsors. The ED would be relocated to the west side of the proposed new SHC Hospital building, off Welch Road. Tunnels and walkways would be located between the new SHC Hospital building, the existing buildings, and the LPCH; children who are admitted to the ED would be transferred via tunnels to the LPCH. Given the lower volume of children who are admitted to the ED, it was determined that a separate pediatric ED would not be feasible due to staffing constraints.[15]

One of the SUMC Project sponsors' objectives, as outlined on page 2-6 of the Draft EIR, includes siting the SHC and LPCH facilities to efficiently use a single, shared ED. The building program of a hospital structure allows for limited location placement of an ED because of the adjacency requirements of placing an emergency department close to the imaging department, ambulance access, and community visibility. As explained in the hearing transcript, the tunnel and bridge connections from the ED to the LPCH would be the same travel distance as if the ED were located in a different area of the SHC Hospital building. Therefore, relocation of the ED, or providing separate EDs for the two hospitals, would not meet the SUMC Project sponsors' objective.

[15] Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children's Hospital, City Council Hearing, June 2, 2010.

The commentor also suggests that a mitigation measure could be included in the Draft EIR to make the ED more accessible for the LPCH. The Draft EIR focuses solely on the physical impacts that the SUMC Project would have on the environment and its surroundings. As such, no significant impacts were identified regarding the placement of the ED. According to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for impacts that are not found to be significant. Therefore, mitigation measures that would address the location of the ED are not required under CEQA.

PTC1.33 *The commentor requests information on the uses and leaseholds of the buildings between Welch Road and Vineyard Road.* The SUMC Project does not include alterations to the properties or structures outside of the SUMC Sites; therefore, this comment does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues. Table 5-4, below, includes information on leaseholds for buildings located along Welch Road.

Table 5-4
Leaseholds Along Welch Road, Adjacent to the Main SUMC Site

Property	Owner	Ground Lessee	Ground Lease Termination Date	Existing Bldg SF	Developable Capacity (SF)	Potential Development SF	% Occupied by SU/SUMC
750 Welch Road	Stanford University	Howard White	7/31/11	29,998	44,124	14,126	78%
770 Welch Road	Stanford University	Larry Spitters	6/10/14	43,894	48,875	4,981	72%
777 Welch Road	Stanford University	Dental Plaza	12/31/57	14,100	35,175	21,075	0%
780 Welch Road	Stanford University	Linda Ramsden	3/31/12	21,136	30,645	9,509	77%
800 Welch Road	Stanford University	Stanford University	2/28/56	25,534	32,670	7,136	100%

Source: SUMC, 2010.

PTC1.34 *The commentor questions the PAUSD impact fees that would be imposed as a result of the SUMC Project.* As stated on page 3.14-17 of the Draft EIR, and discussed in Response PTC1.18, above, the SUMC Project would pay non-residential development fees subject to SB 50 School Impact Fees. According to Section 65996 of the State Government Code, payment of school impact fees is deemed to constitute full and complete mitigation. According to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for impacts that are not found to be significant. Therefore, since the impacts to the PAUSD would be less than significant with the payment of the School Impact Fee, no additional mitigation measures are warranted.

PTC1.35 *The commentor does not agree with the approach of changing the Comprehensive Plan.* The changes to the Comprehensive Plan (see page 2-23 of the Draft EIR) are treated in this EIR as part of the proposed actions under the SUMC Project. It is not the purpose of this EIR to discuss the merits of the various components of the SUMC Project. Rather, the purpose of this EIR is to disclose environmental implications of the proposed SUMC Project. Please see Master Response 9 for a discussion of the merits of the SUMC Project.

The commentor indicates that the potential unintended consequences of the new Hospital Zone should be looked at. This EIR discloses the physical environmental consequences of the SUMC Project, including the environmental effects of development allowed by the proposed Hospital Zone, pursuant to the requirements of CEQA and based on the significance criteria identified by the City of this analysis. Generally, the physical environmental impacts are derived based on the proposed project location, building envelope, and building program which would be entitled in part through the proposed rezoning (see Section 2, Project Description, of the Draft EIR). The EIR also identifies cumulative impacts based on the SUMC Project plus other, foreseeable future projects outside the SUMC Sites. To identify other potential, unintended environmental impacts due to the rezoning (i.e., those that could result from potential future development at the SUMC Sites) would be speculative since no development at the SUMC Sites other than the SUMC Project is currently contemplated. Also, it would not be appropriate for this EIR to examine the ease or probability of applying a similar rezoning to other areas, since such other rezonings are neither part of the SUMC Project, nor are they reasonably foreseeable at this time. Please refer to Master Response 11 for the City review process and the Comprehensive Plan amendments resulting from the SUMC Project.

PTC1.36 *The commentor inquires about additional growth-inducing impacts associated with constructing a state-of-the-art new hospital.* As described in the hearing transcript, a discussion of the growth-inducing impacts is a requirement of CEQA and is included in Section 4, Other CEQA Considerations, of the Draft EIR. As explained on pages 4-3 through 4-5 of the Draft EIR, Section 15126.2(d) of the CEQA Guidelines states that an EIR should discuss "…the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." Growth can be induced in a number of ways, including through the elimination of obstacles to growth, or through the stimulation of economic activity within the region. In accordance with the CEQA Guidelines, the discussion of growth inducement in the Draft EIR is not intended to characterize growth induced by the SUMC Project as necessarily beneficial, detrimental, or of little significance to the environment. The growth inducement discussion is provided for informational purposes so that the public and local decision-makers have an appreciation of the potential long-term growth implications of the SUMC Project.

The Draft EIR discusses growth inducement related to: direct and indirect housing growth, direct and indirect job growth, and infrastructure capacity/land use changes. Although the Draft EIR does not specifically address the growth inducement from private practitioners moving offices to Palo Alto, this is generally covered in the analysis of indirect job growth. As explained on page 4-4 of the Draft EIR, the potential "multiplier effect" associated with the SUMC Project-related jobs was estimated by using the ABAG local and regional economic multipliers for the San Francisco Bay Region. The economic multipliers measure the direct, indirect, and induced employment caused by a project. Applying the local and regional economic multipliers for the 2,242 new jobs directly resulting from the SUMC Project, the SUMC Project would result in about 538 local and 1,345 regional indirect and induced jobs.

In addition, the SUMC Project, as proposed, includes expanded clinics and medical offices, both on the Main SUMC Site and the Hoover Pavilion Site. Therefore, it is assumed that many of these private practitioners would be employed in this expanded clinic/medical office space on site. As such, the analysis of growth inducing impacts in the Draft EIR is adequate and no further analysis is necessary.

PTC1.37 *The commentor questions how the land use impacts could be less than significant when the SUMC Project is so expensive, and given the size of the SUMC Project*. As described in the hearing transcript, the Draft EIR specifically analyzes the consistency and the conflicts with the applicable Comprehensive Plan policies, land use designations, and zoning. In addition, the Draft EIR considers the extent to which the SUMC Project would conflict with the existing uses in the vicinity that could be adversely affected by the activities that would occur at the SUMC Sites.

In order to ensure that the SUMC Project would be consistent with the Comprehensive Plan, City staff identified all policies applicable to the SUMC Project. Table 3.2-2 demonstrates how the SUMC Project would be consistent with each of these policies with the implementation of proposed mitigation measures. Mitigation measures, as outlined in the respective subsections in Section 3 of the Draft EIR, would help ensure consistency with Comprehensive Plan policies by avoiding or reducing significant impacts. As such, consistency with the Comprehensive Plan policies would be less than significant.

The Draft EIR also discusses consistency with Comprehensive Plan land use designations and consistency with the Palo Alto Zoning Ordinance. In order to be consistent with the land use policies, clarifying changes would be made through a Comprehensive Plan Amendment. With regard to the Zoning Ordinance, a new zoning district would be created that would include development standards that would accommodate the SUMC Project. The impacts from the physical changes in the environment that would result from development allowed by the zoning changes are addressed in various sections of the Draft EIR.

A land use conflict would occur if a project, after its construction, would significantly impede the function of the surrounding uses. The function of surrounding uses would be impeded if localized noise, air emissions, or hazardous materials exposure produced by the SUMC Project would disrupt activities and functions of surrounding land uses. As described on pages 3.2-30, the SUMC Project would not conflict with nearby residential, recreational, educational, religious, or scientific uses. Such uses have functioned adjacent to the existing hospitals, clinics, and School of Medicine facilities for many years and would continue to do so after expansion or replacement of these same uses.

Please refer to Impacts LU-1 and LU-2 on pages 3.2-8 through 3.2-31 of the Draft EIR for more details regarding SUMC Project land use conflicts.

PTC1.38 *The commentor expresses concern regarding the SUMC Project's consistency with Policy L-51.* As noted by the commentor, the Stone Building complex would be demolished, and the Comprehensive Plan policy encourages "public and private upkeep and preservation of resources that have historic merit." It is important to note, however, that this policy *encourages* the preservation of historic structures rather than mandates preservation. In addition, the SUMC Project includes preservation and renovation of the Hoover Pavilion, which also is a historic resource under CEQA. Therefore, with the implementation of Mitigation Measures CR-1.1 through CR-1.4, the SUMC Project would result in Comprehensive Plan consistency.

PTC1.39 *The commentor requests the height of the building located at 600 Welch Road and the outpatient surgery building that is part of the complex.* There is no building at the location of 600 Welch Road. The closest building to this location is the Stanford Barn at 700 Welch Road. This building is 47 feet tall to the top of the primary roof, with dormers that rise up to 58 feet. For additional building heights along Welch Road, please refer to Response PTC1.61, below.

PTC1.40 *The commentor questions the challenges of fighting fires at large structures, the issues associated with the siting of buildings, and mutual aid from surrounding communities.* According to Gordon Simpkinson, the acting Fire Marshall for the PAFD, fire scenarios at the SUMC Sites would be similar to the high-rise structures at 101 Alma Street, 525 University Avenue, and Escondido Village on the Stanford campus. The SUMC Project buildings would have fire protection materials such as fire sprinklers, as required by the Building Code. In addition, as the building height increases, the robustness of construction and compartmentalization of the buildings would improve the survivability of the structure in the event of a fire. Therefore, engineering solutions would be implemented to mitigate the additional heights proposed. Additionally, as included on page 3.14-14, the Draft EIR includes improvement measures that would replace the existing PAFD 75-foot ladder truck with a 100-foot ladder truck. This measure would help reduce the equipment burden

resulting from the SUMC Project. Nonetheless, this measure is only recommended and not mandated by the Draft EIR.

With regard to the siting of the SUMC Project buildings, the acting Fire Marshall states that the PAFD has worked very closely with the SUMC Project sponsors in developing the site plan. The SUMC Project design team has designed fire access roads in locations that would allow the PAFD to achieve the best proximity to the buildings for the emergency vehicles. Throughout each design phase of the SUMC Project, the SUMC Project sponsors have consulted with the PAFD to allow for the delivery of PAFD equipment to the most advantageous locations for fighting fires.

The acting Fire Marshall also states that the PAFD would have support from neighboring jurisdictions in the case of an emergency. For the buildings proposed under the SUMC Project, if smoke or flame is visible, a two-alarm fire would be triggered, which would activate response from Menlo Park via automatic aid. As such, the PAFD would automatically receive additional personnel and Chief Officers in the event of a fire. The acting Fire Marshall confirms that the PAFD already has the response capabilities and mutual aid agreements in place. [16] Therefore, the construction and operation of the SUMC Project would not add an extra burden on the PAFD, especially with the implementation of the improvement measures outlined on page 3.14-14 of the Draft EIR.

PTC1.41 *The commentor explains the Draft EIR process of identifying the significant physical impacts to public services under the SUMC Project.* The Draft EIR correctly follows the method for analyzing public services as required under CEQA, and as described by the commentor.

PTC1.42 *The commentor suggests that the proposed revisions to Policy L-8 should exclude the amount of square footage used for right-sizing and only include the amount of area used for expansion.* The revisions to Policy L-8 would exempt Stanford University Medical Center hospital, clinic, and medical school uses from this policy. These uses would include square footage associated with right-sizing, and City staff has determined that the proposed changes are appropriate. Please also see Response 22.5 in Section 4 of this document for further clarifications to the text changes.

PTC1.43 *The commentor suggests intensifying the outboard portion of Welch Road and moving some (or all) of the medical office square footage and parking proposed at the Hoover Pavilion Site to this site instead.* Please refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and a discussion of the variation on the alternatives suggested by the commentor.

[16] Gordon Simpkinson, Acting Fire Marshall, Palo Alto Fire Department, Planning and Transportation Commission Hearing, June 2, 2010.

PTC1.44 *The commentor questions the SUMC Project construction schedule as outlined in Section 2, Project Description, of the Draft EIR.* As noted on page 2-53, the mid-2009 approval date for the SUMC Project serves as a conservative assumption to ensure that mitigation would be in place when warranted and not at a later date. Although the Draft EIR was published in May 2010, after the assumed approval date, this date was retained in order to guarantee that the mitigation measures would be implemented during construction. As such, the construction timeline as outlined in Section 2 of the Draft EIR will remain as is and the analysis in the Draft EIR remains adequate for the purposes of CEQA.

PTC1.45 *The commentor questions the number of beds identified in Table 2-12 of the Draft EIR Project Description.* As explained on pages 2-37 through 2-39 of the Draft EIR, the new SHC Hospital building would house 456 beds and would replace shared patient rooms with single patient rooms. In addition, the existing Hospital Modernization Project (HMP) building would be renovated and reused. After renovating and right-sizing the rooms in the HMP building, this facility would have 144 beds, for a total of 600 beds at the SHC portion of the SUMC. Table 2-12 states that Phase 1 of the SUMC Project would construct a 456-bed replacement hospital. This is in reference to the SHC Hospital building and does not include the 144 additional beds at the HMP building. Therefore, the number of beds identified in Table 2-12 is correct.

PTC1.46 *The commentor requests to know the square footage of land that encompass the SUMC Sites.* As stated on page 2-2 of the Draft EIR, the SUMC Project would occur on two sites that are collectively about 66 acres: the approximately 56-acre Main SUMC Site and the approximately 9.9-acre Hoover Pavilion Site. When converted to square feet, the Main SUMC Site consists of approximately 2.4 million square feet of land and the Hoover Pavilion Site consists of approximately 430,000 square feet of land. In total, the SUMC Sites consist of approximately 2.87 million square feet of land.

However, as described above in Response PTC1.11, due to the Welch Road widening, the Hospital District portion of the Main SUMC Site would be 54.8 acres and with Durand Way, the Main SUMC Site would total 55.3 acres. Even with this slight reduction in acreage, the Main SUMC Site would still total approximately 2.4 million square feet. Refer to PTC1.11 for more details.

PTC1.47 *The commentor disagrees with the wording of the analysis of Policy T-27 in Table 3.2-2, page 3.2-18, of the Draft EIR.* While the Durand Way extension would increase roadway capacity, it would provide traffic relief to nearby roads and would include a new bicycle and pedestrian connection, which would help satisfy the requirements of Policy T-27. Similarly, the Welch Road improvements would improve public safety and bicycle connections meeting the goal of Policy T-27.

Since the wording in the Draft EIR is unclear, the following edits have been made to the second paragraph in the right-hand column on page 3.2-18 of the Draft EIR. However, it

is important to note that although edits have been made, the conclusion that no conflict with Policy T-27 would occur remains the same.

> Generally, existing roadway capacity is improved by adding left and right turn lanes to the intersections. The SUMC Project would add a connection (Durand Way) between Sand Hill Road and Welch Road; however, this connection would extend through one block and would provide new access to the Main SUMC Site. The Durand Way extension would increase roadway capacity, but only to the extent that it would provide traffic relief to Pasteur Road and Sand Hill Road. This would enable traffic from El Camino Real to rely on Durand Way and traffic from I-280 to rely on Pasteur Drive. Although roadway capacity would increase, bicycle and pedestrian facilities would be included as part of the Durand Way extension, which would connect to the Class I bicycle path along San Francisquito Creek. This connection would help satisfy compliance with Policy T-27.
>
> In addition, Welch Road would be widened to three lanes ~~provide roadway capacity~~ in order to improve safety and to accommodate on-street bicycle lanes. ~~Neither of these improvements would enhance capacity for anticipated vehicle movement, including ambulance access.~~

PTC1.48 *The commentor requests that the analysis in Table 3.2-2 of the Draft EIR under Policy N-6 on page 3.2-19 include the view obstruction impact of the SUMC Project on 101 Alma Street.* The SUMC Project would conflict with Policy N-6 if the site and design process did not minimize impacts on views of the hillsides, on the open space character, and the natural ecology of the hillsides. The SUMC Project would not encroach on open space or affect the natural ecology of hillsides. Views of hillsides are addressed in the Draft EIR's visual quality analysis. As explained in Table 3.2-2, the SUMC Project is subject to the City's Architectural Review process. The Architectural Review of the SUMC Project would consider, among other factors, whether the SUMC Project has a coherent composition, and whether its bulk and mass are harmonious with surrounding development. The ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The Architectural Review of the proposed buildings under the SUMC Project would be required under Mitigation Measure VQ-2.1, as presented on page 3.3-39 of the Draft EIR.

As acknowledged on page 3.3-42 of the Draft EIR, proposed structures at the SUMC Sites could obstruct views of the foothills from additional vantage points that are within the line of sight of the SUMC Sites. This would include the building at 101 Alma Street, which is a private multi-family residential complex. However, compliance with Mitigation Measure VQ-2.1, as described above and in more detail in Section 3.2 of the Draft EIR, Visual Quality, would ensure that impacts on views from various locations in Palo Alto would be less than significant. As such, a separate analysis for the impacts on 101 Alma Street is not warranted.

PTC1.49 *The commentor notes that the discussion under Comprehensive Plan Policy N-39*[17] *in Table 3.2-2 on page 3.2-25 of the Draft EIR is in reference to residents adjacent to Sand Hill Road. The commentor notes that the discussion does not identify impacts to the Welch Road residents, which are closer in proximity to the SUMC Site than residents along Sand Hill Road.* The first paragraph of the policy discussion on page 3.2-25 of the Draft EIR does state that the mechanical noise generated by the SHC emergency generators off Welch Road could have a significant impact on nearby residential uses along Welch Road and that Mitigation Measure NO-4.1 would reduce noise this impact to less-than-significant levels. The discussion on page 3.2-25 of the Draft EIR also includes a discussion about potential noise impacts to residents along Sand Hill Road where there would be a new ambulance route.

The commentor asks why a similar finding was not made for the residences along Welch Road, which are closer to the SUMC Site. No potential noise impact was identified for the residences on Welch Road regarding ambulance noise because Welch Road is an existing ambulance route and the noise level increment there from the additional future ambulance traffic would not exceed the significance threshold established by Comprehensive Plan Policy N-41. The ambulance noise level increase on Sand Hill Road with the SUMC Project would be greater than on Welch Road because this is would be a new ambulance route and at least one-third of all future SUMC ambulance traffic was assumed to use this new route. Thus, the daily ambulance traffic volume that counts toward the estimated project noise increment would be greater on Sand Hill Road than on Welch Road.

The commentor further notes that elsewhere in the Draft EIR, a noise level of 66.3 dBA was determined for the residential uses on Welch Road and asked whether this should have been identified as significant because it exceeds 60 dBA, which is the Comprehensive Plan's Normally Acceptable threshold for residential uses. Table 3.7-11 on page 3.7-26 of the Draft EIR identifies an existing 63.6 dBA L_{dn} at the Welch Road residences associated with traffic noise, with an estimated 0.3 dBA increase to traffic noise levels with the SUMC Project. This was not identified as a significant impact because the existing noise level there already exceeds the Comprehensive Plan's 60 dBA Normally Acceptable threshold for residential uses and the project-related increase would not exceed the Comprehensive Plan's 3 dBA incremental threshold.

PTC1.50 *The commentor states that, given the tradeoff between low level development that is sprawling or if the development should go up, it seems that the location of a building of that height is appropriate.* Please refer to Response PTC1.1 for an explanation of the SHC Hospital tower heights.

[17] In the hearing transcript, the commentor cites Policy N-49; this should be a reference to Policy N-39 as Policy N-49 is not discussed in the Draft EIR.

PTC1.51 *The commentor requests additional open space as a way to mitigate the height of the SHC Hospital towers*. The significant impact related to visual quality and character would be mitigated to a less-than-significant level by Mitigation Measure VQ-2.1, as discussed on page 3.3-39 of the Draft EIR. The City's Architectural Review process would address, among other factors, whether the SUMC Project has a coherent composition and whether its bulk and mass are harmonious with surrounding development. The City Council will then determine if the design promotes consistent transitions in scale and character and that the amount and arrangement of open space are appropriate to the design and function of the structures. Mitigation Measure VQ-2.1 would reduce visual quality impacts to less than significant. Additionally, open space protection in areas other than the SUMC Sites would not further mitigate the increased density impacts to the SUMC Sites. As such, further mitigation is not warranted.

In addition, as stated on page 3.14-9 of the Public Services section of the Draft EIR, the SUMC Project sponsors propose to expand the existing open space at the SUMC Sites. The open space would include walkways, open plazas, and landscaped areas for employees, patients, and visitors. The SUMC Project would also incorporate new sections of open space and small grass fields, increasing pervious surfaces by 23 percent over existing conditions. Several of these proposed open spaces would be visible from public areas, such as the landscaped gateway at the corner of Welch Road/Quarry Road, the LPCH/Shopping Center connection along Welch Road, the Hoover Pavilion entry lawn, and the refurbished Pasteur Mall. In addition, the SUMC Project sponsors would provide access to Stanford University's fields for SUMC employees. This access would offset the potential deterioration new SUMC employees could cause on City parks. Therefore, even though the SUMC Project would increase height and bulk at the SUMC Sites, additional open space would be included and access to other open space areas would be available. Since these open space areas are already part of the SUMC Project site plans and would be sufficient, additional open spaces on- or off-site are not required as mitigation in the Draft EIR.

PTC1.52 *The commentor expresses support for a hotel at the Hoover Pavilion Site*. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

PTC1.53 *The commentor suggests renewal of the Palo Alto-Stanford Fire Protection Agreement as part of the Development Agreement for the SUMC Project*. The Palo Alto-Stanford Fire Protection Agreement is scheduled to terminate in 2026. This is a separate agreement that is not part of the Development Agreement. At the termination of this agreement, it is expected that the City and Stanford will renegotiate. There are no other parts of the Development Agreement that are currently related to Fire Protection services. The City Council has thus far provided staff with no policy direction to attempt to negotiate an extension of the Fire Protection Agreement as a term of this Development Agreement, and

has instead identified other priorities for negotiation in the Development Agreement. See Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption.

PTC1.54 *The commentor contests the methodologies applied in the cumulative analysis, and raises some specific questions on the cumulative analyses related to land use pattern, visual quality, population and housing, and fire services.* This response first describes the overall approach for the cumulative analysis and then addresses the specific questions.

Per CEQA Guidelines Section 15355, cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. According to CEQA Guidelines Section 15130(b)(3), "Lead agencies should define the geographic scope [or context] of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used." The geographic context is typically tailored to the nature of the environmental issue/impact and resource or population being affected. Each discussion of cumulative impacts in Sections 3.2 through 3.15 of the Draft EIR includes an explanation of the relevant geographic context. Depending on the topic, the geographic context could be localized or regional. For example, the cumulative context for air quality would include the larger regional air basin.

As stated on page 3.1-2 of the Draft EIR, CEQA Guidelines Section 15130(b) requires that an EIR's analysis of cumulative impacts should be based on either a list of past, present, and probable future projects producing related impacts or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document. The cumulative projects analyzed in the Draft EIR rely on both a list of projects within Palo Alto and regional growth projections. The list of foreseeable projects within the City of Palo Alto was provided by City staff and included in the analysis (see Appendix B to the Draft EIR). Growth projections applied to the cumulative analysis in the Draft EIR include forecasted growth in adjacent cities other than Palo Alto. Growth projections also include growth allowed under the Stanford University 2000 Community Plan and General Use Permit (CP/GUP), ABAG Projections 2005, the Bay Area Air Quality Management District's (BAAQMD) air quality projections, the City of Palo Alto's Travel Demand Forecasting Model, and projections of various public service and utility providers for the SUMC Project.

Cumulative Impacts on Land Use Pattern. *The commentor questions the geographic context of Impact LU-6, Cumulative Impacts on Changes to Overall Existing or Planned Land Uses in the Area (page 3.2-33 of the Draft EIR).* The geographic context for Impact LU-6 is the vicinity of the SUMC Project, which is generally bounded to the north by San Francisquito Creek, to the east by El Camino Real, and to the south and west by unincorporated Santa Clara County (containing Stanford University lands). The vicinity of

the SUMC Project generally follows "Area 9" under General Plan Policy L-8 and as such comprises a distinct planning area within the City. Contrary to Comment PTC1.54, this area does not just include the SUMC Sites; rather, it includes all areas within the vicinity of the SUMC Project. Since Impact LU-6 is a cumulative analysis, the criteria focuses on whether the SUMC Project and other past, present, and future foreseeable development would cumulatively result in an adverse change to the type or intensity of existing or planned land uses in the area. Because the issue here is land use pattern and intensity, it is appropriate to limit the geographic scope to the distinct planning area within Area 9, or the vicinity of the SUMC Project. It would not be appropriate to extend the geographic scope to the north, south, or west because these areas are beyond the City's land use/planning jurisdiction (these areas are in Menlo Park and Santa Clara County). El Camino Real is a six-lane State highway and distinctly divides the vicinity of the SUMC Project from other parts of the City. As such, the geographic context for Impact LU-6 is appropriate. According to Appendix B of the Draft EIR, which lists all other foreseeable future projects within the City, the only other foreseeable project within this geographic context is the project at 777 Welch Road.

Cumulative Impacts on Visual Quality. *The commentor contests the conclusions regarding cumulative impacts on visual character under Impact VQ-7, Cumulative Impacts on Visual Character.* Contrary to the commentor's statements that [cumulative development] is going to be what is here, the cumulative analysis considers impacts from the SUMC Project, CP/GUP, 777 Welch Road project, California High Speed Train (HST) project, and Caltrain Electrification project. These projects would be subject to the design and setback controls under either the City's Architectural Review process (Section 18.76.020 of the Municipal Code) or under the required mitigation measures for the CP/GUP. The design and setback controls would ensure that cumulative impacts on visual character would be less than significant. This analysis is appropriate.

Cumulative Impacts Related to Population and Housing. *The commentor states that the analysis in Section 3.13, Population and Housing, dismisses cumulative impacts by saying housing will be built in several communities over time.* The analysis does not dismiss cumulative impacts. Rather, the analysis indicates that the project-level analysis under Impact PH-1 captures both the project-level and cumulative-level analysis. As discussed above, growth projections such as ABAG Projections may be applied to cumulative analyses. The analysis under Impact PH-1 applies ABAG Projections 2005 to determine the cumulative housing growth in each community. Table 3.13-8 demonstrates that the indirect housing demand from the SUMC Projects would represent a small percentage of the cumulative housing development at 2025 for all jurisdictions. The SUMC Project would not have a significant cumulative impact related to increased housing demand.

Cumulative Impacts Related to Fire Service. *The commentor contests the rationale for determining a less-than-significant cumulative impact related to fire services.* The

significance criterion for fire service is, the SUMC Project would result in a significant impact if it would result in an adverse physical impact *from the construction of* additional fire, police, recreational, or school facilities, such as stations, parks, or schools, in order to maintain acceptable performance standards (see page 3.14-12 of the Draft EIR). Therefore, even if cumulative development would result in additional demand for fire services, if the increased demand would not necessitate new or expanded fire facilities, then the cumulative impact would not be significant.

PTC1.55 *The commentor states that the SUMC Project is overwhelming the Comprehensive Plan, and in updating the Comprehensive Plan, the City should look at policy changes that should be applied to the SUMC Project.* The changes to the Comprehensive Plan that are proposed as part of the SUMC Project are discussed on page 2-23 of the Draft EIR. Table 3.2-2 of the Draft EIR provides an analysis of SUMC Project consistency with applicable Comprehensive Plan policies; this table shows that, including the SUMC Project's entitlements, the SUMC Project would not conflict with applicable Comprehensive Plan policies. The City is undergoing a Comprehensive Plan Amendment process, which is separate from this SUMC Project process. However, this SUMC Project process will inform the Comprehensive Plan Amendment process. This analysis of the SUMC Project's consistency with the Comprehensive Plan must be based on the currently adopted Comprehensive Plan. Please refer to Master Response 11 for further discussion of the City approval process for the SUMC Project and its relationship to the Comprehension Plan Amendment process.

The commentor also states that serious consideration should be given to provision of workforce housing, housing near transportation, and housing near the workplace. The Draft EIR identifies Mitigation Measure PH-3.1, which conceptually describes provisions for such housing. Please see Master Response 7 for a discussion of the feasibility if this measure. The Draft EIR also identifies the Village Concept Alternative, which involves recommendations for such housing. Please see Master Response 8 for a discussion of the range of alternatives for consideration and the City's ability to approve portions of various alternatives. By including Mitigation Measure PH-3.1 and the Village Concept Alternative in the Draft EIR, City staff have identified such housing for serious consideration.

Two commentors express concern that ARB's role in reducing land use impacts for the SUMC Project is beyond their authority. As stated on page 3.3-38 of the Draft EIR, ARB would conduct Architectural Review of the mass and layout, landscaping, and exterior building treatment, but not make recommendation with regard to proposed land uses. Please see Master Response 11 for further discussion of the City approval process for the SUMC Project. ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The City Council would then review the recommendations and make findings, as appropriate, that the design is compatible with the existing character.

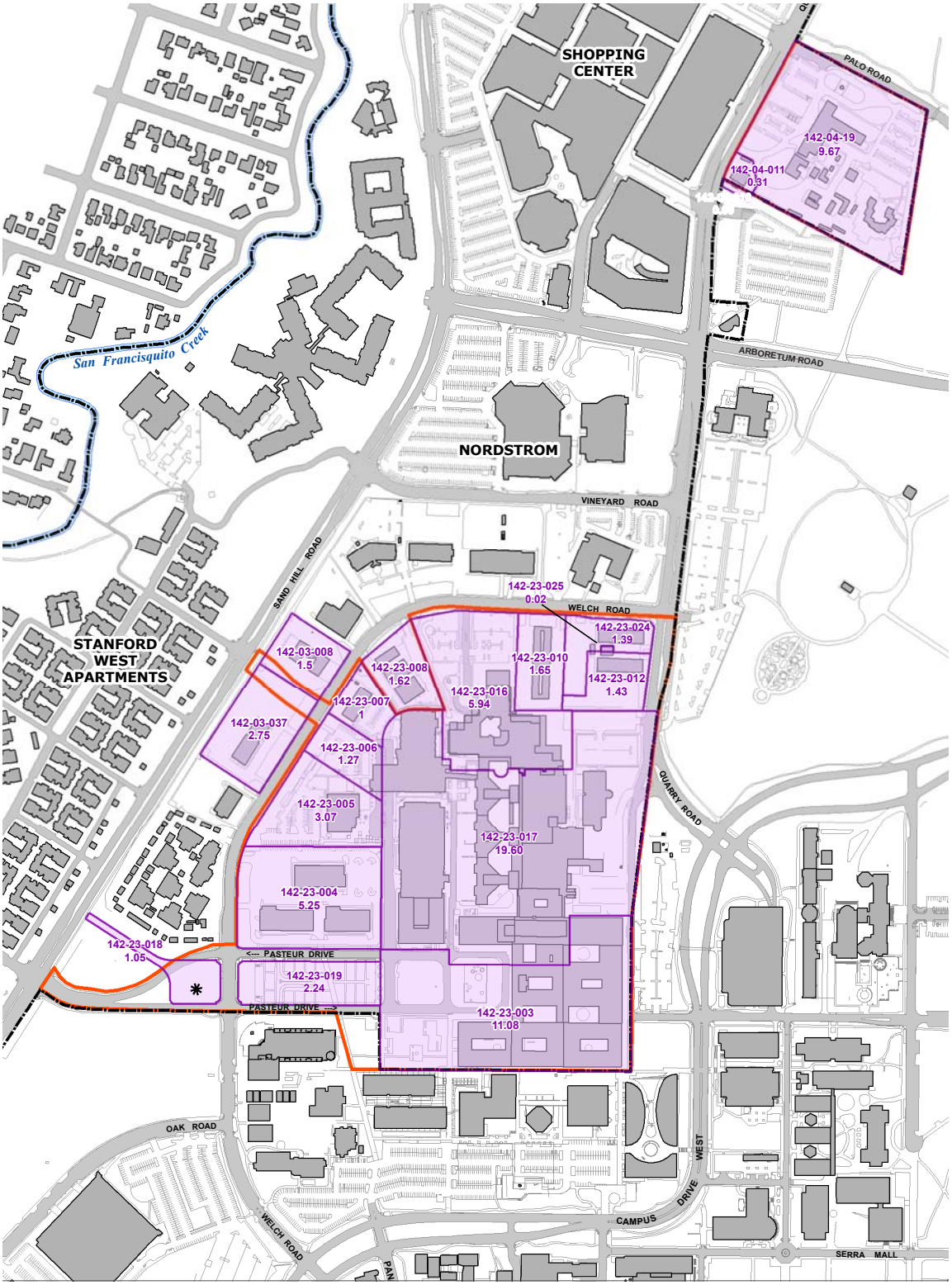
Therefore, the City Council would have the final approval regarding the building mass, site layout, landscaping, and exterior building treatments.

PTC1.56 *The commentor suggests that the PAFD review the Draft EIR to make sure that it is adequate in terms of Office of Statewide Health Planning and Development (OSHPD) standards*. This comment pertains to the design of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. The Draft EIR analyzes whether the design features of the SUMC Project as a whole would impact the environment and surrounding areas and does not consider specific design features that would not have a physical impact on the environment. As explained in Responses PTC1.2, PTC1.41, and PTC1.54 per CEQA requirements, the SUMC Project would only have an impact on the PAFD if it triggered the need to construct new fire facilities. Since the SUMC Project would not expand the need for fire services to the extent that new facilities would need to be constructed, the impacts are considered less than significant.

However, with regard to the SUMC Project building design, acting Fire Marshall Simpkinson confirms that due to the Building Code, the buildings would be required to adhere to the correct fire protection measures. In addition, OSHPD has a policy of implementing locally adopted ordinances or requirements and standards. Therefore, if the PAFD has a particular local standard, OSHPD will need to respect those and consult with the PAFD for clarification. This would be addressed when the SUMC Project sponsors apply for the building permit.[18] Please refer to Response PTC1.40, above, for more discussion regarding communications between the SUMC Project sponsors and PAFD.

PTC1.57 *The commentor requests a parcel report that shows the property lines and how they relate to adjacent properties*. A parcel report for the SUMC Sites is available upon request at the City of Palo Alto Planning and Community Environment Department. In addition, Figure 5-2 is included to show the parcels that comprise the SUMC Sites, their acreage, and how they relate to one another.

[18] Gordon Simpkinson, Acting Fire Marshall, Palo Alto Fire Department, Planning and Transportation Commission Hearing, June 2, 2010.



Palo Alto Boundary

Project Area Boundary

Assessor Parcels (Source: City of Palo Alto, Lynx PWE Cogo)

✱ New parcel recorded with Sand Hill Road Project approval but not yet reflected in assessor parcel maps.

PROJECT NORTH

Source: PBS&J, 2010.

PBS&J

FIGURE 5-2

Existing Assessor Parcels at the SUMC Sites

The parcel report indicates that there are no parcels within Assessor Parcel Number (APN) 142-04-012 at the Hoover Pavilion Site, as suggested in the Draft EIR. Instead, APN 142-04-019 is the main parcel at the Hoover Pavilion Site. In addition, APN 142-04-10 is within Santa Clara County lands and not within the City of Palo Alto. As such, the below edits have been made to the Draft EIR. Additionally, it is important to note that although the parcel report does not include APN 142-23-018, as included in the Draft EIR as part of the Main SUMC Site, this is a new parcel recorded with the Sand Hill Road Project approval, but not yet reflected in assessor parcel maps.

The following edits have been made to the third paragraph on page 2-12 of the Draft EIR:

> The approximately 56-acre Main SUMC Site is comprised of Assessor Parcel Numbers (APNs) 142-03-008, 142-03-037, 142-23-003, 142-23-004, 142-23-005, 142-23-006, 142-23-007, 142-23-010, 142-23-012, 142-23-016, 142-23-017, 142-23-018, 142-23-019, 142-23-024, 142-23-025. Properties within the approximately 9.9-acre Hoover Pavilion Site include APNs ~~142-04-012,~~ 142-04-011, and ~~142-04-10~~ 142-04-019.

PTC1.58 *The commentor suggests dedication of open space to offset the increased FAR of the SUMC Project.* The Draft EIR does not identify a significant impact that would warrant dedication of open space as a mitigation measure or as an alternative to the SUMC Project. Please refer to Master Response 11 for further information regarding the City approval process and Master Response 12 for further information regarding the Development Agreement.

PTC1.59 *The commentor has questions regarding the cumulative impact analysis and consideration of regional effects.* For a description of cumulative impacts, including regional impacts, refer to Response PTC1.54, above.

The commentor also expresses the desire for the Project Objectives to include meeting regional needs for disaster preparedness. The SUMC project sponsor objectives do include objectives to meet regional needs for disaster preparedness. The following objectives are presented on page 2-5 of the Draft EIR:

- Meet regional needs for emergency and disaster preparedness:
  1. Design facilities to take into account needs identified in the region's Disaster Preparedness Program, such as the ability to quickly add or convert beds and procedure rooms to manage critically injured patients for mass population events such as earthquakes, pandemics (influenza), or man-made biological/chemical exposure (bioterrorism, etc); and
  2. Design facilities to maintain and further SUMC's role as a Level 1 Trauma Center for daily and extreme-disaster healthcare delivery.

PTC1.60 *The commentor suggests a No New Net Trips requirement that all trips be mitigated either onsite or elsewhere in the City*. Please see Master Response 2 for a discussion of imposing a No Net New Trips requirement. Also, per CEQA Guidelines Section 15126.4(a)(4)(B), mitigation measures must be roughly proportional to the impacts of the project. The standards of significance that were applied to the transportation analysis are listed on pages 3.4-30 through 3.4-32 of this EIR. Based on these criteria, there could be some increase in traffic that would not result in a significant impact. As such, requiring no net new trips as a mitigation measure would be beyond the requirements of CEQA. See Staff-Initiated Change 2, which provides the revised analysis of level of service (LOS) impacts, and the updated mitigation measures for significant LOS impacts. The mitigation measures identified in Staff-Initiated Change 2 are appropriate.

PTC1.61 *The commentor requests an update to Figure 2-11 on page 2-36 of the Draft EIR to reflect surrounding building heights*. The heights of additional existing structures adjacent to the SUMC Sites do not change the SUMC Project impacts. As such, Figure 2-11 of the Draft EIR will not be revised to include adjacent building heights. Please refer to Master Response 10 for a discussion of non-CEQA issues.

However, the following is a description of building heights in the vicinity of the Main SUMC Site. The buildings along the outer portion of Welch Road are restricted to a 50-foot height limit. Although data on specific building heights are not available, the number of floors for each building is as follows:

- 730 Welch Road – Two stories
- 750 Welch Road – Three stories
- 770 Welch Road – Four stories
- 780 Welch Road – Two stories
- 800 Welch Road – Three stories
- 900 Welch Road – Four stories
- 1000 Welch Road – Four stories[19]

PTC1.62 *The commentor states that Table 3.13-3 on page 3.13-5 of the Draft EIR should be updated with a specific date for when housing building permits were issued*. As such, Table 3.13-3 has been revised as follows.

[19] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

Table 3.13-3
ABAG Regional Housing Need Allocation for Palo Alto, 2007-2014

Income Level	2007-2014 Need	Building Permits Issued 2007-~~Present~~2008	Unmet Need
Very Low[a]	690	57	633
Low[b]	543	2	541
Moderate[c]	641	91	550
Subtotal of Affordable Units	*1,874*	*150*	*1,724*
Above Moderate[d]	986	591	395
Total	**2,860**	**741**	**2,119**

Sources: ABAG, 2008. San Francisco Bay Area Housing Needs Plan: 2007-2014; and City of Palo Alto, 2008.
Notes:
a. Very Low: Households with incomes between 0 and 50 percent of County median family income.
b. Low: Households with incomes between 51 and 80 percent of County median family income.
c. Moderate: Households with incomes between 81 and 120 percent of County median family income.
d. Above Moderate: Households with incomes greater than 120 percent of County median family income.

PTC1.63 *The commentor questions whether Table 3.13-8 on page 3.12-12 of the Draft EIR considers the zip code 94303 as Palo Alto or East Palo Alto.* The SUMC employee zip code data are broken up based on which city the employee is from and further divided into the individual zip codes. Several zip codes traverse more than one jurisdiction and this is considered in the employee zip code distribution in the Draft EIR. Regarding the zip code 94303, as shown in Appendix L of the Draft EIR, 124 employees in the 94303 zip code are from Palo Alto and 158 SUMC employees in the 94303 zip code are from East Palo Alto. Therefore, the table makes a distinction between the two cities, although they share the same zip code. The zip code data provided is accurate and does not change the information provided in the Draft EIR. No further revisions are required.

PTC1.64 *The commentor requests a revision to the Draft EIR to include the Stanford campus, Portola Valley, and Los Altos Hills employee zip code data into the Palo Alto Unified School District (PAUSD) impact calculations.* It is important to note that although the PAUSD serves portions of these jurisdictions, not all areas are served. According to the PAUSD, the school district serves students who live in "the City of Palo Alto, certain areas of Los Altos Hills, and Portola Valley, as well as the Stanford University campus."[20] However, it is difficult to determine which areas of these jurisdictions that future employees would move to. In addition, even if all future SUMC Project employees would move to areas outside of Palo Alto that are served by the PAUSD, the increase in student generation would be negligible, as described below.

[20] Palo Alto Unified School District, "Background," accessed on September 15, 2010 at: http://pausd.org/community/about/background.shtml.

As shown in Appendix L of the Draft EIR, 93 employees from the Stanford campus, 29 employees from Portola Valley, and 18 employees from Los Altos Hills currently work at the SUMC. This means that 1.1 percent of the total employees who work for the SUMC live on the Stanford campus, 0.3 percent are from Portola Valley, and 0.2 percent are from Los Altos Hills. Therefore, the SUMC Project in 2025 would generate the demand for approximately 14 housing units within the Stanford campus, four housing units in Portola Valley, and three housing units within Los Altos Hills.[21] In total, the SUMC Project would generate a demand for 21 housing units between these three locations. Applying the standard student generation rate of 0.7 students per household, the indirect school demand that would be generated by the SUMC Project would be approximately 15 additional students within the PAUSD schools. However, this is a conservative scenario since the PAUSD does not serve all areas of Portola Valley and Los Altos Hills. In addition, even if all 15 students were added to the 73 students in Palo Alto generated by the SUMC Project, the indirect school demand of the SUMC Project would still be within the current capacity of the PAUSD. As such, the tertiary impact of the SUMC Project on the PAUSD is not expected to trigger the expansion of schools.

Nonetheless, as explained in more detail in Response PTC1.18, above, regardless of whether the school district is at capacity or whether the SUMC Project would increase enrollment over the existing or future capacity, payment of the school impact fees by the SUMC Project sponsors would mitigate impacts to less than significant. As discussed on page 3.14-17 of the Draft EIR, payment of the school impact fees enabled by the Leroy F. Greene School Facilities Act of 1998 is deemed to constitute full and complete mitigation for school impacts. As such, fulfillment of this requirement would mitigate the tertiary impacts of the SUMC Project to less than significant.

PTC1.65 *The commentor questions the relationship between the additional 2,053 parking spaces and the 8,000 net new daily trips with GO Passes, which would fill the 2,053 parking spaces.* The 2,053 parking spaces is the calculated number of net new parking spaces required to be provided under the SUMC Project without mitigation measures. Some mitigation measures, such as the GO Pass, would reduce the required parking because the number of automobile trips would be reduced. Appendix I of the Transportation Impact Analysis (Appendix C of the Draft EIR) calculates the reduction in additional parking needed with the implementation of the GO Pass mitigation measure. As shown in Appendix I, the 2,053 spaces can be reduced by 716 parking spaces with the GO Pass mitigation measure. A substantial number of the 8,000 daily trips would be patient or visitor trips with several patients or visitors using the same parking space as it turns over during the day.

[21] 1,303 SUMC Project housing units (full buildout) x 1.1 percent = 14 SUMC Project housing units at the Stanford campus; 1,303 SUMC Project housing units x 0.3 percent = ~4 housing units in Portola Valley; 1,303 SUMC Project housing units x 0.2 percent = ~3 housing units in Los Altos Hills

The commentor also states that the work schedule of the SUMC employees does not generally match the schedule of Stanford University and Caltrain. Appendix H of the Transportation Impact Analysis (Appendix C of the Draft EIR) includes information provided by the SUMC Project sponsors concerning mode split and the hours worked by Hospital employees. The data in Appendix H shows that 77 percent of existing employees work a typical day shift. As shown in Table 5-5, below, Caltrain currently operates trains to meet the demand of a typical day shift and would serve those 77 percent of employees.

Table 5-5
Caltrain Service By Hour

Time	Number of Northbound Trains	Number of Southbound Trains
5.a.m.	2	1
6 a.m.	3	2
7 a.m.	4	3
8 a.m.	4	4
9 a.m.	2	3
10 a.m.	2	2
11 a.m.	1	1
12 noon	1	1
1 p.m.	1	1
2 p.m.	1	1
3 p.m.	2	2
4 p.m.	2	3
5 p.m.	3	4
6 p.m.	3	4

Source: AECOM, 2010.

PTC1.66 *The commentor expresses support for a hotel at the Hoover Pavilion Site.* Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

PTC1.67 *The commentor requests that the fire agreement consider the development under the CP/GUP.* Please refer to Master Response 12 for a discussion of the City/Stanford fire contract.

PTC1.68 *The commentor questions the potential development along Welch Road and at the Stanford Shopping Center.* The future projects list and map that was used for the cumulative analysis in Section 3 of the Draft EIR is provided in Appendix B of the Draft EIR. Included in this list is the development at 777 Welch Road, which would construct a 3-story, 35,115 square-foot medical building. The construction and operation of this project

is incorporated into the cumulative analysis in Section 3 of the Draft EIR. Other than the development at 777 Welch Road, no further development in this area was being considered when environmental review of the SUMC Project commenced. Subsequently, the Stanford School of Medicine has applied for building improvements at 800 Welch Road. The 800 Welch Road project would not substantially increase cumulative impacts compared to the impacts disclosed in the Draft EIR. The 800 Welch Road project is smaller in size than the 777 Welch Road Project.

As explained on pages 3.1-3 through 3.1-4 in Section 3.1 of the Draft EIR, the Stanford Shopping Center expansion is not considered a reasonably foreseeable project in the City and is, therefore, not included in the cumulative project list evaluated in the Draft EIR. As described in the Draft EIR, the Simon Property Group submitted an application in 2007 to expand the Stanford Shopping Center and construct a boutique hotel.[22] However, this application was withdrawn in April 2009. Given Stanford University's statement that it intends to focus its development efforts on the SUMC Project, and due to the current economic downturn and changing retail trends, the scope of any future development at the Stanford Shopping Center is too speculative to analyze at this point. As stated by Stanford, the Shopping Center expansion is no longer before the City for its consideration and there are no foreseeable plans, proposals, or programs in place that would bring the Shopping Center expansion back to the City for approval at a later time.[23] Therefore, the Stanford Shopping Center expansion is not considered a probable future project for the purposes of the discussion of cumulative impacts, per CEQA Guidelines Section 15130. Nevertheless, background growth at the Shopping Center is included in the City's regional traffic model.

PTC1.69 *The commentor requests that an earthquake scenario be considered in relation to the SUMC Project.* Impact GS-1 on pages 3.10-22 through 3.10-25 of the Draft EIR discusses the exposure of the SUMC Project to seismic-related hazards. As explained, the SUMC Project would be required to comply with the seismic safety standards of the City of Palo Alto and the State Building Codes for the non-hospital portions of the SUMC Project. In addition, the hospital portions would need to comply with the OSHPD 1 requirements of the 2007 California Building Code and design recommendations of the SUMC Project's geotechnical report. Therefore, the SUMC Project's impact on exposure to seismically-induced groundshaking would be less than significant.

The PAFD would follow the strategies outlined in the Palo Alto Emergency Operations Plan (EOP) immediately following an earthquake. Although the SUMC Project would increase operations, it would not significantly impact how the PAFD would respond to emergency calls during or after a natural disaster. However, as explained on pages 3.12-

[22] Simon Property Group, "Simon Properties – Stanford Shopping Center Expansion Application," August 20, 2007.

[23] Barbara Schussman, Bingham McCutchen LLP, correspondence with Cara Silver, Palo Alto Senior Assistant City Attorney, April 16, 2009.

48 through 3.12-50 of the Draft EIR, the SUMC Project would have a significant impact on emergency access routes due to truck traffic during construction and degradation of the LOS at several intersections during operation. Mitigation Measure HM-10.1 would require advanced coordination with the City of Palo Alto on construction routes. This measure, together with Mitigation Measures TR-1.1, TR-1.4 through TR-1.6, and TR-1.8, presented in Section 3.4, Transportation, would reduce the significant impacts to a less-than-significant level. In addition, Mitigation Measure TR-9.1, also presented in Section 3.4, would involve the installation of emergency vehicle traffic signal priority (OptiCom) at all intersections significantly impacted by the operations of the SUMC Project. Therefore, implementation of these measures would reduce the SUMC Project's impact on emergency evacuation and response plans to less than significant and the SUMC Project would not affect PAFD disaster strategies that are already in place.

PTC1.70 *The commentor asks for the number of net new Peak Hour trips, and asks whether or not these trips would add to congestion.* Before mitigation, the SUMC Project would generate 766 new trips is the AM Peak Hour and 746 in the PM Peak Hour, as shown on Table 3.4-16 on page 3.4-45 of the Draft EIR. These numbers would be reduced by approximately 500 trips in each Peak Hour with the implementation of the GO Pass mitigation measure. Therefore, there would be an additional 266 AM Peak Hour and 246 PM Peak Hour trips with the implementation of the GO Pass mitigation measure. Each of these trips would add to intersection delay, a measurement of congestion. At intersections that operate at an acceptable LOS, ranging from LOS A through LOS D, the additional congestion caused by these added trips would be less than at intersections that operate at poor LOS, either LOS E or LOS F. As intersection LOS deteriorates, each trip added to the intersection has a greater effect on overall delay.

Before mitigation, 11 intersections would operate at an unacceptable LOS due to the increase in traffic from the SUMC Project. After mitigation, no intersections would operate at an unacceptable LOS due to the increase in traffic from the SUMC Project. Please refer to Staff-Initiated Change 2 and Section 6, Revisions to the Draft EIR, for an updated list of intersection impacts resulting from the SUMC Project.

PTC1.71 *The commentor believes that ARB should not have to address land use impacts.* See Response PTC1.55 and Master Response 11 for an explanation in ARB's role in addressing visual impacts associated with the building designs and locations.

PTC1.72 *The commentor states that open space should be set aside for mitigation of the building intensity at the SUMC Sites.* See Responses PTC1.51 and PTC1.58 for an explanation as to why open space dedication would not be a warranted mitigation measure for the SUMC Project.

PTC1.73 *The commentor states that the SUMC Project overwhelms the Comprehensive Plan.* Please see Response PTC1.55, above.

PTC1.74 *The commentor questions whether a gift shop and/or a cafeteria would be included in the SUMC Project designs.* Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

A description of the amenities that would be provided under the SUMC Project is provided here. As currently contemplated, the SUMC Project would include a new cafeteria on the ground floor of the new SHC Hospital building, as well as a new cafeteria and café on the first floor of the LPCH Hospital building. In addition, the other food service options that are currently located at the SUMC would remain, including a café on the ground floor of the Advanced Medicine Center, a café on the ground floor of the CCSR building, a cafeteria on the ground floor of the Clark Center, a Peet's Coffee shop on an upper floor of the Clark Center, and Tootsie's on the ground floor of the Stanford Barn.[24] Changes to these amenities would not substantially change the SUMC Project's environmental impacts.

PTC1.75 *The commentor is concerned that the 100-foot ladder truck would trigger the need for new or expanded fire facilities.* As described by acting Fire Marshall Gordon Simpkinson, the PAFD has examined the apparatus housing capabilities of the fire stations and has determined that the current facilities are capable of handling any new equipment. In addition, the existing facilities would be able to house additional PAFD staff that could be hired as a result of the SUMC Project.[25] Therefore, since the SUMC Project would not trigger the need for new or expanded fire stations, the impact would be less than significant, as concluded in the Draft EIR.

PTC1.76 *The commentor states that, in order to properly implement the GO Pass mitigation measure, effective bicycle and pedestrian linkages and/or Marguerite shuttle service need to be in place.* Please see Master Response 1, which discusses the effectiveness of the GO Pass, provision of expanded Marguerite shuttle service to accommodate increased ridership between the SUMC and Caltrain due to the GO Pass, and provides clarification to the enhancements to the pedestrian and bicycle network under Mitigation Measure TR-2.3.

PTC1.77 *The comment questions how much authority Menlo Park has on the SUMC Project and asks how the fee of 10 cents per-square-foot to fund the Menlo Park shuttle was negotiated.* Menlo Park does not have any approval authority over the SUMC Project; however, they can comment on the Draft EIR and meetings between Palo Alto and Menlo Park have occurred with respect to the SUMC Project. Please see Staff-Initiated Change 1 for a discussion of the warranted measures related to transit, including contributions to shuttle service and the deletion of payment toward the Menlo Park Shuttle as Mitigation. Please see Master Response 6 regarding the SUMC Project sponsors' offer to pay such a fee as part of a Development Agreement.

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[24] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

[25] Gordon Simpkinson, Acting Fire Marshall, Palo Alto Fire Department, Planning and Transportation Commission Hearing, June 2, 2010.

PTC1.78 *The commentor expresses that review of the Comprehensive Plan Amendment should occur concurrently with the review of this EIR.* The Comprehensive Plan Amendment is on a separate schedule than the SUMC Project. Please refer to Master Response 11 for the review process of the SUMC Project in relation to the City's Comprehensive Plan Amendment schedule.

PTC1.79 *The commentor disagrees with the assumption that eight percent of SUMC employees would seek to live in Palo Alto, and indicates that the City should mitigate all SUMC Project housing demand in order to "reciprocate" with other communities.* As shown in Table 3.13-8 of the Draft EIR, the SUMC Project's indirect housing demand for 1,303 units would be a small percentage of projected housing growth for each community within the region; as such, region-wide there would be a less-than-significant demand on housing. Eight percent of the housing demand, or 104 units, would occur in Palo Alto and would comprise a small 1.7 percent of the projected housing growth in Palo Alto. As such, impacts would be less than significant. The data in Table 3.13-8 is based on historical evidence, comprised of SUMC's data on the residential distribution of their employees (see Appendix L of the Draft EIR).[26] As such, it is appropriate to apply the eight percent distribution within Palo Alto. Also, per CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant. Lastly, the impact on the City's jobs to employed residents ratio is not, itself, an environmental impact. The analysis of impacts to the jobs of employed residents ratio is presented for informational purposes as an alternative metric of analyzing ways to mitigate the SUMC Project's mobile source air pollutant emissions. Please see Master Response 7 for a discussion of the SUMC Project's impact on the jobs to employed residents ratio and Mitigation Measure PH-3.1.

PTC1.80 *The commentor indicates that the proposed changes to the Comprehensive Plan would be "defining away" the impact rather than evaluating and mitigating the impact.* The proposed changes to the Comprehensive Plan would be consistent with the proposed development at the SUMC Sites. The environmental impacts of the SUMC Project, which would be consistent with the Comprehensive Plan after the proposed entitlements are obtained, are identified and mitigated to the extent feasible throughout this EIR. Please refer to PTC1.35, above, for additional discussion of the Comprehensive Plan amendments. Please refer to Master Response 11 for the review process of the SUMC Project in relation to the City's Comprehensive Plan Amendment schedule.

[26] Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.

PTC 2

PLANNING& TRANSPORTATION COMMISSION MINUTES

==========MEETINGS ARE CABLECAST LIVE ON GOVERNMENT ACCESS CHANNEL 26==========

Special Meeting of Wednesday, June 9, 2010
Council Chambers, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

ROLL CALL: 7:50 PM

Commissioners:	***Staff:***
Daniel Garber - Chair	*Curtis Williams, Planning Director*
Samir Tuma – V-Chair	*Cara Silver, Sr. Assistant City Attorney*
Susan Fineberg	*Julie Caporgno, Chief Plan. & Transp. Official*
Eduardo Martinez	*Steven Turner, Advance Planning Manager*
Arthur Keller	*Lisa Green, Admin. Assoc.*
Lee I. Lippert	
Greg Tanaka	

AGENDIZED ITEMS:
1. Stanford University Medical Center Facilities Renewal and Replacement Project
APPROVAL OF MINUTES: Meeting of May 26, 2010.

Chair Garber: Welcome to the Planning and Transportation Commission meeting of Wednesday, June 9, 2010. Would the Secretary please call roll. Thank you.

Now would be the time for anyone wishing to speak on items not on our agenda this evening to speak. I see no cards.

ORAL COMMUNICATIONS. Members of the public may speak to any item not on the agenda with a limitation of three (3) minutes per speaker. Those who desire to speak must complete a speaker request card available from the secretary of the Commission. The Planning and Transportation Commission reserves the right to limit the oral communications period to 15 minutes.

AGENDA CHANGES, ADDITIONS AND DELETIONS. The agenda may have additional items added to it up until 72 hours prior to meeting time.

Chair Garber: We will go immediately therefore to item number one. Item number one is the Stanford University Medical Center Facilities Renewal and Replacement Project. This evening we are going to be focusing on the Visual Quality, Biological Resources, and Cultural Resources Chapters of the DEIR. Would Staff like to make a presentation?

NEW BUSINESS.

Public Hearing:

1. **Stanford University Medical Center Facilities Renewal and Replacement Project**: Stanford University Medical Center Facilities Renewal and Replacement Project-Meeting to accept comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an overview of the Visual Quality, Biological Resources, and Cultural Resources chapters of the DEIR.

NEW BUSINESS.
Public Hearing:

1. **Stanford University Medical Center Facilities Renewal and Replacement Project**: Stanford University Medical Center Facilities Renewal and Replacement Project-Meeting to accept comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an overview of the Visual Quality, Biological Resources, and Cultural Resources chapters of the DEIR.

Mr. Steven Turner, Advance Planning Manager: Yes, thank you Chair Garber. My name is Steven Turner, Advance Planning Manager for the City of Palo Alto, and Project Manager for the Stanford Projects. As Chair Garber mentioned, tonight is the second meeting of our continuing series of discussions with the Commission regarding the Draft EIR for the Stanford University Medical Center Project. Tonight's meeting is to focus on the Visual Quality, Biological Resources, and Cultural Resources Chapters of the Draft EIR.

I won't go into a lot of detail regarding the background of the Draft EIR. That was discussed at the last meeting. Just in summary the EIR was released for public review on May 20 of this year for a 69-day review period, which would end on July 27, 2010.

We are breaking the review of the EIR into smaller pieces for the benefit of the Commission, Council and the public so that we may just focus on small individual chapters rather than the whole document at one meeting. So we are having a series of 11 meetings, six with the Commission and five with the Council, to accept public comment and questions on the Draft EIR.

The purpose of tonight's meeting really is to collect comments on the Draft EIR. It is not intended to discuss the merits of the project itself, but it is to collect comments so that we can respond to those comments for the Final EIR that would be prepared later on in the year. It would be helpful for the Commission to keep the questions and comments focused on the topics identified in the Staff Report for this evening. Certainly we will accept comments on all chapters of the Draft EIR, but it would be probably most efficient to keep comments from the Commission focused on those chapters that we have identified tonight. I will let the Commission and public know that all comments that we received tonight will be addressed in the Final EIR.

I want to talk briefly about a couple of the roles of our Boards, namely the Historic Resources Board and the Architectural Review Board as it relates to the overall process. The Architectural Review Board will be reviewing the architecture, design, site planning, and landscaping for the projects. They are not a land use Board, they are not reviewing the use of the land, but they are reviewing how proposed buildings and structures relate to and exist on the land. They are a recommending body. They are not a decision-making body. In this case they would be making their recommendations to the Planning Commission and then onto the City Council. So we wanted to make it clear that the Board does not make any sort of decisions, and all of their recommendations would be passed through the Planning and Transportation Commission. You would have the same type of review and be able to see the same materials that the ARB has seen before you make your recommendation to the City Council.

The role of the HRB is slightly different in the fact that there are no structures on the sites that are listed on the City's Historic Inventory. So there is not an automatic process where the HRB would make a recommendation on these projects to the Planning Commission and to the Council. The Edward Durell Stone Building and the Hoover Pavilion have been identified as historic resources for CEQA purposes. The analysis of those buildings as they relate to the projects is contained within the Draft EIR so you can review that analysis, but the HRB would not make a specific recommendation. We do understand though that the public does rely upon the HRB for providing comment with regard to historic or potentially historic structures. So it does make sense for the projects to go to the HRB to receive their comment on the projects, but not to receive a recommendation. So we intend to take the projects to the HRB in a meeting in early July, we think July 7, to solicit those comments at that time. There may be other opportunities for the HRB's involvement to provide comments later on in the process.

Before we go onto the topics at hand tonight I want to talk about two alternatives that appear in the Draft EIR that have somewhat of a relationship to the topics this evening. If you have read the Alternatives chapter you have notices two specific alternatives. One is the Tree Preservation Alternative and that relates to the preservation of trees on the site. Over the review of this process has really become the applicant's preferred alternative. So the bulk of the EIR analyzes what essentially is the project as described in the Project Description. Staff has a couple of exhibits up on the board that show the existing conditions and the proposed project as it is described in the Draft EIR. However, the protected tree alternative as I have mentioned has become the applicant's preferred alternative. I have included a figure from the Alternative section that shows the site planning for the protected tree alternative. We are not specifically discussing alternatives tonight but the protected tree alternative does relate to Biological Resources in that the protected tree alternative seeks to retain more trees than the project would. There is a slight contraction of the site planning. There is the removal of a hospital module from the Kaplan Lawn area where there are I believe nine protected trees. The protected tree alternative that module does not exist in that location so it retains Kaplan Lawn essentially as it exists today. So that is an important alternative to consider in that that is the preferred alternative from the applicant's perspective.

The second alternative is the Historic Preservation Alternative that seeks to retain the historic Stone Building, and not necessarily reduce the scope or the size of the project, or

the program of the project, but it would retain that Edward Durell Stone Building. Then the program essentially would be build around the Stone Building. So if you are interested in those topics you will want to read through the Historic Preservation Alternative and the Tree Preservation Alternative. We will discuss those in more detail I believe at our July 7 meeting.

With that I just want to go to the format of tonight's meeting. We are going to now give it over to PBS&J to discuss the chapters of our discussion tonight. Then the project sponsor is going to make a brief presentation focusing on the visual aspects of the project. Then we will certainly accept Planning Commissioner's comments and questions, and open the public hearing for public comment. With that I will hand it over to PBS&J.

Ms. Trixie Martelino, Project Manager, PBS&J Consulting: Thank you and good evening. My name is Trixie Martelino, Project Manager for the EIR and with me is Rod Jeung, Project Director for the EIR. As Steven mentioned we are discussing Visual Quality, Biological Resources, and the Cultural Resources analysis.

The above table shows the summary of the visual impacts. As discussed previously the column on the left summarizes the criteria for determining environmental impacts. The top row provides various impacts level, NI for No Impact, LTS for Less Than Significant, S/LTS for Significant Impacts that Warrant Mitigation and would be Less Than Significant after Mitigation, and SU Significant Unavoidable Impacts for those impacts that remain significant even with mitigation.

As shown in the table there would be no significant impact after mitigation in the Visual Quality section. Impacts requiring mitigation pertain to Visual Character, Public Views, New Light and Glare. Visual impacts would occur both during construction and post-construction so mitigation has been identified to reduce impacts in both phases. During the 12-year construction period within the 66 acres that comprise the SUMC sites visual character onsite would be significantly impacted by construction staging and activities. However, Mitigation Measure VQ-1.1 involves implementation of a visual improvements plan during construction concealing staging areas and removing construction debris regularly, as well as landscaping as soon as feasible.

During operation or post-construction without required implementation of the City's Architectural Review process to ensure appropriate design of proposed structures the increase in massing from the SUMC project would have a significant impact pertaining to Visual Character, Public Viewsheds, Corridors, and Light and Glare. With mitigation requiring adherence to the City's Architectural Review process and implementation of ARB recommendations impacts would be less than significant. I would also like to point out that this mitigation measure to adhere to the Architectural Review process has also been applied to the previously discussed Land Use Analysis where impacts related to changes in the development pattern in terms of height and density were identified.

The above table summarizes the Biological Resources Impacts. As shown in the table the project would have significant but mitigatable impacts on Special-Status Species and Wildlife Nursery Sites. Specifically, the construction could disturb special-status bats, which may roost in trees and structures onsite and Cooper's hawk, which may nest in

onsite oak trees. In terms of disturbing wildlife nursery sites the project would remove trees, shrubbery, and structures that could be utilized by birds for nesting. Disturbance of nesting birds constitutes a violation of the California Department of Fish and Game Code, and is a significant impact.

Also, the project would have a significant impact on protected trees as defined by the Municipal Code. There are 176 trees onsite that can be designated as protected trees, and up to 76 of these trees would be removed due to the project. As shown in the table mitigation measures cannot guarantee that impacts on the protected trees would be reduced to less than significant. The impacts on the protected trees would be significant and unavoidable on both the project level and the cumulative level.

The above slide shows the mitigation measures to reduce impacts on special-status bats and Cooper's hawk as well as impacts on nesting birds. Mitigation Measures BR-1.1 through BR-1.5 involve such measures as pre-demolition surveys for these species, avoiding roosting areas, and other protective measures. Mitigation Measures BR-3.1 and 3.2 involve avoidance of tree removal during bird nesting season to protection of birds in the event of nest discovery. These measures would reduce impacts to less than significant.

In terms of protected trees, Mitigation Measures BR-4.1 through 4.6 have been identified. These involve preparation of a Tree Preservation Report, a solar access study, tree relocation feasibility plan, provision of a tree preservation bond, and provision of optimum tree replacement for loss of publicly owned trees. It also involves implementation of minor site modifications to preserve those protected trees that have been identified by the City as being biologically and aesthetically significant.

The above table shows Cultural Resource Impacts. As shown in the table most impacts would be reduced to less than significant after mitigation. However, impacts on historical resources would remain significant and unavoidable. The historic resources that would be impacted by the project include the historic Hoover Pavilion and the Stone Building complex. Mitigation measures would reduce the impacts to the Hoover Pavilion to less than significant. Impacts on the Hoover Pavilion could occur during construction and demolition of nearby and adjacent structures. Mitigation Measure CR-1.1 and CR-1.5 involving manual demolition of structures at the Hoover Pavilion site and implementation of protective measures specified in documents prepared for the construction of the Hoover Pavilion would reduce the impact to less than significant.

For the historic Stone Building complex the impact would not be reduced to less than significant although mitigation measures have still been identified to document extensively the Stone Building complex.

Those Cultural Resource impacts that would be mitigatable to less than significant include potential disturbance of archeological and paleontological resources, and human remains. Mitigation Measure CR-2.1 through CR-4.1 involve conducting protocol in the event of encountering such resources.

That is the end of the presentation.

Mr. Turner: The next part of the presentation would be from the project applicant. So we will switch over the presentation to them.

Chair Garber: Will you need more than 15 minutes?

Mr. Mark Tortorich, Vice President, Design and Construction, Stanford Hospital and Lucile Packard Children's Hospital: No, I think we can do pretty well in 15 minutes. Good evening Chair and members of the Commission. We will run quickly through our presentation, which will include about a two-minute video that sort of takes you with photo-realistic through the project site, so you will see all the projects, and then some PowerPoint slides of the architectural presentation. Dave Lennox, the Campus Architect from Stanford will help me during that presentation. So with Zach Pozner's help we will start the video.

We will be starting at the corner of Quarry and El Camino and moving up Quarry Road past the Hoover complex. That will be the first set of buildings that you will see. So here we go crossing El Camino at Quarry Road. To the left is the Hoover Pavilion, the medical office building in the foreground. As we pass the medical office building you will see the parking structure deeper into the site beyond the PG&E power vaults.

Now crossing Arboretum as we head toward Welch Road you will see the Stanford Barn on the right, you will see Lucile Packard Children's Hospital expansion right behind that. Turning onto Welch Road you will see the grove of redwood trees that we are preserving there on the site. The new entry to the Children's Hospital, patient rooms with landscaping on the terraces. The existing Children's Hospital. Stanford Hospital buildings in the background that you can see. The new median strip and turn lane on Welch Road with the Welch Road improvements.

Now we will be turning left onto Pasteur Mall. This is the FIM 1 building that you see immediately on the right, and then to the left is Stanford Hospital buildings and the future clinic buildings, which you see on the left on the back side. FIM 1, 2, and 3 are shown here. Passing the Thomas Church fountains, the clinic buildings to the right, and this is the hospital entry. The towers and the courtyard between the clinics building and the new hospital. The emergency department that you see there at the base of the hospital building. That completes the video fly-through. We can go back to that video and take stills at various points in the animation if you have questions about them.

So a quick overview of the proposed project slides. At the Hoover Campus there are three project renovations to the existing Hoover Pavilion, the new medical office building, and parking structure, the expansion of the Lucile Packard Children's Hospital, Stanford Hospital and Clinics, the replacement hospital, and then the future clinics building, and then three buildings for the School of Medicine that replace on a square footage basis the space that they have in the existing 1959 Edward Durell Stone Building.

Next. The plan to the left shows you existing conditions and the plan to the right shows the proposal as drafted in the EIR. This is not the Tree Preservation Alternative. You can see the development really of parking lots and parking structures into new hospital buildings, and then the surface area here for the Lucile Packard Children's Hospital. We

create about three acres I think of green space with the addition of the new hospital buildings given the open space that is at the corner of Quarry and Welch, and the green space that will be on top of the diagnostic and treatment roof.

Next. A key component of this project is establishing architectural guidelines to connect the elements of the various parts of the project that we believe will help guide development through the terms of the Development Agreement. So the design guidelines are something that has come here to the Commission before and to the Architectural Review. It covers areas such as connective elements for the planting, paving, signage, and other elements that you wouldn't necessarily see detailed in each architectural package. It is covered within our design guidelines.

Next. So let's start with the Hoover Campus. Next. The Hoover Campus, as I mentioned, has three projects. One is the renovation of the existing Hoover Pavilion, the new medical office building, and the new parking structure. We have been very sensitive we believe in the architectural design of the new buildings and of the siting of the new buildings to protect what we consider to be really the historic viewshed here from Quarry Road as well as the entry circle that was resident when this building was a hospital.

Next. Our architects, WR&S, have done a pretty extensive study of the architectural character of the Pavilion. They have established cornice height limits for the new building and for the parking structure. They have studied the base condition to make sure that it matches between new and existing. They have also looked at the vertical elements of the existing Pavilion and tried to replicate that in both the parking structure and the medical office building. The tower form, the ziggurat tower form of the Pavilion is represented again in the elevator towers for the new medical office building and the parking structure so there is a family of element on the Hoover Campus. Here you can see the composition of how these various elements come together.

Next. Lucile Packard Children's Hospital, there within one facility really are two components, about 470,000 square feet of inpatient facilities and 50,000 square feet of clinics. These are constructed areas not net new areas. As we have presented before, this being a children's hospital is a very special place and there is a very strong connection to nature with the design of the project. The Children's Hospital is really one of the most forward thinking landscaped buildings in healthcare. When it was built in 1991 it was really a groundbreaking feature. So we wanted to reinforce those concepts in the expansion.

Next. Looking at the site plan we really have created open space from what had been parking lots and small buildings on the site. This garden, our Emerald Garden, at the corner of Quarry and Welch, we have taken great efforts to preserve the tree growth that is here at the corner. In fact, through the process of architectural review we actually changed the parti to make sure that we could preserve that growth. Then we are providing a discovery garden on top of our operating rooms, our diagnostic and treatment space.

We have done a great deal of medical planning inside the building. Next. You can see that we have progressed the design fairly far so we really do understand how all these elements come together. This is the large component of operating rooms and imaging spaces of

which the Discovery Garden is on top of this. Our lobby with a glass enclosure allows for views from the indoor spaces out to the garden and a real interaction of indoor and outdoor spaces. So this really becomes a healing place for children and the connection to nature.

Next. The patient floors, the single beds that we need to construct for the Children's Hospital are organized in two towers, again to maximize views out from each component of the tower to provide overlooks of outdoor spaces off of each unit, so you can experience the garden and the fresh air. It will be a relief and a respite for families and also to provide some elements of landscaping along the terraces right outside of the patient room windows. These terraces also help in the energy management in the building. We are using a rather innovative displacement ventilation system that reduces our energy consumption in the building. So this will be a very, very sustainable healthcare building.

Next. Here again are the views from the animation of the Children's Hospital expansion. We have the stair tower here that really announces the new entry. There will be a rather playful element hopefully to capture the energy of the wind and generate it into renewable energy and maybe having a demonstration theme in the lobby so children can learn about sustainable environments within the healthcare setting. Then you can see the grove of trees at the corner of Quarry and Welch that are preserved through this alternative.

Next. The new Stanford Hospital, again two components here 1.1 million square feet of new hospital space. This is to replace the seismically deficient facilities in the Edward Durell Stone Building, which we cannot use beyond 2030. The second is the future clinics, 429,000 square feet that will be on the site of the Stone Building after it is demolished.

Next. The concept here by the architects, Rafael Vinoly Architects, and Lee, Burkhard, Liu, Medical Planner was to provide a modular platform that would allow the structure to be flexible for future unidentified uses. The seismic requirements to this building will make sure that it withstands pretty much any kind of event so we would see this building as being really a 100-year building. So the interior needs to be as flexible as possible. This was the concept that generated our Pavilion module.

Next. This site plan that you see was the site plan for our application to Palo Alto, and is the alternative studied in the EIR before we altered the design to accommodate the preservation of trees here on the Pasteur Mall and an area we call the Kaplan Lawn, and to preserve some trees here above a below-grade parking structure and in this corner. So from this modular plan we actually did quite a significant amount of redesign to be able to accommodate trees in the Tree Preservation Alternative.

If you go to the next slide you will see what we did, or what trees we were trying to preserve by adjustment of the design. So as I mentioned there were trees on top of the below-grade parking structure. We redesigned the parking structure to make it a thinner volume and actually brought it up above grade. We removed the sixth pavilion here that was on the Pasteur Mall. We adjusted the framework of the building modules to accommodate this tree in that location. We also redesigned the School of Medicine's FIM 1 building to accommodate trees on that site.

Next. So again, here are the views of those trees that have been preserved. So you can see the trees here on the Kaplan Lawn, the Pasteur Mall and the tree here in front of FIM 1. This is the site plan that is being studied as the Tree Preservation Alternative and has become our preferred Alternative and the design we have pursued.

Next. So you can see the site plan now for the Tree Preservation Alternative project. We have the Kaplan Lawn is preserved with the oak trees here still in full bloom. We have moved the entrance into this location so that there is a greater connectivity to the existing building, and we have created a much more compact volume organizing around an indoor atrium instead of organizing around an outdoor courtyard.

Next. Layering the concept is the idea of a garden as an interface between technology and humanity. Technology being the diagnostic and treatment floors, the operating rooms, the emergency department, imaging department, and the humanity floors being the patient bedrooms.

Next. So this gives you just a sense of how big these volumes are at the ground floor. I think Commissioner Keller had the question about the emergency department. This volume here is our emergency department and the purple volume is our imaging department. You can see these very big blocks of space really do need to be next to each other to provide the full spectrum of healthcare in emergency services.

Next. On the upper floor you can see how the pavilions are organized around a courtyard with these modules of patient rooms. We have views out of our corridors, all of our patient rooms are organized not to have views predominantly into each other, capture plenty of natural light into the patient rooms. Again, here we are using displacement ventilation technologies to significantly reduce our energy consumption, but the architecture of the building deals with the sun shading and day lighting in a different way than we have done at the Children's Hospital.

Next. So as you get a view of the campus surroundings the glass curtain wall is actually a double-glazed curtain wall with sunshade devices within the two layers of glass to mitigate the solar exposure into the rooms, and therefore reduce the loads on the HVAC system.

Next. The School of Medicine Foundation of Medicine buildings will be presented by Dave Lennox, our Campus Architect.

Mr. Dave Lennox, Campus Architect, Stanford: Thanks. The project components for the School of Medicine include three buildings as Mark said earlier that replace square footage that is used by the School of Medicine in the existing 1959 Medical Center.

This is the site plan. If you have been to the campus recently you will see that we have completed two buildings for the School of Medicine, which will face the main campus and the campus center. FIM 1, 2, and 3 will literally provide a face for the School of Medicine to the Medical Center itself. We have positioned FIM 1 and FIM 2 to create a gateway into the School of Medicine along that Medical Center promenade, which takes you through the adult hospital, past the Children's Hospital, up to the shopping center, and on

to the city itself. As we reposition FIM 1 to save the protected trees we are also trying to create a nice streetscape for bikes and pedestrians that fronts the three buildings.

Next. The visual and mass of these buildings will leverage the kit of parts, the architectural kit of parts we have been using recently at the School of Medicine. These also reflect medical center design guidelines. Then these are the views that you saw in the animation earlier.

Mr. Tortorich: So that completes our formal presentation, hopefully right on time. Certainly we are available to answer any questions you might have.

Chair Garber: Thank you very much. We will open the public hearing and we have one card. We have Niraj Dangoria.

Mr. Niraj Dangoria, School of Medicine: I want to make two points today. One is the challenges we face with the continued use of the Stone Building complex in general, and more specifically the use of the Stone complex as a research facility.

Next. Within the Stone complex the School of Medicine occupies these four buildings, Grant, Alway, Lane, and Edwards. You just heard Dave Lennox talk about the FIM buildings. The 415,000 square feet that are currently in the Stone complex would be replaced in the FIM buildings.

These 50-year old have building systems that are completely enmeshed with each other and creating separate buildings, or renovating those buildings in place is a real challenge because we would need to surge everybody out of the buildings in order to renovate them. The ability for the School of Medicine or anybody to surge 415,000 square feet of space in order to renovate it is a challenge, which is almost impossible to work, no not almost, it is impossible to work. So that is one significant aspect we face in the reuse of the Stone Buildings within the School of Medicine.

As to the use of these buildings for research purposes I want to shift my attention a little bit and talk about the SIM 1 or the Lokey Stem Cell Building, which has just been completed or is very close to completion.

Next. So this is the new building and you just saw a slide of this from a slightly different angle that Dave Lennox showed. Next. These are the labs in this new building. When research is done there are four components that really make up the research. The labs themselves, these are the wet bench areas. Associated with these labs are support spaces, which include tissue culture rooms, microscope rooms, cores, things like that that are needed to support this research endeavor. In today's lab planning paradigm for every square foot of wet lab bench you have you need another square foot, an equivalent square foot, for the lab support space.

Next. This is what lab support could represent. We have some barred safety cabinets, and so in the Lokey Stem Cell Building for every square foot of lab bench that we have we have a square foot of this lab support space. In the Stone complex that proportion is about

one to .25 so that is one reason why it is very difficult to continue to use that as research space.

Next. This is what the Stone Buildings look like. I could tell you that every space looks like this but that is not true. Next. Or that every space looks like this, but even that is not true. But these buildings are 50-year old buildings and there are many, many spaces within these buildings that look like these two spaces.

Next. We have however done a reasonable job of creating decent looking labs within the Stone complex, but that is not the point. The point is the infrastructure, which is the last piece that goes together in making these labs and lab support spaces functional.

Next. So when you really look at how these new lab buildings are built on the right is our new Lokey Stem Cell Building or SIM 1, on the left is a section through the Stone Building. The floor-to-ceiling height that is in the current and modern lab buildings really is what is needed. As you can the see the space needed to support the infrastructure that is required to support these research labs. In the Stone complex there just isn't enough space to accommodate the infrastructure to support those labs. So the previous picture that I showed you showed a lab that looked pretty good, but to have the infrastructure that supports those labs is very, very challenging, and impossible to accommodate all the labs that we need in the Stone complex.

Next. The last point I want to leave you with is there is only so much you can stuff in these buildings. This is a ceiling access area. Over the years we have tried to do so much, so much with these buildings that the ceiling spaces themselves have remained inaccessible. Therefore I would like to conclude with the fact that the Stone complex is really not capable of meeting the research needs of the School of Medicine and neither is it possible to completely rehab the Stone complex because of the surge issues associated with it. Thank you.

Chair Garber: Thank you very much. We have no more cards. We will leave the public hearing open should anyone else come and like to speak. Commissioners, questions or comments? Commissioner Keller.

Commissioner Keller: A couple of questions. Firstly is that animation from Stanford available on the City website?

Mr. Turner: It will be. It is approximately 115 megabytes so we need to figure out a way to compress it a bit so that the public can download it easily and properly.

Commissioner Keller: Okay, thank you. Has anybody considered the potential for whether the Stone Building is suitable for use by community physicians?

PTC2.1 Mr. Turner: I think I would leave that to the applicant to discuss.

Commissioner Keller: Thank you.

Chair Garber: As you approach, please identify yourself.

Mr. Tortorich: We are making space at the Hoover Pavilion available for community physicians, and that should provide an adequate space in the short-term. In the long-term the proposed medical office building would be offered to community physicians for their use. That is a more suitable space for them.

Commissioner Keller: I understand that this is basically your desire to use Hoover Pavilion for community physicians. I am just wondering hypothetically is the Stone Building suitable in terms of floor-to-ceiling heights so that it could be renovated to be adequate for community physicians, and are there any legal requirements such as OSHPD or whatever that preclude its use for that purpose?

Mr. Tortorich: So, the community physicians housed at 1101 Welch Road need space immediately so that is why we are moving them to the Hoover Pavilion. If we don't move them we can't build the new hospital, which we have to do because of seismic requirements.

If you were to renovate the Stone Building for community physicians they may have to comply with what is called OSHPD-3 Requirements depending upon how they practice, which relates to HVAC issues that Niraj just talked about. Also, we would have to define exactly how they create individual suites within that large building, which is something we PTC2.1 Con't are able to accommodate within the Hoover Pavilion but it hasn't been without its challenges. So they are like separate tenants within a large building. So you would have to create a way to create those suites.

Chair Garber: If I may Commissioner, and just to prompt you, are you getting to an impact that hasn't been identified in the DEIR or a mitigation that should be included?

Commissioner Keller: Yes. I am sort of wondering about whether instead of demolishing the Edward Durell Stone Building its potential reuse, severing it from the rest of the hospital so that it would not have a problem of being a structural issue, but making it suitable for community physicians might be an alternative to demolishing it. The advantage of using that square footage there might be also another issue and that is if we concentrated the community physicians adjacent to the rest of the hospital complex rather than the additional new buildings at Hoover it would deal with the visual impacts of the new buildings around Hoover, which I don't think were adequately addressed, as well as reduce the transportation impacts of getting between the community physicians. I don't think this issue has been studied and perhaps an alternative that retains these buildings should be considered. I think that the use of them for community physicians while I understand the Professor from Stanford's concern about using them as part of the School of Medicine but their use for community physicians doesn't seem to be problematic. You can subdivide buildings any way you want and I don't think that is an issue.

Chair Garber: Anything else at this time?

Commissioner Keller: One thing I would like to talk about is in terms of the video. Could you bring us slowly to where the sight line goes past Hoover Pavilion? In particular I want to see not just the sight line from Quarry and Palo Road but beyond that where you are sort

of full on to Hoover Pavilion and beyond it when you are passing it towards where the substation is. I am wondering the degree to which those new buildings obscure the view of Hoover Pavilion. So if you can go slowly from here on. Stop there. Come back a few. See it is beginning to obscure. What I am seeing here at 43 seconds in. It looks like it is beginning to obscure Hoover Pavilion and then when you go a little bit further, about 45 seconds you can see it is obscuring the edge of Hoover. If you go further it is completely obscured. If you come back a little bit and stop there, I am not sure but it looks like you might be from here or slightly beyond you might be able to see the corner of Hoover Pavilion. Can you go a little further? It is basically…come back about two or three frames. In that gap there that is probably Hoover Pavilion in the trees. Because of the vantage point, you know the further back you go you see more of it.

So it does appear that the parking garage and these new buildings pretty much obscure Hoover Pavilion from the sightlines along Quarry Road. I think that the only consideration for visual has been from essentially the corner of Palo and Quarry and not elsewhere along that. For example there are no visuals taken from where they would be on the parking structure of the Stanford Shopping Center across the street and along there, or the other parking structure further towards Arboretum and see what the views of that would be of Hoover Pavilion. So I think that is a significant impact along those sightlines. It is particularly not only for visual but it is also historic resource because it impacts that historic resource of the Hoover Pavilion. I will come back to historic resources in a moment. PTC2.2

Chair Garber: Commissioner Martinez.

Commissioner Martinez: Okay, thank you. There is another campus nearby here. I think some of you have seen it. It is called Stanford. From what I understand from having listened to a lecture by David Lennox in Los Altos recently that Stanford is going back to the planning of Olmstead in looking at the future growth, preserving corridors, sightlines, really establishing the practice of siting buildings that made the campus both beautiful and great. I would like to see, this is a concept in planning, very traditional, called continuity. What it establishes is that you try to build upon something, which is part of the historic past.

Part of Commissioner Keller's comment about the siting of the new building at the Hoover Pavilion is that the Medical Center is working in the context of buildings that are set almost in a park way. The new building is sort of forced right to the front. If you look at that video as it goes down Quarry Road it is really a series of buildings with ample open space around them, set back from the street, and the new building sort of violates the concept of the visual quality of the Pavilion and the rest of the experience leading down towards the Medical Center. I would suggest that this impact on the siting and the context of both the Hoover building, Stanford Shopping Center, the buildings that are further along Quarry is an environmental impact. The way in which it can be mitigated is by relocating that new medical office building. By following Commissioner Keller's recommendation of looking at the Stone hospital as a site for medical office buildings or moving it behind the Hoover Pavilion perhaps where there is some of that surface parking. In any respect, it feels kind of forced and uncomfortable in its relationship to an historic building. I think

mitigation of that problem is appropriate. I want to come back to this later but I want to just sort of collect my thoughts for now. Thank you. PTC2.2 Con't

Chair Garber: Commissioner Tanaka.

Commissioner Tanaka: Thank you. First, thank you to Staff and PBS&J as well as Stanford for coming out tonight. I had some questions about the trees. It looked like a pretty extensive study was done on the trees in terms of the impacts and possible mitigations. I guess one question I have for Staff is let's say this goes forward as planned, maybe as one of the alternatives, what is the plan for notification and alerting people of the tree removals?

Mr. Turner: No plan has been established at this time for that.

Commissioner Tanaka: Okay. I notice that there are going to be tags placed on the trees if I am not mistaken. Is that right? PTC2.3

Mr. Turner: That is correct.

Commissioner Tanaka: Okay. So maybe what can be done as this progresses forward just to kind of alert the community and people who care about the trees, ample notification to people around there on the trees well in advance versus just the day before. It is kind of a small thing but I think given what the community cares about I think ample notification is something that I think would serve everyone very well. Perhaps even a website with information about why these trees are being removed and the alternatives that were looked at. Also, I would suggest maybe just preserving some of the documentation that has been done so that people who are concerned about this issue can kind of serve themselves, and understand the rationale, and not be surprised if and when this does happen. Those are my comments for now. Thank you.

Chair Garber: The Comprehensive Plan does not address specifically the visual character of Stanford in its Land Use chapter. It is not a neighborhood center. It is not a business, a street, etc. Although the Comprehensive Plan does address a variety of ways in which we address those conditions. I believe in 2007 or 2008, I am forgetting exactly when the presentation was at the very beginning where the City had hired a consultant to weigh in on how we are approaching or imagining these areas to be developed, and developed a concept called the Village Concept. It emphasized as I recall three things. One focused in on modes of transportation, trying to find ways to increase the opportunities for walking and bike routes, and less dependence on the car. The second important thing that it did was created and acknowledged the linkages that occur between the campus and the campus planning and the city and its immediate surroundings. Thirdly, emphasized the ground plane and the experience of the person on the ground. How has that informed these analyses that have gone into the DEIR and the mitigations that are being recommended relative to these things? I ask that because there is a lot of attention in the DEIR about viewsheds as opposed to say the linkages that we were looking for that were important to the city as opposed to the experiences that Commissioner Keller and Commissioner Martinez are speaking about at the Hoover Pavilion for instance. Have we utilized some of those findings? Maybe there is also another piece to this, as part of my question, which is PTC2.4

the design guidelines which was something new at least for me a couple of meetings ago, as an introduction. Granted that that has been pretty much the auspice of the ARB but perhaps that is also filling in some gaps here as a way to evaluate where things should be mitigated, can be, and what those things are.

Mr. Turner: Thank you Chair Garber. I think I will have Trixie and Rod perhaps describe a little bit about the approach to the visual analysis and the analysis of the project from specific view points, and the CEQA requirements for that type of visual analysis and how that was approached in the EIR. They can describe that kind of briefly but I will discuss a little bit about the Village Concept Alternative.

Really from the very beginning Staff realized that it was very important to look at how pedestrian and bicyclists would move from Palo Alto's Downtown area, from the Intermodal Transit Center, across the street from El Camino to the shopping center, to Hoover Pavilion, and then how pedestrians would make their way down to the Medical Center buildings. So very early on in the process we hired an Urban Design Peer Reviewer, Bruce Fukuji, to help the City essentially do a peer review of the application and the materials that were provided by the applicant. Out of those discussions really came what has been called the Village Concept Alternative, which is an alternative that exists in the EIR. The intent of that Alternative is to take a look at the physical aspects of the Village Concept Alternative the linkages, the connections between the transit center and the Stanford Shopping Center/Medical Center area. So it looks at the physical changes that would be brought on by the Village Concept Alternative.

PTC2.4 Con't

As we have gone through the design review of this process I would have to say that the applicants really have come onboard with the concept of a Village Concept with regards to linkages. The project has evolved over the past few years to emphasize the need for those strong connections. Parts of those physical connections have been addressed in the EIR through the Architectural Review process. The more specific design of those linkages and connections would be reviewed and certainly brought to the Planning Commission and Council for your review. So in summary the importance of the linkages and connections was really known early on and we have taken what we think are good steps to incorporate that into the project.

Mr. Curtis Williams, Director of Planning and Community Environment: If I could just add that we do have Mr. Bruce Fukuji here in the audience and I think it might be worthwhile to just hear from him and how he thinks that those connections have been made. It also would be good to hear from Trixie and Rod because I think what we have here is there is an EIR set of significance criteria and those dictate sort of what is in here, and then some of the design architectural issues that the Chair has brought up are not necessarily EIR specific. I think Bruce can probably speak to those more. So Trixie do you want to start with the significance criteria and Bruce can come up.

Ms. Martelino: Thank you. As mentioned earlier in the presentation and as shown on page 3.3-23 of the EIR there is a set of Standards of Significance on which the visual analysis is based. There are six criteria listed in there. The first is whether or not the project would degrade the existing character or quality of the site and its surroundings. That is treated in terms of the appearance of the site, onsite massing, development of the

site, amenities onsite. The second is pertaining to impacts on public viewsheds or view corridors, or scenic resources. When we took a look at that analysis we were looking at views particularly from scenic roadways as defined in the Comprehensive Plan. For example, Sand Hill Road is identified in the Comprehensive Plan as a scenic route. We also gave consideration to the nearby gateway, El Camino Real. There were comments during the Notice of Preparation process where in streets that were heavily traveled people would want to see the views of the project from those areas, and also from sensitive viewer locations. The EIR considers residential areas as sensitive viewer locations. So considering all of that certain vantage points were selected to depict simulations of what the project would look like and those are presented in the EIR.

The other criteria that are looked at here include train modifications, violation of Comprehensive Plan policies regarding visual resources that was addressed but in the Land Use section rather than the Visual Quality section. All Comprehensive Plan policies were addressed in the Land Use section as they related to the project. Substantial source of light and glare and shadowing. So in terms of the question related to impacts and views, and view corridors how the Comprehensive Plan was tied into that was really looking at which roadways were identified in the Comprehensive Plan, which policies in the Comprehensive Plan protected visual resources such as views of the hillsides to the west that was considered in the analysis.

Chair Garber: Well, maybe before I ask some questions we can have Mr. Fukuji speak a little bit about the work that he did.

PTC2.4 Con't

Mr. Bruce Fukuji, Consultant: Good evening Planning Commissioners and Chair to answer your specific question about what the initial intentions were of the Village Concept and then how the issues you identified in terms of how transportation issues were done with walkability and transit orientation and linkages and then what happened with the ground plane.

Chair Garber: Forgive me for interrupting, just as a reminder we will be dealing with transportation a little later. So we don't have to drill into those specifically. I am really thinking perhaps more germane to this conversation are the visual aspects and the aspects of the ground plane, etc., and then how the linkages play into that may be important. Forgive me for interrupting. Go ahead.

Mr. Fukuji: I think that is good to clarify the questions. In really looking at the sort of visual quality and linkages and how that goes through your experience on that what the applicant has done is they have not only these projects that they have developed and designed but they put together the design guidelines that are in the package of documents that are part of the entitlements. What we did is looked at the Village concept overall, identified kind of a holistic set of strategies around land use, public space, connectivity, and sort of urban design. Then we said okay, with the applicant's documents and their design how is that consistent with a sort of Village Concept? What has happened with the evolution of the Village Concept and the design work that the project applicants have done, what came out of that was really a list of infrastructure improvements for pedestrians and bicyclists, and transit connections that were not included in he projects that were in the application or in the design guidelines. So we came up with a list of what those

improvements would be and those are being included really in the Development Agreement in terms of what is needed. Those linkages have to do with how you connect from the Intermodal Transit Center to El Camino and then from El Camino how do you connect all the way to the Medical Center overall.

I think the major changes that have been introduced as a result of that are looking at how that pedestrian/bike tunnel that is proposed at Everett as future planning how you would have a pedestrian/bicycle connection from that to the corner of El Camino and Quarry Road, and how to link up the pedestrian connections from there to the transit center. Then looking at intersection improvements that would happen and how you would stripe and connect and coordinate signal timing for pedestrian movements for those intersections that go along Quarry. So you have Quarry and El Camino, Palo Road, Arboretum, Vineyard and Welch doing those.

The other major area that we really looked at that there were changes was what happens in the Stanford Barn area because that area really wasn't included in the application. How do you connect from the shopping center to the medical campus center? It really needed to be addressed and how do you enhance that? Through conversations and a proposal that our team put together and then submitted and discussed they had modified what they would want to provide for that area in both changing the parking arrangement and the street access points to and from the Medical Center and to the Stanford Barn area to be able to have more direct connections for pedestrians and bikes in that area. So that was another major change.

PTC2.4 Con't

Then there were a few others that are part of that. I can go through a more complete list on that. Those improvements include ground plane changes, landscaping, and attention to lighting. There is a whole package of improvements that are being cost estimated that are part of what Public Works looked at that would be included in that set of improvements, especially around El Camino Park area. So there have been very specific recommendations that have come out of that that have very specific physical changes in the environment that will then be implemented as part of the projects.

Chair Garber: So just before we go back to PBS&J, have you taken a look at the DEIR document in light of some of the work that you were doing, and have you made recommendations or suggestions as to mitigations or evaluation if mitigations are needed?

Mr. Fukuji: Well, when we went through the process and how the environmental document was put together I was part of several meetings in looking at that. What we were doing at that time was really focusing on the Village Alternative and how to define what that is, and how would you analyze that in a way to be able to demonstrate what kind of performance benefits would happen for that, especially in terms of reduction of VMT and greenhouse gases.

The other thing that really came out of that was really identifying that set of improvements that hadn't been discussed. Regarding mitigations we looked at what would be needed for sort of pedestrian/bicycle improvements. What came out of that was a set of improvements that were not included in the proposals. That was the main focus of the effort on that.

Chair Garber: Thank you. Commissioner Martinez has one question.

PTC2.4 Con't

Commissioner Martinez: So I can understand it, your work really focused on the periphery and not anything within the Medical Center Project itself?

Mr. Fukuji: Well, it did include looking at the Medical Center Project itself. We have in this process through the preliminary architectural review process and study sessions that were done, and working with Staff and the applicant there were several memos that I had put together to help inform the architectural review of the projects that included the Hoover, Children's Hospital, the Stanford Medical Center, and the FIM buildings. So there was design review for all of those, and there was also site planning review for all of those. There were several points that were made throughout that review process that then was information that was provided to the project sponsors, which they considered and in many ways incorporated in terms of the evolution of the design of the project.

Commissioner Martinez: Okay, thank you.

Chair Garber: Please.

Mr. Rod Jeung, Project Director, PBS&J Consulting: I would just like to add a couple of points. There were some really, really great points that Bruce just brought up regarding the direction and the impetus for coming up with the Village Concept. If you think about some of the terms that he was using and some of the things that we are very concerned about in terms of how this area functions it had to do with the experience and what an individual, either as a motorist, a pedestrian, or a bicyclist, appreciates as they are going through a particular transition or through a corridor. Those are all very important planning, and urban design, and visual principles that should be followed in enhancing the design of any kind of a project.

There is a hard distinction to be made when you look at the specific CEQA criteria that Trixie was articulating a little bit earlier. There it is really not so much the experience, although that has to come into play because visual is a subjective analysis, but you do have to look more specifically just what is the mass of the structure relative to its surroundings. What is the height of that building or that proposal relative to its surroundings? To what extent is it removing identified visual resources? Those are the things that we can identify as impacts within the environmental document.

Through the Planning review process there are other opportunities both through you and the ARB to identify other improvements that can be made to enhance the experience and the functioning of those transitions, and the corridors. So that is one small distinction I wanted to make.

The other thing I wanted to point out is that as we begin to identify the impacts associated with the project we are really looking to the Comprehensive Plan or local guidance to give us those resources that are considered precious by a community. So Trixie earlier said we looked at the Comprehensive Plan, we looked at the Comprehensive Plan policies, and we are seeing a lot of deference and importance placed on heritage or protected trees and to

the foothills. So it was interesting as we got into the visual analysis and specifically for Quarry Road on page 3.3-41 it came to our attention that while Hoover Pavilion is a visually distinctive structure in the project vicinity, and we have heard about it tonight, it is not a visually protected resource under the Comprehensive Plan. The obstruction of this building would not comprise a significant Visual Quality impact but it is something that is discussed in the Cultural Resources section. So again, we are looking to the Comprehensive Plan, we are looking to local sensibilities in order to identify what are the scenic resources that need to be protected and whose views are important.

Chair Garber: I have hogged enough time here but let me just do one follow up. The selections of the views that you have included in the mitigation plan here how are those specifically defined?

Ms. Martelino: We have a slide showing the various vantage points for the benefit of the audience. We are going to pull it up.

Generally, there were five visual vantage points selected. Selection of those vantage points, as I was mentioning earlier, took into consideration policies in the Comprehensive Plan, comments during the Notice of Preparation process, and consideration of land uses that would be considered sensitive to visual change.

Chair Garber: I am going to interrupt you, if you will forgive me. If you actually have notes of the vantage points and the places in the Comprehensive Plan that have led you to those points I would be interested in learning those.

PTC2.5 Ms. Martelino: We do have a write-up. We will be pulling that up. We can get that for you in awhile. In the meantime to further explain the rationale in selecting the vantage points first I mentioned Comprehensive Plan policies that identified scenic routes. The nearest scenic route to the site is Sand Hill Road. So we considered points along Sand Hill Road where the project would be most visible. That would primarily be Sand Hill Road near its corner with Pasteur Drive at the entrance to the main SUMC site. That is our first vantage point.

We also have a second vantage point at Sand Hill Road near the El Camino Real gateway. We did consider how the project would affect the gateway into the city since a gateway is an entrance into the city where a city would want to portray a distinctive character, or have a memorable experience entering the city.

Chair Garber: The Sand Hill vantage point is number one in your diagram, and the El Camino Road is vantage point number three, is that correct?

Ms. Martelino: Yes, that is correct, El Camino and Quarry Road. The second vantage point on Sand Hill Road is along Arboretum Road. That is another vantage point where the SUMC structures would be visible from.

Mr. Turner: Just to help out the Commissioners that figure appears in the Draft EIR on page 3.3-25.

Ms. Martelino: So to continue, the correction earlier that the third vantage point yes is on El Camino Real and Quarry Road and that shows structures of the SUMC project along Quarry Road. The fourth vantage point is also along Quarry Road, and the fifth vantage point is also along Quarry Road. Quarry Road is not a designated scenic route according to the Comprehensive Plan but it is a heavily traveled roadway from which the structures would be highly visible. It is also a public road from where foothills would be visible. The simulations depict from which vantage points foothills could potentially be obstructed.

Chair Garber: Forgive me for interrupting again. Is it specifically those points along Quarry Road or is it anywhere along Quarry Road?

PTC2.5 Con't Ms. Martelino: Well, we selected specific points along Quarry Road from which the project would most be visible. However, it doesn't exclude other portions of Quarry Road from where the project would be visible. The analysis does acknowledge that….

Chair Garber: I apologize again, I apologize I am drilling down into this but I believe it is important here for us not only to know how to respond appropriately, but also to make sure that when you do get comments that they are appropriately placed.

So is it only in the impacts that the projects have to the foothills, is that it?

Ms. Martelino: Well, the impacts that the projects would have on the foothills is one of the considerations, particularly on views. Do you have the policy number? Comprehensive Plan Policy L-3 states that the City should guide development to respect views of the foothills. So that was a major consideration in the analysis.

Also, pursuant to the significance criteria we looked at impacts on onsite character due to increased massing, for example.

Chair Garber: So I am just flipping over to Policy L-3, and noting for instance Policy L-5 maintain the scale and character of the city. Avoid land uses that are overwhelming or unacceptable due to their size and scale. Would that not be a part of your consideration as well?

PTC2.6 Ms. Martelino: That was part of the considerations as well. That was considered under Impact Discussion VQ-2 starting on page 3.3-27. Impact Discussion VQ-2 pertained to impacts on onsite character and part of the considerations were building mass, height, and layout. We also considered landscaping, lighting, and exterior building treatments.

Chair Garber: Relative to some of the Commissioner's concerns about the new proposed building being in front of the existing Hoover Building would that sort of relationship be excluded from consideration here given these policies that we are responding to?

Part of the reason I am focusing in here is that the sense of this particular chapter in the DEIR is that it is highly dependent on these very specific views, and it is excluding the opportunity to make more general comments that in fact might be outside of the criteria of the significance criteria. It is simply not clear to me that that is in fact the case, and that some of the comments even though they are being expressed as content as opposed to

PTC2.6 Con't

mitigations or impacts that need to be included that there may be validity to them. Part of the other issues here of course is that this particular chapter is highly reliant on the ARB's review and the use of that as a mitigation factor in and of itself. However, the ARB can't use their review and the criteria that they have to keep a building from overlapping another, nor can they truly address the size and limits the way that the Planning Commission can given our ability to have more auspice over height and mass, etc., given FARs and land uses. One moment, Curtis.

PTC2.7

The other issue there of course is that we are not dealing with a Map so that we can't deal specifically with the site plan, at least in terms of locations. It seems to me that there would also be ways that we could tie some of those issues back to the Comprehensive Plan policies. Even in those sorts of things the Comprehensive Plan doesn't deal with them directly, and that is part of my question about getting back to the Village Concept and the design guidelines. Where do we hang those sorts of comments if they in fact do reach levels of significance? Curtis.

Mr. Williams: I think you should make those comments and assume that they are valid comments and we need to see how they fit in here. If there isn't really a way to do that then we need to respond that there isn't. I think you are right generally that what we have looked at, and I know we had a lot of discussion early on and then throughout the process, are the views from scenic roads so that is fairly limited, fairly specific that we can get down to Sand Hill Road basically being it, and the entry points, so the views of the foothills, essentially scenic views, which are sort of defined in here as the foothills, the Baylands, which obviously don't apply here. Then the more generalized one as you mentioned is this visual character, more nebulous type of criteria.

I again want to clarify that the ARB is not making those decisions. They are making recommendations to you, and then to the Council. So it is a process that we are relying on not just the Board. To some extent I take exception with saying that they can't cut down the height, reduce the size. If they feel that that is appropriate and that it does not provide architectural compatibility or desirability or whatever they are looking for under their findings then they have authority to do that. I know from a practical standpoint that is difficult so it may rely more on how you come down on the zoning in the end. Then the other thing is that we do have is Alternatives. So we have reduced intensity alternatives. We have preservation alternatives, and some of those it may be that you feel that some of those are more appropriate to avoid those kinds of potential visual character conflicts. So I would certainly not discourage you from making those comments at this point because they are certainly relevant. Whether they are entirely specific to the EIR I don't know, but I think they need to be considered one way or the other, and then we put them the appropriate box and they get considered some place.

Chair Garber: Well, I accept your criticism or correction. Thank you for that and the reminder. Let me just ask you when do we actually hear those recommendations from the ARB? I presuming they come back to us before the 27th of July.

Mr. Williams: No. Not on the EIR. We are talking about recommendations on the buildings themselves before you consider designs and the entitlements and all of that. So we will probably have some sessions with you in the fall on some of these topics. Then

when the entitlements actually come before you there will be a recommendation from ARB that will come to you, and then you make recommendations to the Council from there.

Chair Garber: All right, I have taken up enough time here. Let me get to some of the other Commissioners. I have one or two more things to follow up on that but I will do that in the next round. Commissioner Keller.

Commissioner Keller: Thank you. So the first thing is with respect to the view point number one, which is on there at Sand Hill Road and Pasteur Drive. One drives that currently towards the hospital entrance by the fountain. When you are driving along there there are some buildings on the right and buildings on the left. When get to the fountain what you have is a surrounding of the Edward Stone Building, and the hospital complex. There is some nice visual quality to that. I would consider that a view-related thing. So I am not sure if it is the same kind of thing as the view and the quality of the foothills but there is some cultural quality, some visual quality to that.

PTC2.8

There is an improvement, in terms of tree protection alternative, in removing essentially a building from the middle of that, which I guess is the Kaplan Lawn. So there is a building that sort of was on there in an odd place and that is being removed. My understanding is what you now have as the view when you are looking down that corridor is you have a building on the left, which is part of the medical office complex, and then a gap on the right, and then the FIM buildings to the right of that. The current visual symmetry is lost. You essentially have a side of a building and a gap. Your view in that gap if I understand it correctly is the parking structure on Roth Way and Campus Drive. So that is kind of odd.

PTC2.9

The other thing that is kind of odd, is that on page 3.3-17 you are considering the housing that is proximate, namely the Stanford West Apartments and 1100 Welch Road multifamily apartments, but you are not considering something which is certainly within the view of this namely 101 Alma. The 101 Alma building is certainly tall enough to be able to see this entire complex and the views from 101 Alma should certainly be considered in terms of this.

PTC2.10

There is a nice map in Figure 2-5. It looks like one of the buildings being demolished is Building B which the core expansion. The core expansion connects the original 1959 Stone complex from Building T, which is the hospital modernization project, which appears to be remaining. If you demolish Building B and retain Building A and Building J and possibly get rid of G, H, and I which are the Edwards Building, the Lane Building, and the Always Building. The latter three buildings are essentially being replaced by FIM, and you may retain one or more of them or you may get rid of all of them. I am wondering the degree to which we can create an integral structure out of what is labeled Building A, namely the 1959 hospital buildings east, west, core and Boswell, and Building J, which is the Grant Building, which provide nice visual from both sides. I am wondering the extent to which that would actually work because these buildings, according to what is for example on Figure 5-1, are the SHC clinic/office. So my question is whether these buildings would satisfy the requirements for SHC Clinic/Office. Since they are not physically connected to the hospital whether they need to be of the same framework as they are now with Building B there, whether that would allow for a lower level of

PTC2.10 Con't compliance than is required for buildings that are physically connected. So I think that is something that should be considered.

Short of the issue of the buildings around Hoover Pavilion one other consideration for that is potentially intensifying the outboard portion of Welch Road. If we consider intensifying the outboard portion of Welch Road and consider putting some of the square footage there as an alternative to putting it around Hoover Pavilion that increases the proximity to the hospital, it reduces transportation impacts, and I think that is an alternative that should also be considered because of the visual and other impacts, cultural impacts around Hoover Pavilion. I will continue my comments later.

PTC2.11

Chair Garber: Commissioner Martinez.

Commissioner Martinez: Do we have a slide of the site plan of the campus as proposed? The alternative tree one is a good one if you have that.

Mr. Turner: We don't have a slide but it is contained in the EIR. It is the Tree Preservation Alternative and is up on the board.

Commissioner Martinez: I want to try to stay the straight and narrow on Visual Quality. As you approach on Pasteur Drive you have retained the very important Pasteur Mall and the Kaplan Lawn. I don't know the history of how they came to be but they are very beautiful and they do provide both visual quality in themselves and of the new proposed hospital.

I am concerned as you go further down that there is one module of the medical office building that kind of sticks out into that visual connection towards where the Stone hospital sits today. I would suggest that that is really an obstruction to the view quality. If there were a way either through Commissioner suggestion of relocating these medical office buildings or that one in particular to allow that corridor to remain as wide and as lovely as it is today would be great.

PTC2.12

I also don't see anything happening where the hospital sits today. Am I missing something in the site plan? Is there something proposed for that land if the hospital is demolished?

Mr. Turner: I would have the applicant respond to that.

Mr. Tortorich: Let me see if I understand your question. The existing hospital building, the Edward Durell Stone Building, fits a profile like this. So it ends that view corridor on Pasteur Mall.

Commissioner Martinez: Currently.

Mr. Tortorich: Yes.

Commissioner Martinez: I am asking about when it is demolished.

Mr. Tortorich: This clinics building sits on that site as do the FIM buildings and some underground parking in this region. So we are demolishing the Stone Building and replacing it with the modern research labs and replacing it with the clinics necessary for the program.

Commissioner Martinez: So the entire footprint of the hospital will be covered with these structures, is that correct?

Mr. Tortorich: Pretty much, yes.

Commissioner Martinez: Is that intended to be the terminus of that access, of that view corridor towards the old hospital?

PTC2.12 Con't Mr. Tortorich: So we are creating a view corridor here, which actually connects with the Olmstead Plan, in terms of the view corridors along here. So that is actually a fairly lovely tree-lined street. There is the Dean's Lawn here, so we are making that. Then we are also making other connections through the promenade to allow the School of Medicine buildings to be connected with the adult hospital and the Children's Hospital, and then this pathway would meander on through the shopping center. So we are creating some pathways there in the organization of the site.

Mr. Turner: Commissioner Martinez, in the Draft EIR there is a pretty good figure that shows the demolition and replacement at the site. It is on page 2-38.

Commissioner Martinez: I was focusing on the tree replacement alternative because you had stated that that's the ongoing preferred alternative, and the buildings have shifted slightly from there.

Mr. Turner: That is correct, but also this Figure 2-12 does show the relationship of the existing hospital buildings that would remain as part of the project in relation to generally the new hospital buildings although it would be slightly modified with the Tree Preservation Alternative.

Commissioner Martinez: Okay, I will take a look at that. As long as you are up here one question. I am not clear about that first parking structure as you enter on Pasteur Drive, the one that is closest to the hospital. Somewhere it states that it is below grade but when you look at the site plans it looks like it is above grade, at least partially.

PTC2.13 Mr. Tortorich: It is both. There are levels below grade and levels above grade. It is this parking structure right here identified by the number '3.' We had to skinny that structure up to allow for the preservation of some trees here in this corner. So it is below grade and above grade.

Commissioner Martinez: What are you doing to promote the visual quality of that parking structure?

Mr. Tortorich: Actually, I think we are doing quite a bit to it. The roof of the structure is landscaped and we will have a conference center at the top of that structure as well as a

wellness center. There will be access to the structure so that it could be a more accessible component of the facility after hours, and could be a well-used facility for the Medical Center.

Commissioner Martinez: Okay, so it is not going to look like an IKEA kind of parking garage?

Mr. Tortorich: No, no.

PTC2.13 Con't

Commissioner Martinez: It is really going to look more like a building.

Mr. Tortorich: Oh yes, very much. In fact it is integrated with the base condition of the adult hospital. Sort of all created as one sort of element that connects. I don't think we can see it that well there Zach. It all creates sort of a ground plane to hold the buildings down to the site. You can't see it very well but there are structures on the top of that, and it is landscaped and it is going to be well integrated with the ground plane and landscaping.

Commissioner Martinez: That is excellent. What about the structure at the Hoover Pavilion?

Mr. Tortorich: Well we can go either to the site plan or to the structure. Actually, why don't we just go to the site plan, Zach? So the site plan for the Hoover Pavilion and Adjoining Structures. So we have the Hoover Pavilion here. We need to preserve this entry and we felt it was very important to preserve this view corridor. Hoover I think is receiving I think an interesting amount of attention now, but it is a building we hope through the renovations to clean up quite a bit. It has been neglected over the time so it will be cleaned up and look much better. We also wanted to be cognizant that on the other side of the Pavilion are the Arboretum and the main grant entry to Stanford University. We did not want to put a building in this location that was visible from the Arboretum. So it is a wooded view as you drive up Palm Drive and we wanted to preserve that wooded view. So we were really very conscious of views in this location.

Then we have the child daycare center here, which occupies this piece of the site. So the parking structure, medical office building, and Pavilion in the terms of the architect were really designed to be an ensemble of buildings. We were really focusing quite a bit on the space that is made in between these buildings, between the structure, medical office building, and the Pavilion, and then with the porch, which is a lower rise component of the parking structure, the space that is made here. So this porch meets the lower level piece. There is a two-story piece of the Pavilion and this creates what we think will be a very, very nice landscaped courtyard. So we are trying to make some spaces between the buildings and really focus on the landscape at the Pavilion and make it a much more campus feel at the Hoover site.

PTC2.14

Chair Garber: Just a quick question while you have that up there. The arrows I presume are calling out the primary entrances to these buildings.

Mr. Tortorich: Yes, they are.

PTC2.14 Con't

Chair Garber: I am confused because the primary drop-off access, the turnaround, doesn't appear to be where the major entrance to the Hoover Pavilion is and know that entry suffers from – it is not a very strong entry there. Are you expecting that most of the people using the Hoover Pavilion are actually approaching from the top of the drawing as opposed to the side in this case?

Mr. Tortorich: Now the top of the drawing suffers from, in the 1930's there wasn't a concern about disabled access. So you actually have to go up a flight of stairs to the second floor for the entry. We are going to preserve the architectural character. Actually when you go up the flight of stairs you will enter into the Medical Library, which is a public amenity. You can then also get into the Pavilion building through that library. This used to be the emergency department entrance but it is right now the primary entrance to the Pavilion clinics. We will clean up that entry, restore the canopy over the entry, and make that the primary entry for the majority of the clinics. There is also a separate entrance here for pediatricians who are community physicians. So they will have direct access from the street.

Chair Garber: Thank you.

Commissioner Martinez: Don't go away. I wanted to hopefully start a round of discussion on the towers on the hospital building itself. Can you describe the, I don't want to use this word but I am stuck, can you describe sort of the architectural design intent of the …..

Chair Garber: Actually, just before you start, let me just ask if there are any other questions regarding the Hoover Pavilion or comments regarding that? Maybe we can put that one to bed before we move on. Commissioner Tanaka, anything? Go ahead.

Commissioner Tanaka: Thank you. I appreciate my fellow Commissioners comments on the Hoover Pavilion. I think they made some very good observations about the viewshed along Quarry Road. One observation I have been thinking about as my fellow Commissioners have been speaking is I notice that there is a substation right next to the Hoover Pavilion. I don't know if that fly-through was visually accurate in terms of what it looks like. Then I noticed across the street there is the shopping center garage, which is a parking garage. So while I think Hoover Pavilion is a very beautiful building, it could be a very beautiful building, it is surrounded by some other things that are not quite as beautiful. So I wasn't as impacted by the loss of view of Hoover Pavilion especially when you are looking at it from the substation. I did think that this could also be an opportunity perhaps to do some beautification so to speak around the substation as a kind of mitigation for what is going to be hidden by the medical office building on the Hoover Pavilion site. So perhaps that is something that could be considered as another mitigation factor if it is not already. I don't know if it is. Is it?

PTC2.15

Mr. Tortorich: No, this is a City of Palo Alto substation.

Commissioner Tanaka: I understand that. Is there anything that could be done to cover it up?

Mr. Williams: Chair Garber, I think you should just make that as a comment and we should look at that rather than getting into dialogue with the applicant about what might be done.

PTC2.16 Commissioner Tanaka: Okay, point taken. The other comment I had about this was for the medical office building I know that there has been some intent to kind of make it compatible with the Hoover Pavilion and I think that makes a lot of sense. When I was looking at it I see a lot of glass, it doesn't look quite like the Hoover Pavilion. I don't know whether, and this is more look and feel, but whether more could be done in that respect to make it look like it is part of the Hoover Pavilion campus versus a modern implant of what was done awhile back. If not, then perhaps it could be designed as kind of a wing of the Hoover Pavilion so it does look very complete versus an implant into this area. Thank you, that's it.

Chair Garber: Commissioner Martinez, you wanted to continue and talk about the towers.

Commissioner Martinez: Yes, if I can just ask about the design concept of the towers sort of visually.

Mr. Tortorich: So the concept of the buildings, you saw the slide we had earlier talking about the technology platform, the garden, and then the humanity piece.

Commissioner Martinez: Yes, I am really asking about the exterior.

PTC2.17 Mr. Tortorich: The exterior in many ways reflects sort of the programmatic needs of the interior. So the interiors of the first two floors are large spaces. Frequently there is not as much daylight necessary into the imaging spaces or some of the emergency department spaces. So we are trying to create strong horizontal base that matches sort of close to that 50-foot height limit that had existed on the Medical Center Campus. We then have the very realistic need of having large mechanical equipment above those two technology floors. So our third floor is a garden cleverly disguised is the necessary mechanical equipment. So there we created a gap. The upper stories, the patient rooms that are enclosed in glass, we are trying as best we can to make those feel as light as possible. So you have a heavy base of stone material or stone-like material. You have a gap of garden. Then you have very light glass pavilions sitting on top of it with the idea that really your eye is drawn to that horizontal base. That is sort of the legacy of the Stanford Campus. Then the upper floors are trying to really sort of, as much as four stories of patient rooms can disappear, try to disappear within the detailing of the glass.

Commissioner Martinez: Thank you. I know in an institutional environment way finding is an important aspect of visual quality. Was there some interest or attempt to make some distinction among the towers?

Mr. Tortorich: No. There is not necessarily a distinction from the exterior of the building. As you come into the building you come into an atrium. There will be two public elevator corridors, one to the right and one to the left. Those will probably have distinctive names or distinctive signage or distinctive way finding so you know right or left. Then each tower and each floor of each tower will probably be identified in some way so that they

have sort of a special meaning and a special purpose. We were not trying architecturally to distinguish one tower from the other because really this is a kit of parts that over time will expand to be multiple towers.

Commissioner Martinez: Thank you for that. I am concerned about the entrance. I think once you get inside in terms of people finding it seems kind of dark. Sort of as a place where people are sort of bringing some serious issues by recessing it into that atrium rather than bringing it forward with an atrium that is really kind of more external you are kind of losing some of the inviting visual quality of that.

PTC2.18 Mr. Tortorich: We actually feel that there will be quite an abundance of natural light into the atrium. Obviously there is the skylight. There are also openings to the garden on the third floor of atrium. So maybe the rendering isn't representing so well but we believe it will be quite a light-filled space.

Commissioner Martinez: That is what I was referring to, the rendering. It looks kind of dark.

Chair Garber: Commissioner Tanaka. Commissioner Keller.

PTC2.19 Commissioner Keller: Yes, thank you, a couple of things. The first is if the Edward Durell Stone Building is to be demolished I am wondering if there can be a scale model of it somewhere. For example, a scale model might be in the lobby of the hospital or a scale model might be a climbing structure that can be placed in the middle of the Children's Hospital for the kids to climb on. As sort of a way of bringing that forward I think that might be nice. Yes, institutional memory.

PTC2.20 Also, I notice that there is a motif of the Edward Durell Stone Building. If you can go to the first page of this slide please, of this presentation, the very first cover page. Yes. I don't know if you can see that but the logo of the Stanford Medical Center in fact has – can we look at that a little bigger? The logo. That logo over there actually uses the motif of the Edward Durell Stone Building. I am wondering to what extent is that motif carried forward in terms of design of the new hospital. Are there echoes of that motif in terms of the architecture of the new hospital, in terms of the design of features in the hospital? Is that carried forward to provide some sort of institutional memory? I think that is an interesting thing to think about.

PTC2.21 So a couple of other comments. The first thing is, and this would also be a potential mitigation under CR-1.2 in terms of these potential issues. I am wondering with respect to page 3.3-30 how would the City's ARB process of "appropriate design of proposed structures" not "have a significant impact on the existing character of the Stanford University Medical Center and its surroundings." In particular in terms of VQ-2.1 how can landscaping and public art deal with building heights and massing? It is sort of like thinking about putting a fig leaf on a telephone pole. Telephone polls are very utilitarian things and you want to put public art or some landscaping around it. It doesn't seem to actually have that affect. How tall can the landscaping be? So I am not really sure how that really addresses that issue.

PTC2.22 The same thing is true about Hoover Pavilion. So it seems to me that one of the things is that obviously we are talking about radical reconstruction of the hospital, although I have proposed consideration of retaining part of the Stone complex. Why do we have to also ruin the view of the Hoover Pavilion? I think in terms of reallocating the land or the square footage area that might affect that.

PTC2.23 A few corrections. I believe Palo Alto was founded in 1894 not 1892. I believe it was founded originally as University Park, which is why it is University Park Fire Station Downtown. I think Mayfield was originally founded as Palo Alto. One of the things Leland Stanford Did was essentially forced Mayfield to rename themselves to Mayfield from Palo Alto so that he could get Palo Alto to be named Palo Alto instead of University Park. So that should be corrected in terms of that. In addition, there is a mention in terms of the history of the Stanford Medical Center it is later mentioned the Hoover Pavilion was originally the Palo Alto Hospital. When you are talking about the history of the Stone Building and that whole process there is no mention that this whole area was originally – it is discussed as if the Stanford Hospital was the first hospital there but the Palo Alto Hospital preceded it at the Hoover Pavilion site. So that needs to be clarified.

PTC2.24 So let me ask a question. There was a question raised about the fact that Hoover Pavilion and the Stone Building are not part of the City's historic structures list. What I would like to know, I realize that the people from Planning Staff might not know the answer to this question. I am wondering when the City created the historic structures list what was the scope of what was created for the historic structures list. Was it intended to include structures like Hoover Pavilion? Was the Hoover Pavilion actually even considered? Was the Stone Building even considered for the historic structures list or was it primarily residential and commercial property located within the city?

Mr. Williams: We will need to respond to that later. I don't think we here have that collective information to go back that far.

Commissioner Keller: Thank you, because the reason I am asking this question is because if you are citing that Hoover Pavilion and the Stone Building are not part of the City's Historic Resources List and if it turns out to be that they were not even considered for inclusion because it wasn't part of the scope then failing to have them on the list is why you don't have to consider them as historic resources is essentially improper analysis. So it is only if they were within scope and actually were rejected from inclusion should we actually treat their omission as significant for not being an historic resource. Thank you.

Mr. Jeung: Maybe I could just clarify on that point because the City's Historic Resources List is only one source that provided the universe of those properties that are considered historic or potentially historic. So not only did we use that list we also went and evaluated the buildings based on the California Register of Historic Resources and their criteria. So even though it may not have been on the City's list we still evaluated the building and its merits.

Commissioner Keller: Thank you for that response. It does say however I believe I read in this document somewhere, and I am sorry I didn't note exactly where it was, but there was some comment in there saying because these are not on the City's list then there is no

requirement for something with respect to preservation for the Comprehensive Plan. Do you want to add something?

Chair Garber: No, I was just going to say Commissioner Martinez has a follow up, but please continue.

Commissioner Keller: Thank you. So the issue is that because they are not on the City's Historic List there is some comment about therefore they are not an issue for the Comprehensive Plan. I question that assumption, because if they are eligible for the California list they certainly should be considered in terms of historic resources for the Comprehensive Plan, and all of the Comprehensive Plan considerations should apply. I think that is inappropriate.

Also, to what extent is there provision in this process for Historic Resources Board review of the exterior of the Hoover Pavilion? To what extent is there Historic Resources Board review of what is going on with respect to the Stone Building and potential preservation?

Mr. Turner: Chair Garber and Commissioner Keller, regarding the Hoover Pavilion renovations again the Historic Preservation Ordinance really kind of limits us in terms of what the HRB can review and make a recommendation on. We feel that it is appropriate for the HRB to review the projects and provide comments to the decision-makers regarding the improvements and the renovations to the Stone Building, so we intent to seek those comments from the HRB. We don't intend to seek a recommendation from the HRB, again because the building is not one of the buildings on the Historic Inventory that the HRB would review. PTC2.24 Con't

Commissioner Keller: So that brings us back to the issue of the omission of Hoover Pavilion and the Stone Building from the Historic Resources List and whether that was intentional or whether they should be treated as being included, possibly through the Development Agreement. I assume you mean renovation of the Hoover Pavilion and not renovation of the Stone Building.

Finally, in terms of this sequence, is the HRB going to review the DEIR and are they making comments on that?

Mr. Williams: I think that is the primary intent here is to get their input on the DEIR. As part of that they will be seeing the Hoover Pavilion and the Stone Building. I think what Steven is differentiating from is in terms of strictly what our code allows them to recommend on. It doesn't really matter what the intent or basis was it is either on our list or it is not on our list. If it is not on our list right now then they do not make a recommendation on the building historic compatibility. We certainly will take the EIR to them and have them review these chapters and provide their comments and questions just like you are for evaluation.

Commissioner Keller: Is it appropriate as part of the Development Agreement to include HRB review of the changes to the Hoover Pavilion and the surroundings of that, whether or not it is strictly part of our Historic Preservation Ordinance?

PTC2.24 Con't

Ms. Cara Silver, Senior Assistant City Attorney: Yes, Commissioner Keller, it would be a negotiated term in the Development Agreement and both parties would have to agree to that.

Commissioner Keller: Thank you. So that is something that perhaps should be added to the list is HRB review of the Hoover Pavilion changes. Obviously we are also considering HRB review of the Stone Building to the extent to which it might be retained as an alternative.

One last thing if I may?

Chair Garber: Sure.

PTC2.25

Commissioner Keller: I will add more comments later, but the main thing is that I note that the first presentation said that these were 100-year buildings and I think that is the first time in these hearings that that length of time has been mentioned. I had mentioned at the mitigations discussions a month ago that the mitigations should last for the life of the building rather than the life of the Development Agreement. There are often agreements whose provisions last beyond the life of an agreement, and the mitigations should certainly last for the length of life of the building not merely for an arbitrary length based on the Development Agreement. This 100-year length is an interesting figure for that. Thank you.

Chair Garber: Commissioner Martinez you had a follow up.

Commissioner Martinez: Yes, again, about Hoover Pavilion. I know we are making changes to the Comprehensive Plan as mitigations for some of the requested project requirements. Can we make changes to the Comprehensive Plan regarding including Hoover Pavilion? In other words, go the other direction with the Comprehensive Plan to make it protected or make issues we are concerned about here tonight part of the Comprehensive Plan. In other words, can it be amended up instead of down as we are doing in some cases?

PTC2.26

Mr. Williams: Commissioner Martinez, Steven can correct me if I am wrong, but I think what we are talking about is whether it is on the list designated as historic, which is not the Comprehensive Plan per se. It is our inventory that has been adopted as the list of historic structures. Are you suggesting to amend that list to include?

Commissioner Martinez: No, our consultant mentioned that there was no mention of the Hoover Pavilion in the Comprehensive Plan and I was wondering whether we can address that as part of the Comprehensive Plan amendments we are undertaking.

Mr. Jeung: I just want to add a point of clarification because I know there is a lot of interest in ensuring that the Hoover Pavilion is protected. Regardless of whether it is included on the City's Inventory we looked at the building along with other professionals in this field of cultural resources to make a call about whether or not it was eligible for inclusion on state recognized lists. The determination from those evaluations was that the building is worthy of consideration and inclusion. As a result there are very specific

mitigation measures that govern how the renovations would occur at Hoover Pavilion, and the protective measures to ensure that it maintains it eligibility. Some of the design features that are proposed talk about removing some of the additions that maybe detract from the historic merit and architecture of the building such as the fire escape and other appurtenances that were added. However, any future renovations are very, very carefully governed under a set of improvement plans, or what are they called? Under Mitigation Measure CR-1.5 on page 3.8-23. So there is a lot of attention to assuring that the Hoover Pavilion's integrity is protected.

Ms. Martelino: If I also may add a clarification to an earlier reference about Hoover not being included in the Comprehensive Plan, the Visual section of the EIR on page 3.3-39 indicates that the Hoover Pavilion is not called out as a visually protected resource. Within the Comprehensive Plan there is a distinction between a visually protected resource and a resource of historical significance. We will treat a visually distinctive resource as something with appearance. With something that is structured as historical you look at various criteria to look at the historic integrity of that structure. Other policies in the Comprehensive Plan, for example Policy L-3 state that the City should guide development to respect views of the foothills, Policy L-69 and Program L-71 seek to preserve scenic qualities of Palo Alto roads and recognize Sand Hill Road as a scenic route. There is no such policy protecting visually the Hoover Pavilion so that is a distinction different from Cultural Resource discussion. As Rod was saying earlier, the Cultural Resource section does treat the Hoover Pavilion as a historically significant resource and mitigation measures are identified to protect the historic integrity of that resource.

PTC2.26 Con't

Chair Garber: I thought we had gotten off the Hoover Pavilion here, clearly we have not. Not that I want to speak for my other Commissioners here but I think that trying to understand the issues of the Hoover Pavilion relative to its historic significance is one way to think about the issues. For me, I am less concerned about that. However, to some of the other points that have been made I am more interested in what the City's approach is to Quarry Road and what role that building plays in the supporting of those concepts. The trouble is that the Comprehensive Plan really doesn't address that other than saying this is a good thing to look at, let's make sure that we can see the foothills, etc. There was some conversation two years ago about Quarry Road and how we could approach that. That was done with Mr. Fukuji, if I am pronouncing his name correctly, and apologize if I am not. Mr. Fukuji. The issue in my mind is that the Hoover Pavilion presents itself to Quarry Road in a very appropriate way for its time in that you had a front presentational lawn created for this tall building that rose out of this plane. You had a front entry that addressed the street through this processional piece of space that was there. The building that is being proposed doesn't address the street at all. The entrance is on the inside not the outside. There is not that space that the Quarry building has. It doesn't make a lot of sense to me from an urban planning standpoint of what is our approach to that road. I don't know how you mitigate that. I don't know how I propose an alternative to that, but I will point that out as an inconsistency there. Anything else? Are we done with the Hoover Pavilion now?

Commissioner Martinez: You said it much better than I could but can we amend the Comprehensive Plan to address that? That was my basic question. It didn't have anything to do with preservation or historic resources. The new building seems appropriate both to

PTC2.26 Con't

the street and to Hoover Pavilion and can the Comprehensive Plan address it as sort of an upping of the requirements?

Ms. Silver: Commissioner Martinez, you can always proceed to amend the Comprehensive Plan. The question is how it would impact this particular project. It is primarily a timing issue. Of course if you were to go through a Comprehensive Plan Amendment process it would require amendments to this project, and recirculation, and impacts, and all of that. So that is another separate issue.

I would like to just clarify though that the issue of the Hoover Pavilion is dealt with as we have said in several different chapters. It is deal with in the Land Use chapter, to some extent the Cultural Resources, Biological Resources, to some extent some of the compatibility issues, and then of course in the Visual. I think that we have heard your comments and those comments will be integrated better. They may not fall directly under the Visual Resources but there is a place for those comments to be addressed.

Chair Garber: May I go? Back to the towers because I think I am finally beginning to understand something that is probably taken me two years to finally figure out. A question for Stanford. The cut, the axis that the Edward Durell Stone Building currently resolves, the emphasis is being taken off of that and being put onto the street that is connecting that portion of the Medical Center with the University. That is the design goal. Is that not the case or is that in fact the case? I am sort of alerted to this through some of the other questions that the Commissioners were asking in that there was not a building for instance that was at the end of the cut anymore, I am calling it the cut but the axis. So building indicated by target number two, rather than it being – let's just assume that it is moved such that the area of the building that is covered by number two is centered on that cut that comes through. You would have clearly an axis with something ending there and that sort of makes sense. It may be that what we are reacting to is that is the way that it used to be, but that is not what you are proposal is now because you are taking that emphasis that sort of visual memory there and sort of putting that onto Pasteur Drive which continues all the way through. In other words, I am not sure I am being clear here.

PTC2.27

Mr. Tortorich: You are talking about this?

Chair Garber: Yes.

Mr. Tortorich: This is available for pedestrians and service vehicles it is not a driveway.

Chair Garber: Could we check to see if his microphone is working? I ask because this all gets transcribed.

Mr. Tortorich: You are correct. The original hospital and School of Medicine buildings were the termination of the Pasteur Drive. So they were the main event. No longer will the hospital be located at the end of that access. The hospital's primary entrance will be here number one, so we do want to deemphasize that as the termination and the main event. This road will go through for service vehicles, for possibly shuttle vehicles, and for pedestrians, but you are not going to drive your car all the way through there. That wouldn't be advisable for a variety of reasons. We do want to reinforce the pedestrian and

quite often bike passage that is called The Promenade that will connect the Children's Hospital, the adult hospital, and the School of Medicine in this way. So that will get added emphasis in this plan. It doesn't show up very well in this diagram but that gets added emphasis in the plan.

Chair Garber: Right, and to that exact point your fly-by we are tending to look at buildings as opposed to what we really should be focusing on which are the spaces in between because that is going to be the dominant memories that presumably someone would take away from their experience, and this sort of urban planning change that you are trying to construct. Thank you.

Commissioner Tanaka, did you have your light on? Go ahead.

Commissioner Tanaka: Thank you. I have been thinking about the discussion we have been having on the Stone Building in terms of should it be kept and maybe repurposed, is it historically significant, should it be preserved? I have been thinking about why we have even been thinking about or talking about the Stone Building. I think the reason is because in that building is where the first heart transplant happened in this part of the world. At the time that was a cutting-edge, advance procedure that was groundbreaking. So as I think about that and I think about probably the people involved in this, and the research that enabled this probably what, and I am guessing here, but what the people involved in all this would want is for modern research to continue so that we could have more breakthrough world-setting procedures done that can be done today. I think to enable that it sounded at least from one of the speakers what is needed is actually a usable research building. It sounds like the current research building has some deficiencies that are hard to mitigate. So perhaps the best way to actually memorialize the Stone Building is really not necessarily to keep it but really to enable future research to happen so that we could have more memorable moments like what happened a long time ago in the Stone Building. I like actually my fellow Commissioner's suggestion of having a model, even a play structure for that matter as a way to kind of memorialize the architecture of it. The significance of it is not the architecture, at least in my mind. It was the fact that we were able to do procedures that could not have even been imagined before. I think enabling those groundbreaking procedures is actually the real purpose here of what we want to do. We want to have more of that. I think having these FIM buildings and clinics maybe would help enable that. So those are my comments. Thank you.

PTC2.28

Chair Garber: Commissioner Keller.

Commissioner Keller: Thank you. So I would basically like to summarize some of the comments I had in terms of alternatives. Firstly, one alternative that should be considered is the alternative of retaining the existing intensity at the Hoover Pavilion site. The applicant has asked to increase the intensity of the Hoover Pavilion site however the City can choose not to allow that. That is worthwhile considering. I am not sure that the increased intensity is actually an improvement for that particular location and it could be handled better in my opinion in terms of it should be considered for increasing the intensity on the actual main Medical Center site.

PTC2.29

PTC2.30 The second consideration for alternative is to retain all or part of the 1959 Stone Building and reusing that for the Stanford Medical Center clinic and office as shown in Figure 5-1. It looks like the footprint of SHC clinic/office is in fact the footprint of part of the existing building. Perhaps some of that can be reused. It is not clear the degree of OSHPD requirement for that building and whether the 1959 would in fact satisfy that if it were physically disconnected or suitably connected with appropriate earthquake preparation techniques.

PTC2.31 The third alternative that I think should be considered is whether some of the intensity that is proposed for the Hoover Pavilion site or some of the intensity that is proposed for the existing complex in the main portion of this might be shifted to the outboard side of Welch Road. I don't think that has been considered. That is all under the same ownership of Stanford University. I realize that there are leasehold issues that may be different, but in terms of if the idea is to support community physicians there are certainly a lot of buildings along Welch Road outbound that are suitable for community physicians. I would certainly want suitable consideration of placing increased intensity along the outboard of Welch Road as a potential for a clinic building rather than placing it on the Hoover Pavilion site. So I think that is certainly worthwhile considering.

PTC2.32 We asked some questions last time and I want to remind them that come to mind now so we can analyze them because they are somewhat relevant to some of the issues. For next meeting, next meeting I think we are going to talk about transportation, is that right? Therefore we need to understand a little bit more about the Welch Road right-of-way and whether it needs to be widened, and whether that will impinge upon the existing parcels that are used for this. So this gets into the issues that I addressed last time about is the new Durand Way included in the floor area ratio calculation? Perhaps one way to deal with this is to have an existing parcel map distributed to the Commission and made available to the public showing the exact square footages on each parcel and how that is used to compute what the parcel boundaries are, where the street right-of-ways are, and how that is used to compute the overall floor area ratio calculation for the entire site. I think that will be helpful to look at. Particularly since the Welch Road outbound portion is relevant to this, particularly on the land that is adjacent to Durand Way it would be helpful to understand what happens to those parcels and the floor area ratio with respect to the adjacent parcels there. Also, with respect to understanding the potential for intensification of Welch Road of the outbound portion, understanding that would be I think helpful as well.

I appreciate the Staff and the members of the public and the people associated with Stanford Medical Center staying here late. I realize that we started approximately 100 minutes later than we originally planned. I hope that gave you an opportunity to have dinner. I also appreciate the fact that the people from the Media Center who are video taping this and broadcasting it have stayed late to do this and I thank them for that.

Chair Garber: Commissioner Martinez.

PTC2.33 Commissioner Martinez: I want to say that visually I really like the project. I think the towers do something for our hospital, which very clearly we don't have now. I am concerned about the sameness of the visual quality. I am hopeful as the design develops that we will get a little bit more distinction in each tower, keep the theme of the glass, the

lightness perhaps, but look at introducing something that breaks up the institutional quality.

I am not really happy with the visual placement of the medical office building, but I don't want to convey the message that we need to keep site planning, and designing, and pushing the project off another year. I think the suggestions that have been brought forth today on visual qualities, and the accessibility of view corridors, the continuity of the landscape, preservation of memories those can work with the refinement of the design. I really want to come forth with the idea of all of us that we are in support of this great project and we hope that the suggestions that we are making will make it better in terms of going forth PTC2.33 Con't from this point. Not looking for ways to why don't you try this, or why don't you try this, or we don't agree with that, but really respecting some of the resources we have, which I think you have done a great job in trying to do, but also in looking at some of these problem areas that we have suggested. Thank you.

Chair Garber: Commissioner Tanaka, anything else?

Commissioner Tanaka: Yes, I would just like to echo some of my fellow Commissioners' comments. I think Commissioner Martinez says it quite well, at least in my opinion, I think this is a project that visually while there were some issues pointed out I think overall it looks, at least from my point of view, reasonable. I hope that as this moves forward we are able to address some of these issues and this project is able to move forward. Thank you.

Chair Garber: I think if there are no other comments. Commissioner Keller.

Commissioner Keller: Thank you. So one of the things in terms of thinking about alternatives and this may have something to do with views because of height issues, is in terms of the reduced size alternative it seems to me that the one that makes the most sense is what happens if you lop one floor off of the main hospital complex? What is the PTC2.34 implication of that in terms of the number of hospital beds, the square footage, the impacts, and all of those? That seems to be the one that is simplest to understand with respect to design alternative. I am not sure the degree to which the alternative of reduced size is key to that particular division of size impact. So I think that in particular removing one floor is an alternative that should be considered specifically in terms of reduced size. Thank you.

Chair Garber: With that we will conclude the item. I would like to thank everyone again for their patience and for the late hour. We will see you next week. We will close this item and the public hearing.

We have a few administrative things to take care of. We have approval of minutes for the meeting of May 26. Do I hear a motion to approve them?

APPROVAL OF MINUTES: Meeting of May 26, 2010.

MOTION

Commissioner Martinez: So moved.

Chair Garber: Moved by Commissioner Martinez. A second please?

SECOND

Commissioner Tanaka: Second.

MOTION PASSED (4-0-0-3, Commissioners Fineberg, Tuma, and Lippert absent)

Chair Garber: Commissioner Tanaka will second. Thank you. All those in favor say aye. (ayes) All those opposed? The motion passes unanimously with Commissioners Tanaka, Martinez, Garber, and Keller voting yea, and Commissioners Fineberg, Tuma, and Lippert absent.

REPORTS FROM OFFICIALS/COMMITTEES.

1. Appointment of one Planning and Transportation Commission member to the Blue Ribbon Infrastructure Commission.

Chair Garber: Reports From Officials/Committees, we have the appointment of one Planning and Transportation Commission Member to the Blue Ribbon Infrastructure Commission. Can you speak on that? Sure.

Commissioner Martinez: I would like to nominate our Chair, Dan Garber, to the Blue Ribbon Infrastructure Commission.

Chair Garber: Thank you. I had spoken with the Planning Director and we actually do not have to nominate and vote on this apparently. Thank you for the suggestion and the vote of whatever. However, I would like to suggest that we have Commissioner Tanaka be our representative in large part because of his involvement and questions that he had when we reviewed the Capital Budget when it came before us. If Commissioner Martinez would accept…

Commissioner Martinez: Are you declining?

Chair Garber: I am declining. Commissioner Tanaka, would accept that, please?

Commissioner Tanaka: I would, thank you.

Chair Garber: Unless there are any other suggestions we will move on.

COMMISSION MEMBER QUESTIONS, COMMENTS, AND/OR ANNOUNCEMENTS.

Chair Garber: Commission Member Questions, Comments, and/or Announcements. Commissioner Martinez is the rep to the City Council this month. I am the rep for next month, and then we have August.

Do we have a report from any of the other meetings?

Commissioner Martinez: A brief report. The Council took this item up after ten o'clock. After Staff Reports and consultant report and I think 21 public comments it was getting late. There were a few comments by about half of the Council and they voted to continue it to the next meeting.

NEXT MEETING: Special Meeting on June 16, 2010 at 6:00 PM

Chair Garber: Okay. Anything else? It is 10:15 and we are adjourned.

ADJOURNED: 10:19 PM

PTC 2. Planning and Transportation Commission, June 9, 2010

PTC2.1 *The commentor opposes the demolition of the Stone Building complex and proposes alternative uses for the existing structure.* Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

PTC2.2 *The commentors question the visual impacts that the new buildings at the Hoover Pavilion Site (the medical office building and the parking structure) would have on the Hoover Pavilion.* Impact CR-1, on pages 3.8-19 through 3.8-21, discusses the potential impacts of the SUMC Project on the Hoover Pavilion. The analysis examines the impacts to the building, as well as the visual impacts due to the proposed new development. The Draft EIR concludes that the proposed medical office building and the parking structure would be in close proximity to the Hoover Pavilion; however, significant views would be retained. In addition, several non-historic buildings already exist in the surrounding area; therefore, additional modern buildings would not further degrade the visual appearance of the Hoover Pavilion.

Please refer to Staff-Initiated Change 5 for further discussion regarding the impacts of the new buildings under the SUMC Project at the Hoover Pavilion Site. As discussed under Staff-Initiated Change 5, the proposed site plan would not obstruct views of the Hoover Pavilion to the extent that the Hoover Pavilion would no longer be eligible for listing in the California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP).

PTC2.3 *The commentor requests advanced notification for the removal of the trees at the SUMC Sites during construction.* Tree removal is likely to occur over various stages of the construction process, rather than all at one time. The City of Palo Alto Tree Ordinance and the City's Tree Technical Manual do not include policies or regulations that mandate the notification to surrounding communities of tree removal. However, prior to large scale tree removal, the SUMC Project sponsors could post a notice of intent to remove the trees. The requirements for noticing the public about tree removal could be determined upon the issuance of a tree removal permit.

PTC2.4 *The commentors touch upon two issues in this comment: the visual quality analysis of the SUMC Project and the Village Concept Alternative.* It is important to distinguish between the SUMC Project as proposed and the Village Concept Alternative, which is presented in Section 5 of the Draft EIR, Alternatives. Regarding the SUMC Project, as described on page 3.3-23 of the Draft EIR, there is a set of Standards of Significance on which the visual quality analysis is based. There are six criteria listed. The first criterion is whether the SUMC Project would degrade the existing character or quality of the site and its surroundings. This is treated in terms of the appearance of the site, onsite massing, development of the site, and other onsite amenities. The second criterion pertains to

impacts on public viewsheds, view corridors, and/or scenic resources. This analysis addresses views particularly from scenic roadways as defined in the Comprehensive Plan. For example, Sand Hill Road is identified in the Comprehensive Plan as a scenic route. The Draft EIR also considered the El Camino Real Gateway, other heavily-traveled streets, and sensitive receptor residential areas. After considering all of the potential vantage points, the vantage points with the greatest impacts were selected to depict simulations of the SUMC Project and are included in Section 3.3, Visual Quality, of the Draft EIR.

The other criterion in the Visual Quality Section examined violations of the Comprehensive Plan policies regarding visual resources. All Comprehensive Plan policies are addressed in Section 3.2, Land Use, as they relate to the SUMC Project. Therefore, when considering impacts to view corridors and viewsheds, the Visual Quality analysis examines the roadways and scenic resources that are identified in the Comprehensive Plan. If a resource is not identified in the Comprehensive Plan, for example the Hoover Pavilion, then the Visual Quality analysis generally does not consider the impacts to this resource. Nonetheless, impacts on the Hoover Pavilion are discussed in the Cultural Resources section of the Draft EIR.

The commentor also questions bicycle and pedestrian linkages and whether these features are included in the Draft EIR. Since the SUMC Project does not include bicycle and pedestrian linkages outside and in the vicinity of the SUMC Sites, these features are not analyzed in Section 3 of the Draft EIR. However, bicycle and pedestrian linkages are included as part of the Village Concept Alternative, as described and analyzed in Section 5 of the Draft EIR. The linkages would serve to connect the SUMC Sites with Downtown Palo Alto, the Palo Alto Intermodal Transit Station (PAITS), and the Stanford Shopping Center, and the proposed housing sites under the Village Concept Alternative. The impact analysis of the Village Concept Alternative is included on pages 5-195 through 5-228 of the Draft EIR. The Draft EIR determined that the addition of pedestrian linkages would not further negatively impact visual character and views in the area. The linkages could serve to enhance the visual experience for pedestrians and bicyclists.

PTC2.5 *The commentor questions how the vantage points in the Visual Quality Section were identified.* Figure 3.3-7 on page 3.3-25 of the Draft EIR provides a map of the five vantage points from which the SUMC Project simulations are depicted. The selection of vantage points considered sensitive and heavily travelled viewer locations or roadways, and vantage points that were identified during the scoping process as areas of concern.

PTC2.6 *The commentor expresses concern that the analysis focuses on the selected vantage points.* As described on pages 3.3-39, the selected vantage points also represent views from which the SUMC Project would be most visible and as such represent the worst-case impacts on views. As such, it is appropriate for the focus of the analysis to be on the changes in views from the selected vantage points.

The commentor also expresses concern that the visual analysis relies on the Architectural Review Board (ARB) review as mitigation, given the limited authority of the ARB. As discussed on page 3.3-18 of the Draft EIR, the Architectural Review process requires a recommendation from the ARB. Based on the recommendation of the ARB, architectural approval then is made by the Director of Planning and Community Environment, or by the City Council. ARB recommendation will be forwarded to City Council for consideration. Architectural Review approval cannot be granted unless the SUMC Project would meet stringent criteria. As stated in Municipal Code Section 18.76.020, neither the Director, nor the City Council, shall grant architectural review approval, unless findings are made as articulated on pages 3.3-19 and 3.3-20 of the Draft EIR. For additional information, please see Responses PTC1.55 and PTC1.71.

Second, please see Master Response 11 for a discussion of the Planning and Transportation Commission's (Commission) opportunity to review the ARB's comments on the SUMC Project, including the SUMC Project's Design Guidelines. Also, it is appropriate as part of the EIR review process to comment on the range of alternatives, including the scope of the alternatives. However, it should be noted that the formulation of project alternatives is based on (1) meeting the basic project objectives and (2) eliminating or reducing significant environmental impacts from the project.

PTC2.7 *The commentor asks if site plan issues can be tied back to Comprehensive Plan policies, and asks where comments regarding Design Guidelines and the Village Concept Alternative site plan can be made.* First, this EIR addresses SUMC Project consistency with currently adopted Comprehensive Plan policies. As indicated in Table 3.2-2 of the Draft EIR, the SUMC Project would not conflict with applicable policies from the current Comprehensive Plan. If the commentor is concerned about changing Comprehensive Plan policies to better address issues raised during this review process, the City is undergoing a Comprehensive Plan Amendment process, which is separate from this SUMC Project process. However, this SUMC Project process will inform the Comprehensive Plan Amendment process.

PTC2.8 *The commentor questions if the analysis should acknowledge a cultural quality and visual quality to views of the Stone Building complex from Pasteur Drive, near the fountain.* The Draft EIR acknowledges the distinctive appearance of the Stone Building complex. On page 3.3-5, the Draft EIR acknowledges, "The most visually distinctive structure in the Main SUMC Site is the 1959 Hospital Building complex (designed by Edward Durell Stone and thus also called the Stone Building complex)… It should be noted that this complex is on the southern end of Pasteur Drive and is not visible from Sand Hill Road and residences along the road…" Accordingly, while demolition of the Stone Building complex constitutes a significant effect to cultural resources, it does not constitute a substantial adverse effect on the usual character or quality of the Main SUMC Site and its surroundings.

The commentor also indicates that there would be a loss in visual symmetry from Pasteur Drive due to the site plan. As discussed on page 3.3-38 of the Draft EIR, compliance with the Architectural Review process would ensure that impacts on on-site visual character and quality (which includes visual symmetry) would be less than significant because the Architectural Review process would address massing, layout, landscaping, and architectural design impacts from the SUMC Project. The Architectural Review process would consider, among other factors, whether the SUMC Project has a coherent composition and whether its bulk and mass are harmonious with surrounding development. The City Council would review the ARB recommendations and make findings, as appropriate, that the design promotes harmonious transitions in scale and character in areas between different designated land uses; the planning and siting of the various functions and buildings on the site create an internal sense of order and provide a desirable environment for occupants, visitors, and the general community; and the amount and arrangement of open space are appropriate to the design and the function of the structures. As such, with Mitigation Measure VQ-2.1, the impact on visual symmetry from Pasteur Drive would be less than significant.

PTC2.9 *The commentor indicates that impacts on views from 100 Alma Street should be considered.* The building at 100 Alma Street is located on the east side of Alma Street, which is east of El Camino Real. El Camino Park, El Camino Real, the Stanford Shopping Center, and wooded open space are located between the SUMC Sites and 100 Alma Street. Views of the SUMC Project would comprise a minor portion of views, and only from higher-level apartment units at 100 Alma Street. Moreover, the SUMC Project would not be visible from the common open space area at ground-level of the 100 Alma Street property. With Mitigation Measure VQ-2.1, which would ensure that impact on views would be minimized, SUMC Project impacts on views from 100 Alma Street would be less than significant.

PTC2.10 *The commentor questions if it would be feasible to retain all or portions of the Stone Building complex.* Preservation of the Stone Building complex is evaluated as an SUMC Project alternative in Section 5 of the Draft EIR, Alternatives, as part of the Historic Preservation Alternative. In order to reuse this building as clinics, medical offices, and for the SoM, certain demolitions, retrofits, and renovations would need to occur. As described on pages 5-23 through 5-24 of the Draft EIR, the Historic Preservation Alternative would physically separate the Stone Building complex from the remaining hospital buildings such that it would no longer be considered part of the SHC Hospital for purposes of compliance with Office of Statewide Health Planning and Development (OSHPD) requirements. To accomplish the required physical separation, certain construction steps would need to be taken, including the demolition of the 1973 Core Expansion building and separation of utilities such that no utility lines would be allowed to run through the Stone Building complex to the HMP building. In addition, the West, East, Core, and Boswell buildings would need to be retrofitted to house the clinics and medical offices and the Grant, Alway,

Lane, and Edwards buildings would need to be renovated to house the SoM. As explained on pages 5-45 through 5-48 of the Draft EIR, this alternative would not meet the SUMC Project sponsors' objectives of providing state-of-the-art facilities to deliver high quality health care. For additional variations on reuse of the Stone Building complex, please see Master Response 8.

PTC2.11 *The commentor suggests intensifying the outboard portion of Welch Road and moving some (or all) of the medical office square footage proposed at the Hoover Pavilion Site to this site instead.* Please refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the alternatives suggested by the commentors.

PTC2.12 *The commentor questions the SUMC Project site plan and the building that would replace the existing Stone Building complex.* Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the proposed site plan at the location of the existing Stone Building complex, as explained by the SUMC Project sponsors at the public hearing. The Stone Building complex would be demolished, and would be replaced by the SHC clinic/medical office building, which would consist of four buildings connected by a center platform. In addition, the clinic's parking structure would be located underground at this site. The areas surrounding the SHC clinic/medical office building would consist of the Dean's Lawn and pathways and other connections between the SHC, LPCH, and SoM sites.[1] The site plan in this area would be the same under the SUMC Project and the Tree Preservation Alternative.

PTC2.13 *The commentor questions the design of one of the parking structures at the SUMC Site and the Hoover Pavilion Site.* Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the parking garage proposed under the SUMC Project, as explained by the SUMC Project sponsors at the public hearing. The parking structure at the corner of Pasteur Drive and Welch Road would minimize the visual impacts by providing landscaping on the roof, as well as a conference and wellness center on the top level. The parking structure would be integrated with the base of the SHC Hospital building and would appear to connect as one building.

At the Hoover Pavilion Site, the parking structure, medical office building, and the existing Hoover Pavilion have been designed by the SUMC Project architect to be an ensemble of buildings. The design focuses on the space in between the parking structure, the medical office building, and the Hoover Pavilion in order to break-up building massing. In

[1] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 9, 2010.

addition, landscaping would be emphasized to make the Hoover Pavilion Site appear like the rest of the campus and integrate it with the surroundings.[2]

PTC2.14 *The commentor has concerns about the design of the main entrance to the Hoover Pavilion.* The following is a description of the Hoover Pavilion entry, as explained by the SUMC Project sponsors at the public hearing. The original design of the Hoover Pavilion building did not include Americans with Disabilities Act (ADA) access and a flight of stairs was built to access the building from the second floor. Therefore, in order to meet current ADA requirements, the primary access to the Hoover Pavilion building as part of the SUMC Project cannot be through the original entrance. The SUMC Project has been designed to preserve, to the extent possible, the architectural character of the original building entrance and clean up the entry, restore the canopy over the entry, and make that the primary entry for the majority of the clinics. As part of the new building design, a separate entrance is included for pediatricians who are community physicians with direct access from the street.[3] The proposed changes to the main entry were minimized and as such do not threaten the NRHP or CRHR eligibility of the Hoover Pavilion. Please refer to Staff-Initiated Change 5 for additional information about proposed renovations to the main entrance of Hoover Pavilion.

PTC2.15 *The commentor states that the City of Palo Alto substation and the Stanford Shopping Center parking garage already degrades views in the area of the Hoover Pavilion and suggests that mitigation be included as part of the SUMC Project in order to reduce the visual impacts of the substation.* The visual character of the Hoover Pavilion Site is described on page 3.3-6 of the Draft EIR. Since the substation and Shopping Center parking garage are existing conditions and not new features proposed under the SUMC Project, mitigation to block the substation from view is not required by CEQA. Accordingly, the Draft EIR does not include a mitigation measure to improve existing visual quality at the substation.

In addition, the substation is owned and operated by the City of Palo Alto. Therefore, beautification of this area is outside the control of the SUMC Project sponsors. City staff have determined that planting trees at the edge of the substation, along Quarry Road, would be infeasible due to insufficient space between the sidewalk and the fence around the substation. Additionally, the Palo Alto Utilities Department has expressed concern regarding the risk of tree canopies touching the overhead power lines. The SUMC Project would retain the existing planting around the substation, which includes trees, shrubs, and ground cover planted along the Quarry Road side of the substation.[4] As such, since the substation is an existing condition, and the SUMC Project would not further degrade the

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[2] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 9, 2010.

[3] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 9, 2010.

[4] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

visual character in this portion of the Hoover Pavilion Site, landscape buffering of the substation is not warranted under CEQA.

PTC2.16 *The commentor requests that the proposed medical office building at the Hoover Pavilion Site complement the existing Hoover Pavilion building*. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description as to why this action would be undesirable. The strategy of making the proposed medical office building match the Hoover Pavilion would not be consistent with a historically sensitive design approach. The SUMC Project has been designed to be harmonious yet distinct from the original Hoover Pavilion. As required by Municipal Code Sections 2.21 and 18.76.020(b), the SUMC Project has undergone preliminary Architectural Review and SUMC Project plans are being considered by the ARB and the Historic Resources Board (HRB). The ARB and HRB have provided a significant amount of feedback on the design of the proposed buildings and both boards have generally been supportive of the design approach for the medical office building at the Hoover Pavilion Site.[5]

PTC2.17 *The commentor questions the exterior design concept of the SHC Hospital modules*. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the SHC Hospital towers exterior, as explained by the SUMC Project sponsors at the public hearing. The exterior of the SHC Hospital building (including the tower elements) would reflect the programmatic needs of the interior. The first two floors of this building would contain large spaces with less daylight, which would be necessary for the imaging and emergency department areas. To achieve this goal, the SUMC Project sponsors have attempted to create a strong horizontal base that is relatively equivalent to the 50-foot height limit that currently exists at the SUMC Sites. The floor above the technology floors would contain large mechanical equipment to serve the functional needs of the first two floors and would be shielded by landscaping. As such, the third floor would feature a garden that would conceal the mechanical equipment. The upper stories, which would house patient rooms, would be enclosed in glass in order to allow for the maximum amount of natural light. Therefore, the exterior of the building would consist of a heavy base of stone-like material, a gap for the garden and mechanical equipment, and light glass pavilions on top of the modules' horizontal base. There would be no exterior distinction between the SHC Hospital modules.[6]

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[5] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

[6] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 9, 2010.

PTC2.18 *The commentor is concerned about adequate interior lighting within the entrance of the SHC Hospital building*. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the SHC Hospital building interior lighting, as explained by the SUMC Project sponsors at the public hearing. The main entrance to the SHC Hospital building would feature an abundance of natural light in the atrium area, along with the main skylight. There would also be openings to the garden on the third floor atrium. Therefore, the SHC Hospital building would allow for the maximum amount of natural light possible.[7]

PTC2.19 *The commentor requests a scale model of the Stone Building complex to be included in the design of the SUMC Project*. At this time, the SUMC Project sponsors do not anticipate installing a scale model of the Stone Building complex at the SUMC Sites. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

In terms of retaining the history of the Stone Building complex, Mitigation Measures CR-1.2 through CR-1.4, as presented on pages 3.8-22 through 3.8-23 of the Draft EIR, would be required as part of the SUMC Project. Mitigation Measure CR-1.2 requires HABS documentation with site-specific history, accurate mapping of all buildings, architecture descriptions, and photographic documentation. As included in Mitigation Measure CR-1.3, all written and photographic documentation regarding the Stone Building complex would be submitted to applicable agencies. In addition, Mitigation Measure CR-1.4 requires the SUMC Project sponsors to install interpretive displays within the SUMC Sites that provide information to visitors and residents regarding the history of the Stone Building complex. The displays, signs, and/or plaques would be installed in highly visible areas. Therefore, although the SUMC Project would require the demolition of the Stone Building complex, these mitigation measures would lessen the significant and unavoidable impacts associated with the loss of this historic structure.

PTC2.20 *The commentor asks whether the tile motif of the Stone Building complex would be incorporated into the design of the SUMC Project*. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues. See Response PTC2.19, above, for mitigation measures that would lessen the significant and unavoidable impacts on the Stone Building complex.

The decorative pattern on the exterior façade of the Stone Building complex has been recently used to create a textile pattern. The SHC has used this textile pattern at the recently completed Vision Center and other Outpatient Clinics projects.[8]

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[7] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 9, 2010.

[8] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

PTC2.21 *The commentor questions how ARB review would address impacts on height and massing.* As indicated on page 3.3-42 of the Draft EIR, the Architectural Review of the SUMC Project would consider, among other factors, whether the SUMC Project has a coherent composition and that its bulk and mass are harmonious with surrounding development. The ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The City Council would then review the recommendations and make findings, as appropriate, that natural features are appropriately preserved and integrated with the SUMC Project; the design promotes harmonious transitions in scale and character in areas between different designated land uses; and the planning and siting of the various functions and buildings on the site create an internal sense of order and provide a desirable environment for occupants, visitors, and the general community. Implementation of Mitigation Measure VQ-2.1 regarding the Architectural Review process would ensure that impacts on visual character and quality would be less than significant.

PTC2.22 *The commentor indicates that Comment PTC2.21 applies to the Hoover Pavilion, and suggests reallocating land and square footage to preserve views of the Hoover Pavilion.* The Architectural Resources Group (ARG) prepared a study (included as Appendix Y of this document) that concludes that the construction of the new medical office building and parking structure would not significantly alter the physical characteristics that convey Hoover Pavilion's historical significance such that it would no longer be eligible for inclusion in the National and California Registers. Therefore, the SUMC Project would not result in a substantial adverse change in the significance of this historical resource and the impact under CEQA would be less than significant. Please see Staff-Initiated Change 5 for an expanded discussion of potential impact on views of the Hoover Pavilion.

PTC2.23 *The commentor suggests corrections to the history of Palo Alto and the SUMC Sites, as described in Section 3.8, Cultural Resources, of the Draft EIR.* As stated by the commentor, Palo Alto was incorporated in 1894 rather than 1892. However, according to the City's Comprehensive Plan, the original Hopkins Tract, also known as University Park, was included as a district in the original Town of Palo Alto. Therefore, the description by the commentor is not entirely accurate. Based on some of the suggestions by the commentor, the following text has been revised starting in fourth sentence of the last full paragraph on page 3.8-5 of the Draft EIR:

> The City of Palo Alto in Santa Clara County was ~~founded in 1892~~ incorporated in 1894 and lies on the historic land grants *Rancho Rincón de la San Francisquito*, *Rancho de la Arroyo de San Francisquito*, and *Rancho San Francisquito*. The southern portion of present-day Palo Alto used to be part of the Town of Mayfield, which continued to develop as a separate town until its annexation to Palo Alto in 1925.[14]

[14] City of Palo Alto, Palo Alto Comprehensive Plan, Land Use and Community Design, 1998.

In addition, the commentor states that the Draft EIR should be reworded to implicitly state that the Palo Alto Hospital was the first hospital in the immediate vicinity. Page 3.8-11 of the Draft EIR includes a description that states that the Hoover Pavilion was constructed in 1930 to house the Palo Alto Hospital. Later in the section, on page 3.8-14, the Draft EIR explains that the Stone Building complex was constructed in 1959 and 1963 for the joint Palo Alto-Stanford Hospital and Stanford University Medical School. Although the Draft EIR does not specifically state that the Palo Alto Hospital was the first medical facility at the SUMC Sites, this fact is implied based on the dates provided in the Draft EIR. Therefore, no changes will be made to the Draft EIR.

PTC2.24 *The commentor has several questions regarding the historic status of the Stone Building complex and the Hoover Pavilion. One question pertains to the City of Palo Alto Master List of Structures on the Historic Inventory*. The City of Palo Alto's Historic Inventory lists noteworthy examples of the work of important individual designers and architectural eras and traditions as well as structures whose background is associated with important events in the history of the City, State, or nation.[9] However, none of the buildings at the SUMC Sites, including the Stone Building complex and the Hoover Pavilion, are listed on the Historic Inventory.

The Historic Building Inventory for Palo Alto was originally completed in 1979. The survey was confined to the area of Oregon Expressway to the south, El Camino Real to the west, San Francisquito Creek to the north and east and including the College Terrance neighborhood. This area does not include the Hoover Pavilion Site. Although only a specific area of the City was surveyed, it was not intended to mean that there were no other significant buildings outside of the survey area. For the purposes of the survey, the City simply decided to survey this specific area only. The survey studied buildings built on or before 1940 and identified many of the most obvious landmarks in the City, including the shingled houses in what is now known as Professorville and commercial buildings in the Spanish Colonial Revival (or Early California) style and the works of several major architects. The survey team emphasized architectural design over other aspects of historical importance. In 1997, an update to the 1979 survey was completed in order to add additional sites to the inventory. This survey area included the City limits and considered the Hoover Pavilion for listing. However, the City eventually decided not to add the sites identified in 1997 to the inventory.

However, it is important to note that even though the City's Historic Inventory does not include the buildings at the SUMC Sites, the Draft EIR considers the Stone Building complex and the Hoover Pavilion as historic resources for the purpose of the CEQA

[9] City of Palo Alto, Department of Planning and Community Environment, "Historic Inventory Category Information," accessed on September 16, 2010 at: http://www.cityofpaloalto.org/depts/pln/news/details.asp?NewsID=539&TargetID=209

analysis. The fact that the Historic Inventory does not include these buildings does not change the impact analysis and conclusions in the Draft EIR.

The commentor also observes that the document states that since the Stone Building complex and the Hoover Pavilion are not on the City's Historic Inventory List, there would be no conflict with the Comprehensive Plan. Section 3.2, Land Use, includes Table 3.2-2, which provides a comparison of the SUMC Project to the Comprehensive Plan policies. The table lists the applicable historic preservation policies under the Comprehensive Plan and discusses how the SUMC Project would be consistent with these policies. The Historic Inventory List is included in Policy L-51 of the Comprehensive Plan. However, the inclusion of the Historic Inventory List in this policy pertains to *residences* listed on the inventory. Therefore, even if the buildings at the SUMC Sites were included in the inventory, this portion of the policy would not be applicable. Nonetheless, as stated above, none of the analyses in the Draft EIR base the conclusions on the City's Historic Inventory List.

Table 3.2-2 considers whether the SUMC Project would be consistent with the Comprehensive Plan's historic resource preservation policies. The SUMC Project would comply with Policy L-51 because it would encourage preservation of resources with historic merit by implementing Mitigation Measures CR-1.1 through CR-1.5. The SUMC Project would not conflict with this policy since the policy *encourages*, rather than mandates, protection. In addition, the SUMC Project would support the goals and objectives of the Statewide Comprehensive Historic Preservation Plan (Policy L-54) and would promote the adaptive reuse of old buildings (Policy L-58). Please see pages 3.2-14 and 3.2-15 of the Draft EIR for further explanation.

The commentor asks if the Development Agreement should include review by the HRB regarding the changes to the Hoover Pavilion. Review by the HRB of the Hoover Pavilion renovations has occurred and comments from the HRB are included in HRB1 of this section. As such, the Development Agreement would not include a term that would mandate review by the HRB.

The commentor also questions the process for the HRB review. Please refer to Master Response 11 for a detailed description of the City's review process and the next steps in the EIR review.

PTC2.25 *The commentor states that the mitigation measures should last for the life of the proposed buildings rather than the life of the Development Agreement.* Per CEQA Guidelines Section 15126.4(a)(4)(B), mitigation measure must be roughly proportional to the impacts of the project. The mitigation measures identified in this EIR vary; some measures would apply only during construction, other measures apply for the life of the project because the measures involve modifications to project design; other measures would need to be in

effect during project operation. The mitigation measures identified in this EIR are appropriate.

PTC2.26 *The commentors ask why the Hoover Pavilion is not considered in the City's Comprehensive Plan and Palo Alto Historic Inventory as an historical resource and whether the Comprehensive Plan and Palo Alto Historic Inventory can be amended to include this structure as a historical resource.* The City's Comprehensive Plan is being updated under a separate process from the review of the SUMC Project. This review of the SUMC Project will inform the separate Comprehensive Plan Amendment process, and staff will consider this comment on revising policies for the Hoover Pavilion as part of the Comprehensive Plan Amendment process.

However, as explained in Section 3.8 of the Draft EIR, Cultural Resources, the Hoover Pavilion is considered to be an historical resource for the purposes of the CEQA analysis. Although the building is not protected under the Comprehensive Plan or included on the Palo Alto Historic Inventory, studies were conducted to determine its historically significance. Stanford University's Director of Heritage Services and University Archaeologist evaluated the Hoover Pavilion and recommended that the building be considered eligible for listing on the CRHR under criterion 3 as an important example of pre-World War II hospital design.[10] ARG, a consultant for the City, concurred with Stanford's conclusion and stated that the building is also eligible for the NRHP under criteria A and C.[11] As such, this EIR considers the Hoover Pavilion to be a significant historic resource.

The commentor states that the proposed medical office building at the Hoover Pavilion Site does not address the Quarry Road street frontage due to its orientation, and questions how to mitigate this issue. The site plan's orientation towards the Quarry Road street frontage is not a significant impact under CEQA that warrants mitigation. It should be noted that the proposed site plan at the Hoover Pavilion Site retains the views of the Hoover Pavilion from the intersection of Quarry Road and El Camino Real. Further, the buildings at the Hoover Pavilion Site have been grouped and oriented to create a courtyard area that would serve as an amenity to pedestrians, and would include an enhanced bus stop to encourage Marguerite shuttle use.

PTC2.27 *The commentor questions the circulation and access at the Main SUMC Site.* Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

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[10] Jones, L., *Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project*, 2007.

[11] Architectural Resources Group, Inc., Stanford University Medical Center Historic Resource Evaluation and Peer Review, 2009.

The following is a description of the Main SUMC Site circulation and access, as explained by the SUMC Project sponsors at the public hearing. The Stone Building complex is currently the termination of Pasteur Drive and is the main feature in this area. However, under the SUMC Project, the SHC Hospital building would not be located at the end of this access. The proposed SHC Hospital building's primary entrance would be located to the east of Pasteur Drive; therefore, the SUMC Project sponsors intend to deemphasize the existing area as the termination and the main feature. Under the SUMC Project, Pasteur Drive would continue to Quarry Road, to the west of the proposed SHC clinic/medical office building. However, the extension would only be used by service vehicles, pedestrians, and potentially shuttles; the general public would not have vehicular access in this area. In addition, the pedestrian and bicycle passage along the Promenade (a linkage between the proposed SHC Hospital building and the SHC clinic/medical office building) would connect the SHC, LPCH, and SoM.[12]

PTC2.28 *The commentor states that the importance of the Stone Building complex is not necessarily the building itself, but the events that took place there. As such, the real importance of the site is to enable the continuation of research and ground-breaking procedures.* This comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. Please refer to Master Response 9 for a discussion of project and alternatives merit in the CEQA process.

In addition, the commentor suggests memorializing the Stone Building complex with a scale model or a play structure. Please see Response PTC2.19, above.

PTC2.29 *The commentor requests that the Draft EIR consider and analyze an alternative that would not include construction, renovation, and increased intensity at the Hoover Pavilion Site.* This suggestion is evaluated in Section 5 of the Draft EIR, Alternatives, as part of No Project Alternatives A and B, on pages 5-4 through 5-9. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

PTC2.30 *The commentor requests that the Draft EIR consider and analyze an alternative that would retain the Stone Building complex.* Preservation of the Stone Building complex is evaluated in Section 5 of the Draft EIR, Alternatives, as part of the Historic Preservation Alternative. Also, please refer to Response PTC2.10, above, and Master Response 8 for additional variations on reuse of the Stone Building complex.

In addition, the commentor notes that Figure 5-1 of the Draft EIR shows that portions of the Stone Building complex would be retained. This is incorrect. Figure 5-1 on page 5-19 of the Draft EIR illustrates the site plan under the Tree Preservation Alternative, rather

[12] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 9, 2010.

than the Historic Preservation Alternative. The white outline of the Stone Building complex is meant to show the existing buildings at the Main SUMC Site. However, the proposed buildings, which are denoted by a tan color, are also included on this figure. As the figure demonstrates, the proposed SHC clinic/medical building and the SoM FIM buildings would be constructed at the current location of the Stone Building complex. As such, under the Tree Preservation Alternative, the Stone Building complex would be demolished. Please note that Figure 5-1 in the Draft EIR has been replaced by Figures 5-1a, b, c, and d, as shown in Staff-Initiated Change 6. The Stone Building complex is not included in Figures 5-1 because there are no Protected Trees in that location that would be affected by the SUMC Project.

PTC2.31 *The commentor suggests intensifying the outboard portion of Welch Road and moving some (or all) of the medical office square footage proposed at the Hoover Pavilion Site to this site instead.* Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations on the alternatives suggested by the commentors.

PTC2.32 *The commentor questions if the square footages of the SUMC Project site plan includes the proposed roadway expansion of Durand Way and Welch Road reconfiguration.* The term "square footage" refers to the floor area within occupiable structures. As such, square footage of roadway extensions are not included in the square footage calculations. However, the site acreage as defined on page 2-2 and other areas in the Draft EIR includes the areas in which roadway extensions are proposed. The commentor is correct in saying that roadway extensions are not accounted for in determining floor area ratio (FAR), which means the maximum ratio of gross floor area on a site to the total site area.[13]

The commentor also points out that the proposed roadway expansion (Durand Way) and widening (Welch Road) would encroach on parcels both inboard and outboard of Welch Road, and asks how the encroachment would affect parking requirements and FAR at the affected parcels. The encroachments would not affect existing structures, and since parking requirements are based on square footage the roadway expansions would not affect parking requirements of existing structures at the affected parcels. However, the roadway expansions could reduce parcel size both inboard and outboard of Welch Road. As such, the roadway expansions could increase existing FAR at each parcel.

As shown in Figure 5-1 and Table 5-1 (included in Response PTC1.11), the reconfiguration of Welch Road would encroach on properties located on both sides of the street. However, encroachments would range from 0.01 to 0.47 acres and would comprise a minor impact on the overall acreage on the parcels. Although the property at 900 Welch Road would have the largest reductions due to the construction of Durand Way

[13] City of Palo Alto Municipal Code, Chapter 18.04.

(approximately 0.47 acres), the parcels would still be able to accommodate the existing building at 900 Welch Road within the Medical Office and Research (MOR) FAR of 0.5.[14]

In addition, for a parcel map that depicts all parcels that comprise the SUMC Sites, please see Figure 5-2 (included in Response PTC1.57).

PTC2.33 *The commentors express concern regarding the design of the SHC Hospital modules and the medical office building*. These comments pertain to the design of the SUMC Project and do not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. As required by Municipal Code Sections 2.21 and 18.76.020(b), the SUMC Project has undergone preliminary Architectural Review and SUMC Project plans are being considered by the ARB. The SUMC Project design is still in progress and could continue to be altered. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

PTC2.34 *The commentor suggests a reduced intensity alternative that would remove the top floor of the SHC Hospital building in order to reduce visual impacts*. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

[14] Stanford University Medical Center, email correspondence to Whitney McNair, October 28, 2010.

PTC 3

PLANNING& TRANSPORTATION COMMISSION MINUTES

==========MEETINGS ARE CABLECAST LIVE ON GOVERNMENT ACCESS CHANNEL 26==========

Special Meeting of Wednesday, June 16, 2010
6:00 PM, Council Conference Room, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

ROLL CALL:

Commissioners:	***Staff:***
Daniel Garber - Chair	
Samir Tuma – V-Chair	*Cara Silver, Sr. Assistant City Attorney*
Susan Fineberg	*Julie Caporgno, Chief Plan. & Transp. Official*
Eduardo Martinez	*Steven Turner, Advance Planning Manager*
Arthur Keller	*Jennifer Cutler, Planner*
Lee I. Lippert	*Zariah Betten, Admin Associate*
Greg Tanaka	

2. **Stanford University Medical Center Facilities Renewal and Replacement Project**: Stanford University Medical Center Facilities Renewal and Replacement Project- Meeting to accept comments on the Draft Environmental Impact Report (Draft EIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an overview of the Transportation chapter of the Draft EIR.

Mr. Steven Turner, Advance Planning Manager: I would thank you Chair Garber and Commissioners. I am Steven Turner, Advance Planning Manager for the City of Palo Alto and Project Manager for the Stanford University Medical Center Projects. We are here for a meeting focusing on the Transportation Chapter of the Draft EIR.

Just a quick summary of where we are at in the process. The EIR was released for a 69-day public review period on May 20 and that public review period ends on July 27. We are breaking the review of the Draft EIR down to smaller chunks so tonight's discussion is

focusing on the Transportation Chapter of the EIR, however we will accept comments on any chapter of the EIR the Commissioners might want to comment on, and certainly members of the public if they would like to speak any chapter they are more than welcome to do so.

The purpose of tonight's meeting is to collect comments and questions on the Draft EIR. It is not intended to discuss or debate the merits of the project. Certainly we want to hear your comments and questions tonight. We will also accept written comments in the form of a letter or an email. If you have very detailed comments on the Transportation Chapter certainly send those to me. My contact information is in the Staff Report. Perhaps just focus on your larger items for this evening.

All the comments and questions that we receive at tonight's meeting will be addressed in the Final EIR. So what we will do is collect your comments and questions and then respond to each of them as part of the EIR process.

A little bit about the format of tonight's meeting. After my concluding remarks I will hand it to PBS&J who will introduce AE COM, the City's consultants on the Transportation Impact Analysis. Then Staff will provide a very brief overview of the traffic model and some of the adjustments that we made to afford this project. Then we will give it over to the project applicant who has an approximately 15-minute presentation tonight. Then we will hand it back to the Planning and Transportation Commission for questions and comments. So with that I will hand it to PBS&J.

Mr. Rod Jeung, PBS&J: Thank you Steve. My name is Rod Jeung with PBS&J. I am here with Trixie Martelino of PBS&J. It is good to be here and see all of you. As Steven mentioned, tonight's presentation and discussions will be on Transportation. There is an old adage in real estate about location, location, location. Well, when we do Environmental Impact Reports and we do development projects it is always about transportation, transportation, transportation.

In places like Santa Clara County where for the larger projects a Transportation Impact Analysis is prepared. In this case we were fortunate to work with AE COM, represented by Dennis Struecker. They prepared the Transportation Impact Analysis and we summarized that information for its inclusion in the Environmental Impact Report.

Just a few key overview points regarding that before I turn it over to Dennis. The first is that the Transportation Impact Analysis really does try to cover all the different modes of transportation. So we do talk about traffic. We do talk about transit. We do talk about pedestrian and bicycle access.

The impacts that are identified in the Environmental Impact Report are a comparison of the no build conditions in the year 2025 against the 2025 conditions with the project. So the delta is projected out to year 2025, and the difference between the no project versus the project conditions represents the impacts. It is important because a lot of the other topics tend to look at the impacts as it relates to existing conditions. It is important to also understand that the future forecasts are based on the City's traffic demand model. So all the analysis that Dennis and Nicole have been doing rely on the City's data sources and

existing conditions. So without further ado I think you all know Dennis pretty well, Dennis Struecker.

Mr. Dennis Struecker, AE COM: Thank you Rod. So we have a little slideshow here to go through. Steven kind of touched on this Purposes Overview of the Transportation Analysis, discussed the mitigation measures that have been proposed and the Commission and public input.

The study area is pretty extensive with 66 intersections, six freeway segments, three on 101 and three on 280, eight residential roadway segments in Palo Alto and Menlo Park, and then the Menlo Park analysis required an additional roadway corridor analysis. So there are eight roadway segments that required analysis in Menlo Park. Analysis year 2025 coincides roughly with the completion of the project and it is also consistent with the City's travel demand model.

The scenarios we looked at, we looked at existing conditions, and traffic counts were collected from 2006 to 2009. In the Traffic Report although no in the EIR, but in the Traffic Report there is an existing with project analysis provided for information, and in the future no project conditions in 2025 and the future with project conditions in 2025.

The idea of traffic, 10,000 new daily trips and in the 650 range of AM and PM peak hour trips. The existing traffic is around 1,700 AM and PM peak hour trips from existing traffic for the hospital to give you an idea where the growth is.

Here are the 66 study area intersections. As you can see they blanket Palo Alto pretty well and extend considerably into Menlo Park and a few key intersections in Palo Alto. Here are the eight residential streets that were analyzed in Palo Alto and in Menlo Park. There are the freeway segments on 101 and 280. Here are those other roadway corridors that were required to be analyzed based on the criteria of Menlo Park.

The 2025 no build plus the project in the AM we have identified five intersections that would be significantly affected by the project. They are shown there in the circles. They are El Camino, Page Mill, Galvez, Arboretum, Palm, University, the northbound off ramps of Alpine, and Sand Hill, Santa Cruz. The 12 intersections affected in the PM peak hour are shown there again, a lot of the same intersections, and as you see we get up onto Bayfront Expressway with a couple of impacts and a couple of impacts in Menlo Park.

Other transportation impacts. The freeways were assessed and based on the CNA criteria there were no freeway impacts. There were no residential street impacts but there were some impacts based on Menlo Park criteria to those roadways that we looked at there. Transit service, it says delayed by intersection congestion, actually the EIR identified the transit impacts based on increased transit volumes. Delay to emergency vehicles, pedestrian and bicycle movements affected by traffic, and construction impacts were access of workers, access of materials, and effects on traffic lanes, bike lanes, and sidewalks.

Mitigation measures we looked at for the roadways, physical improvements. Many of the physical improvements were identified to be infeasible because of lack of right-of-way and

they also conflicted with the general plan policies of the City. Intersection delays and inefficiency can be dominated by what is called traffic adaptive signal technology, and the un-signalized intersections are generally mitigated through signalization.

There were also trip reduction mitigation strategies, smart planning, build housing around it close to the project, we looked at some remote parking lots to intercept the trips before they got into the area, Transportation Demand Management programs, and improved pedestrian and bicycle connections.

Alternative modes. Transportation can be mitigated by increasing service and expanding service, bicycle and pedestrian improvements and safety enhancements. Emergency vehicle access can be improved by installing signal overrides that are activated by the emergency vehicles. The construction impacts are mitigated by construction access plans, remote parking lots, and restricting access routes and access times.

Key measures of the TDM. The one that gets the most reduction in impacts is providing Go Pass to not only the new employees but the existing employees. That is really where you not only are dealing with the project trips but you are dealing with trips that are on the road today. An onsite TDM coordinator, guaranteed ride home for those people that have an unexpected emergency during the day, and shower and bicycle storage facilities to encourage cycling. The program needs to be monitored to make sure that the desired most is achieved and expand the zip car programs.

So we should have a slide in here that talks about the priorities but let me talk about them or list them here. Priority 1 is the traffic adaptive signal technology, so that is what we applied first. You can see what reduction in impact we achieve through that Priority 1. Priority 2 is new pedestrian and bicycle undercrossings near Everett in Palo Alto and near Middle in Menlo Park. Priority 3 is TDM measures, and then Priority 4 is roadway improvements. So by implementing Priority 1, the traffic adaptive signal technology, there were five impacts in the AM but one of them is mitigated. So now there are only four impacted intersections left. In the PM there were 12 but now there are nine, three are mitigated by traffic adaptive signal technology. If we add on top of Priority 1, Priority 2 the new added bike undercrossings we eliminate one more AM so now we are down from four to three, but the PM stays the same at nine. If we add Priority 3, TDM measures, on top of the other two now we are down to zero impacts in the AM, all AM impacts are mitigated, and we still have four PM impacts.

Then if we look at the intersection improvements on top of the other three measures, these are the four intersections that on the last slide were noted as still impacted with Priority 1, 2, and 3 only. Middlefield - Willow improvements, we identified them in the Traffic Report in the EIR as being infeasible. One we didn't think they may be possible and two they were outside our jurisdiction to make the improvements. Menlo Park has come back and said that improvements at Middlefield and Willow are feasible and in addition to the ones that we have suggested they have suggested some other ones. So according to Menlo Park in parentheses we put 'feasible' according to Menlo Park. Arboretum-Galvez was identified as a feasible mitigation in the Traffic Report in the EIR. Signalization is the solution there. Bayfront-Willow in the EIR in the Traffic Report we identified those as being potentially feasible but they are in the City of Menlo Park. Menlo Park again said

that they agree with those mitigations and they think they are feasible. Finally, Bayfront-University we said that the improvements there are probably infeasible but again Menlo Park came back and said they are feasible. So what this last slide shows us is that by having Priority 1 mitigations, Priority 2 mitigations, and Priority 3 mitigations plus these four other physical roadway improvements that are then determined to be feasible either for Arboretum-Galvez in the City of Palo Alto or the three that Menlo Park said are feasible mitigates the project impacts. I think that is the last slide.

Mr. Turner: With that I will hand it to Gayle Likens to give comments on the model.

Ms. Gayle Likens, Management Specialist: Thank you. I will try to brief but there are quite a few steps that I want to go through to update on how the model was developed.

The City developed the model in order to be able to forecast the local traffic impacts of the projects and also potential mitigations. Our original model dates from about 2003. At that time it was developed and the output years for the base year, which was using the counts from 2002, and 2010, and 2015. The projections stopped at 2015.

Starting in 2007 with the development of the Stanford Projects the model was updated to include projections through 2015 and 2025 using the approved and known projects and the regional land use data using the ABAG projections, also consistent with the way VTA does their model, because our model needs to be consistent with the VTA model.

Then the model was run for the original projects, which were both the hospital and the Medical Foundation. Because we have the actual development projects for those two projects we backed out of the model the ABAG projects for the future years for the two projects. When the Stanford Shopping Center project was withdrawn and we had the new project that was only the Medical Center projects we needed to add back the shopping center growth projections into the background conditions through 2015 and 2025, at least through 2025 because now the project was horizon year 2025, so we could measure the Stanford Medical Center project against background conditions that also include the shopping center growth projections. In doing that, when we ran the model we found that we had to make further adjustments in the model to constrain the volumes that were being produced. So we looked at gateways where we would constrain the growth so that there wouldn't be more traffic coming into the city then could actually get through on these gateways. There were 11 of those and I can provide a map if you would like to see where the gateways were constrained. They are on our major streets, major entryways to the city. Even the constraining at the gateway points didn't solve all of the capacity problems at all of the 66 intersections that were analyzed. There were still the volume-to-capacity ratios that were greater than 1.0 which is greater than the capacity of the growth to carry this so further adjustments were made. All of this was done in conjunction and in consultation with the VTA because whatever model changes we make we still have to be verified and accepted by VTA because we use their regional model as well.

So we did look at exactly where there were some intersections that were over capacity, and since it is not technically feasible to be over capacity there were ways that we could shift the traffic by looking at moving some of that traffic to under-utilized freeways, or adjacent corridors. Traffic would gravitate to the freeway rather than being constrained on our

surface streets. Also, to use a peak spreading methodology and this was all done by our traffic consultants in consultation with our City Traffic Engineers. So that is basically how the model was changed. We have received VTA's concurrence and actually they encouraged us to look at making these tweaks because we cannot have streets that are running at greater than their capacity.

So there is a technical memo that is included in the Appendix of the Traffic Report that discusses all of this in detail. If you have any questions I will try to answer those or our Traffic Engineering Consultant can respond as well. Thank you.

Chair Garber: As you start, if you would identify yourself.

Mr. Bill Philips, Senior Associate Vice President of Land, Buildings, and Real Estate, Stanford University: As you have heard, the traffic section of the DEIR is usually very complicated and lengthy, and complex. So I would like to just mention a few work issues, and probably reiterate a few of Dennis's about things that we saw and understood as highlights and important information.

I think it is important in terms of the setting, the context, we know that Palo Alto's policy is to first and foremost advocate multimodal approaches to getting traffic off the streets as opposed to increasing roadway capacity to accommodating that increased traffic. At Stanford and at the hospitals Transportation Demand Management is one of the most important things we do, and it has that importance because it is something that helps achieve environmental sustainability. It allows us to work to meet the no new net trips target that we have under the General Use Permit as an alternative to widening the street. Of course, it enhances employee wellbeing.

We know and have learned over time that a robust TDM system is robust simply because it is full of flexibility. It has variability. It adapts to the situation at hand. It responds to various employees' use of alternative modes of transportation, making those things available that will appeal to the individual employees. The success I think of that program is in today's modal split where the University drive alone rate is now under 50 percent. The Caltrain mode split is just under 20 percent. Even for the Medical Center the drive alone mode rate is just slightly over 70 percent and the Caltrain mode split is almost six percent. That is very good if you compare that with a number of our Research Park tenants who are very aggressive, or even with the City of Palo Alto's mode split. Both the University of course far below and the even the Medical Center are below what we see at those tenants and at the City of Palo Alto.

I think there is a bit of a leap occasionally that the SUMC employees, the hospital employees won't be able to take as much advantage of TDM or the Go Pass because of their habits in terms of when they work, how they work, the time of day they work, and these kinds of things. What we found, what Robert Eckles of Fehr & Peers found, and he did a very close study of the habits s that probably 89 percent of the employment base for the hospitals working at regular times, regular commute times can take advantage of something like a Go Pass or an Eco-Pass. We also found to our surprise that actually more of those employees live in locations crossing Caltrain than where the University itself in comparison of the 65 percent to 52 percent.

Next slide. I am not going to go through all these. This is just an example of everything that we have and shows the robustness of the program, and how we try and work everything to get people to do things that will take cars off the streets. Even the commuter check sales where people can go and buy with before tax dollars to pay for BART passes and other bus lines, SamTrans, something that moves these people off the roadway.

Next slide. I think we talked about this with Dennis's layout of the various Priorities, with the last one being the feasible intersection improvements.

Next slide. We have focused on, and I think the DEIR focuses on the mode split for transit and the advantages that we get out of having a Caltrain Go Pass for all the hospital employees, not just for the project employees, but all hospital employees, which is the way the Go Pass works. The DEIR refers to an expected increase in the transit mode split of 21.1 percent, 15.8 percent of that being to Caltrain as a result of the Go Pass. It talks about the Stanford Shuttle Program adjusting and supporting the Go Pass connections. Also, our shuttle program is really designed to work to meet the capacity demands through route and vehicle changes. Extra bus supply, new routes rather than having transfers and people waiting around for additional buses because that slows down the headways and that tends to prove to be an impediment to getting people to use the transit system.

What we see is with these assumptions we can eliminate over 500 peak hour trips from the 766 that Dennis showed you. We get down to the intersection impact removal that Dennis described. Also by using a Go Pass and applying to the existing employees we are decreasing the vehicle miles traveled, or VMT. So that 500 peak hour trip reduction from the 766 is what causes this 66 percent reduction in the project's peak hour trips.

I think Dennis went over these so I am not going to do them again. Let's see, so we don't have any significant impacts on Palo Alto residential roadway segments. We know we don't have any intersection impacts left after making the adjustments and doing the roadway improvements. There are four roadway segments in Menlo Park on Marsh Road, Sand Hill, Willow, and Alpine which still have unmitigated impacts. I would just like to draw your attention to the criterion for those impacts. It is a peculiar one going in Menlo Park. It is an increase of 100 daily trips to a minor arterial that carries over 18,000 daily trips. So it wouldn't take a very big project at all to trigger that criterion. That is the end of my presentation. I have Robert Eckles here with me tonight too. I would be happy to answer questions and I know Robert would as well. Thank you.

Chair Garber: Thank you. Before we return to the Commission we will open the public hearing. We have one card. If there is anyone else that would like to speak to us please fill out a card. The first speaker will be Michael Griffin, and you will have three minutes.

Mr. Michael Griffin, Palo Alto: Thank you Commissioners. I do not live up in Portola Valley or Woodside, or even in the safety of Sharon Heights. I live in scenic Downtown North Palo Alto, which is ground zero for a lot of traffic impacts that occurred across the El Camino in Stanford. I am an advocate of priority number five, which is a satellite parking or as the DEIR calls it the remote parking lots alternative to mitigation measure TR-2.3. The details of this improved mitigation are found unfortunately in a CD in

PTC3.1

PTC3.1 Con't

Appendix D. So it is a little hard to dig out for citizens, but nevertheless it is there and worth reading. It is to be used in conjunction with the Eco-Pass and the Go Pass solutions to discourage drive alone coming into Palo Alto. I do not think the DEIR adequately assessed the need for offsite parking and erroneously places way too much reliance on TDM measures alone for solving the enormous traffic impacts brought by these projects.

PTC3.2

The EIR states Stanford knows the employees home locations due to their zip code analyses that then begs the question of where indeed do all these employees live? No answers are provided in the DEIR that I could see. Wouldn't it be instructive to know how many employees live in areas outside the sphere of Caltrain? The EIR says on page 59, "Likelihood of using Caltrain is a function of place of residence. Employee location data indicates 52 percent of University employees on the peninsula live within a city that is served by Caltrain". So that is great. That is great if you live on the peninsula. But what if you don't? What if you live over on the coast side, Santa Cruz, or in the East Bay? What is the likelihood of you benefiting from the Caltrain Go Pass? At that stage I am saying not very darn much.

PTC3.3

The TDM program being Caltrain-centric presumes we will continue to have a Caltrain in the future. Recently, this has been put into some doubt. According to the press releases from the agency hopefully Caltrain is too big to fail, but it would be smart to have a contingency plan, would it not? We don't want to be over-reliant on the single solution and then run the risk that the Caltrain solution doesn't cut it. We for sure don't want to hear Stanford use the infamous word, "We don't have any more tools in our toolkit to fix that problem." Because in fact we do have tools and they are called offsite parking lots.

PTC3.4

The EIR says if the Go Pass isn't satisfactory then the TDM scheme will be enhanced by leasing 75 spaces at the Ardenwood Park and Ride, and the bus service of course expanded. That is obviously a step in the right direction, nevertheless why doesn't the EIR deal with the factual, known number and location of East Bay employees and deal proactively with leasing more than 75 parking spaces? Empirical evidence suggests parking lots in Newark, in the area of the Pacific Research Park next to the Dumbarton Bridge tollbooth is more in keeping with actual East Bay commuter requirements.

Stanford has the numbers and they appear to be unused by the EIR.

Chair Garber: Mike, I apologize you are significantly over your three minutes. Can you sum up?

PTC3.5

Mr. Griffin: Okay, sorry. Well, gosh I have a few more quick ones here. I encourage the construction of the two mini centers, of mini transit centers. The fair share Stanford to contribute to all of this means 100 percent in my estimation.

PTC3.6

Also, and lastly, there is a trip distribution map on page 48 that says the vast majority of regional traffic attempts to access the projects from the east, basically existing off Highway 101 and then sifting westward through the neighborhoods until finally reaching Stanford. I am suggesting this must change. We must have the projects provide an incentive for traffic to access Stanford off 280 in the west. A method for doing this would be to provide offsite parking at SLAC, by expanding their existing lots off Sand Hill Road, and another lot behind the berry farm

PTC3.6 Con't

at Alpine is also required to give incentive for people to use park and ride lots that will then be served by Marguerite. There is more but thank you for your patients.

Chair Garber: There may be an opportunity if one of the other Commissioners calls on you. Our second speaker and last speaker is Robert Moss. You will have three minutes.

PTC3.7

Mr. Bob Moss, Palo Alto: Thank you. A lot of the comments you had are things I was thinking about. While Stanford has a lot of good ideas in mitigating the traffic impacts, they will only work if everything falls in place. The one obvious one of course is Caltrain. They said recently that they think three years is going to go out of business. I don't think that is going to happen but I think it is quite likely that the frequency of trains and the service level will drop over the next three to five years. That is going to make Caltrain and TDM Go Passes less viable for reducing traffic.

PTC3.8

The offsite parking and then having it served by Marguerite is an excellent idea especially if you have it areas where you know that the workers live. I also think as a fallback position since Stanford has been using Marguerite successfully for years you might consider running Marguerite type buses to places like San Francisco, Fremont, and other areas. They have buses that come from San Francisco and some other cities to Mountain View quite successfully. So there is no reason why Stanford can't do the same thing with the Marguerite system, expanding it from 41 to 51 buses for example is not a huge increase. Especially if Caltrain dies I think something like that is going to be essential. So that ought to be on a specific list of fallback positions.

PTC3.9

Other things that people can do -- Palo Alto has been very successful with having offsite parking lots and serving them from the three to five miles from the city. They could have offsite parking lots and they have the Marguerite go there to pick people up and drop them off. So all of those are possible. There is nothing that hasn't been done before successfully. As I say, everything has to be done simultaneously for this thing to have fallback positions. If we need then we can just pull them out and do it. You don't have to go through the exercise of having hearings and publicizing it and all that.

PTC3.10

Well, if Caltrain did shutdown this year so we are going to expand the Marguerite. I think it is possible to get the traffic mitigated but I think you are going to have to have more on the plate, more options. Thank you.

Chair Garber: Thank you. We will return to Commissioners for questions and comments. I am going to start and Commissioner Keller is next. We will do this in five-minute bites. I apologize for the door. We are not actually allowed to close the door. It is a public meeting so we have to suffer through our public.

PTC3.11

So I think this question is actually perhaps for Gayle. What I am interested in learning is the last time that the parking and transportation analysis was presented to the Commission was perhaps two years ago, something like that. It was when the project included the mall. So is the information that was a part of that presentation related to the Medical Center is that what we are seeing here, or is this generated anew, or is that information imbedded in what we are seeing this evening? Are we seeing the same information or has this been totally regenerated?

Ms. Likens: It has been regenerated. The whole model was redone and the output was redone because the shopping center project is no longer part of the application. If you were to go back and look at that analysis I think it would be very confusing and very misleading because the projects were packaged together at the time. We have changed the way we have constrained the model output. It is much more aggressive then at that time. I think we did have four constraints gateways at that time and they have since done more constraints and we now have 11. We have moved the analysis out, as I mentioned, to sidetrack it to the freeways that are under capacity and to use peak spreading to reflect what really can actually occur on the network. Some of the inputs about the project descriptions and all that are for the most part the same I think.

Chair Garber: The model has become much more refined over the last years.

Ms. Likens: Much more refined and it reflects in the background conditions all of the ABAG projections including what is foreseen for the shopping center area that has been removed from the original model.

PTC3.12 Chair Garber: In a very conceptual way one of the key learnings that came out of the previous presentation some years ago was simply the background increase in population had a significantly larger impact on the transportation outcomes than the project itself did. Does that still, in a very general comment still apply in a very general way here?

Ms. Likens: I believe it does. Dennis I think did some further analysis about that. Yes, the background conditions without the projects are going to show growth to 2025, and now we are looking only at 2025 and not 2015 as the horizon year of the project. So I believe that is an accurate statement.

Mr. Struecker: The only thing we looked at, as I noted, was existing plus project and future plus project. There were quite a few more impacts in future plus project than the existing plus project in the outside growth was triggering those impacts on the project.

Chair Garber: That is it for me for the moment. Commissioner Keller, and then Lippert.

PTC3.13 Commissioner Keller: So first I note that the way of evaluating whether there are significance is the significance criteria for whether there are impacts in Menlo Park seem to be a lot more stringent than the ones in Palo Alto. With Menlo Park having criteria of adding 100 daily trips to a minor arterial that carries over 18,000 daily trips that seems like a pretty low threshold. This particular project basically has 15 percent of the new traffic is going to go along Embarcadero Road, and there seems to be practically no impact about that. I am not sure that people living along Embarcadero Road would agree that there is practically no impact. But it seems like our significance thresholds are such that there is no impact detected by those significance thresholds. So I think that is something to be questioned.

That is I guess why Santa Cruz Avenue north of San Hill Road, which seems pretty much like Embarcadero Road in terms of being a four lane, two lanes each way, road is treated specially while Embarcadero Road is essentially not considered in terms of the – it is only

considered because of traffic lights not because of increase in traffic load. I think that says something about our traffic significance thresholds and whether ours are really adequate to the task and whether we should consider for the future importing Menlo Park's in terms of our Comprehensive Plan analysis.

So although the Appendix does mention the Homer Avenue Undercrossing and the University Avenue Undercrossing there is no mention, the maps do not indicate a bicycle undercrossing. The map on Figure 3.4-2, which is on page 3.4-20, does not show a Homer Avenue Undercrossing so that was confusing.

So my first question is that there was a description by Mr. Struecker, who did the traffic analysis, of essentially 766 AM peak hour trips and 746 new PM peak hour trips. I am wondering if you have an idea with the four mitigations that you have proposed what the new numbers would be for the amount of peak hour trips in AM and PM.

Mr. Struecker: Well, the Go Pass gets rid of about 500.

Commissioner Keller: Five hundred in the morning and 500 in the afternoon?

Mr. Struecker: Right. That is both new employees and existing employees.

PTC3.13 Con't Commissioner Keller: So do we have the numbers of how many new peak hour AM and trips, because if there is a number I don't know what it is, after mitigations P-1 through P-4.

Mr. Struecker: Well, the Go Pass takes it down 500. The traffic adaptive doesn't take anything, it just allows for more traffic to go through a signalized intersection. The pedestrian and bicycle undercrossings get rid of three percent of local trips. So we have not exactly got what it would be. Two measures would get rid of trips, the Go Pass, and the undercrossings. The traffic adaptive only accommodates the volume in a more efficient manner, as well as the intersection improvements do not get rid of trips they just accommodate the trips through the intersection faster.

Commissioner Keller: So is it fair to say that if you add the PM and AM trips you get about 1,500 or 1,600 trips all told, within that range? And that this will reduce it from 1,500 trips to about 500 trips morning and afternoon combined?

Mr. Struecker: Five hundred plus the undercrossing so it may be 450, somewhere in that range.

Commissioner Keller: Four hundred and fifty, so we still have a significant number of trips it is basically reduced by about two-thirds of the increase.

Mr. Struecker: Yes, the slide showed 60 to 66 percent.

Commissioner Keller: Okay. I will pass it off to the next Commissioner.

Chair Garber: Commissioner Lippert and then Martinez.

PTC3.14

Commissioner Lippert: A member of the public has spoken about Stanford being able to quantify by zip code I guess where the people are coming from. Is that easily derivable data? Is that something we could get hold of and is significant in this model?

Ms. Likens: I believe we do have all of this sorted by zip code.

Commissioner Lippert: So we do understand where people are coming from?

Mr. Struecker: It is in Appendix H. There is a table in Appendix H that lists to the hospital employees and lists that city that they are from. They start with Group 1 are cities that are on the peninsula where they are served by Caltrain, and the number is 65 percent.

Commissioner Lippert: Okay. So that has all been substantiated as far as what we are looking at in terms of people being able to make use of the Go Passes.

Mr. Struecker: Correct. We only counted the people that lived in a Caltrain city as being a part of the population that would take advantage of the Go Pass.

Commissioner Lippert: Okay. How would that be administered, the Go Pass? How is it currently administered at Stanford?

Chair Garber: If you would please wait for the microphone.

PTC3.15

Mr. Robert Eckles, Fehr & Peers Associates: The Parking and Transportation Services of Stanford is the organization that manages the Go Pass. Basically what they do is they purchase a Go Pass for every employee outside of Palo Alto. They basically buy those for every person that lives outside of Palo Alto. The way the Go Pass works is you have to buy the pass for all your employees whether they live in an area they could use it or not because part of the idea is that the regular commuter can use it, they can also get other people interested in using it. You can use a Go Pass any time of the day, any time that Caltrain is operating. So basically the Parking and Transportation organization purchases the Go Pass and they work with the Joint Powers Board, the JPB, of Caltrain to get those passes.

Commissioner Lippert: Okay. My understanding is in listening to I guess the presentations we have had on SB 375 transportation issues that if you can get ten percent of the people to use public transit that that is a significant reduction in terms of mitigating traffic. Is that correct?

Mr. Eckles: Correct. Getting more people out of their drive alone vehicles and onto available transit is a positive.

Commissioner Lippert: So already 50 percent or 48 percent, close to 50 percent?

Mr. Eckles: When you are talking about the number of users?

Commissioner Lippert: Correct.

PTC3.15

Mr. Eckles: But those are people that are living in the city. That percentage as related to what Bill what said that five percent of the employees are using Caltrain today but then you boost that up with the Go Pass. So that is where you get the percentage increase. Then by applying it not only to the new employees but to the existing employees that is the big growth there.

Commissioner Lippert: But in terms of what you currently have on campus, not the hospital, on campus you currently have already gotten to about 48 percent.

Mr. Eckles: Yes, on campus on 48 percent drive alone, and then the Caltrain is around 19 percent.

Commissioner Lippert: So you have already exceeded the threshold of ten percent. Okay. Then I have a question for Dennis, I guess. When you look at the levels of service here, the level of service letter grades that are given here they are not really grades. What you are talking about here is describing how traffic is flowing or the density of the traffic based on, and A is not passing and F is not failing, it is just talking merely about the density or how traffic is moving. If you go to let's say for instance an E density that is appropriate along University Avenue because you don't want people zipping down University at an A level because they would miss all the shops, and they would pass the shops before they even saw it. Correct?

PTC3.16

Mr. Struecker: Yes, you can drive faster at an A level than you could an E. E, you are right, you are pretty much right at capacity of the street. F, you are starting to breakdown.

Commissioner Lippert: So in terms of the F capacity here my understanding is that people are only willing to commute a certain amount of or dedicate a certain amount of time during the day to commuting. If it is going to take more than what is it, two hours, they pretty much throw up their hands and find another route or another job.

Mr. Struecker: Or another time. That is where the peak spread in the model is estimating more traffic. So the peak hour spreads from an hour and a half or two hours to three or four hours.

Commissioner Lippert: So if we saw an F level at an intersection that has been grayed in on the chart here would it ever become a self-fulfilling prophecy where people would just sort of commute at another time or throw their hands up and say hey, I am going to find another way to get here?

Mr. Struecker: That is why if you look at the existing conditions analysis you really don't see any intersections out there that are operating greater than, or have a capacity ratio greater than 1.0. A couple of them maybe go 1.05 and that is because of that, yes. You just can't get through and so they either go somewhere else, get a job somewhere else, or go on flex time, change routes. Traffic is really a lot like water it finds its own level.

PTC3.17

Commissioner Lippert: Can I just ask one other? It is not uncommon, on the peninsula it is real easy, I can get on Caltrain, I can go to Redwood City, or I can go to San Jose. In

PTC3.17 Con't

fact, my first job I think I commuted to San Jose on Caltrain. But it is not uncommon for people to drive to say where the Dumbarton Express, hop on the Dumbarton Express and cross, and go to Welch Road toward the hospital.

Mr. Struecker: That expansion at Ardenwood was just completed not very long ago. My understanding is it is filling up quite a bit.

Commissioner Lippert: Thank you very much.

Chair Garber: Commissioner Martinez and then Fineberg.

PTC3.18

Commissioner Martinez: I have a follow up to Commissioner Lippert's question about the level of service. My understanding isn't that in A you can drive faster and it slows faster in an F. Those conditions are really controlled more by signalization, traffic speeds, and safety rather than the designation of A through F. Is that correct?

Mr. Struecker: Well, it kind of depends on what you are talking about, whether you are talking about an intersection or whether you are talking about a section of freeway. The level of service A for an intersection means that when your phase of the signal turns green you will get through. If you have an intersection where it is operating at level of service F and your phase of the signal turns green you probably won't get through on that phase. You probably will have to wait until is cycles around again.

Commissioner Martinez: I travel those every day.

Mr. Struecker: On a freeway for instance a level of service A means that you can go at whatever speed you want to go. If you want to go 85 you can probably go 85. If you want to change lanes it would be fairly easy for you to change lanes. If you are operating on a freeway at level of service F the speed is highly variable. It is from zero to 35 and back to zero. The ability to change lanes is greatly restricted. So it kinds of depends on whether you are talking about an open road type drive or an intersection.

PTC3.19

Commissioner Martinez: Thank you. I wanted to ask a little bit about the difference between the University employees and the Medical Center employees in terms of their Caltrain and driving habits. The applicant used a little bit more populist number but I memorized the numbers in the DEIR so I am going to use those, and if they are little bit low just bear with me. What I recall is drive alone for University employees is about 56 percent, and for Medical Center employees it is 77 percent. Is there any reason for that difference that you discern? Is it a zip code kind of thing?

Mr. Struecker: It is one of the things that the people that ride Caltrain to the University are very much higher than for the hospital because they are in the Go Pass.

Commissioner Martinez: Okay. Then that relates to my next question. The Go Pass participants from the University, I think the number was 15.6 percent or something like that, and for just Caltrain users from the Medical Center it is 3.6. The numbers the applicant showed here are a little bit better than that.

Mr. Struecker: Yes, the numbers we are working with are numbers that were generated when the Go Passes were proposed and are about three years old by now.

Commissioner Martinez: Okay.

Mr. Struecker: I did those, that same stuff on the slide and they continue to go up, which is a good thing.

PTC3.19

Commissioner Martinez: That relates to my question. In the DEIR it says that by 2025 for the Medical Center by that time it will be about equal, 15.6, or 17 or 19, whatever your current projection is. Can you explain why your confidence is that number going up for the Medical Center?

Mr. Eckles: Just to clarify the data that was put into Appendix H was from 2006. That was the most current data that we had at the starting of the whole process. That is where you get the 52 percent and 77 percent drive alones because that was what it was in 2006. We prepared the memorandum and we provided information on doubling, tripling, or quadrupling of the ridership going to Go Pass at the Medical Center. Ultimately I think it was the City's decision to use the 15.8, which was the University's level in 2006 as what they wanted to shoot as the target. So again, we felt that because we see the same similar housing patterns and people living in that corridor there is that potential there.

Mr. Struecker: There are slightly more hospital employees in Caltrain cities than University employees. So that was another thing.

Commissioner Martinez: That sounds good but do you have a criteria for things like I live six blocks from the station. If you live five miles from the station does that still kind of allow you to count that?

Mr. Struecker: We made the assumption if you live in a Caltrain city then you could be a candidate for riding Caltrain. Also, the mitigation in the EIR also says that if 15.8 is somewhat arbitrary. The University is doing it so the hospital should be able to do it, but there is a margin in there that they all based the non-drive alone mode split and then they need to do other things to get them to where they need to be.

Commissioner Martinez: Okay, that's good.

Chair Garber: Mr. Eckles.

Mr. Eckles: I also wanted to mention that when you are living in a Caltrain city, and in your discussion earlier, if intersections start going to level of service F and it gets harder to move on the freeways then even if you may be a little bit farther away from the station but you can get to a station and avoid some of the delay on the other facilities that is another motivation for those people that are living in those areas closer to the station.

Chair Garber: Commissioner Fineberg and then Tanaka. Then we will do another round.

PTC3.20 Commissioner Fineberg: A couple of meetings back we were talking about impact on housing. I think it was Commissioner Keller mentioned I think it was in Appendix H that 94303 zip code was being treated as East Palo Alto. Can Staff take a look again and make sure. The zip code 94303 is basically the eastern part of Palo Alto and East Palo Alto. Can Staff make sure that split zip code is being accounted for properly in all of these analytic models?

I would like to ask a quick question of Staff. Of the Stanford University employees how many employees participate in the Go Pass program on an average daily basis, Monday to Friday, so commute type hours?

Mr. Turner: I think the Stanford University applicant could probably best answer.

Mr. Eckles: In terms of the actually numbers using it today?

Commissioner Fineberg: Yes.

Mr. Eckles: Actually I don't have the University's here.

PTC3.21 Commissioner Fineberg: Okay, here is where I am with that. I would love to have a sanity check. How many Stanford University employees, how many Stanford Hospital employees given all of our assumptions however we define it utilizing the Go Passes? How many people get on and off the trains at the Downtown train station, and does it make sense? If we have 15,000 employees riding a train and there are only 2,000 people getting off?

Mr. Eckles: That is something that Stanford or Brody Hamilton from VT&S can give us that information because they do that check in terms of when they do their employee surveys. They then look at their ridership because they actually have the loadings by where they get on and where they get off. So they do a validation of that.

Commissioner Fineberg: Okay. My guess is there are a lot of people who get the passes who may not actually use the passes. There are probably a lot of people who use them occasionally. So I would love to see the analysis validated that the way we are saying the mitigation is going to reduce traffic. If it turns out that people use them one-tenth of one-one hundredth of what the headcount is, the actual – if 100 percent of the traffic getting off at the Downtown station is way under what we are thinking the mitigation would be are we jiving? I know you can't answer that tonight if you don't have the basis numbers but I think we need to do a rationality test on that one.

PTC3.22 Let me move onto some questions on the cumulative analysis on page 3.4-85. I am not sure I understand how cumulative analysis is being handled for the transportation. Typically what I see in other things is that it is the cumulative impact of multiple projects in adjacent areas. They define the geographic context. Here we are saying that the LOS impacts under the project level analysis above already accounted for cumulative growth through 2025 because growth has been incorporated in the City of Palo Alto's demand forecasting model.

PTC3.22 Con't So if we have this model that says we have a massive amount of growth from millions of different things by 2025 and then we compare this to that what is triggering all that growth? Where are they going? Our population is not growing that fast within Palo Alto. Stanford is the largest employer. They are the largest sales tax generator, the largest retail. By every measure they are they magnet, they are the bull's-eye, they are the target that everybody is heading to or from. So if we have all this other cumulative growth what is it? If is other parts of Stanford then why is it not part of what we see as the cumulative impacts of this project?

Chair Garber: Again, forgive me Commissioner. I don't know if we need an answer. We need to record this as part of the comments.

PTC3.23 Commissioner Fineberg: Answer another night. Okay. Then going down further in that same paragraph on page 3.4-85 it talks about the cumulative analysis applied to construction period impacts. It is saying that we will mitigate those, but what about other projects like the Performing Arts Center, or other Stanford development on contiguous land but outside the bounds of this project? I am not sure that we are appropriately addressing the amount of growth other than saying we already have it in the model, and the model is showing massive growth, but it is cumulative and from someplace else. Do we need to consider the other projects on Stanford land, the other projects across El Camino in Downtown Palo Alto, other projects that might be immediately adjacent in Menlo Park outside our scope but still, or areas down in Stanford Research Park? Again, just because it is outside the project area I don't think the geographic context of cumulative analysis is the project bounds. So are we considering the appropriate geographic context for cumulative impacts on traffic?

PTC3.24 Then the last piece of that is something the geographic context analysis and cumulative, I am sorry. The next sentence. The cumulative transit impacts are the service areas of the major transit services servicing the Stanford University Medical Center sites. These areas include San Mateo County and Santa Clara County. The highlight there is on the cumulative transit impacts. Then two pages later, 3.4-87 on TR-11 it talks about cumulative transit impacts. It says the major transit agencies providing service to the surrounding areas include Caltrain, VTA, SamTrans, and AC Transit. Well, if you look at most of those, all of them, they are having serious financial problems. There is a Bay Area wide study saying that they are on a road to failure. So we are using a mitigation, external agencies that may cease to exist, or at best have massively limited service. So what happens if Caltrain shuts down? What happens if VTA continues to cut service? What happens is SamTrans cuts service? AC Transit Center, how much of a proportion of the ridership is on AC Transit? So our major transit mitigation is agencies that are beyond the scope of this project, beyond our control, and are not economically viable. So how do we handle if they fail? Is there I guess a Plan B? Then what would be appropriate within the EIR, or what would be appropriate in the Development Agreement, or the project conditions to handle if they fail? If we lose the mitigations that depend on their financial viability and continued existence. The other piece to add to that, it was up on the screen, the zip cars. There was recently some news about their economic model and potential viability and needing to get cash infusions. So that was another sort of transit mitigation that could have questionable economic viability going forward.

PTC3.24 Con't

Chair Garber: Before we get to Commissioner Tanaka, Commissioner Keller you had some quick VTA numbers and comments.

Commissioner Keller: Actually, I have the ridership numbers for 2006 overall from Caltrain. So what it shows here is that in the northbound direction there are 777 people getting off in the morning at the Palo Alto Downtown station. In the morning in the southbound direction getting off are 1,185 people. So that indicates about 1,800 people or so getting off in the morning at the Caltrain station. In terms of getting on it is kind of interesting because in the afternoon there are 1,300 people getting on going northbound and 850 people getting on in the southbound direction. So somehow more people get on in the afternoon that is kind of weird. But essentially what you are seeing are somewhere about 1,800 to 2,000 people taking Caltrain. I am not sure how that compares to the current figures. But it does indicate that the Palo Alto Downtown station is the second busiest station along the entire Caltrain line. It also, from the data I have seen, looking at this and the analysis I did it looks like most of the people taking Caltrain are doing so between San Francisco and Palo Alto. A lot fewer people are doing them closer. I wouldn't expect anybody to take Caltrain from Mountain View, maybe from San Jose. So the degree of how far you go on Caltrain is not merely whether you are in a city that is close. You have to be far enough away to have the wait for Caltrain make your while. So cities probably north of San Mateo may make sense. Cities that are south of Sunnyvale may make sense. Anything between San Mateo and Sunnyvale probably the overhead involved in taking Caltrain probably does not make up that overhead compared to driving.

Chair Garber: Commissioner Tanaka.

PTC3.25

Commissioner Tanaka: Thank you. So this question is actually for AE COM. So thank you for putting this together. I have questions about the potential impact on two residential neighborhoods, Downtown North and College Terrace. I noticed on page 3.4-1 that is looking at Downtown North for right now. Let's do page 3.4-2 that the points analyzed are on Middlefield going into Downtown North from let's say 101, so 19 and 20. I guess in terms of the speaker had mentioned earlier was I guess the potential for cut-through traffic. Like you said, traffic is like water it will kind of spread out and going down University is very difficult. I understand why 19 was chosen because that is a natural choice to cut-through. But I think a driver going down University towards the Medical Center depending on whether the light is green or red, if it was green I would go onto maybe Webster and turn right, and then go and make a left on a street like Webster is a lot less of a light to get off Middlefield. So I was just wondering whether any thought had been given to the fact that maybe half the time or more that drivers might actually turn into that neighborhood not necessarily go on Middlefield.

Mr. Struecker: Yes, that is why we looked at some of the residential streets in Crescent Park, which is shown, well we don't have a graphic here I guess. I had one in the presentation.

Commissioner Tanaka: I was actually looking at Downtown North though because I think drivers going down University all the way to Middlefield, and then after Middlefield I would imagine that they would make a decision, do I go onto Lytton or Everett on

Middlefield, or do I do it on Webster or Cowper depending on lights. So I was wondering if you guys took that into account or not.

Mr. Struecker: Well, we took it into account to the degree that somebody existing does it today then that is accounted for in existing traffic movements. As they go over time they tend to go in the same proportions.

Commissioner Lippert: I live on Hawthorne. There is a mitigation in place to prevent people from cutting through Downtown North. Currently between the hours of five in the morning and ten you can't make a right hand turn off of Middlefield Road into Downtown North. You have to go as far south as Lytton.

Commissioner Tanaka: Okay, thanks.

PTC3.25 Con't

Mr. Struecker: Yes, and that is why we looked at Lytton.

Commissioner Lippert: And it is currently enforced by the Palo Alto Police. People do cut through. It does happen. I am getting the hand from Mike because I know that he does it. The neighborhood does have something in place to prevent that. Then also between morning hours and afternoon hours there is also no left hand turn going down Alma Street from Menlo Park and cutting through again Downtown North.

Chair Garber: Commissioners, just in general what we should be doing is less asking of questions and more making statements so that they can either be considered for inclusion in the DEIR or be responded to as to why they are or not.

Commissioner Tanaka: Okay, anyway it sounds like that is taken care of. I think in terms of the College Terrace area I doubt that people would go to the California area because that is a very common cut through when Page Mill is busy, which it looks like it is in here, so perhaps that could also be studied and see if there is necessary mitigation measures for that intersection.

PTC3.26

I have a question also I was looking at the map and it looks like Pasteur does not go all the way through in terms of pedestrians and not necessarily for cars. I was wondering why. That might also help mitigate the impact on Sand Hill Road and El Camino, which is also one of the intersections heavily impacted.

Chair Garber: Your thinking there is, or the question for the team here is could that be used as an alternate route.

Commissioner Tanaka: Correct, and that might help unload off of that intersection.

Commissioner Keller: Are you suggesting connecting it to Campus Drive?

Commissioner Tanaka: Maybe all the way to that or Quarry or Campus Drive so that instead of having to funnel everything down on Sand Hill maybe ….

Commissioner Keller: It does connect currently with Welch.

PTC3.26 Con't

Commissioner Tanaka: Right, but Pasteur doesn't connect with Campus Drive.

Commissioner Keller: Right and Quarry doesn't go that far.

Commissioner Tanaka: Okay. That's what I have so far.

Chair Garber: Commissioners, you have each had five minutes and for some strange reason we are 55 minutes from where we started. That said, let's see if we can try and aim for like 10:30. We may have more questions but maybe if we are succinct we can try and get at least close to that. I just have a couple of quick comments but one clarification on your slide number six, which is about background SUMC trip generation. You are describing new trips daily and then AM peak hours and PM peak hours. So is this existing condition, or is this what it looks like in 2025 with the no project impact?

PTC3.27

Mr. Struecker: This is what the proposed expansion of the hospital will generate in addition to what is generated today. This is new growth.

Chair Garber: In 2025?

Mr. Struecker: Yes.

Chair Garber: Okay.

Mr. Struecker: Or maybe more accurately it could be 2022 whenever they are fully built and operable.

PTC3.28

Chair Garber: Understood. On page 3.4-27 Transportation Demand Management, would you include some consideration for bike sharing and bike sharing programs to determine if that is valid or would have impact, and/or mitigation to some issues?

PTC3.29

On page 3.4-65, excuse me before I get there I want to go to page 3.4-43 the Mitigation Measure TR-1.4 and TR-1.5 which deal with restricted construction hours. It states that the project shall be required to limit the amount of construction material deliveries from 7:00 AM to 9:00 PM and from 4:00 PM to 6:00 PM on weekday. I think we need to expand actually both of those particular mitigations to recognize local conditions. Maybe what it should really more get at is constructing a plan for how they should be restricted. For example, I would not want to have deliveries being made, trucks coming up Embarcadero at that time of the morning because it is going to run smack into Paly and that would make a mess out of that street. But, if those were coming down University Avenue it is a lot more imaginable, however if they are coming down at that time on Sand Hill that is a problem. So it seems to me that there is probably some planning that can be done to make that more better. Commissioner Keller.

PTC3.30

Commissioner Keller: A few things. First of all I think that the analysis of the Go Passes should be clarified to really indicate the fact that people are – what I think is the likelihood is that people won't be taking Go Passes from nearby cities but would be taking them from further away cities. Usually, the reason that people pick their mode share is because of

PTC3.30 Con't

time. So it doesn't make sense if it takes several times more to take Caltrain than it takes to drive people will drive. On the other hand if Caltrain is comparable in time or faster, but at most slightly slower then you have to have a pretty stiff financial incentive to force them to take Caltrain. So I think what would be helpful is to understand in terms of the 19 percent that is actually taking Caltrain or the claim number for Stanford is to understand what zip codes they are coming from, and map zip codes. Matching cities doesn't make sense. Matching zip codes makes sense and proportionately deal with those zip codes makes a lot more sense then dealing with it in terms of entire cities. So this way you are basically comparing apples and apples, not apples and oranges.

I heard Mr. Struecker say that there is some notion of cut-through traffic is proportionate basically when you increase background traffic then cut-through traffic increases proportionately. Actually, I find that counter-intuitive, because from my point of view what I would guess is that if you increase background traffic and there is more congestion then cut-through traffic will increase more than linearly. The more congestion you have the more intensive it is for cut-through traffic. If the background traffic is rather light there is no incentive for cut-through traffic. As you get to LOS E and LOS F because the delays are increasing the cut-through traffic would increase more dramatically.

PTC3.31

Therefore I think the way to think of it is not that the cut-through traffic would increase proportionately with traffic, but that the cut-through traffic would increase proportionately with the delay. Since delay is super linear, it is perhaps exponential with respect to traffic increases then you would expect cut-through traffic to increase based on that. I think that makes sense. Basically you are trying to avoid delay is why you would cut-through. I have seen people turn left onto Downtown North from Alma Street between the hours of three and six.

Commissioner Lippert: It is not left. It is not right

Commissioner Keller: I have seen people take left hand turns on Alma Street onto Downtown North from Menlo Park. I have seen it happen between the hours of three and six, and I have had to wait behind cars when I was going straight even though they were making and illegal left turn. They are waiting there at the intersection to make the left turn when traffic was coming in the opposing direction. So I have seen that happen.

PTC3.32

I understand that people have said that a no new net trips requirement for Stanford is onerous even though the Stanford General Use Permit requires a no new net trips for Stanford on the general part of the campus. I actually have made a statement in favor of saying no new net trips unless mitigated. What I mean by that is that an acceptable mitigation from my point of view is get somebody else's car off the road. So for every car that Stanford puts on the road during peak hours that is additional over baseline get somebody else's care off the road. Then that seems to make a lot more sense.

Now how can you take people's cars off the road? Well, there are ways of doing it. There was a mention in the EIR about increasing the Palo Alto Shuttle. That is one way of taking people's cars off the road. Right now we are capacity constrained on the Embarcadero Shuttle to Palo Alto High School. There is more demand for the Embarcadero Shuttle for Palo Alto High School then there is capacity. As a result of that demand is suppressed

below that. So to the extent that the Palo Alto Shuttle can be expanded to take the Paly students and provide maybe additional routes to take those students to Paly and maybe additional routes to take them home, because you can't get to school if you can't get home. People have to go both ways. That is an example of taking other people's cars off the road. I think that would be of general benefit to the community and general benefit to reducing the 15 percent of the Stanford traffic that is expected to go along Embarcadero Road.

PTC3.32 Con't

Also, the 88 bus for Gunn High School is capacity constrained. According to the figures that I got from the VTA essentially that is operating at seated capacity in the morning, and sometimes in excess when it rains, well in excess of seated capacity. So taking those cars off the road at Charleston and Arastradero would actually have some benefit in general. Getting VTA to increase their capacity and perhaps additional routes, perhaps providing Gunn students with these VTA Eco-Passes as you do for the community would also help encourage taking those cars off the road. So I think be creative in terms of getting cars off of this structure.

With respect to cut-through traffic on Downtown North considering that a great deal of the congestion is due to people coming from the north or people coming from the east who are cutting through Menlo Park, taking Willow Road, and presumably because they can't get through Willow Road all the way to El Camino. Nobody is going to want to go on Ravenswood that doesn't make any sense for people who are trying to get efficiently to Stanford. What they are doing is making a left turn from Willow Road onto Middlefield, and then they are turning right onto Lytton, and then they get stuck waiting for Lytton. Therefore, those people are turning right into Downtown North to avoid the intersection of Lytton and Middlefield Road.

PTC3.33

So first of all, one of the things that is a useful mitigation, and we have talked about traffic adaptive signaling. But there is something to me that is much more interesting than traffic adaptive signaling and that is timed signaling. So if we were to time Lytton Avenue so that traffic moved at a constant 25 miles an hour, if the traffic was timed from Middlefield towards Alma Street, once you get on that street the lights are timed in sequence in green at 25 miles and hour just as there are streets in San Francisco that do that. You get on a street, you go at the speed limit, and you get all the way to the other end and you know you are going to make it, and you don't get stopped along the way. That is going to encourage people to take that route. Similarly at Hamilton, you take Hamilton and have it timed signals that go all the way in the other direction so that the traffic doesn't speed. It goes exactly 25 miles an hour, because if you go faster than 25 miles an hour you are going to hit a red light. But if you are going exactly 25 miles an hour you are going to make it all the way through to the other end. I have personally talked about the idea of having those be one-way streets. That would certainly, but traffic timed signals would certainly help this. I think for those two streets it would be much better than traffic adaptive signaling and it would encourage that traffic and it would just go all the way. I think that would be much more effective. Perhaps it could be increased by making those into one-way streets in those directions, but I think that would be helpful.

I would like to know what is the goal for Go Passes and the goal for the drive alone figure for the hospital. Do we have the numbers for that and the mitigation and the goal overall? Do we have numbers for what those are?

Mr. Struecker: The Go Pass is 15.8 percent.

Commissioner Keller: So the Go Pass goal is 15.8 percent. How will that be road share, which means an increase of about eight points or nine points?

Mr. Struecker: We worked off the data as Robert said from 2006, and existing at that point in time was 3.6 so if we went to 15.8 it would be 12.2 percent increase.

Commissioner Keller: Alright, 12.2 percent. What you are thinking about right now they said the data is almost six. So are we still going to 15.8 or are we going to 19, which is the current mode share for the University?

Mr. Struecker: I looked at those numbers briefly. The University now is doing 19+ and the hospital is doing 6+ percent. So it is still pretty close to the 12.2 percent increase.

PTC3.34

Commissioner Keller: Okay. So I think it was 5.7 for the hospital, if I remember correctly. So I am wondering what the goal is. First of all, we should have a clear understanding of the goal. Is the goal 15.8? Is the goal 19+? A clear understanding of what the goal is. Also a clear understanding of what the drive alone mode share is. For the University mode share it says that the drive alone mode share is a fantastic 48 percent, and that is down 20 percentage points or more since the County implemented their GUP rules of no new net trips. So I think that is a very important issue to think about. We would have to think about what the mode share is for drive alone for the hospital, because I think that is in some sense another figure that needs to be measured and a goal for that.

And, I would like to understand what happens when these goals are not met, because the mitigations of P1, P2, P3, and P4 are based on an understanding of that mode share being met in terms of Caltrain and other traffic mitigations. I think we need to understand if Caltrain is not met then it is not clear that the other Priorities combined will work to reach it. So I would like to see in some sense some understanding of something with more teeth than simply mitigations that are proposed, but an understanding that if they are not met then additional things will happen, additional traffic mitigations, or various kinds of measures of what this is.

I think one of the things that were done, I studied the Gunn High School Expansion EIR, and one of the things that EIR did was said you exceed the number of cars exiting the driveway by 20-some odd cars, and 54 students I think it was. When you exceeded that, you have to keep below that in order to avoid the impacts. So in some sense what we have to think about is if we think that a certain number of cars are being mitigated by these traffic adaptive signals and such, in some sense if that is the amount that we think are mitigating that then it would be helpful to see that we actually don't exceed that number of cars exiting Stanford, and if we do then that calls for additional mitigation for transit. So it seems to me that additional mitigations for traffic. So I do think that to summarize 1) get

PTC3.34 Con't

somebody else's cars off the road; 2) have some measures with teeth which allow for additional measures to be implemented if we exceed those goals. Thank you.

Chair Garber: Commissioner Lippert and then Martinez.

PTC3.35

Commissioner Lippert: Well, I have no desire to make it easier for Stanford employees to get here by motor vehicle. I don't have a desire to do that at all. I would like to try to find ways to make it easier and to increase the number of employees that arrive by public transit. That is really the key to success here. So I am looking at these zip codes, and it is a difficult table to read and decipher. I think it is probably a little easier if I could understand the dot on the map, measure the number of employees in a zip code, or if it was done by color or something like that. In fact there are a number of employees here that commute from out of state, Boston, Massachusetts, and Kentucky, and Miami. I don't think that is even relevant to the data here.

What I am thinking of here, and I don't even know if this considers the employees that will be coming to the Hoover Pavilion in terms of working there as well. So what I am thinking, is there a way to extend the Go Pass program and make it work better than it does on the campus right now? Part of what I am thinking is that if parking were prohibitively expensive and the Go Passes were provided for free then more people would be inclined to take public transit to get there. The flip side of that of course is that we happen to have one of the largest parking lots in Palo Alto immediately adjacent to the Stanford Medical Center, which is the Nordstrom parking lot. So to circumvent the whole punitive nature of paid parking they could shop at Nordstrom every day. Sir?

Commissioner Keller: The Stanford Medical Center and Stanford University already have paid parking and I believe the Go Passes are issued for free, is that correct? So I am getting nods from them. So I figured I would add that to the list.

PTC3.36

Commissioner Lippert: So how do you get that ridership up above that threshold that we are looking for, the 19 percent or higher? I guess part of what I am thinking is Go Passes are being provided to people that really are not going to be using them. Is there a way to take Go Passes and provide them to other people that are commuting to Palo Alto that would not be working at the Medical Center? I am using an adage here because this really has to do with energy. A kilowatt saved is a kilowatt we don't have to generate in terms of electricity. In this case a car off the road, does it really make a difference if it is one that is going to the Medical Center or whether it one that is going to the Research Park or whether it is one that is going to the Downtown? We already have impacts of people driving to the Downtown or to the shopping center to work and impacting our neighborhoods in terms of parking in Downtown North for instance.

Commissioner Keller: My understanding is that the Go Passes are issues to an entity like a university or a company or a school or whatever, like a VTA Eco-Pass or Go Pass, and that you have to buy them based on the census of that entity. Essentially for every employee and they are not transferable to other entities.

Commissioner Lippert: Well.

Commissioner Keller: Certainly, an entity can buy them for some other entity but that requires an additional outlay of cash.

Chair Garber: Again, let him get through his comments so that they can be added to the record. We don't have to answer them.

PTC3.36 Con't

Commissioner Lippert: What I am interested in is finding ways to mitigate the traffic and mitigating ultimately the greenhouse gas emissions that are generated by those cars. The traffic is then generated by those automobiles, congestion on the roads. So I guess where I am going is is there a way for Stanford Medical Center to purchase these Go Passes and issue them for instance to employees at the shopping center if they are not being used by employees of the Medical Center? It is the general vicinity. It is still Stanford land. It may that Simon Group runs the shopping center but we do have a large number of people that do commute from all over that do come to the shopping center, which is in proximity to the Medical Center. I just want to find a way to reduce the traffic, and how that is done is the mechanics of how it is financed. So that is just my thought here.

PTC3.37

My other question I have, and then I will sort of stop it here, is where does traffic and climate change sort of intersect? I don't think that has been clearly defined. I think that if we look at the third sort of cross of that it is housing. So the idea is you have people that live here and they work here the commute is minimized. If you have people that live in other areas and they can get here via public transportation the impact is minimized. If you have people that are coming from great distances and driving here you have an impact. People that are living locally and they are driving their vehicle to the Medical Center you have an impact. So I want to find ways of where climate change or greenhouse gas emissions and traffic definitely impact. I want to reduce traffic but I also want to reduce greenhouse gas emissions.

Chair Garber: I believe our next topic is Air Quality and Climate and we can address that more at our next meet.

Commissioner Lippert: Maybe what needs to come back at that point is an understanding of if we were to follow the numbers that are proposed in the mitigations how many kinds of carbon emissions would be reduced.

Chair Garber: Anything else?

Commissioner Lippert: That's it.

Chair Garber: Commissioner Martinez and then Fineberg.

Commissioner Martinez: I wanted to make a point that is really directed to us, but I wanted to make the start of our deliberations about my report on the Council. There have been two Council hearings one on the 6th and one Monday related to the DEIR. Both because of the fullness of the Council Agendas it started very late. I think the first one started at 10:30 at night and Monday's started around ten o'clock or something like that. The first one there were 21 members of the public that spoke so that was almost an hour. The Council started to discuss this item going on 11:30 and they decided to continue it to

this last Monday. So on Monday they are taking up the project description, and Comprehensive Plan, and housing, and Visual Quality, and Cultural Resources. The stuff we had taken three hours each to talk about.

A couple of things were clear. One, their time to consider these was very limited. I think each got less than an hour after Staff presentations and all of that. The other thing that really struck me, and I may be stepping over my bounds a bit, but that is okay I am a volunteer. I think this 1,000-page document is not easy to just sort of be able to absorb. I kind of got from the Council's comments that they are not having the time to sort of take in every section and generate the questions because we have 71 intersections to look at along with bicycle alternatives, and Go Passes, and all that. You are going to go through it very quickly. I want to echo something that Chair Garber said, in that it is really incumbent upon us to really try to put out either what we consider larger impacts, mitigations that are marginally addressed, and not just sort of our questions about what this means. I hope for the remainder of our time we can assist the Council by really putting back to our consultants and Staff some questions about what really needs to be further addressed in the DEIR or the Final EIR. That is my thought.

Chair Garber: Commissioner Fineberg and then Tanaka.

Commissioner Fineberg: That is a hard act to follow. I think my next set of comments will live up to the spirit of the request.

Commissioner Martinez: I will let you know.

Commissioner Fineberg: I raised before some questions about TR11, Cumulative Transit Impacts, on page 3.4-87. There has been a whole bunch of numbers bandied around since then. I went back and looked at some other numbers from some other places in the document. Unless I am making a mistake I don't think this mitigation statement that as part of our operations these transit providers adjust service frequencies and distribution of services to meet demand trends. As such cumulative impacts of transit would be less than significant.

PTC3.38 The way I am figuring it I question if that is correct. Let me tell you where my numbers are going. Commissioner Keller cited earlier that the people getting on and of Caltrain at the AM and PM peaks at the Downtown station is roughly 1,800 in the AM and a little over 2,000 in the PM. Let's call it 2,000 to make numbers easy to think about. On page 3.4-45 it is talking about 750, I am rounding, additional trips in the peak AM and peak PM. Then it is talking on page 3.4-67 in TR2.3 providing the Go Pass to 15.8 percent of the hospital employees. On page S-23 I found that the population of the Stanford University Medical Center employees at full build out is 12,123. If the baseline of that 12,000 is let's say five percent now are using Go Passes and our goal is 15 percent then we are adding an additional ten percent of the population would use Go Passes. So ten percent of 12,000 employees would be 1,200, I am rounding, employees. So our baseline right now, we have about 2,000 people hopping on and off the train in the morning and at night. We are going to give them an additional 1,200 that is I don't know, 40 percent. So we are going to ask Caltrain to add 40 percent capacity during their AM and PM peak? How can that be? Then we say adjust service frequencies and distribution so the cumulative impacts would

PTC3.38 Con't be less than significant. A 40 percent increase in capacity during peak AM and PM? What is the threshold of significance? I think 40 percent is significant. So can that be addressed, not tonight, but in future comments?

The other thing I want to say generally just to echo Commissioner Martinez's comments is I am finding this chapter on Transportation difficult and how can I say this? Got an MBA from Cornell, I have done gobs of work with day-to-day, I am technically proficient, I get the analysis, but I don't understand what I am reading. It doesn't fit the common sense and the smell test. I don't know how to incorporate that sense of incredulity into a CEQA comment that could be responded to in an EIR other than like what I am talking about with this TR-11 Cumulative Transit Impact comment. I don't follow the logic and maybe there could be a quick executive summary that would help Council. We have the baseline of our projections that include ABAG's growth projections, and that includes Stanford because they are the major job-producing engine, the major population-producing engine, the major employer, the major source of sales tax. We have this baseline of growth and somehow PTC3.39 using all our models that are black boxes project traffic for 2025. We have the biggest project in the City's history. Then we say with some relatively focused mitigations there won't be significant impact. I don't follow that logic. I don't see how you can get from the beginning to the end. It is partly because I am not following how the models – I guess I am questioning a lot of the underlying assumptions in the models. I am not seeing how they are getting us to those conclusions. If I am struggling with that and if, forgive me, Council doesn't have ten hours to sit and go through these thousands of pages, and read the thousands of pages and the Appendixes, if there can be a two-page summary that explains it, maybe some basic numbers, a kind of an executive summary especially on this Transportation Chapter. I know I still don't get it. I don't understand how we are getting from the beginning to the end, and I have read this, I have looked at the Appendixes, and I don't have trouble with numbers, but I am just not following it. Thank you.

Chair Garber: Thank you, good comments. Commissioner Tanaka.

Commissioner Tanaka: Thank you. This is to go back to the Go Pass mitigation and other alternatives other than what have been currently proposed. I just listened to my fellow Commissioners about this and I am thinking perhaps it is not just employees but maybe residents going to jobs outside of the area near a Caltrain station perhaps also could PTC3.40 benefit. I know there is a lot of negotiation that would have to happen with Caltrain to kind of make that actually happen but if you do that you could get almost nearly 100 percent. To the residents, to City employees, to Stanford employees at the shopping center, you could really expand the program perhaps you would get a tremendous reduction in car trips. So that is something for consideration.

Then the other thing I was just looking at is there are going to be a lot of construction workers over the 15 years of this project. I kind of want to reemphasize the pedestrian access for not just the hospital workers but the construction workers, or anyone else that PTC3.41 wants to dine and help the economic activity in Palo Alto to make sure there is a nice core, a nice way of facilitating that from the hospitals to the shopping center. I think that is important to have so we have a reduction in parking, better economic activity, and less traffic.

One thing I am not clear on is are we not talking about the climate change and air quality?

Chair Garber: Next time.

Commissioner Tanaka: That's it. Thank you.

Chair Garber: We have follow up comments from Commissioner Keller and then Martinez. Commissioner Keller.

Commissioner Keller: So the first thing is not only do I have the data on ridership of Caltrain from 2006 I actually have the ridership by train. The ridership by train shows that in the southbound direction in the morning the train that arrives shortly before eight o'clock in the morning has 214 people getting off and going to Stanford or Palo Alto, but probably most of them are going to Stanford on the Marguerite Shuttle. Right before that there are 461 people onboard on that train when that data survey was done. I don't know what the capacity is of Caltrain but it would be helpful to know what the capacity is of a Baby Bullet train. I can tell you I have taken Caltrain Baby Bullets at around five o'clock out of San Francisco and they are pretty darn full. So I am wondering where these other people are going to go if they are taking that depending on what their schedule is.

Similarly the northbound schedule that leaves just after five o'clock in the afternoon 239 people get on at the Palo Alto station and there are 397 people onboard right after that. So it is a little bit less than there is in the morning but still a significant amount. So I am wondering how much additional capacity and really to understand how the mode share is for people working eight to five. They are going to try to catch those two trains and therefore peak demand certainly makes sense.

PTC3.42

I think it is helpful to understand that I actually engaged in discussions on behalf of Gunn High School of trying to see what would be needed for Gunn High School to get Go Passes for all of Gunn. I had some discussions with the VTA about that. What was constructive about this is I got a letter in support of yes we are willing to price these Go Pass, we are willing to sell them to you, but we are not willing to commit to increasing service. In fact, they were willing to say – they were writing a letter saying they won't increase service even if we gave all the students free bus passes. Presumably demand would increase if you give them free bus passes but the original draft letter says we are not going to increase service. I wrote back to them saying I am not going to be able to write a letter to a grant agency asking for people to pay for Go Passes for Gunn High School if you are not going to increase service. That is ridiculous. You are going to increase demand and not have service that is sort of a self-defeating prophecy. That doesn't really work. So I basically said to them that your policies are that you accommodate to increases in demand to accommodate increases in service. But they basically said with their environment the next year at least, and who know how much further it will be, the next so many years they don't have the money to increase service.

So the issue is that if you expect VTA to increase service there has to be money behind it not simply Go Passes because that is not going to work. If you want Caltrain to increase service their budget is being cut primarily instigated by San Mateo County with the fact that there is no dedicated funding for Caltrain. So they are being cut in San Mateo. VTA

is happy to go along with San Mateo's cuts and so is Muni because they want to protect their own bus service. So these services are at risk and they are continually going down. So expecting that to fill in the gap as Commissioner Fineberg mentioned in TR-11 doesn't make sense.

I think that also there is a lot of stuff here in terms of Transit Impacts, TR-7. I like a lot of what I read here because it says you are going to expand this, you are going to expand that, you are going to provide more capacity. These things need to be quantified. It says as part of the plan communities are required, and then the comment says the SUMC Projects sponsors will contribute the project's fair share of Palo Alto's share of expanded VTA community service. Well, I am not sure if Palo Alto actually pays the VTA to expand the community service. I am not sure exactly what the share would be from Stanford, but this needs to be quantified. You are going to provide X dollars estimated with inflation based on VTA's costs to provide that. I would say it is interesting because according to the figures that I know is that the Palo Alto Shuttle, the two lines, carry 175,000 passengers, boardings, a year at a cost of about $350,000 from the City plus another $150,000 or $175,000 that comes from somewhere else. The figures I have are probably obsolete but they were that 1.3 million boardings for Marguerite. That is an amazing, fantastic service. I guess the number has gone up since then. I don't remember what they were. Are they 1.4 million now? So that is several times, eight or so times, what Palo Alto gets for the Palo Alto but on the other hand there are 13 or 14 routes. You compare that with VTA, the entire VTA county system, is about 30 million boardings a year. So contrast the Marguerite with the VTA for the entire county and you are something like three or four percent of the entire county's boardings, which is pretty amazing. So I think that the issue is that Stanford has shown itself to a leader in providing transportation, at least on campus. I think that if Stanford sets its mind to it and it shows that its mind has been sharpened very significantly by the county GUP and let's see how Stanford can go well with the Stanford Medical Center and community physicians and how we can really bring that down so that in fact there will be not only mitigated impacts but in fact the mitigations will actually bring it down to zero rather than bringing it down to something that is below significance. I think that can be done, I think that Stanford knows how to do it, and Stanford has done a fantastic job so far of 20-some odd percentage points reduction in mode share of single occupant vehicles. That is an amazing thing to do in ten or so years. I think that is fantastic. So it is a challenge to figure out what you can do with the Medical Center. I realize there are more people in the Medical Center who are coming from or more people who are patients and community physicians and such than the share is on campus where it is a lot of workers and a lot of students who live on campus. A lot of workers who have a schedule on campus. I think something can be done so I would challenge you to do as equally as well a job and to have that quantified in the EIR exactly what that means, and have it backed up by doing additional measures to make that work, and indicating what the fallback measures are if it doesn't work. If that means that Stanford at some point in time says we are not meeting the thresholds and the limits, and we are exceeding that, and they come back to Palo Alto just as Stanford would have to do with the County with the GUP then so be it and we figure out collectively the additional mitigations to make that work. I think that that's very important and I think that Stanford is certainly a leader in the peninsula and most of the Bay Area in this. I think that Stanford can do as well with the Medical Center. Thank you.

PTC3.42 Con't

Chair Garber: Commissioner Martinez, some final words, and then we will wrap up.

PTC3.43 Commissioner Martinez: Okay. I will be as quick as I can. On page 3.4-60 what do we do if the mitigations don't work? This is following in the steps of Commissioner Keller. I think there is a lot more that can be done in terms of the TDM, much more creativity. It is rather weak. It doesn't mention any kind of creative sort of Facebook kind of thing related to people using Go Pass, and who should be using it. I get an email every month telling me I need to pay my Fast Track. We can do things that are even much more multidimensional that. I didn't see anywhere about rideshare and vanpooling and carpooling that is also a great alternative.

PTC3.44 I wanted to get back quickly to Commissioner Lippert's point about housing. We know there are two sure-fire ways to decrease traffic. You locate your project near transportation, which is not going to happen. We couldn't even get them to move the building. The second is to build housing near facilities, which ironically is one of the first items of this section that describes the policy at Stanford. I know when we discussed housing the impact was considered not so significant. I was curious because the study looked at improving bicycle and pedestrian access. If it were only for the increased population, and you sort of calculate it out it would be for 42 residents of Palo Alto. We know that is not the intension it is going to be used by all 10,000 workers at the hospital and students and Stanford employees, and that is the way we should look at it because that is the total mitigation that would happen. We should also look at mitigation for housing in that same way. We have a problem today of too much commuting by people who work at Stanford. I understand we can't require it as a mitigation but the inclusion of increased worker housing in the Development Agreement or as a mitigation for all this traffic would do more to reduce this impact then anything I can think of. Thank you.

Chair Garber: Thank you. Commissioners, we are at the end of this particular item. I would like to thank Stanford. We will close the public hearing and close this item. Thank you for sticking with us for so long. We will see you next week.

Commissioners, we have a couple of items to take care of. It won't take long. The first thing is if I am understanding Zariah's note correctly, if we give her our folders this evening she will fill them and return them to us tomorrow for next week's items.

APPROVAL OF MINUTES: None.

REPORTS FROM OFFICIALS/COMMITTEES.

Chair Garber: Commissioner Martinez you already gave us a report on Council. Are there any other reports, Commissioners?

Commissioner Lippert: The Palo Alto Housing Corporation had their 40th Anniversary.

Chair Garber: Did you attend?

Commissioner Lippert: I did.

Chair Garber: How was the party?

Commissioner Lippert: It was great. They inaugurated a new community room built by Northway. It was very nice.

Chair Garber: Anything else?

Commissioner Lippert: That's it.

COMMISSION MEMBER QUESTIONS, COMMENTS, AND/OR ANNOUNCEMENTS.

Chair Garber: The one other item that we will add to our agenda here is that Garber will take the month of July for representation at City Council. I will need someone to take my place I believe it is July 19 because I will not be available that Monday.

Commissioner Lippert: I can do that.

Chair Garber: Commissioner Lippert will do that. Alright, if there is nothing else, Julie?

Ms. Caporgno: No.

NEXT MEETING: Special Meeting on June 17, 2010 at 6:00 PM

Chair Garber: We are adjourned. It is 10:42 PM.

ADJOURNED: **10:42 PM**

PTC 3. Planning and Transportation Commission, June 16, 2010

PTC3.1 *The commentor supports priority number five (satellite parking) as an alternative to Mitigation Measure TR-2.3 and states the Draft EIR does not adequately address the need for offsite parking and places too much reliance on the transportation demand management (TDM) measures*. Please refer to Master Response 1 for a discussion of the viability of Caltrain and measures that would be taken if the Hospitals do not achieve the mode split requirements in Mitigation Measure TR-2.3, which involves an enhanced TDM program. Please also see Master Response 2 for a discussion of remote parking.

PTC3.2 *The commentor states that rather than focusing on where SUMC employees live, the Draft EIR should consider how many employees would be served by Caltrain and benefit from the GO Pass*. Please refer to Master Response 1 for a discussion on the effectiveness of the GO Pass mitigation measure (Mitigation Measure TR-2.3), the desired mode split under this measures (which relates to how many employees would use the GO Pass), and measures that would be taken if the desired mode split were not achieved.

PTC3.3 *The commentor states that the mitigation for traffic impacts relies heavily on Caltrain, but has concerns that Caltrain may not be in service in the future and suggests a contingency plan, such as offsite parking*. Please refer to Master Response 1 for a discussion of the viability of Caltrain and measures that would be taken if the desired mode split requirements in TR-2.3 were not achieved. See Master Response 2 for a discussion regarding remote parking.

PTC3.4 *The commentor states that if the GO Pass is not satisfactory, the TDM program should be enhanced by leasing more than the 75 parking spaces suggested in the Draft EIR at the Ardenwood park-and-ride*. The requirement to use reasonable efforts to lease 75 parking spaces in the Ardenwood park-and-ride lot or an equivalent location is part of the enhanced TDM program under Mitigation Measure TR-2.3, not a measure implemented only if the GO Pass does not achieve the expected results.

The commentor also suggests that the number of leased spaces be based on the actual number of SUMC employees living in the East Bay, and suggests other areas for leased parking spaces. Please see Master Response 1, which explains that the Hospitals would be required to use all reasonable efforts to lease parking spaces in the Ardenwood park-and-ride lot, or at an equivalent lot, at the east end of the Dumbarton Bridge to allow East Bay employees to park at the park-and-ride lot and board the U-Line to reach the SUMC. Also, the GO Pass mitigation measure reduces significant impacts on intersection LOS by achieving a certain Caltrain usage rate, rather than by providing Caltrain service to every employee who lives in the East Bay. As such, it would not be appropriate to base the leased parking provision on the actual number of SUMC employees living in the East Bay.

Lastly, the commentor indicates that Stanford's numbers on where SUMC employees live appear unused in the EIR. Stanford's numbers on where SUMC employees live were used in the EIR, including analysis of the GO Pass, as shown in Appendix H of the Transportation Impact Analysis (Appendix C to the Draft EIR).

PTC3.5 *This commentor encourages the construction of two mini-transit centers and states Stanford should pay the complete cost of these centers.* The SUMC Project sponsors would provide enhanced bus stops at the new SHC and Hoover Pavilion Site. Please refer to Staff-Initiated Change 1 for a revised discussion on the enhanced bus stops.

PTC3.6 *The commentor references the trip distribution map on page 3.4-48 of the Draft EIR and states that there should be an incentive, such as remote parking, for traffic to access the SUMC Sites from I-280.* As shown in this graphic, the vast majority of regional traffic is expected to access the SUMC Project from the east, exiting off US 101 and then sifting westward through Palo Alto neighborhoods. Please refer to Master Response 2 for a discussion of the feasibility and effectiveness of remote parking.

PTC3.7 *The commentor states the mitigation measures for the SUMC Project traffic impacts, such as GO Pass mitigation, rely on several factors outside the control of the SUMC Project sponsors.* Please refer to Master Response 1 for a discussion of the effectiveness of the GO Pass.

PTC3.8 *The commentor supports off-site parking served by the Marguerite shuttle and requests that the SUMC Project sponsors consider running Marguerite-type buses from San Francisco, Fremont, and other areas.* The intent of the TDM mitigation measure (Mitigation Measure TR-2.3) presented on pages 3.4-67 through 3.4-68 of the Draft EIR is to increase Caltrain ridership from a current level of 3.6 percent for hospital employees to 15.8 percent, which would result in a reduction of approximately 500 vehicle trips in the AM and PM Peak Hours. Remote parking would not be required, except at the Ardenwood Park-n-Ride Lot as required under revised Mitigation Measure TR-2.3. In addition, please refer to Master Response 2 for discussion regarding remote parking and the viability of expanding shuttle services.

PTC3.9 *The commentor states that the City of Palo Alto has been successful with off-site parking lots due to the Marguerite shuttle service connections.* Remote parking lot information is contained in Appendix K of the Transportation Impact Analysis (Appendix C of the Draft EIR). Please refer to Master Response 2 for additional information regarding remote parking. Please refer to Master Response 1 for information about the viability of Caltrain.

PTC3.10 *The commentor states that if Caltrain ceases to provide service, then the Marguerite shuttle service would need to be expanded.* Please refer to Master Response 1 for information about the viability of Caltrain.

PTC3.11 *The commentor asks if the parking and transportation analysis presented in the Draft EIR has been revised since it was first presented to the Commission, which included the Stanford Shopping Center Project*. The analysis included in the Draft EIR is based on the SUMC Project as currently proposed, without the Stanford Shopping Center expansion. The City of Palo Alto Travel Demand Forecasting Model was revised to include some assumed growth at the shopping center as part of the background future development, but is not included as part of the proposed SUMC Project.

PTC3.12 *The commentor asks whether the background increase in population has a significantly larger impact on the transportation network than the SUMC Project itself.* Please see Master Response 3 for a discussion on background population growth.

PTC3.13 *The commentor states that the significance criteria for impacts in Menlo Park are much more stringent than in Palo Alto and suggests that the Comprehensive Plan Amendment analysis incorporate Menlo Park's thresholds into the Palo Alto significance thresholds*. As stated by the commentor, the Menlo Park significance criteria for impacts on residential arterials is much more restrictive than Palo Alto's. However, changing the standards of significance for traffic impacts in the City of Palo Alto is beyond the scope of this EIR. As discussed in Section 3.4 of the Draft EIR, Transportation, the Menlo Park standards of significance were applied to those roadways in Menlo Park. Please see Master Response 11 for a discussion about the City of Palo Alto's Comprehensive Plan Amendment and how its schedule is not applicable to the SUMC Project.

The commentor continues by stating that that Figure 3.4-2 of the Draft EIR does not show the Homer Avenue undercrossing. Figure 3.4-2 on page 3.4-20 of the Draft EIR has been updated to show the Homer Avenue undercrossing. See Staff-Initiated Change 2 and Appendix T of this document for the revised figure.

The commentor also asks if the mitigation measures proposed in the Draft EIR would reduce the 766 AM Peak Hour and 746 PM Peak Hour trips. Two of the mitigation measures would reduce traffic volumes. The GO Pass (see revised Mitigation Measure TR-2.3 in Master Response 1) would reduce Peak Hour traffic by approximately 500 vehicle trips in each Peak Hour. The construction of bicycle and pedestrian undercrossings (Mitigation Measure TR-2.2 page 3.4-67 of the Draft EIR) at Everett Avenue and Middle Avenue would reduce Peak Hour traffic by approximately 25 vehicle trips in each Peak Hour.

PTC3.14 *The commentor questions if SUMC employee residential zip code data is available and if it is factored into the traffic model.* The SUMC Project sponsors have zip code data for all employees, which was used to determine the trip distribution in the TRAFFIX model. Appendix L of the Draft EIR includes SUMC employees by city of residence.

PTC3.15 *The commentor questions how the GO Pass would be administered and states that a 10 percent shift in mode split to transit would be significant.* Please see Master Response 1 for the discussion of the administration of the GO Pass and effectiveness of the GO Pass mitigation measure.

PTC3.16 *The commentor questions whether LOS F at an intersection would be realized where people commute at another time or find another way to get there.* LOS describes how traffic is flowing, as described on page 3.4-11 of the Draft EIR. LOS A indicates little or no delay, where all traffic would flow through a signalized intersection on the next signal cycle from when they arrived. LOS D indicates long traffic delays, wherein vehicles may need to wait through two signal cycles to flow through the intersection. LOS F indicates extreme traffic delays with intersection capacity exceeded, such that most vehicles would not flow through the intersection on the first signal cycle and would need to wait for the second cycle, or possibly the third. When traffic reaches a certain level, at LOS E and LOS F, motorists tend to find alternative routes, alternative modes, or alternative travel times. As noted in Table 3.4-6 on page 3.4-16 of the Draft EIR, the volume to capacity ratios (V/C) are nearly all less than 1.0. Once traffic reaches a certain level, it cannot go higher and must be accommodated in another way.

PTC3.17 *The commentor states that it is not uncommon on the Peninsula to use Caltrain to go Redwood City or San Jose or to drive to the Dumbarton Express and use it to cross the Bay and access the SUMC.* As the commentor states, many people use Caltrain for their commute on the Peninsula. In addition, the Ardenwood park-and-ride lot was recently expanded to accommodate the commuters who park their vehicles at the park-and-ride and use the Dumbarton Express or the U-Line to reach the Stanford campus or other locations such as the VA hospitals, downtown Palo Alto, and Stanford Research Park.

PTC.18 *The commentor asks if LOS conditions are controlled more by signalization, traffic speeds, and safety rather that the LOS rating of A through F.* LOS designations differ for intersections and for freeway segments. LOS for intersections is based on overall delay, which includes factors such as signal timing, phasing, the volume of traffic, and bicycle and pedestrian volumes. LOS A represents very little delay to individual vehicles. At LOS A, when the signal turns green, all vehicles would be able to traverse the intersection. At LOS F, when the signal turns green, several vehicles at the back of the queue would not be able to traverse the intersection and would have to wait for the next signal cycle. In that sense, travel speeds are lower because of the delay at an intersection.

LOS for a freeway segment is based on density and density is a function of travel speed. At LOS A on a freeway, the driver is free to drive at almost any speed and is free to change lanes at will. At LOS F on a freeway, the speeds are highly variable from 0 to 35 miles per hour (mph) and back to 0 mph. Changing lanes is very restrictive because of the other vehicles on the road.

PTC3.19 *The commentor asks why the drive alone percentage for Stanford University employees is about 56 percent and for SUMC employees it is about 77 percent. The commentor also states 15.6 percent of University employees are GO Pass participants and 3.6 percent of SUMC employees are Caltrain riders.* Please refer to Master Response 1 for a complete discussion of the mode split assumptions.

PTC3.20 *The commentor states that zip code 94303 is in both Palo Alto and East Palo and this fact needs to be properly accounted for in the analytic models.* The SUMC Project application provides cities where SUMC employees live, and further divides these locations by zip codes. Several zip codes traverse more than one jurisdiction and this is considered in the employee zip code analysis. The zip code data from the application is provided as Appendix L of the Draft EIR, which shows that 124 SUMC employees who live in the 94303 zip code are from Palo Alto and 158 SUMC employees who live in the 94303 zip code are from East Palo Alto. Therefore, Appendix L of the Draft EIR makes a distinction between the two cities, although they share the same zip code.

The zip code information for place of residence of the SUMC employees was used to establish the trip distribution for additional traffic that would occur from the SUMC Project. Traffic was assigned to logical streets based on the location of the zip code. A zip code shared by two jurisdictions does not change the travel path of traffic attracted to that zip code.

PTC3.21 *The commentor asks how many Stanford employees participate in the GO Pass program on a daily basis.* Data provided by the SUMC Project sponsors for 2006 show that out of the 11,000 Stanford University employees, 9,400 are eligible for a GO Pass. The mode split to Caltrain is 15.8 percent. Therefore, approximately 1,740 employees may use Caltrain on a daily basis. Adjusted for vacations and other absences, about 1,390 employees use Caltrain on a daily basis, or for two-way travel, 2,780 daily one-way trips. By comparison, Caltrain currently has approximately 37,000 total daily trips (boardings) as reported in the February 2010 Ridership Counts.

Also, the commentor asks for the projected number of SUMC Project employees that would use the GO Pass, and asks for the number of people who get on and off the trains at the Palo Alto Intermodal Transit Station (PAITS). The commentor questions the usage of the GO Pass, and it projected effectiveness in mitigating SUMC Project impacts. Please see Master Response 1 for a discussion of the effectiveness of the GO Pass. The Hospitals are projected to employ 10,615 workers in 2025. The GO Pass mitigation measure requires that the Hospitals achieve a mode split equal to the University (15.8 percent). This requirement would add about 1,680 daily Caltrain riders, or 1,345 adjusted for absences. The current average daily number of boardings and alightings for PAITS is 3,905 boardings and 4,013 alightings.

PTC3.22 *The commentor questions the assumptions for cumulative growth.* As discussed on page 3.4-85 of the Draft EIR, the project-level LOS analysis accounts for cumulative growth through 2025 because the growth was incorporated into the City of Palo Alto Travel Demand Forecasting Model. As explained on page 3.1-6 of the Draft EIR, the City of Palo Alto Travel Demand Forecasting Model projects increases in traffic in 2015, 2025, and 2030 based on forecasted growth within Santa Clara County and San Mateo County. The key inputs to the model are the estimated growth in commercial and residential development, and the planned and programmed infrastructure improvements (roads, public transit, bicycle, and pedestrian facilities) that would occur between the existing and future years. As warranted under CEQA, the cumulative analysis should identify the cumulative impact of the SUMC Project plus other future growth as projected in the model, then identify and mitigate as warranted the SUMC Project's contribution or portion of the cumulative impact. This cumulative analysis is accomplished in the project-level analysis, as indicated on page 3.4-85 of the Draft EIR. While growth in other parts of the Stanford University has been included as part of the cumulative impact, it would be inappropriate to account for other Stanford University growth as part of the SUMC Project impact or SUMC Project contribution to cumulative impacts. Also, please refer to Master Response 3 for a further discussion of background growth for the transportation analysis.

PTC3.23 *The commentor questions the growth assumptions under the cumulative analysis of construction-period impacts, and questions the geographic context for cumulative analysis.* The cumulative scenario can vary depending on the nature of the impact. For the cumulative analysis of construction-period impacts, the analysis appropriately considers other construction activities that could occur concurrently with the construction of the SUMC Project. This construction-period cumulative scenario differs from the operational cumulative scenario, which examines future traffic conditions as projected in the City of Palo Alto Travel Demand Forecasting Model. Contrary to the commentor's statement, the geographic context for the cumulative scenario is not restricted to the SUMC Sites, in either the construction or operational impact analyses. As stated on page 3.4-85 of the Draft EIR, the geographic context for the analysis of cumulative construction-period transportation impacts (as well as the LOS analysis) is the Study Area for the transportation analysis (see page 3.4-2 of the Draft EIR). The geographic context for the analysis of cumulative transit impacts is the service areas of the major transit services serving the SUMC Sites; these areas generally include San Mateo County and Santa Clara County. Please refer to Master Response 3 for a further discussion of the cumulative transportation analysis. In addition, please refer to Master Response 4 for discussion of construction traffic.

PTC3.24 *The commentor expresses concern regarding the Draft EIR's reliance on public transit and questions what would happen if Caltrain, Santa Clara Valley Transit Authority (VTA), San Mateo County Transit District (SamTrans), and Alameda-Contra Costa Transit District (AC Transit) either shut down or cut service.* All transit agencies are currently experiencing

financial difficulties. There would be considerable changes to regional commuting behavior if all transit agencies discontinued or substantially reduced operations. Given the high volume of ridership, it is not likely that the transit services would cease to exist. More likely, the cutbacks would occur outside of the Peak Hours when most employee trips take place. In the very unlikely event that transit services in the region were to shut down or substantially reduce operations, regional solutions would be needed to address the needs of the high volume of ridership. Such regional solutions are outside of the control of individual project sponsors. Please refer to Master Response 1 for discussion of the viability of Caltrain and stapes to be taken if desired mode splits were not achieved through the GO Pass mitigation measure.

Another commentor provides information regarding Caltrain ridership at the PAITS for 2006 and indicates that commuters who live closer to Palo Alto than San Francisco would not take Caltrain. Please refer to Staff-Initiated Change 1 for 2010 statistics. As noted in Response PTC3.21, above, Stanford University employees account for approximately 1,400 of these riders. Please also see Master Response 1 for a discussion of the effectiveness of the GO Pass mitigation measure.

PTC3.25 *The commentor raises issues regarding cut-through traffic through the Downtown North and College Terrace neighborhoods.* Section 3.4, Transportation, of the Draft EIR considers the Downtown North neighborhood and analyzes intersections #19 (Middlefield Avenue/Lytton Avenue) and #20 (Middlefield Avenue/University Avenue). Although Webster Street is not studied in the Draft EIR, both Hawthorne Avenue and Everett Avenue are included in the analysis. Even though, as the commentor points out, turning movements directly onto Hawthorne Avenue and Everett Avenue are not possible from Middlefield Road and Alma Street during peak commute times, there are other routes that can be used. As shown on Table 3.4-20 on page 3.4-71 of the Draft EIR, the SUMC Project would not have a significant impact on the two main Downtown North streets that are analyzed. Based on these results, no significant impact would be expected to occur on Webster Street.

In terms of College Terrace, a detailed analysis is not included in the Draft EIR since traffic calming measures have already been implemented that control cut-through traffic. No significant impact from the SUMC Project would be expected to occur in College Terrace. The intersection of California Avenue and El Camino Real is included in the transportation analysis, which indicates that no significant impacts would occur at this intersection.

PTC3.26 *The commentor notes that, according to the SUMC Project site plan, Pasteur Drive does not allow automobile access or connection to Quarry Road or Campus Drive West.* The SUMC Project sponsors specifically do not propose an automobile connection between Pasteur Drive to the extension of Quarry Road or to Campus Drive West in an effort to

discourage cut-through traffic. A roadway would be constructed, but it would not be open to public traffic. Please refer to Master Response 5 for the discussion of the connection between Pasteur Drive and Roth Way.

PTC3.27 *The commentor questions whether the daily and Peak Hour trips included in the presentation reflect Existing Conditions or the 2025 No Project conditions.* The slide at the presentation showed the 2025 SUMC Trip Generation for the SUMC Project. Before mitigation, the SUMC Project would generate 10,061 new daily trips, 766 new AM Peak Hour trips, and 746 new PM Peak Hour trips. These trips represent the estimated newly-generated traffic from the SUMC Project in 2025 when the SUMC Project is completely built and occupied. However, the trip counts do not account for any trip reduction associated with the mitigation measures presented in the Draft EIR.

PTC3.28 *The commentor refers to page 3.4-27 of the Draft EIR and asks whether bike sharing could be included in the TDM program, as explained on page 3.4-27 of the Draft EIR, and would if it would mitigate some of the impacts.* Please refer to Master Response 2 for a discussion of the bike-sharing program.

PTC3.29 *The commentor states that Mitigation Measures TR-1.4 and TR-1.5 should be expanded to reflect local conditions and requests a plan to restrict certain truck deliveries.* Mitigation Measure TR-1.4 restricts deliveries from 7:00 a.m. to 9:00 a.m. and from 4:00 p.m. to 6:00 p.m. Mitigation Measure TR-1.5 restricts truck deliveries to designated routes in Palo Alto, Menlo Park, and East Palo Alto. The language in these mitigation measures is typical for large construction projects in Palo Alto. Please refer to Master Response 4 for a discussion of construction traffic.

PTC3.30 *The commentor states that it would be helpful to understand the zip code location of the 19 percent of university employees who use Caltrain.* Please refer to Master Response 1 for a discussion of the SUMC employee residence data and the effectiveness of the GO Pass mitigation measure.

PTC3.31 *The commentor asserts that cut-through traffic would increase proportionately with delay rather than background traffic.* Travel paths, either on arterial streets or cutting through residential neighborhoods, is based on minimizing delay or total travel time. If Existing Conditions had LOS A, LOS B, or LOS C conditions, and the future had mostly LOS E and LOS F conditions, then the increase in cut-through traffic would be exponential. However, the Existing Conditions in the specified streets in Downtown Palo Alto are not LOS A, LOS B, or LOS C, but rather LOS E and LOS F. Therefore, while the increase in cut-through traffic may not be entirely linear, it is closer to a proportionate increase than would be the case if acceptable traffic operations currently occurred.

Additionally, the commentor states that people turn left from Alma Street into Downtown North from Menlo Park. As stated by the commentor, some drivers ignore the turn

restrictions in place on Alma Street that prohibit vehicles from turning either left or right from Alma Street onto Everett Avenue or Hawthorne Avenue. However, this is an existing enforcement issue rather than an environmental impact resulting from the SUMC Project.

PTC3.32 *The commentor states that for every car that the SUMC Project adds to the existing baseline, another car should be taken off, resulting in no net new trips.* Please refer to Master Response 2 for a discussion of a No Net New Trips requirement.

PTC3.33 *The commentor states that traffic is cutting through the Downtown North neighborhood and that traffic signals on Lytton Avenue and Hamilton Avenue should be timed and that these streets should be reconfigured to be one-way.* Willow Road, Middlefield Road, and Lytton Avenue are highly-used routes and the travel pattern from Willow Road to Middlefield Road to Lytton Avenue is considered in the Draft EIR transportation analysis. The concept of tying the traffic signal timing to the desired speed is also an approach that has been used in other jurisdictions. This approach works best if the signal progression is in one direction only, as described by the commentor. In addition, a one-way street system advances the implementation of this concept. Changing Lytton Avenue and Hamilton Avenue to a one-way pair has been previously discussed, but a separate study and community involvement process would be necessary to make this conversion. Such a study is beyond the scope of this EIR because, with the identified mitigation, the SUMC Project would not result in significant impacts to intersections or roadway segments in Palo Alto.

PTC3.34 *The commentor questions the mode split goal for the GO Pass and the increase from the current mode split.* Please refer to Master Response 1 for a discussion of the effectiveness of the GO Pass mitigation measure.

PTC3.35 *The commentor supports the use of transit for SUMC employees and requests a colored map that shows employee residential data rather than a table by zip code (as included in Appendix L of the Draft EIR).* Provision of GO Passes to Hospital employees is expected to change the drive alone mode split from 77.1 percent to 64.9 percent. The locations of employee residences outside the Bay Area were not used in the GO Pass Analysis. Appendix H of the Transportation Impact Analysis (Appendix C of the Draft EIR) provides a map that shows University versus Hospital employees by zip code location, along the Peninsula.[1]

PTC3.36 *The commentor suggests increasing parking fees and offering the GO Pass to Shopping Center employees to attain or exceed the desired mode split.* Please see Master Response 1 regarding effectiveness of the GO Pass mitigation measure and additional steps to be taken if required mode splits were not achieved. The SUMC currently charges for parking. If that parking fee was increased, then it may cause a shift in travel patterns to alternative

[1] Fehr & Peers, memorandum: Analysis of Go Pass Program for Hospital Employees, Figure 4, September 22, 2008.

modes, as suggested by the commentor. However, a fee increase may also cause drivers to park at the Stanford Shopping Center or in residential neighborhoods, creating a parking enforcement issue. In addition, the SUMC needs to remain competitive with surrounding hospitals and a parking fee that is too high may discourage employees from working at the SUMC.

It is uncertain whether the Hospitals could achieve Caltrain usage greater than a 15.8 percent mode split. Stanford University has experienced an increase in Caltrain use from 15.8 percent in 2006 to over 19 percent currently. Because more Hospital employees than University employees live in a city served by Caltrain, it is possible that a modal split to Caltrain greater than 15.8 percent can be achieved. However, until GO Passes are offered to hospital employees, the rate of usage cannot be predicted with precision. The 15.8 percent mode split identified in the Draft EIR is a reasonable goal.

GO Passes must be purchased for all eligible employees, those who work 20 hours or more and do not live on campus. GO Passes cannot be purchased or transferred to other entities or individuals.

PTC3.37 *The commentor would like clarification on how traffic impacts climate change and further, how the proposed traffic mitigation reduces carbon emissions.* The combustion of fossil fuels results in the emission of various chemicals including carbon dioxide, methane, and nitrous oxide (all greenhouse gases). Therefore, whenever vehicles engines are on, they contribute to climate change impacts. The amount of greenhouse gas emitted is dependent on time idling, as well as the speed and length of time in motion. When vehicles are replaced with other modes of transportation, greenhouse gas emissions are reduced because although the buses, shuttles, and/or trains may be producing greenhouse gas as well, the quantities are significantly lower than if every passenger were in their own vehicle. The mitigation measures presented in the Draft EIR provide various ways in which to reduce the number of single occupancy vehicles on the roads. This is accomplished by either replacing them with non-motorized modes of transportation or by mass transit, both of which would reduce emissions of carbon dioxide, methane, and nitrous oxide. In addition, please refer to Master Response 1 for more information about the effectiveness of the GO Pass and Staff-Initiated Change 4 for updated climate change information.

PTC3.38 *The commentor disagrees with the significance conclusion for Impact TR-11 on page 3.4-87 of the Draft EIR and believes that the impact would be significant, rather than less than significant as stated in the Draft EIR.* Please refer to Staff-Initiated Change 1 for a discussion of transit impacts.

PTC3.39 *The commentor states that the transportation chapter is difficult to follow.* Please refer to Master Response 3 for a discussion of background growth. Please refer to Staff-Initiated Change 1 for a discussion of Caltrain usage.

PTC3.40 *The commentor suggests that the GO Pass program be expanded to include other employees working in Palo Alto and residents of the City*. The proposed GO Pass program would be for Hospital employees only and passes would be purchased for all eligible employees, whether they will use Caltrain or not. Each of the employers mentioned in the comment would need to purchase GO Passes for their employees. There is currently no program for residents to acquire GO Passes en masse. Please see Master Response 1 for a discussion of the effectiveness of the GO Pass mitigation measure and the required steps in the event that desired mode splits were not accomplished.

PTC3.41 *The commentor states that the SUMC Project would employ many construction workers over the 15-year construction period and suggests that pedestrian access should be emphasized for construction workers*. Please refer to Master Response 4 for a discussion of impacts and warranted mitigation measures during construction.

PTC3.42 *The commentor requests data on the capacity of a train and suggests that Mitigation Measure TR-7.2 for expanding transit service be quantified*. The capacity of a Caltrain train is 650 seated passengers. Please refer to Staff-Initiated Change 1 for a discussion of transit effects, and Mitigation Measures TR-7.1 and TR-7.2. Please refer to Master Response 6 for a discussion of mitigation costs.

PTC3.43 *The commentor states that more can be done in terms of TDM, and suggests other TDM measures such as ridesharing, vanpooling, and carpooling*. Please refer to Master Response 1 for a discussion of the effectiveness of GO Pass and Master Response 2 for a discussion of other TDM measures. Please note that the SUMC Project sponsors already provide the TDM measures listed by the commentor.

PTC3.44 *The commentor indicates that solutions for SUMC Project issues are locating the SUMC Project near transit and building housing near the SUMC Project. The commenter points out the mitigation measure regarding bicycle and pedestrian connections would serve all commuters to the SUMC Sites, and the housing mitigation should be applied the same way*. First, it should be noted that the SUMC Sites are within walking distance to the PAITS. The Hoover Pavilion Site is located approximately 950 feet from PAITS and the Main SUMC Site is approximately 3,300 feet away. Other modes of transportation are also within walking distance of the SUMC Sites. As stated on page 3.4-23 of the Draft EIR, the Study Area is currently served by several transit providers, including SamTrans, VTA, AC Transit, Stanford University Marguerite shuttle routes, City of Palo Alto shuttle service, City of Menlo Park shuttle service, and Caltrain. Both fixed route bus service and commuter rail service are available within walking distance of the SUMC Sites. Figure 3.4-5 of the Draft EIR shows the public transit network within the Study Area. The goal of locating the SUMC Project in close proximity to transit is already achieved by its location.

In addition, it is not the purpose of CEQA to mitigate the entirety of the impact of a project. Rather, CEQA requires feasible mitigation measures to be identified for those impacts determined to be significant, based on the significance criteria applied to the analysis. In other words, only the portion of the project impact above or beyond the significance criteria would need to be mitigated. In the case of bicycle and pedestrian circulation, the significance criterion indicates that a significant impact would occur if the SUMC Project would result in increased traffic related hazards to pedestrians and bicyclists as a result of increased congestion (see page 3.4-31 of the Draft EIR). The analysis indicates that the resulting increase in bicycle and pedestrian travel, and traffic volumes, plus the associated intersection congestion caused by higher traffic levels from the SUMC Project, could result in increased traffic-related hazards to pedestrians and cyclists. As such, Mitigation Measure TR-6.1 has been identified to enhance bicycle and pedestrian infrastructure to reduce potential for hazards, and reduce the impact to less than significant.

Finally, please see Master Response 7 for a discussion of the conceptual terms under which Mitigation Measure PH-3.1 has been developed, the uncertainty for implementing this measure, and the number of housing to be required under the this measure.

PTC 4

PLANNING& TRANSPORTATION COMMISSION MINUTES

==========MEETINGS ARE CABLECAST LIVE ON GOVERNMENT ACCESS CHANNEL 26==========

Special Meeting of Thursday, June 24, 2010
6:00 PM, Council Chambers, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

ROLL CALL: 6:05 PM

Commissioners:
Daniel Garber - Chair
Samir Tuma – V-Chair - conflicted
Susan Fineberg
Eduardo Martinez
Arthur Keller
Lee I. Lippert
Greg Tanaka

Staff:
Julie Caporgno, Chief Plan. And Transp. Official
Cara Silver, Sr. Assistant City Attorney
Steven Turner, Advance Planning Manager
Joe Teresi, Senior Engineer, PW Dept.
Zariah Betten, Admin Associate

2. Stanford University Medical Center Facilities Renewal and Replacement Project: Meeting to accept comments on the Draft Environmental Impact Report (Draft EIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an overview of the Climate Change, and Air Quality chapters of the Draft EIR.

Mr. Steven Turner, Advance Planning Manager: We do, thank you Chair Garber and good evening Commissioners. My name is Steven Turner, Advance Planning Manager, and Project Manager for the SUMC projects. I just want to give a brief overview of about the Draft EIR and the public review period. We have heard this presentation a number of times before but for anybody who may be listening in or who is first time here tonight I will just go over the public review period a bit.

We have released a Draft EIR for public review on May 20, for approximately a 69-day public review period that will end on July 27. The process that we have taken in introducing the Draft EIR to the Commission, the Council, and the public is to breakup the Draft EIR into chapters for review at 11 public hearings, six of which with the Commission, and five with the City Council. Tonight we will be speaking about and focusing on the Climate Change and Air Quality Chapters of the Draft EIR.

The purpose of tonight's meeting is to collect comments on specifically these two chapters but really we will take comments on any chapter of the Draft EIR. It is not intended to discuss or really debate the merits of the project this evening. It is helpful to keep the questions and comments on the topics that we have identified in the Staff Report this evening, but as I mentioned members of the public or the Commission may comment on any portion of the Draft EIR. All of the comments that we receive through this process will be addressed during the preparation of our Final EIR, which will come back to the Commission and Council later on this year.

Just for the format of tonight's meeting, we have PBS&J here to provide an overview of the Climate Change and Air Quality Chapters. They have members of their staff in the audience tonight, technical professionals that worked on these two chapters, and they will be available for questions that the Commission may have. The project sponsors have a presentation this evening, approximately ten to 15 minutes. Then the Planning and Transportation Commission can accept comments from the public and have their own questions and comments for Staff.

Before we get into Trixie's presentation I just want to give the Commission an update regarding a meeting that City Staff had with the Menlo Park City Council this past Tuesday evening. Menlo Park Staff invited City of Palo Alto Staff to the City Council meeting with the City of Menlo Park on Tuesday to provide essentially an overview of the project, and to provide some background with regard to some of the more specific impacts that affect Menlo Park, and that is namely traffic. So the project sponsors provided an overview of the project much similar to the visual presentation that you saw a number of weeks ago. The City provided a summary of the applicant's entitlement requests, talked about the process and the schedule for the rest of the year. Again, we highlighted sections of the Draft EIR but focusing on traffic that really affects Menlo Park. There was a question and answer period between the Council and Staff. At the end we really reaffirmed our commitment to provide updates and project information to the City of Menlo Park as needed, and we certainly would make ourselves available to speak at future City Council meetings if their City Council so requested.

So with that I had the presentation over to Trixie Martelino from PBS&J.

Ms. Trixie Martelino, PBS&J: Thank you Steven. Good evening I am Trixie Martelino of PBS&J, Project Manager for the Draft Environmental Impact Report. Also with me tonight is Michael Hendrix who prepared the climate change analysis, Geoff Hornek who prepared the air quality analysis, and ENVIRON our specialists who prepared the health risk assessment that was folded into the air quality analysis.

I will first get into a summary of impacts of the Air Quality section. The above table summarizes the air quality impacts. As explained in previous hearings in the upper row NI stands for No Impact, LTS is Less Than Significant, S/LTS is Significant without mitigation but Less Than Significant with mitigation, and SU is for an impact that cannot be mitigated to a less than significant level and is considered Significant and Unavoidable.

As shown in the table the project would have less than significant impacts with regards to localized carbon monoxide emissions for motor vehicle traffic. It would also have a less

than significant impact related to health risk from toxic air contaminants. It would also have a less than significant impact related to objectionable odors. As I mentioned earlier, the toxic air contaminants analysis was extracted from the health risk assessment by ENVIRON, and that health risk assessment has been appended to the EIR.

As shown in the table there would be significant and unavoidable construction and operational emissions of criteria air pollutants on both the project and cumulative level. In specific, construction activities would emit significant amounts of nitrogen oxides during the early stages of construction. Operation of the project would result in significant emissions of reactive organic gases, nitrogen oxides, and respirable particulate matter.

Mitigation measures have been presented in the EIR for both construction and operation. For construction impacts mitigation measures AQ-1.1 and AQ-1.2 have been identified. These measures would reduce both construction dust and vehicle emissions, however as stated, emissions of nitrogen oxides would remain significant and unavoidable even with these measures.

During operation of the project measures identified in the Transportation section and the Population Housing sections would apply. These measures were discussed in previous hearings. As you know, Mitigation Measure TR-2.3 involves enhancing Stanford's ongoing Transportation Demand Management Plan by providing Caltrain Go Passes to all SUMC employees or an equivalent TDM measure. Mitigation Measure PH-3.1 involves measures related to providing employee housing near the SUMC sites to reduce vehicle trips and emissions associated with employee commutes. Even with these measures emissions of reactive organic gases, nitrogen oxides, and respirable particulate matter would be significant and unavoidable.

It should be noted that the conclusions in the Draft EIR are based on BAAQMD, Bay Area Air Quality Management District, thresholds prior to June 2. New thresholds were adopted on June 2, 2010. However those thresholds were adopted after publication of the Draft EIR. The Draft EIR provides, for informational purposes only, an analysis of the project emissions against the criteria for criteria air pollutants. The new thresholds by the BAAQMD identify that the project would have a significant impact if it would have 54 pounds per day of ROG, Reactive Organic Gases, nitrogen oxides or fine particulate matter, and 82 pounds per day of particulate matter ten microns in diameter. Both of these dust emissions would be from mobile sources. The previous criteria was 80 pounds per day. For informational purposes the EIR identifies that the project would exceed these thresholds even with mitigation.

Now onto Climate Change. Climate Change is a fairly recent topic that is being addressed in CEQA documents. As such I am first providing a brief overview of Climate Change. Global Climate Change refers to changes in normal weather of the Earth. These changes in weather could affect sea level, water supply and quality, ecosystems, and human health. Global Climate Change is increasingly attributed to greenhouse gases from human activity. Greenhouse gases effectively trap heat in the atmosphere and these greenhouse gases include water vapor, carbon dioxide, methane, nitrous oxides, among others. Climate Change is a cumulative impact on a global scale, and as such the Draft EIR examines the projects contribution to Global Climate Change through its greenhouse gas emissions.

In recent years several plans and regulations have been set forth on the federal, state, and local level. These regulations are described in the Draft EIR starting on page 3.6-15. I am not going through all the regulations listed above, but I would like to highlight the California Global Warming Solutions Act, or AB 32. This law requires the California Air Resources Board to implement rules to reduce greenhouse gas emissions in the state to 1990 levels by 2020. As a result the Air Resources Board prepared it Climate Change Scoping Plan. The scoping plan strategizes to reduce by 30 percent California's projected 2020 greenhouse gas emissions under a business as usual scenario. The business as usual scenario refers to operations that conform minimally to the required building codes and state regulations. The business as usual scenario does not include enhanced green building practices or more robust emissions reduction strategies such as that proposed as part of the project.

I would also like to point out that the new criteria adopted by the BAAQMD includes new criteria regarding climate change, however those are not applicable to the project.

Also, on a local level there is the Palo Alto Climate Protection Plan. The plan identifies that current emissions in the city are over 800,000 metric tons of CO2 equivalent per year. The plan also has the following goals: by 2009 reduce 2005 municipal emissions by five percent; by 2012 reduce 2005 municipal and community emissions by five percent; by 2020 reduce 2005 municipal and community emissions by 15 percent. These City goals are aligned with the carbon reduction goal of 30 percent below business as usual emissions. As such, the EIR applies as one of its thresholds the 30 percent reduction from business as usual emissions.

The above slide summarizes the criteria and impact conclusions on Climate Change. The two criteria that were addressed include whether or not the project would further the goals of the City's Climate Protection Plan, and whether the project would through its proposed emissions reduction program reduce the business as usual emissions by 30 percent. The analysis shows that even with the proposed emissions reduction program and additional mitigation the SUMC project would have a significant and unavoidable impact under both criteria.

The mitigation measures that have been identified include those listed above. Mitigation Measures CC-1.1 through CC-1.5 include commissioning or maintenance of new energy systems, participating in the City's green energy program, greenhouse gas monitoring, performing and annual waste reduction audit, and construction period measures as well. The measures also include the enhanced Transportation Demand Management program involving the Caltrain Go Pass, as well as previously identified measures to provide housing for SUMC employees. As said earlier, the project's greenhouse gas emissions would be a considerable contribution to Global Climate Change and as such impacts would be significant and unavoidable. That concludes my presentation.

Mr. Mark Tortorich, Vice President of Design and Construction, Stanford Medical Center: Good evening Chair Garber and Commissioners. We want to share with you a presentation of our sustainability program for the proposed projects, and as it relates to the Climate Change sections and Air Quality sections that you are considering.

First of all, one significant issue these hospital buildings face significant challenges in being sustainable buildings, and challenges that we are working quite hard to overcome. The first is our very strict infection control requirements. We obviously are caring for immune compromised patients within our hospitals and so there are obviously very stringent requirements on airflow, the amount of airflow, the quality of air, which generally requires that it be mechanically ventilated. OSHPD, our state agency does heavily regulate these buildings and ultimately is the final authority on what types of systems we can implement. Third, we are running 24/7. So it is a 24-hour operation. We don't have great opportunity to shut these buildings down and conserve energy during off-peak hours.

LEED, Leadership in Energy and Environmental Design, the standards within LEED are predominantly created for commercial buildings not for healthcare buildings, and specifically not for hospitals. However, there is an awful lot of work underway to prepare guidelines for healthcare buildings. The Green Guide for Healthcare is one of those guidelines. The design teams employ consultants who are primary authors of the Green Guide for Healthcare and we have used that as sort of our roadmap for sustainability in our projects.

Finally, the Draft EIR concludes that with mitigation the project will result in approximately 25 percent fewer greenhouse gas emissions than business as usual. We appreciate the City's consultant's thoughtful work on this, however we think there may be some technical clarifications that will demonstrate that we are really very close to the 30 percent goal that has been outlined. For example, by designing much more energy efficient buildings we will use less chilled water from our central utility plant, which will reduce the amount of emissions created by that plant to produce the chilled water.

We have talked about within our design process 15 Big Ideas for Sustainability. You see them here. We want to highlight the top six, and give you some illustrations of what we are doing in these areas to provide sustainable buildings. First is our desire in our design attempt to achieve Energy Star scores of 90 to 95 for the hospital buildings. That is a very, very ambitious goal. That goal will require the approval of state OSHPD to achieve. What that means is we will be designing these hospital buildings to use 35 percent less energy than typical hospital buildings, and 20 percent less than a hospital designed to meet the current energy standards. There are a couple of features that you will see later in the presentation that talk about how we are attempting to achieve those goals.

Our School of Medicine buildings, which are not regulated by the State of California as hospital buildings are designed to use 30 percent less energy than buildings designed to meet current standards.

Finally, we are absolutely committed to using green materials and recycled materials wherever possible to reduce greenhouse gas emissions during construction.

So what are some of these features of our projects? We are using first and foremost a displacement ventilation system. I will talk a little bit more about that. That is a rather novel approach for healthcare buildings, and certainly for hospital buildings. It has been

used in one test example by Kaiser at a facility in Modesto. We are close to the bleeding edge on this technology invention. It is a bit of a risk I will have to admit, on the part of the hospitals, to do this, but it is the only way we can achieve superior energy performance we believe.

Variable air volume systems are being designed within the facility. Obviously occupant controls for patient rooms, occupancy sensors as well, so that we can minimize the use of energy when a room is not occupied, and certainly in comparison to our existing facility.

We are connecting the existing buildings to the Stanford COGEN, the existing central utility plant that exists on the Stanford campus. We are not building an independent COGEN plant for the hospitals, as you may see other healthcare providers doing. You would see at El Camino Hospital in Mountain View they did that. Mills Peninsula Hospital in Burlingame has done that. We are connecting to the existing COGEN plant.

So displacement ventilation, what does it really mean in technical terms? You will see the graphic down below. That is me under the cup of water in a few years. Typically the way that you mix the air within the environment is that you provide supply and provide return in the ceiling cavity. So you are really diluting the existing air by pumping a lot of new air, controlled air, into the space. Displacement ventilation introduces new air into the room at the floor and exhausts at the ceiling. So you can reduce the amount of horsepower necessary for the fans to produce the volume of air. You can also increase the temperature of air provided to the space because of this separation effect. So it again is novel technology, it we think is very promising within the constraints of energy use, but it also means we have to do some other things to the architecture.

The control of daylight into the buildings is very important. We have used the same concept for both the Stanford Hospital and the Lucile Packard Children's Hospital but we have applied that concept very differently in architectural terms. So for the Stanford Hospital the glass façades that you see in the building renderings are really a double layer of glass. Actually there are four layers of glass to create a double curtain wall façade. Within the double curtain wall will be operable louvers, large Venetian blinds that will adjust mechanically with the sun movement around the building to make sure that there aren't hot spots on the floor that the displacement ventilation system would then have to try to cool. So by modulating the amount of sunlight into the building, again we can reduce the amount of energy used and therefore the amount of greenhouse gas emitted into the atmosphere. The system we are using at Lucile Packard Children's Hospital is a louver system on the exterior of the building. The differences between the two are really related to the different architectural expressions that not only the architects want to take but the different view that each hospital has of itself and the way that it wants to express the buildings. So similar system applied differently, but all with the attempt of having the solar gain controlled passively, or somewhat mechanically and actively, through the design of the buildings.

We are obviously committed to using recyclable materials and practices wherever we can like the attempts to use crushed concrete from demolition within our projects. Obviously we cannot use the crushed concrete for foundations of the hospital but we can certainly use it as roadway base, and backfill within trenches and pipes. We are using materials

amenable to natural and green cleaning methods. That is something we talk about quite a bit within the hospital environment is to provide materials that are continuously healthy. Then as you have seen within the various architectural presentations there is an extensive use of green roofs within the facilities. It provides a comfortable environment within the facility. It also obviously provides a very attractive space to look out or space to use within the roofs. You can see the abundance of that technology within these buildings.

Our architects also are very aware of material use. So this is a screen capture from Perkins + Will, our architect of the Children's Hospital just to give you an illustration of their precautionary list of specified materials. This list is updated regularly. It is real-time data that can be used by the designers so that they are aware as materials and technologies are being updated how they can specify the latest and greenest materials for the buildings that we are designing.

As I mentioned before about green roofs we also have really done quite something I think that is really quite spectacular at the Children's Hospital. That is that we have taken the parking lots and structures on the facility and we have turned that hardscape into greenscape. We have created about three and one-half acres of greenscape on the Children's Hospital site that didn't exist there before. Clearly that is going to help us conserve energy and create a much more public green face to the hospital. We are taking similar efforts obviously over at Stanford Hospital and Clinics.

Then an element that I think you may have seen a more thorough presentation of this probably quite awhile ago, and Christine Hansen from our General Services Department could always provide an update. We have already implemented within the hospital a very significant waste reduction program, and you would see that program enumerated within the tables within the Environmental Impact Report. We are obviously very committed to maintaining that waste reduction program and enhancing it in the future. So not only are we constructing green buildings but we also are going to be operating green buildings. So that sustainable practice is already part of our business practice but will be improved as we deliver these new facilities. That concludes our presentation and happy to take any questions you have later.

Chair Garber: Thank you. Before we come back to the Commission we will open the public hearing. I have one card. If there are other members of the public that would like to speak please fill out a card. Michael Griffin. You will have five minutes.

Mr. Michael Griffin, Palo Alto: Good evening Commissioners. I have reconstituted my previous comments and make them into questions concerning the adequacy of the Medical Center DEIR relating to traffic impacts.

PTC4.1 First of all, while the DEIR acknowledges Stanford knows the home location of all its employees by zip code there appears to be no attempt to correlate that data with the development of the project's TDM scheme. The TDM proposal is Caltrain centric, which will help employees living in a city served by Caltrain. The question is why then is there not a similar solution for East Bay employees to encourage and financially assist them in riding BART, and the U-Line, and the Dumbarton express buses?

PTC4.2 Secondly, why is there no analysis on the probability that Caltrain can and will have the where with all to deliver sufficient new capacity making the Go Pass solution a valid one producing the mitigations promised in the DEIR. Will there in fact even be a Caltrain when we need it? Considering this uncertainty why then is there no discussion of a backup plan should Caltrain for whatever reason be unable to perform its role as the primary service provider for making a reality of the TDM scheme with its reliance on the Go Pass that we hear so much about this evening?

PTC4.3 Thirdly, the trip distribution map on page 48 shows that the vast majority of regional traffic attempts to access the Stanford projects from the east, basically exiting off 101 and then sifting westward through the neighborhoods until finally reaching Stanford. Why doesn't the DEIR analyze methods of incentivizing motorists to access Stanford off of Highway 280 in the west? Why was there no discussion of encouraging this western access thereby avoiding traffic impacts throughout Palo Alto between 101 and El Camino Real? Why wouldn't offsite park and ride lots at SLAC and behind the berry farm for example be of benefit in accomplishing this goal?

PTC4.4 Fourthly, why is there no discussion of no new net trips? No new net trips are a requirement of Stanford's Santa Clara County General Use Permit. Why doesn't the DEIR discuss the applicability of this County requirement to SUMC? Thank you.

Chair Garber: Thank you. I see no more cards so we will return to the Commission. Commissioners, let me suggest that we take Air Quality first and we can take a round there. Then we can come back and do Climate Control. Do the Commissioners feel that they will need any more than one five-minute pass on the Air Quality Chapter? If I can get a nod of heads. If we can do that we can try and keep our comments to about 30 to 35 minutes or so. Would someone like to lead off? Commissioner Martinez.

PTC4.5 Commissioner Martinez: Normally when I read these things, no offense, but I sort of skip over the construction phase because my attitude is it is temporary, it is going to pass, and I like looking at construction. So I don't feel we need to cover it up. In this case I was sort of struck that in the discussion of the construction phase the mitigation took the same standard route of construction vehicles, and diesel, and screening activity, and dust, and like that which are all valid. It doesn't take into account that we have an operating hospital right next to what is going on. I didn't see anything in this discussion that talked about the impact on patients, on clinic visitors, on people with transplants who have a suppressed immune systems. The dozens of people you see walking around Stanford right now with respirators. It just seemed to be a gross omission of sort of the circumstance of construction. Maybe I missed it but it just seems to me that it would be one time during construction that there would be a red flag.

Similarly, construction is stated to be over 12 years. Well, that is in my estimation, I don't really see anything there about it, but that is not 12 years of constructing a hospital and a medical office building, and the Medical School buildings. I assume that there is a phasing plan and that the hospital will likely be the first major construction project, which with all its excavation, and underground constructions, and heavy equipment would have a greater impact than smaller buildings. So I would have liked to have seen some measure, a graph, a bar chart that kind of shows that this impact on air quality isn't standard and kind of a flat

PTC4.5 Con't line through the 12 years of construction, but it does have some peaks and valley. It seem to me a discussion of the highest peaks, and mitigations for that isn't going to be something that is carried for 12 years but it should be addressed separately.

PTC4.6 Again, on Air Quality we see that the greatest impacts come from pollution from automobiles and like that. We keep coming back to the mitigation measures that were stated under Traffic and under Land Use, and like that, the importance of Go Passes, and TDM, and like that. It is even discussed in the next section that we are going to be talking about. It seems to me to put so much faith in those measures, as a member of the public spoke just a minute ago, for Caltrain that is on kind of shaky ground right now and even its capacity to be able to do what we hope it can do. So it seems to me like we need to have a greater introspection of these assumptions about the TDM and our traffic mitigation measures. I am going to come back to this in the next round, but I really want to talk about really putting some, really some more vitality into these measures to give us things that have a greater chance of working for us. Thank you.

Chair Garber: Commissioners? Commissioner Keller and then Fineberg.

PTC4.7 Commissioner Keller: I am looking at page 3.5-21, Table 3.5-8. This table identifies several intersections for study. So I am curious first of all about how the future baseline of 2025 somehow got magically cleaner than the current. I am assuming that is probably because the California Air Resources Board and the US EPA is continually ratcheting down on emissions from vehicles. That is what I am assuming is going on. But I want to compare these with a chart that is Figure 3.4-8, which is the local distribution of trips as well as 3.4-9, which is the regional distribution of trips. What is interesting to me about this is if you look at the intersections that have been considered there are no carbon monoxide concentrations that have been considered that are east of El Camino. If you look at Chart 3.4-8 it looks like a significant amount of the traffic is coming from east of El Camino. In particular, it says that 15 percent of the increased traffic is going along University Avenue, 15 percent of the traffic is going along Embarcadero Road, seven percent of the traffic is going along Oregon, and so the lack of studies of intersections for which these significant amounts of traffic coming from the east of El Camino seems to be a lack. It seems to be an oversight that is inappropriate.

If we take a look at the regional trip distribution we get 15 percent coming from 101 to the north, 11 percent coming from the Dumbarton Bridge, 21 percent coming from 101 from the south, and that adds up to 47 percent, and that doesn't count the four percent coming from Central Expressway direction. What that seems to indicate to me is that we need to understand the amount of carbon monoxide and other pollutants coming from 101 direction, and that which will be wafting over the eastern portions of Palo Alto near 101. There are no intersections along 101 that are being considered. So that to me is somewhat bothersome about this.

I think that there is a strong correlation between these mobile source pollutants and traffic. What is interesting to me about this is that the traffic mainly considered the issue of AM peak and PM peak, in other words the peak during rush hours. But the pollutants are more widespread in terms of when traffic comes any other time of day. That adds to the eight-hour load but it won't necessarily add to the one-hour average load. So I think it would be

PTC4.7 Con't

helpful to understand a little bit more about traffic midday and understand what those impacts would be so that we can better understand the eight-hour average for this. So that is something that needs to be further considered, particularly considering the coverage area where 60 percent of the trips involve people who are patients at the facilities, understanding where that comes from is important to understand the traffic impacts and the pollution impacts from that traffic. Thank you.

Chair Garber: If you have something else why don't you go ahead? Okay. Commissioner Fineberg.

PTC4.8

Commissioner Fineberg: When we measure the impact of a project on traffic we look at a baseline of what is existing and then require mitigations for only the portion above the existing baseline. Is that the same model for Air Quality impacts or does it measure the total amount of emissions from the entire new buildings, and there is sort of no credit for something that is already there causing impacts?

Ms. Martelino: Geoff Hornek will answer that question.

Mr. Geoff Hornek, Consultant: In general our emission estimates are net emissions for the project. So because there is an existing medical center there we subtract that from the proposed plans for the Medical Center. So in this case all the emission estimates you see are net emissions.

PTC4.9

Commissioner Fineberg: So I can understand that construction impacts won't be netted because that is something in and of itself. So when there is a significant and unavoidable impact you are saying that the new structure will be considerably more polluting than taking old, very how can I say, I don't want to say poorly designed, but inefficient systems that were designed 50 years ago.

Mr. Hornek: Right. That is being taken into account too, but one thing we are working with in making the significance call is we are using Air District criteria that are fixed numbers. Literally every project that comes along for CEQA evaluation gets evaluated against those fixed numbers be it a 100-unit subdivision or SUMC. So literally everyone is working against 54 pounds per day and 82 pounds per day, and that is why it is fairly easy even with projects with significant proposals for mitigations don't get you under that threshold. That is why the significance finding is called.

PTC4.10

Commissioner Fineberg: Do we know what the exiting pounds, forgive me I don't know that terminology, but do we know what the current level of emissions is for the existing facilities?

Mr. Hornek: When I ran the model I ran it for the existing Medical Center and the future Medical Center, and the net is what is in the Table. I can find out what the model predicted the existing Medical Center emissions to be. However, the numbers in the Table are the future horizon so it would depend on what year you were talking about. I don't know if I have the existing emissions for the existing Medical Center, but I believe I have the future emissions for what would have been there had nothing been changed.

PTC4.11

Commissioner Fineberg: Okay, thank you. I would like to echo Commissioner Keller's comments. This is a little bit mixed with Air Quality and Climate. I understand technical measurements and common sense versus how there are prescribed ways to calculate impact, but I am struggling with how we can have a project that has no traffic impacts that are significant but yet can have significant Air Quality impacts. Ignoring the comments that the technical measurements that are prescribed I think it is because the measurements as they are done in this document deal with peak, deal with specific targets, and it kind of defies common sense. Either we don't have a tremendous number of new cars on the street creating greenhouse gases, or we measure them differently so it is okay for there to be lots of new cars, but if they are spread out over time we miss that on traffic but then we will measure that on air quality. I don't know if we have to live with that or if we have the ability to look at it in a more common sense way. There are either a lot of cars and a lot of emissions and we mitigate both, or why are we measuring emissions in off-peak times. So okay, thank you.

Chair Garber: Commissioner, if you have something else on Air Quality why don't you get it out.

PTC4.12

Commissioner Fineberg: Actually two more quicker ones. For the crushed concrete the applicant mentioned would be reused, the crushed concrete from demolition would be reused. Are there specific regulations that govern the reuse of concrete in hospitals near sensitive receptors? I ask that relating to the more recently produced concrete that uses fly ash. Fly ash has been used as a byproduct of coal combustion and as a means of sequestering heavy metals in the concrete. I believe that hospitals have regulations about that so has that been considered, specifically that sensitive receptors cannot be exposed to contact with that concrete if it has excess heavy metals in it.

PTC4.13

The last thing is that the applicant mentioned that they are connecting to the existing Cardinal Cogeneration Plant. Has there been consideration of how power is supplied to that Cardinal Cogeneration Plant, and what contingencies will allow the hospital to continue operations at full capacity for long periods of time in the event there is a power failure because of a single source supply through an area that is in a floodplain, in soil that is at high risk of liquefaction, and subject to potential earthquake risks? Those natural disasters that would take out the power supply would cause a high demand on the hospital at a time when there is a power failure. I am just wondering if there has been a plan for secondary sources of power into the Cardinal COGEN system so that the hospital wouldn't be taken down.

Chair Garber: Commissioner Lippert, and then Garber and Tanaka.

PTC4.14

Commissioner Lippert: Yes, I have a couple of questions for the EIR consultant particularly regarding the Air Quality aspects. I am looking at the presentation that you did here and the chart. The localized carbon monoxide impacts for motor vehicles is less than significant. We have already addressed I believe through Transportation Demand Management program trying to mitigate that. With regard to the operation of the mechanical equipment during construction work can some of the I guess air pollution emissions be offset simply by requiring that construction workers commute here via public

transit or that there be a Transportation Demand Management program for that aspect of the project?

Chair Garber: Commissioner, do you need someone to respond or can we just simply take that as a comment to be added to the EIR?

Commissioner Lippert: Why don't we get a response on that because I have another question associated with that?

Chair Garber: Okay.

PTC4.14 Con't

Mr. Hornek: Just as a quick answer on that the equipment that you are actually using for the construction, the emissions from it are usually far and away greater proportionately and absolutely than any contribution that the worker vehicles would add. So we have estimates for those worker emissions, but I guarantee you that they are a small fraction of the total for the equipment emissions.

Commissioner Lippert: Yes, but going another step with that what I am thinking is if you look at the level of service for a lot of intersections and people coming in from the east, or from Bayshore Freeway, when the level of service is reduced you have vehicles sitting in traffic. So again, and I understand what you are saying, because construction equipment uses far more fuel.

Mr. Hornek: That would be a finer scale detail than we would be able to address. What we are dealing with are purely the number of construction worker commutes and average distance that they drive. To add in the added factor of what exactly the vehicles are doing at every point during the commute would add enormous complexity to the calculation, but I don't believe it would really change the fractional comparison as you compare the equipment emissions to the commute emissions.

PTC4.15

Commissioner Lippert: Okay, while I have you up there with regard to the presentation that Mark Tortorich made with regard to looking at the standards going from LEED to Energy Star in terms of running the equipment, and I understand what the difference is. Does that at all help us in terms of getting into compliance by following the Energy Star standards and making it an Energy Star building?

Mr. Hornek: Most of the criteria pollutant emissions that we calculated in the EIR were based on purely the COGEN contribution to total emissions. Again, proportionally they would be the most dominant factor in both criteria pollutants and greenhouse gas emissions. So I think again we are getting into, at least in my calculations for criteria emissions I didn't address the energy efficiency question at all. It was a question of basically the motor vehicle use associated with the hospital, the energy use large scale for heating and cooling, and a number of other peripheral sources, maintenance equipment, and that sort of thing. The effect of the energy efficiency on that total would be a fairly small variation in the baseline I calculated.

PTC4.16

Commissioner Lippert: Okay and then one last just to put things in perspective. Conventional wisdom up until say the last ten years was that 85 percent of a building's

PTC4.16 Con't

lifecycle costs were really captured in maintenance and operation of the building not in the construction of the building. With higher efficiency standards being used, does that skew at all in terms of the proportion in terms of reducing that 85 percent, and what I am thinking is 85 percent of the cost again fossil fuel getting more expensive, reducing that 85 percent cost down to 65 percent, does it buy is anything?

Mr. Hornek: Actually, you are getting a little bit outside my expertise here, but I might ask Michael Hendrix if he has anything to add on that, our greenhouse gas.

Mr. Michael Hendrix, Consultant: You are right most of the emissions, especially for greenhouse gases, are what we are talking about when you are looking at energy efficiency and the energy consumption for the project. That 85 percent is the focus of the mitigation for climate change. One of the problems with a hospital is that by its nature it is energy intensive. So there is only so much we can do as far as efficiencies. In particular the emergency medical transportation system such as helicopters, ambulances, those sorts we cannot reduce the fuel consumption of those. Then again, the energy efficiencies like we don't know how to reduce emissions or electrical consumption associated with MRI units and those things that are used in hospitals. So there is a lot of energy intensity in hospitals that maybe in a normal building we could do some more robust mitigation for. We did offset in the Climate Change 100 percent of the electrical emissions associated with greenhouse gases through the Palo Alto Green Energy Program.

Commissioner Lippert: Did you want to add anything to that? Thank you, I will pass it along to the next Commissioner.

PTC4.17

Chair Garber: That would be me followed by Commissioner Tanaka. On page 3.5-17 under AQ-1.2, item number A, it says where possible electrical equipment will be used instead of fossil fuel powered equipment. It occurs to me you may want to include if it is appropriate natural gas using vehicles.

PTC4.18

On the following page there is a general description with mitigation measures. I don't have a specific citation here, but it occurs to me in alignment with some of the other comments that have been made by the Commissioners and also related to our last Transportation element that establishing a plan for how the construction workers actually get to the site has likely impacts both on Air Quality as well as Transportation. Given the duration of the project is many, many years long it could have a significant impact. In any case, I believe that could have significantly more meat around it. Commissioner Tanaka.

PTC4.19

Commissioner Tanaka: Thank you. I have a few quick questions for Trixie. The way I read this chapter it seemed like the majority of the impact comes from mobile sources, which seem to be basically transportation. Is that correct?

Ms. Martelino: That is correct.

Commissioner Tanaka: It looks like on page 3.5-18 that 60 percent of the trips are actually made by patients. It says that in the first paragraph.

Ms. Martelino: That is correct.

PTC4.19 Con't

Commissioner Tanaka: Okay. So I guess when I was thinking about this chapter is I kind of assumed that given the aging population and the importance of healthcare that some sort of hospital facility would have to be built somewhere. So do you think about the difference in terms of if it was built here in Palo Alto what the air quality impact would be versus if it was built say in Redwood City versus Mountain View versus Sunnyvale versus other cities in terms of how patients would get to the hospital, whether this is a good location, in terms of air quality impacts whether this would increase trips, decrease trips, has that analysis been done?

Ms. Martelino: In some cases the EIR takes a look at an alternative location in the Alternatives Analysis. In this case, an alternative location was rejected as infeasible.

Commissioner Tanaka: I see. So you are saying that this is the best location then given the air quality impacts?

Ms. Martelino: There has been no analysis as to what a better location would be in terms of air quality impacts. When you look at the Air Quality analysis for criteria pollutants we are looking at standards on a basin wide level.

Commissioner Tanaka: Okay, thank you.

Chair Garber: Commissioner Martinez, anything more?

Commissioner Martinez: I think I am going to overlap into the next section so I can wait.

Chair Garber: Okay. Commissioner Keller and then Fineberg.

PTC4.20

Commissioner Keller: Thank you. A couple of things. Firstly, since a significant amount of the sources seem to be from mobile sources adding to a significant air quality concern I am wondering whether it is possible to offset some of these mobile sources of pollutants, particularly by increasing shuttle services for patients to be able to get to and from the Medical Center from the surrounding area, and by increasing transit for patients during the day whether that will mean that people can get there without taking cars, and thereby reduce both congestion and traffic during off hours as well as criteria pollutants.

I know that some jurisdictions have further incentives for alternative fuel vehicles. Notably Vacaville, which is sometimes referred to as 'voltage-ville' has long had programs for promoting alternative fuel vehicles. I am wondering if anybody has studied the degree to which funding such a project for Palo Alto or perhaps other communities surrounding Stanford might reduce criteria pollutants sufficient to make an impact on the current amount of impacts. In other words, significantly reduce the impact that is provided, perhaps not to eliminate it, but perhaps to make a dent so to speak.

PTC4.21

With respect to the COGEN plant, I understand the COGEN plant generates power from natural gases is that correct? It generates both, it is co-gen, so it generates processed heat, hot water, cold water, or chilled water, and electricity. So the first thing is what has been done about potential disruption of potential supply of natural gas particularly in an

PTC4.21 Con't

earthquake? So are there sufficient reserves of natural gas in the event of an earthquake to provide continued operations until the supply is restored after disruption? Assuming that the COGEN plant is allowed to continue to operate does it have sufficient capacity and reserves to operate during a power outage or a natural gas supply outage? Could the COGEN plant also provide backup power to the Stanford University Medical Center so that if we have a further disruption of power from an airplane hitting the single point where all of the power lines come into the City of Palo Alto that at least the hospital would have a backup supply of power. I think that certainly should be considered.

PTC4.22

A summarizing question. There is a notion of non-attainment days that I understand is a principle of the Air Quality Management District. I am wondering how many non-attainment days in terms of ozone, or carbon monoxide, or whatever the criteria pollutants are that are measured for non-attainment days, how many non-attainment days the Bay Area Air Quality Management District currently has and how likely is it that the project will adversely affect, in other words increase, the number of non-attainment days that the Bay Area Air Quality Management District has? Does it move the needle in terms of the entire district or does it not move the needle? Obviously it moves the needle in terms of significance on a lower threshold but it would be interesting to actually see whether it moves the needle in terms of the overall air district considering that this project is of significant size. Thank you.

Chair Garber: Commissioner Fineberg and then Lippert.

Commissioner Fineberg: Thank you. The applicant had a presentation with slides with a fair amount of detailed text. Is that something that can be made available to us? There was a considerable amount of text in there that I personally at least couldn't take in given the quick pace of the presentation.

Mr. Turner: Absolutely. We can make copies available to the Commissioners and to the public.

Commissioner Fineberg: Great, thank you. Then I have a question about

Chair Garber: Commissioner Fineberg, Commissioner Keller would like to as a follow up.

Commissioner Keller: Can I request that in the future that the applicant provide copies of the presentations at places during the presentations so that we don't have to scribble notes? We didn't get them. So it would be helpful if the Commissioners had them at places too.

Mr. Turner: I just want to make sure the Commissioners have this packet where the applicant's presentation is on the back. Okay, just want to make sure.

Commissioner Keller: Thank you.

Chair Garber: Apologize about that. Commissioner Fineberg.

Commissioner Fineberg: I don't believe I have it but maybe it is….and the end of our Staff Report?

Commissioner Lippert: It is part of the PowerPoint. The first part is the Staff's presentation and the last part is Stanford's presentation.

Commissioner Fineberg: Forgive me then. I take that question back. It got filed with the last item. Okay, I am hearing a comment from my fellow Commissioner though that the print is so small and gray that it is not legible. So enough said on that one.

PTC4.23 I have a question on Mitigation Measure PH-3-1. Basically it says that the City should consider reducing the impacts of the ratio between jobs and housing as a way of mitigating air quality impacts. That to me goes to the heart of the air quality impacts, the traffic impacts, and how we measure housing and the demand that ABAG will place on us to build more housing. Within the DEIR it talks about it in the Housing section so that ties it with this topic.

We right now are factoring eight percent of the new workforce will live in Palo Alto so 92 percent will be driving into the facility. That is where the air quality impacts and the patients are generating the mobile greenhouse gases. I think we need to have some consideration of what means do we have to avail ourselves of, how can we address the jobs/housing imbalance within this project to reduce the impact on the greenhouse gases? Simply mentioning that a mitigation is an option I don't think is specific enough. So can comments from Staff or consultants at a later date address what mechanisms the City could use to create those mitigations triggered by the imbalance in the jobs to housing ratio?

That goes to the earlier question we had about whether using the eight percent, because they happen to live in Palo Alto, is the correct methodology? Or are we mitigating only the historic proportions or are we really attempting to reduce trips and house those that work within Palo Alto? Should the DEIR address what the answer to that question is? Thank you.

Chair Garber: Thank you. Commissioner Lippert. I have a couple of questions for Mark Tortorich.

Mr. Tortorich: I will do my best to answer them.

PTC4.24 Commissioner Lippert: I was very impressed by your presentation, particularly the use of Energy Start. That was a point that I was going to bring up earlier. With regard to your displacement ventilation system and the way you are going to be providing an envelope to the new building, are you going to be re-improving those portions of the existing Medical Center that are going to remain? How are you going to bring those up to efficiencies or are you not?

Mr. Tortorich: So we are proposing the demolition and removal of a significant portion of the Medical Center so we can build new efficient facilities. The 1989 beds that remain we don't currently have a plan to renovate them extensively for energy efficient performance. But by the management of the beds there we will improve the energy performance, because we will lower the occupant load, and in a low census we could actually shut down portions of those units and turn off air conditioning and power to those units.

PTC4.24 Con't Commissioner Lippert: With regard to the OSHPD standards here with regard to infectious disease, actually it is stringent infectious control criteria. What I read in that is mechanical ventilation, filtering as a necessity but not all conditions or all diagnosis are infectious in fact. Are there ways of separating out and perhaps using those wings for noninfectious treatment?

Mr. Tortorich: Well, the risk isn't necessarily to the patient that may not have an infection. The risk is that you are in the hospital environment with patients that do have infections and there can be a spread of those infections within the hospital environment. So there really isn't a way that I know of to segment the building between different disease types in any manageable way effectively. The infection control rules are certainly administered by OSHPD but they are also administered by the hospital itself and by the joint commission that will evaluate and certify hospitals as fit to be operated.

Commissioner Lippert: Okay. Please.

Chair Garber: Commissioner Martinez, a follow up.

Commissioner Martinez: It used to be that OSHPD would require 100 percent fresh air in hospitals. Has that changed?

Mr. Tortorich: Oh no, that has not changed. No, it has gotten more strict in terms of the number of airflow and air exchanges.

Commissioner Martinez: How does that affect this innovative ventilation system?

Mr. Tortorich: Well, so we in effect have to get OSHPD to agree to alter the code or to give us an alternate means of compliance to the code. The challenge is, to be quite candid codes can be somewhat arbitrarily written, but once they are written they are the standard. If you want to change the standard you have to provide more science to change the standard. So that is what we are doing with OSHPD. We are actually going to have to ask them to waive certain requirements of the code to let us do this. We think this is more effective than the code for a variety of reasons, not just energy performance, but also managing the flow of air within the rooms to prevent the spread of infections within a hospital.

PTC4.25 Commissioner Lippert: Okay. Thank you very much, Mark. I have another question for the EIR consultants in terms of air quality, again going back to the heavy equipment here. I guess during the last go-round in terms of Stanford building the underground parking structure there was a great amount of soil removal, and of course big soil trucks that carry and awful lot of weight, and of course there is air quality pollution associated with that. I think during that the City had a prescribed route that they had to follow where they had to go out through South Palo Alto. So could by finding a closer area for dumping soil or dumping materials or dealing with those materials help reduce the amount of air pollution or the amount of greenhouse gases?

Mr. Hornek: Based on what I worked with, and I had some pretty detailed equipment specifications from Stanford, what I found in the course of doing the emission estimates we looked at the actual construction equipment, the excavators, we had fairly detailed phasing, more information on what kind of work they were doing to do, whether it was foundation work or the superstructure work. One thing that really stood out was that the equipment itself was innately much more emission intensive than any of the trucks associated with the operations, be they on the site trucks, or trucks that would be hauling material on and off the site. When basically I finished the equipment emissions and then added in the onsite and offsite trucks they turned out to be a fairly small fraction of the total construction emissions, a very small as a matter of fact. So again if we start dealing with not just the number of trucks but actually how far they are actually going to go that would be another small adjustment to a relatively small source of the pollutant. So I don't think we would see much difference especially when we are comparing to like Air District thresholds or Air District risk criteria.

Commissioner Lippert: I know. My line of questioning is almost like looking for coins in the cushions so to speak.

Mr. Hornek: Right.

Commissioner Lippert: When I go through the report and I see that we are going to have great difficulty making the Bay Area Air Quality Management District guidelines and I don't know, do they have any authority here, and can they be punitive in terms of this process?

PTC4.26 Mr. Hornek: We do meet some of the guideline thresholds. When looking at the toxic risk as a result of the equipment we do meet those thresholds. The thresholds we are not meeting are the regional emission thresholds. Those are again, it is a sort of a one-size fits all threshold. Not matter what the project is, what its size is literally, you are allocated 54 pounds per day. In some cases it is very easy to meet. You might be under it without any effort at all. Again, the larger the project gets the harder and harder it is to get under those thresholds. So I don't think the Air District would be at all surprised that this project exceeded those regional thresholds.

Commissioner Lippert: I guess what I am looking at here is the project would exceed threshold even with mitigation. So the question is does the Bay Area Air Quality Management District have the authority here or are we saying we can make findings for overriding consideration and allow for those additional emissions?

Mr. Hornek: We did show the effectiveness of the transportation measures on reducing the mobile source emissions. The trouble is that the thresholds are fairly low and the project is large. So even with a fairly significant percentage decrease you still don't get under those numbers.

PTC4.27 Commissioner Lippert: Okay. Then one last question here. We are looking at emissions per day, but all days are not the same. I think as Commissioner Keller mentioned there are certain days where we have air quality emergency situations where they don't want us to run our fireplaces for instance. Poor air quality days. Can they be averaged out over a

PTC4.27 Con't period of time in which we are looking at when the building is completed that it would operating at a much lower threshold perhaps.

Mr. Hornek: Actually, the two types of thresholds mentioned in their guidelines are average daily and annual emissions. Both of which we did, but I also have fairly complete timelines for the construction. We were able to go year by year and give the average day, and the average annual emissions per year to show the variation of construction activity as it would occur.

Commissioner Lippert: I think Commissioner Fineberg had comment to make.

Commissioner Fineberg: Commissioner Lippert's comments are making me think about timing much in the same way that we regulate the time of year that construction can be done with cut and fill on slopes to minimize erosion would it worth considering that during the season when we have the Spare the Air Days, I think that is summer and frankly around the Christmas holidays. Would it be worth avoiding certain pieces, and I don't know if one could schedule a project this way, but scheduling the avoidance of whatever the most polluting practices would be to avoid those times.

PTC4.28 Mr. Hornek: The activity that I think you are most familiar with is the fireplace regulations where certain nights are declared Spare the Air nights, and it is strongly suggested that you not light a fire. We also have Spare the Air day for ozone alerts where people are advised if at all possible take public transportation. One possible approach would be to say if the Spare the Air was very severe there might be an Air District recommendation to avoid construction activity or kind of relatively inessential activity, certainly not talking economically, but if you could at all avoid doing it then do it. I don't believe the Air District has those kinds of alerts to kind of include construction activity as part of a Spare the Air suggestion.

Commissioner Fineberg: Should that be considered as a mitigation? I am not thinking necessarily all construction. For instance, somebody could put carpet down, or install a window, and that is not going to create any pollutants. If you have a temperature inversion, you have a Spare the Air day is that a day that maybe we don't dig a big hole which creates dust?

Mr. Hornek: I wish I were the Air District. I wish I could give you an authoritative reply to that. It sounds like it might be applicable in certain occasions. I have never seen a recommendation of that sort from the Air District.

PTC4.29 Commissioner Lippert: I actually have a follow up on the follow up. We do have microclimates in the Bay Area. It is cooler on the peninsula than it is in the East Bay for instance. When you have temperature differentials there are different air quality issues that come into play. Surely San Francisco with its natural air conditioning is another microclimate. Is it possible to ask the Air Quality Management District to look at the peninsula for the sake of the project differently say than the whole Bay Area?

Mr. Hornek: In reading through their new CEQA guidelines, looking at some of the setting information they suggest be mentioned in EIRs they do put in a lot of material to

explain microclimates and how particular air quality problems differ in different sub areas of the Bay Area.

One thing I would comment on is that sometimes when air is good in your area, you may still be creating a bad condition in another part of the Bay Area. Like up in San Francisco on foggy days the wind is blowing toward the hotter interior so all of our ozone precursors, we don't suffer the ozone problem, but if it drifts out to Concord that would affect it negatively there. Basically, the Air District thresholds are generally to give it an indication of when the Air District thinks in general in the Bay Area it kind of rises to the level of interfering with air quality plan implementation, at least potentially.

Commissioner Lippert: Thank you very much.

Chair Garber: Commissioner Martinez a final word and then we move to the next chapter.

PTC4.30 Commissioner Martinez: I just want to follow up a bit on Commissioner Fineberg's question. The construction industry is familiar with rain days. This might just be a progressive step in the right direction when we have a Spare the Air day to incorporate that into the normal practice of construction. I don't think it would be that difficult or too impacting on the project.

I did want to ask Trixie, and this is also a follow up to Commissioner Fineberg's question. You mentioned in your presentation that providing housing is an alternative. Is that elaborated anywhere in your DEIR?

PTC4.31 Ms. Martelino: That mitigation measure is provided in the Population and Housing section.

Commissioner Martinez: Only about the eight percent and the 104 units. It is a question too, I am sorry to state it this way. Is it stated as a way to reduce or improve air quality, reduce the number of trips in that frame of mind?

Ms. Martelino: Yes. The introduction in the Population and Housing section cites back how providing housing near employment centers would help reduce vehicle trips and vehicle miles traveled.

Commissioner Martinez: Okay, I was hoping there was something going forward from that. Okay, thanks.

Chair Garber: Commissioners, lets move to the next chapter, Climate Change. I will go first and then Commissioner Keller.

PTC4.32 First let me compliment the writers on a remarkably comprehensive discussion of the existing regulatory environment. I am no expert but it is one of the few places where I have seen it written up succinctly as well as the quantitative synopsis of the various values that this project is dealing with.

Climate Change in my mind has to do with lifecycle impact, and the greenhouse gas analysis is a proxy for carbon footprint, which is about different types of energy, as I understand it. There are two ways of thinking about energy. One is energy that is expended through operations and the other is energy that is put into things, and is otherwise called embodied or embedded energy. The way that I would have imagined seeing this chapter organized or at least addressing, the project is looking specifically at all of the embedded energy that occurs during the course of construction, and then the operational energy that occurs after occupancy of the building. Seeing that expressed as a carbon footprint in both cases helps as a way to rollup all of those impacts into a single set of numbers. Granted, getting to those numbers is very difficult, particularly difficult when trying to do an analysis of embodied or embedded energy, but I think it would help create incentives that would drive efficiencies as well as good practice and use in the project.

PTC4.32 Con't I note that most of the discussion of the 60 pages here deals with emissions. The construction portion of the project has an operational part to it, which is emissions, the use and the operation of equipment, and appliances, systems, etc. There is also a material side that as well that has embedded energy in it, which is completely missing here, and has an impact on climate change not just here but in the places where those materials are gotten and manufactured from. To the point that was made earlier, the sort of rule of thumb is that that is equal to 15 or 20 percent of the overall energy footprint or carbon footprint of the project. This chapter does not address them.

This would be the opportunity for some of the comments that were offered by the presentation by Mr. Tortorich in terms of how the design addresses some of these things could be incorporated into this chapter, and viewed therefore as mitigations to the energy that has to be embedded into the project. So just to sort of emphasize that, of the 60 pages only three of those pages deal with the emissions that deal with the construction i.e., the energy that is being embedded into the project and that the energy that is embodied into the materials and systems themselves that are brought to the site or assembled onsite, etc. are missing from the conversation. Commissioner Keller.

Commissioner Keller: Thank you. So the first thing is I would like to refer to the Table 3.6-2 on page 3.6-7. On the bottom of this table it says in the year 2050 the population of California will be about 59 million and change, and the greenhouse gas emissions are 80 percent below 1990 levels. Then in Footnote C it says calculated by multiplying 427.0, which is the 1990 level by .80 percent. It is not reducing it to 80 percent. It is reducing it by 80 percent, meaning that the factor that you have to multiply by is .2. So instead of the greenhouse gas target being 341.6, the greenhouse gas target should be 85.4. So I am not sure of the implications of all of that but that is an error by a factor of four. At least that is PTC4.33 how I understand math. So reducing it by 80 percent, which means reducing it to 20 percent of the original.

That also means that because the population is increasing dramatically if we take a look a the 2000 level of 452.3 TGCOE, I don't even know what that stands for but it is some big amount, divided by 34 million people and then you take the factor of 85.4 divided into 59 million people what you wind up actually with on a per capita basis the reduction is 89.2 percent, because population almost doubles. So that is dramatic increase that we have to consider.

I sort of analyzed this project and it looks like the current usage is about 165,000 metric tons of carbon dioxide equivalents is the current usage. The calculation here is that the business as usual increase is approximately 75,000 metric tons of carbon dioxide. That increase of 75,000 metric tons is reduced to 56,000 metric tons. That means that we are essentially changing from a 45 percent increase of current rates to a 34 percent increase of current rates. So I have trouble understanding how business as usual is a reduction. If you are talking about a 30 percent reduction of the increase as opposed to a 15 percent reduction from the baseline, which is where we are now, so I am sort of having trouble understanding that.

Now let me put that a little bit more into perspective before you comment on that. Let me give you some more date. There is a comment here that says the reduction of the City of Palo Alto 119,000 metric tons of carbon dioxide. The Stanford increase is 56,000 metric tons of carbon dioxide. Meaning that the amount that the rest of Palo Alto has to shrink in greenhouse gases in order to accommodate the 56,000 metric tons increase, the rest of Palo Alto has to shrink by additional 47 percent between now and 2020 or so, or if this thing is through 2025 or whatever, and essentially it is going to be even worse by then. Essentially the rest of Palo Alto has to go on a carbon dioxide diet of 47 percent more than we otherwise would in order to accommodate the increase of Stanford. Now that may be a good or a not good thing but that is what I compare it to is the other numbers.

PTC4.34 A further consideration is that if you consider the state's Executive Order S-3-05 that essentially means an 80 percent reduction from current levels, which essentially means that we are about 150,000 or 160,000 metric tons of carbon dioxide for the entire City of Palo Alto in 2050. Yet Stanford Medical Center as envisioned here with all the nice bells and whistles that are going to be here are going to be is 221,000 metric tons of carbon dioxide. So essentially all of Stanford without anything – the best thing that Stanford is doing here gets to be more than Palo Alto is allowed to emit in 2050 under the state's Executive Order. So I am totally confused how all these things fit together, but the math seems to be pretty bad from my point of view. Considering that Stanford is a significant percentage of Palo Alto's greenhouse gas emissions. So maybe you want to address that. Thank you.

Mr. Hendrix: Concerning the state's ambition to get to 80 percent below 1990 emissions, currently that is technologically infeasible. We will have to be carbon neutral, all of us, in order to achieve that. So the 2050 goal is not a threshold at this point. We are focused on the 2020 goal because that is, although very aggressive, is technologically feasible. It is going to take a lot of money and effort to get there but we can get there. The 2050 goal at this point is the ultimate place we need to be to keep climate change at a two degree Celsius rise. In other words, to have it peak and level off. That was from the IPCC.

The reason we have these stair step goals is just because of that, because technologically we can't get to the ultimate goal so we get the ones we can get at and then work from there.

Commissioner Keller: So if I may follow up, then with Stanford increasing by 56,000 metric tons of carbon dioxide equivalents per year how does Palo Alto meet its 2020 goal for reduction, which you say is achievable? That means that Palo Alto has to change its

reduction goal for the rest of Palo Alto from 119,000 metric tons to 175,000 metric tons to deal with Stanford Medical Center's increase of 56,000 metric tons. Could you explain that?

Mr. Hendrix: Palo Alto needs to look broadly at all of the benefits as well as the impacts. Certainly this hospital because it is energy intensive, fuel intensive has significant impacts on greenhouse gas. It also has a significant contribution as far as public safety and health. So you need to weigh the two. You don't want to sacrifice public health and safety in order to achieve a greenhouse gas goal. We want to walk a fine line that allows us feasible mitigation to get the emissions as low as technically feasible without jeopardizing the overarching goals of a hospital. A hospital does not fit well within a Climate Change analysis because things like recycling are not achievable as they are with an office building. You have biohazards and things. We can't get like a 70 percent reduction in solid waste from a hospital. Energy consumption is pretty high because there are things that are required. Hopefully as time goes on our technology will get better with hospitals, and the other things that we have. We have I believe got as much feasible mitigation in here to offset the emissions.

PTC4.34 Con't

Chair Garber: Commissioner, let's take your comments and the comments of the consultant as comments for the DEIR to respond to and we can use that to flush out the conversation.

Commissioner Keller: So can I make one response?

Chair Garber: Please.

Commissioner Keller: So the thing is this. It seems to me that Stanford has done a great job of trying to do a lot in terms of reducing from what it might otherwise be. I know that the Stanford campus throughout has done a lot of work in terms of sustainability initiatives to try to minimize the carbon footprint of the campus. What I am wondering is whether Stanford University as a whole in whatever that means can sort of take on Palo Alto as a project and help the rest of Palo Alto achieve as much greenhouse gas emissions as we can achieve in order to be able to deal with this increased diet of emissions of 47 percent. I think it may be doable if we work in some sort of partnership. I would welcome Stanford taking on the challenge of its wonderful expertise and applying it in this direction.

Chair Garber: Commissioner Lippert and then Tanaka.

PTC4.35 Commissioner Lippert: I am going to make a couple of comments here. The first one is I appreciate Stanford University's presentation here. There are a couple of things that I think the EIR consultants need to take into consideration. One is the standard that they prefer to use rather than LEED is the Energy Star compliance. I think that is particularly important. That is driven by the Environmental Protection Agency. In looking at that it sounds as though that they are going to be, while it is a big energy consumer, it could in fact wind up being more energy efficient than say looking at the LEED standards. The reason being is that LEED is really looking at sustainability and this is looking at actual efficiency. So that is just something that I think we should examine.

PTC4.36 The other thing is that at great risk they are looking at the displacement ventilation system as well as the double building envelop. I think that recently with their approach in terms of the design is something that the merits of that really need to be addressed in terms of the EIR here.

PTC4.37 The third aspect again has to do with climate change and AB 32 and SB 375. The project I believe is within half a mile of the City of Palo Alto transit station. That is a very significant aspect. If this project was not located within half a mile I think I might have additional concerns. But because of that we are able to avail ourselves of certain state level programs within that. I am thinking of TPP, Transit Priority Projects. If Stanford wasn't the single largest landholder in Palo Alto then again I might have difficulty with it. Perhaps again adding the emphasis to providing more housing associated with the project for people that are going to be working in the hospital. It does two things, number one if for instance there is a cutback in Caltrain service as Michael Griffin had mentioned earlier, it actually has staff living locally that could then be working in the hospital during those hours of cutback service. In addition to that a facility like this operating, as Stanford said themselves, 24 hours a day has immediate staff available to get there in case of an emergency, for instance where we might have a Bay Area wide blackout and loss of power for running the trains if we do go with electrification for instance of the railways. So if there was an earthquake for instance staff is local and can get to the hospital

PTC4.38 Then the third thing that I wanted to say, and I may not have the numbers exactly right, you can correct me if I am wrong. With regard to greenhouse gas emission I believe it is 20 percent of greenhouse gas emissions are generated by our homes, 40 percent from commercial buildings, and I believe another 40 percent are generated by transportation aspects. Could there in fact be a tradeoff in that transportation area where we are looking at a further reduction again by getting people to live closer to work and thereby cutting down per person the greenhouse gas emissions in terms of transportation just simply by having people living locally and working in the community. So that is sort of where I am coming from in terms of how it relates to AB 32 and SB 375.

Mr. Hendrix: Yes. There is the Village Concept Alternative that maybe Trixie can elaborate on that I think hits right to the points that you are talking about.

Commissioner Lippert: Do you want to elaborate on that, Trixie?

Ms. Martelino: That is right the Village Concept provides recommendations for housing dedicated to SUMC employees. The analysis of the Village Concept Alternative addresses the vehicle miles traveled and the reduction of vehicle miles traveled compared to the SUMC project without any assumption that housing would be constructed nearby.

PTC4.39 Commissioner Lippert: Okay. Then I want to make one final point, which again goes back to Mark Tortorich's presentation on running a facility 24 hours. If I have a car and it is in my driveway and it is running but it is not going anywhere it is still consuming a certain amount of energy, not at as great a rate as driving on the freeway or on streets, but it is consuming energy. If Stanford has difficulty shutting down the facility at night because they have patients in the rooms, and those patients need to have the facility operating, but there are also ancillary facilities associated with that, particularly operating

PTC4.39 Con't theaters, treatment rooms, MRIs, things like that. Perhaps there is a way of having greater efficiency and a reduction of greenhouse gas emissions simply by having those facilities in operations 24 hours a day. Therefore requiring that maybe I may not like it, but I may have to come in to have my MRI done at two o'clock in the morning. I have had MRIs done as late as nine o'clock in the evening. Again, with increased capacity or demand for medical services it just makes sense to have the facility operating at greater efficiency by having it maybe operate at 24 hours a day.

Chair Garber: Commissioner Tanaka and then Fineberg.

Commissioner Tanaka: Thank you. As I was looking at this chapter it struck me that this chapter is about climate change, which is actually a very global issue not really a local issue. As such, given that it is kind of a global issue, one of the mitigations I wanted to ask Trixie or our consultant here why it wasn't considered is the concept of carbon offsets. Like for instance, Stanford has a lot of land they could plant a bunch of trees perhaps around the Stanford Dish to mitigate some of the carbon impacts, or even buy carbon offsets from third parties. I wanted to understand why that couldn't be considered a mitigation factor.

Mr. Hendrix: We actually looked into offsets as far as planting trees. You have to be careful with that because there are also emissions embedded in say irrigation water and fertilizers and those sorts of things. So if you plant natural vegetation in an area that is stays natural, so a habitat and you don't have to water, you don't have to fertilize it, and those trees grow and mature you actually have sequestration. If you do the kind of urban planting that is typical landscaping they produce more emissions maintaining those trees than they sequester. Offsets are becoming more and more viable a solution.

PTC4.40 The Bay Area Air Quality Management District is in the very beginning stages of setting up an offset program. The California Climate Action Registry is in the process of doing that too. But it is in very early stages. Now you can buy through the Chicago Climate Exchange and a few other existing markets. I have found a buyer beware mentality there. Just like stock it is all in what you purchase. If I was to go into emission credits right now I would want to go into very good detail of exactly what you are buying into, how it is getting funded, the scheduling for it, what is actually being implemented. Are we preserving rainforests, which is not really offsetting emissions but just kind of abating further degradation of sequestration, or are you buying into a project that literally does offset emissions, such as renewable energy or something like that.

Commissioner Tanaka: Okay, thank you.

Ms. Martelino: If I may add as well, I would like to cite mitigation measure CC-1.2 which does call for participation in the Palo Alto Green Program involving purchase of renewable energy as Michael just mentioned. As he mentioned earlier it does offset the greenhouse gas from electricity consumption.

Commissioner Tanaka: Thank you. I was just thinking that given that Stanford does have a lot of open space it would seem to be, and even on the Stanford logo the tree, that they could certainly plant a lot of trees to mitigate assuming it doesn't take more water to

PTC4.40 Con't

irrigate them. I just thought that whether it is on the land or third party it seems to me at least that you could mitigate all the impact if you really wanted to. Now, whether you are actually able to audit it and verify is another story. It seems like there are certainly a lot of people out there selling carbon credits.

Mr. Hendrix: With money not being an issue certainly that is the case. But you get into economic feasibility as well. I think we actually hit Stanford pretty hard by totally offsetting electricity. The Go Pass, we have been kind of conservative in what kind of reduction we are going to get off of that. It may get more than we plan on but I would rather be pleasantly surprised with a mitigation than find out that we didn't adequately address the impacts here. So I have a rather conservative nature on assumptions.

The other place is the steam and chilled water, the amount of BTUs there that are in that combined cycle unit. Like I say, they have mitigated a significant amount of emissions actually. They went from 74 to 56,000.

Commissioner Tanaka: So yes, I would like to see if that could be something that can be considered as part of this in terms of possible mitigations if it has not already.

PTC4.41

The other thing, speaking about the chilled water plant I know that a lot of commercial buildings, especially the other centers these days, they do the concept of at night they actually freeze ice in the basement somewhere or somewhere that they have space. Then during the day they will actually use it to chill the building or cool the servers or in this case cool the hospital. Perhaps using some of that, the fact that it is cooler at night to actually cool the building when it is more economical both in electricity as well as physically might make a lot of sense.

Mr. Hendrix: I think Stanford has actually made some improvements to their steam and chilled water process that improves that. I will let them speak to the details of that but I think they have looked into making that more efficient.

Commissioner Tanaka: Okay, great. I am out of time so I will do more later.

Chair Garber: Commissioner Fineberg and then Martinez.

PTC4.42

Commissioner Fineberg: Thank you. Trixie, could we go back to your response to Commissioner Lippert's comments about the Village Concept Alternative? I am not sure I heard you properly but at the very end of what you said I thought I heard you say that the Village Concept Alternative would reduce the trip miles taken without a requirement for building additional housing nearby.

Ms. Martelino: To clarify, the Village Concept would reduce the vehicle miles traveled assuming that housing would be constructed nearby for employees. In comparison to the SUMC project the analysis for which does not assume that housing would be constructed for employees then the vehicle miles traveled would be reduced.

PTC4.43

Commissioner Fineberg: Thank you. Now I understand the distinction. Regarding the Go Pass as a mitigation measure to reducing impacts of climate changes, in our last meeting

PTC4.43 Con't

we talked about the Transportation Chapter and the relative demand that the Go Pass would put on Caltrain. Commissioner Keller had some data that was not in the DEIR that there were about 2,000 trips at peak, and if we are talking about a reduction of 500 trips at peak that is a 25 percent increase in demand, approximately on Caltrain. I am making an assumption that they have adequate engines and adequate passenger cars to handle peak capacity. If we are asking Caltrain to adjust their schedules, adjust the capacity based on demand, does this chapter on Climate Protection need to account for the energy required, the environmental impacts of Caltrain building cars, buying cars, transporting them to the area, and then running additional cars? I understand that they are more energy efficient than car vehicle trips, but we are requiring the production of new trains. That is going to slim the margin a bit.

Mr. Hendrix: This is where I get into the concept that climate change analysis is not easily fit into CEQA. We are looking at project impacts and you can see where taking that analysis we are actually going off into another jurisdictions realm and figuring out what the emissions are. From a climate change perspective if we were not just narrowly focused on a project would probably be a viable thing to do. Personally and to be candid, I think we need to in the future Palo Alto as a whole as well as Stanford and myself need to rely more and more on transit, to do that we need to increase demand. The budget woes they are going into now are partially related to insufficient demand at times. So I think the Go Pass actually helps us to motivate the state and transit in particular to step up the pace that we need to have statewide. That being said, I don't know what alternative you would have. I suppose Stanford could run an army of shuttles, which would not be as efficient as the transit system as an alternative or a backup. It would certainly be expensive for Stanford and like I say it wouldn't be as efficient emission wise as it is having an in-place, existing transit system that is there.

PTC4.44

Commissioner Fineberg: Okay, thank you. If I could have just one more quick point. In order for the Planning Commission to look at this Climate Change Chapter and review its consistency with our Comprehensive Plan I would like to just make the point that it would have been very helpful to have a new Comprehensive Plan with a section on sustainability and climate change. This is one place where not having the Comprehensive Plan Update done ahead of our review of this project I think is not allowing us to do the best job that we possibly could.

Chair Garber: Commissioner Martinez.

PTC4.45

Commissioner Martinez: Thank you. In this chapter I really liked Table 3.6-5 where we compare the kind of project impacts against our Climate Protection Plan. Even though it is a little wordy it is actually a pretty good summary of all the major issues. It goes back to traffic and like that. I was curious though on I think 3.6-60 it talks about the project as being a mixed use development. I have a little bit of trouble with that because it is basically like a healthcare-hospital project. It describes it as because it is really part of an urban area, close to transit, it allows for people to live nearby. I think this is a bit of a difference from what we have talked about before when we are talking about housing and we only have eight percent of the people living in Palo Alto. We have 275,000 miles per day traveled to get to the campus. I think this section needs to be kind of tweaked just to really state it more accurately.

PTC4.46

I am glad there is a discussion of the importance of the Go Passes because even in climate change, and in air quality, and traffic we talk about how this is a primary TDM. I don't think we have enough really sufficient information about that it would work. That it would work to the level of 20 percent or higher based on the fact that we have so many employees who work within cities that are served by Caltrain. If you count Palo Alto, I wouldn't ride Caltrain to go to Stanford. If you lived in Menlo Park you wouldn't do it. Mountain View? Maybe, but probably not. It is really San Francisco, further north like Redwood City perhaps, San Jose, Santa Clara. So I think the way we use the data to use zip codes and like that to state we have so many employees that the potential of giving them free Go Passes will make this work really is a little bit suspect. If we are going to put so much stock into this I really want better confirmation of where people are coming from. Even if employees lived in San Jose there are some areas of San Jose like Evergreen that people may not take Caltrain. It just may be a little bit too inconvenient to get to. So I am hoping that you will have time to really revisit this concept because it is important to make the project work. We want it to work. We want to reduce those trips from 275,000 miles to less than 100 if it is possible. So let's make sure our data is correct.

Chair Garber: Commissioner, if I may interrupt Commissioner Lippert has a follow up to your line.

Commissioner Martinez: Of course.

PTC4.47

Commissioner Lippert: I was looking at Appendix L, which is the employees by zip code here. one thought that I had here is that perhaps again expanded shuttle service, and maybe paying into not just the Palo Alto Shuttle but also maybe East Palo Alto and perhaps a Menlo Park shuttle or even expanding the Marguerite Shuttle so that it allowed for people living in Menlo Park, Mountain View, and Palo Alto and East Palo Alto to be able to commute by shuttle. Now, why do I emphasize that? Well, it is not just a regional hospital it is also a local hospital. If I was having surgery of course I wouldn't get on a shuttle to go to the hospital I would have my wife drive me. But, if I am going for a simple procedure like an MRI or some blood tests or some lab work it becomes very appealing to be able to hop onto one of the local shuttles to go to Stanford if I knew that it was a pretty direct route, and it was nearby to where I lived. So that is one thought that I had.

PTC4.48

Then in following up here I am looking through the employee staffing by zip code and one of the things in the EIR that needs to be addressed is that there are multiple cities with the same zip code spelled differently that should be consolidated so that we can make better sense out of it. East Palo Alto in particular is E, without a period, Palo Alto, 94303 and then there is E. Palo Alto, with a period, and there is East Palo Alto, and then there is East Palo Alto, spelled differently. It does the same thing for Palo Alto and a number of other cities. So if those could be consolidated that would clarify some of the data here.

Chair Garber: Commissioner Fineberg, you wanted to continue the line.

Commissioner Fineberg: Yes. Also, the zip code 94303 we have talked about this relative to other chapters. Can there be a review of whether the data relating to these two chapters treat 94303 appropriately. Part of it is in East Palo Alto, which is San Mateo County, part

PTC4.48 Con't

of it is the eastern swath of Palo Alto, and if the 94303 in Palo Alto is excluded from Palo Alto it will skew data. So could it be confirmed that in these two chapters 94303 is being treated appropriately.

Chair Garber: Commissioner Martinez, we may have interrupted you. Did you have more?

PTC4.49

Commissioner Martinez: Yes, just one final thought. Also thinking about this mixed use concept, my fellow Commissioner right here, Commissioner Tanaka a couple of meetings ago suggested that maybe Stanford may be building too much. I was thinking well, at $2,000 a square foot I don't think they would build more than they need to, but as I have become more familiar with the master plan, and other Commissioners have suggested this before, that there are elements of what is to be built that could be placed in locations that reduce trips. Offices for community physicians don't have to be right next to the hospital. As we noted earlier, 60 percent of the trips are generated by patients. I would guess having gone through this that 60 percent of those trips are for follow up doctor visits. So I think there is some reasonableness to the suggestion that not everything that is being proposed is necessarily being proposed in a location that is absolutely necessary for the full efficiency of the hospital. I would like us to look at that as part of our mitigations. Thank you.

Chair Garber: Commissioners, we have been going for two hours now. I would either like to take a three-minute break unless you think we can get through in the next 30 to 35 minutes. Is everybody going to be able to get through with one more round? Alright we will not break. We will go back to Commissioner Keller and then Lippert.

PTC4.50

Commissioner Keller: Thank you. So I would like to expand on Commissioner Lippert's suggestion of transit. What is interesting to me about this is I basically created hand-drawn spreadsheet with the benefit of a calculator. What is interesting is that the vehicle miles traveled of the existing hospital is about 600,000 miles. The mitigations reduce the increase of vehicle miles traveled from an increase of 276,000 vehicle miles traveled to an increase of 238,000 vehicle miles traveled, or approximately 37,000 less additional vehicle miles traveled then without mitigations. That means that the amount of vehicle miles traveled instead of going up by 46 percent goes up by about 40 percent.

The greenhouse gases from the existing vehicle miles traveled comes out to 62 percent of the total greenhouse gases of the existing hospital. The vehicles miles traveled of the unmitigated increase compared to the unmitigated increase of greenhouse gases is 55 percent. If you compare the additional vehicle miles traveled and the greenhouse gases from that of the mitigated portion compared to the mitigated total greenhouse gas of the increased project that is 64 percent. What you wind up with on the mitigated portion of the project of the total of the combination of Stanford existing Medical Center and the new Medical Center you wind up with 138,000 metric tons comes from vehicle emissions from vehicle miles traveled. That excluded helicopters and fleets. It seems to exclude all of that kind of stuff. It seems to be mainly passenger cars. Is that right? Mainly people commuting?

Mr. Hendrix: Yes, primarily patients.

PTC4.50 Con't

Commissioner Keller: Right. So that means that 63 percent of the greenhouse gases from the Stanford Medical Center as mitigated, as expanded comes from vehicles miles traveled, which is an astounding amount. If you think about that 63 percent multiplied, I am assuming that some people are coming from further away and some people are coming from closer, I am assuming more of the patients are coming from closer. I don't know. I am not sure of the mix of patients versus the mix of employees and how that comes about, because I don't see a figure on dividing that out. It does indicate that increased transit services would be helpful in this regard, and incentives to increase transit services, because it is not merely a situation where if you provide it they will come. They won't. They will come if there are incentives for doing that such as the Go Pass incentive for Stanford employees to use Caltrain.

So it seems to me that providing additional services if it is free, for example as I mentioned last time the Marguerite Shuttle carries 1.4 million boards a year compared to 30-some odd million for all of Santa Clara County bus service, which is an amazing figure. I think that if we can do something to reduce the total of 839,000 vehicle miles traveled from the combined mitigated project it seems a lot, and any reduction to that would go a long way towards mitigating the hospital greenhouse gases. So I do recognize that there is not much you can do to the building that you haven't already done. There is probably more that can be done in terms of greenhouse gases from vehicle miles traveled.

I don't know what is being considered in terms of for example telemedicine. A lot of elderly may not be able to travel so much from their houses. If you can think about things like fiber to the homes so that you can actually do an effective telemedicine kind of program. I know that Stanford is a leader in terms of using technology. Here is an opportunity where providing additional opportunities for telemedicine, providing additional opportunities where patients don't actually have to come. Where they can do visits and when the doctor is available and don't have to wait in the waiting room but can be seen when the doctor is available. I think this would go a good way towards increasing patient care to the extent possible with appropriate instrumentation and would be a wonderful use of technology, which would have additional spillover. So I would think there are things we could do to reduce vehicle miles traveled through technology and also through transit. Thank you.

Chair Garber: Commissioner Lippert and then Tanaka.

PTC4.51

Commissioner Lippert: I just wanted to follow up here. I had mentioned earlier about expanded shuttle service in terms of being able to capture employees. I had also mentioned about perhaps patients. Part of the reason I had mentioned the patients is that if Stanford did expanded its shuttle service I think it is antithetical and it actually works in the opposite direction if those shuttles are operating but nobody is riding on them. So the idea is by opening it up to patients as well there is at least a chance that we might be able to capture additional ridership there, thereby again reducing the greenhouse gas emissions.

PTC4.52

Then I also wanted to mention one other possibility, which is at this point Stanford is talking about the entire academic campus plus the hospital going with the Go Passes. Maybe there are additional efficiencies by also expanding Go Passes to Hoover Pavilion, which is meant to be again those are leased clinical office spaces for physicians, is that

PTC4.52 Con't

correct? So again that is on Stanford land. It is all within one bundle so perhaps there is a way to incorporate that into the process thereby again reducing another group in terms of commuting.

Then the last aspect that I want to mention is that really only leaves Stanford Shopping Center as the only Stanford entity that is not covered under Go Passes. If we need to again reduce the greenhouse gas emissions further perhaps there is a way to expand Go Passes to Stanford Shopping Center even though it is being operated by the Simon Group. The Stanford Research Park is pretty much handled under Transportation Demand Management programs by the individual companies that are leasing those lands, and part of the development of Stanford is associated with those. So there is not very much left in the way of Stanford lands not being covered by Go Passes, so I am just looking to expand that envelop a little bit more to squeeze the last little bit of greenhouse gas emissions out of it.

Chair Garber: Commissioner Tanaka and then Fineberg.

Commissioner Tanaka: Thank you. I first want to just clarify some comments. I just want to make sure it is understood from what Commissioner Martinez said that I don't actually think this project is too large. I don't want to give the impression that I said the project is too large, because I don't think I did say that earlier. Okay, sorry, I misunderstood then.

PTC4.53

In terms of mixed use I do think it does make sense for a hotel to be nearby as I said several times before.

PTC4.54

Back to Climate Change. I really applaud Stanford for doing the green roofs. It seems to make a lot of sense. I was just wondering is that also counted towards their offset, in terms of the carbon offset by having plants on the roofs. If not, maybe that could be considered.

PTC4.55

The other thing is rooftop space is a lot of times underutilized. In this case it is going to have a helipad and green roofs, but perhaps there could be PV or maybe even a solar water heater up there as well to take advantage of that underutilized space if that has not been considered.

PTC4.56

The other thing is the City of Palo Alto is actually encouraging residents and I think even businesses to do some rainwater harvesting. Perhaps as part of this development that is something that Stanford could consider to use for irrigation perhaps later on. I think there is even a rebate for that, although I don't know if Stanford would qualify.

PTC4.57

Then kind of back to a comment I made back on Air Quality, but I think it is even more applicable here is that climate change is a global issue and because it is a global issue I think kind of like what I said earlier where in some ways there is a difference, maybe it is just part of the Alternatives Analysis where you will look at well if the hospital is here in Palo Alto, which is relative centrally located near transit, as Commissioner Lippert mentioned versus another location let's say Sunnyvale or Cupertino, or who knows where. What would the climate change impact be? Would it be greater because it is in Palo Alto or would it be less compared to other areas? I think that is kind of the question. I think everyone understands that the hospital is a viable service that needs to be built, the public

PTC4.57 Con't

demands it, it benefits a lot of people, but the question is by building it in Palo Alto is it that going to make the climate change worse or better versus other locations? I think that is really to me because this is a global issue, if you locate it in let's say Stockton sure maybe land is cheaper but the climate change might be bigger because people would have to commute there. All the patients would have to commute there for instance, right? So that is something that perhaps as we go into the Alternatives Analysis we could explore further. Thank you.

Chair Garber: Commissioner Fineberg and then Martinez.

PTC4.58

Commissioner Fineberg: Some of the earlier comments by fellow Commissioners about the way Air Quality impacts and Climate Change impacts get measures and get, I am not sure if the word is allocated, but get applied to Palo Alto's allocations for greenhouse gases raised the question for of whether this project presents an opportunity for the hospital or Stanford and the City of Palo Alto to work together with the County and with the State looking at whether the measurements and the models that they allocate the impacts are as they should be. Stanford provides healthcare yet its impacts are measured only against Palo Alto's allocation for greenhouse gases and such, and should those impacts be measured on a regional basis? Is there any pattern of that kind of regional allocation done for other regional creators of significant negative impacts? Things like San Francisco Airport. Does the City of San Francisco have to reduce its greenhouse gas emissions when the airport is a source for the entire region? Can we find answers from what others are doing or do we have the opportunity to jointly enter into negotiations with the County and the State to change how they measure? Commissioner Keller talked about Palo Alto having to go on a huge diet in order to accommodate the needs of the hospital and should Menlo Park and Mountain View and Atherton also have a portion of that diet? So if that could be investigated I think that would be appropriate.

Chair Garber: Thank you. Commissioner Martinez.

PTC4.59

Commissioner Martinez: I am reminded of when the State a few years ago decided to encourage people to drive hybrid vehicles they allowed use of the carpool lanes. Immediately within a month the 80,000 passes for that use were taken because that was a real incentive. People felt they could get to work faster, they could get to wherever they were going faster, and it was worth trading in their car and having that for that.

I think our TDM needs to be reinforced with those kinds of incentives. I am not the one to tell Stanford what it is that those should be exactly, but I am going to kind of give you some suggestions. One suggestion might be following the State's model is what if we said 50 percent of all parking spaces are reserved for clean fuel vehicles? Maybe that would be incentive enough for people to look ahead. We are also looking at 12 to 15 years from now when hopefully most of us will be driving something like that, but who knows.

A second thing is I mentioned sort of a Facebook kind of thing where there is more interaction with people like you know why aren't you using your Go Pass? We see your Go Pass is kind of not used much this month. Or a paid day off every 30 days for the top ten people that use Go Passes. I mean really put some great incentives into making Go Passes and our TDM and all the measures we need to do to make this work.

PTC4.60

Finally, I am like a broken CD, I guess. I think there needs to be something for Stanford to really reinforce the concept of living locally. Maybe it is not building 500 housing units. Maybe it is advocating, encouraging, working with realtors, whatever it takes to try to get more people to live in Menlo Park, Mountain View, Los Altos, locally. I think I left out a city. I think that will make our TDM really more vigorous. I do want to say one thing. I think the shining star in all of this over the past few weeks has been the architecture that Stanford has proposed. I think kudos to my profession for standing up for green building. Thank you.

Chair Garber: Commissioner Keller and Commissioner Lippert had some final comments. Do any of the other Commissioners have comments? Commissioner Keller and then Lippert.

PTC4.61

Commissioner Keller: So I would like to follow up on what Commissioner Martinez said. So one of the things about the Caltrain Go Pass is it is a Transportation Demand Management, TDM, measure that the Stanford campus has long had that the Medical Center does not. What is being proposed here is that here is a TDM measure that will be expanded to the Medical Center. I think it would be worthwhile looking at all the other TDM measures that the campus provides and see if there are any ones that are not provided by the Medical Center and should be provided by the Medical Center. Does the Medical Center currently do carpool promotion? Does the Medical Center currently do vanpool subsidies? Is the Go Pass the only one that exists? I see nods. So that is useful to know, right?

Should it be considered expanding it to the community physicians? Not necessarily the physicians but more toward the nurses and the people like office workers in the community physician block. That is something that might not have that much additional cost if it can be considered sort of one umbrella as opposed to individual companies. That might be something to consider in terms of expanding that.

PTC4.62

I think Commissioner Tanaka had a good idea in terms of offsets but I would like to focus that a little bit. The issue is rather than thinking of it in terms of buying offsets from the Chicago Climate Exchange or something like that, which is somewhat suspect. I kind of like in-kind offsets. So earlier I talked about for putting cars on the road if you put more cars on the road in Palo Alto then take somebody else's cars off the road. Well, similarly if you want to reduce vehicle miles traveled it doesn't matter to me if you reduce only Stanford's vehicle miles traveled or Stanford Medical Center's vehicle miles traveled but if you can reduce some other people's vehicle miles traveled that is the same vehicle miles. So in particular the extent to which Stanford can for example improve the shuttle service to the Stanford Industrial Park from Caltrain, I know there is some there already, but improving that to try to encourage more of the companies in the Stanford Industrial Park to use Caltrain and try to get them to also provide Go Pass services and the like, I think that whatever reductions you can get in VMT there should count as a mitigation in terms of an offset. I think that those are quite valuable. The amount of people you get riding an expanded Marguerite Shuttle or expanding shuttles that other people talked about through Palo Alto or through Menlo Park, or to East Palo Alto or Mountain View. Whatever shuttles you can create those ones are certainly worthwhile.

I do think however that we need to think about what area the hospital serves especially in terms of patients. For example, there is the El Camino Hospital that sort of serves the region to the south. What is the next hospital to the north? Is it Sequoia? So you need to think about what the area that is most served by most of the patients going to Palo Alto. Obviously that can produce a significant amount of congestion and reduce some number of vehicle miles traveled, but also thinking in terms of those who are traveling, mainly workers who are traveling, from further away how we deal with that.

PTC4.62 Con't To some extent as the price of gasoline increases that will discourage people from working farther away. Vanpools certainly help subsidize that. I know that some companies, for example Facebook, really encourage workers to work locally. I am not sure whether that subsidy still exists. Stanford can think in terms of differential pay if you can reduce your vehicle miles traveled you can get some sort of bonuses of some sort. I think that has two benefits. One benefit is that it reduces the vehicle miles traveled for greenhouse gases, but to the extent that workers live closer to the Medical Center it increases their ability to come there in the event of transportation disruptions, for example due to earthquake. Just as Palo Alto is concerned about the amount of public safety workers who will get here in the event of an earthquake that happens in the middle of the night on a weekend or a holiday, and how people can get here next day to be firefighters and police officers, I am assuming that Stanford will also have to be concerned about how many of the nurses and doctors and other people who take care of the Medical Center will be able to come there in the event of this. To the extent that we can get people to live more locally it certainly helps in both of those regards. Thank you.

One finally thing and that is there was a mention by somebody about increasing incentives for clean fuel vehicles. I certainly think that that is also useful. In order to increase incentives for clean fuel vehicles also think about increasing the amount of electric vehicle chargers. I do point out that Stanford has several electric vehicle chargers and has had them for some time. However, has disconnected or disabled the ones over at Tresidder, which I realize are not for the hospital, but they are for Stanford in general. So increasing the amount of electric vehicle chargers and facilitating clean fuel vehicles would seem to be a useful incentive. Thank you.

PTC4.63 Chair Garber: Commissioner Lippert, our final comments on this item.

Commissioner Lippert: I want to follow up on something Commissioner Martinez said earlier, which is again regarding the individual clean vehicles and the incentives behind the for instance hybrid passes or carpool lane passes, same thing for the alternative gas vehicles as well. It is a white sticker instead of a yellow sticker.

We do have something in our Municipal Code that allows for green parking spaces as a consideration of the Transportation Demand Management programs. What is meant by a green parking space is that it is a parking space that is closer to where the front door is given over to clean energy vehicles. One possibility might be to actually, and you were sort of alluding to this, is perhaps it is paid parking versus free parking for the clean energy vehicles. Perhaps that is another way to squeeze out a last little bit of greenhouse gas emissions.

PTC4.64 Another thought that I had is that there is some connectivity between Palo Alto Medical Foundation and Stanford Medical Center. Often times doctors refer patients to Stanford Medical Center and vise-versa. Simply by tweaking the route of the Marguerite Shuttle a little bit and having it cut-through as it comes around by the Caltrain station maybe it goes down Urban Lane and through Palo Alto Medical Foundation before it loops back to the Medical Center. It already does? Okay, great. So again that connectivity I think is particularly important.

PTC4.65 I wanted to make a point with regard to the trees. In the EIR there is mention of those significant heritage trees, protected trees that are being taken out. Again, they add to the canopy and they add to absorption of carbon. Again, I think it should be sort of quantitated as to how those are going to be impacting or not absorbing more greenhouse gases. So I think that the City Arborist does have a plan for replacing those trees but as you mentioned they have to be fertilized and watered, etc., etc. So I think that needs to be further flushed out.

PTC4.66 Then lastly I want to just speak about the Urban Village Concept. I think that is a particularly important point here. Many of us can afford to live here in Palo Alto. Other people can't afford to live here and they need to commute from another area. The tradeoff that is being made is the cost of housing versus putting that burden on the cost of transportation. Somewhere it still comes out of your pocket. You still have to pay for it, but a lot of individual say well, I can get a bigger house out in Stockton or Tracy, and I am going to pay for it by having to commute to Palo Alto. So in some ways, the Village Concept what it says here is that perhaps there should be some sort of subsidized housing. The idea is that they are really paying for it because they are not having to pay for the transportation to get here. So they may have to pay a little bit more for housing here but it could be subsidized but then they don't have to pay for transportation which then recognizes that there is going to be greenhouse gas emissions associated with the carbon footprint of driving from Tracy or Stockton or some other area to get here. So ultimately what we are seeing is we are paying down the carbon footprint. So again, I think that the Village Concept here is particularly important in terms of us cracking this nut of greenhouse gas emissions.

Chair Garber: Thank you. With that we will close this particular item. I would like to thank Staff, the consultants, and Stanford for their continued work on this item. We will see you all next week.

Mr. Hendrix: If I could make one last suggestion.

Chair Garber: Sure.

Mr. Hendrix: Commissioner Fineberg brought up this idea of regional analysis rather than using the Bay Area thresholds. Particular to greenhouse gases there is an opportunity. The City of Palo Alto currently has a Climate Protection Plan. It needs a little updating and some more inventories in it to make it what is called a 'qualified plan' that you could use develop thresholds instead of using the Bay Area thresholds. But this regional concept is really enticing. In a narrow look just combining having Stanford and the City of Palo Alto

have a combined strategy for reducing greenhouse gases would do well with the hospital then as you put it the City of Palo Alto is not stuck with figuring out how to offset those emissions, together you are figuring out how you are going to offset those emissions, plus you have your combined inventories to struggle with. That's it.

Chair Garber: Thank you very much. Again, thank you all. We will see you next week.

Commissioners, we have a little bit of business to take care of. Can I get a motion to approve the meeting minutes of June 2 and 9? Let's just take June 2. Anyone, a motion.

APPROVAL OF MINUTES: Meetings of June 2, and 9, 2010.

MOTION

Commissioner Tanaka: So moved.

Chair Garber: Commissioner Tanaka, thank you. Seconded by?

SECOND

Commissioner Fineberg: Second.

MOTION PASSED (6-0-0-1, Vice Chair Tuma absent)

Chair Garber: Commissioner Fineberg. All those in favor say aye. (ayes) All those opposed? The motion passes with Commissioners Martinez, Tanaka, Fineberg, Garber, Lippert, and Keller voting yea and Tuma absent.

A motion to approve the meeting minutes of June 9. We will note that Commissioner Fineberg I believe was not at that one, nor was Commissioner Lippert. May I get a motion?

MOTION

Commissioner Keller: So moved.

Chair Garber: So moved by Commissioner Keller. Seconded by?

SECOND

Commissioner Tanaka: Second.

Chair Garber: Commissioner Tanaka. Commissioner Fineberg, you had a comment before we vote?

Commissioner Fineberg: Yes. On the 9th the Roll Call does not show Fineberg and I think I heard Lippert say he was not present. So if that could be corrected.

MOTION PASSED (6-0-0-1, Vice Chair Tuma absent)

Chair Garber: Thank you. All those in favor say aye. (ayes) Opposed? The motion passes with Commissioners Martinez, Tanaka, Fineberg, Garber, Lippert, and Keller voting yea and Tuma absent. Commissioner Keller.

Commissioner Keller: It should also state that Vice-Chair Tuma was conflicted just as the June 2nd one does.

Chair Garber: Thank you very much.

REPORTS FROM OFFICIALS/COMMITTEES.

Chair Garber: Representation at City Council this month continues to be Commissioner Martinez. Next month it is myself with the exception of July 19, which will be covered by Commissioner Lippert.

As for representation I am wondering if we have a report from Commissioner Martinez and/or Lippert, or another Commissioner that saw the Council's deliberations on the Comprehensive Plan last night. We will get an update from the Staff at some point.

Any other reports? That is good enough. Commissioner Martinez.

Commissioner Martinez: I left before that item came up it was getting a little late for me. The Council considered it….

Chair Garber: This is Los Trancos.

Commissioner Martinez: Yes, Los Trancos Road the proposed Site and Design. They voted unanimously to approve it.

Chair Garber: All right, any other reports? Julie.

Ms. Caporgno: I don't know if you mentioned that last night the Council supported the growth projections that we had proposed. They elected to undertake the Update to the South El Camino Design Guidelines this year. So they are going to allocate $30,000 to do that. All of the concept plans, other than the two that are currently being worked on, they didn't support those at this time. They supported the concepts of putting some policies in the plan but not allocating money at this time. I think that was it. They didn't make any additional changes to the Housing Element concepts that I think you were all present for at the last meeting where that was discussed.

COMMISSION MEMBER QUESTIONS, COMMENTS, AND/OR ANNOUNCEMENTS.

NEXT MEETING: Special Meeting of July 7, 2010 at 6:00 PM

1 Chair Garber: Thank you. Anything else Commissioners? Then we will adjourn at 10:07.
2 Thank you very much. See you next week, on Wednesday.
3
4 ***ADJOURNED: 10:08 PM***
5

PTC 4. Planning and Transportation Commission, June 24, 2010

PTC4.1 *The commentor states that the Draft EIR did not correlate SUMC's employee zip code data with the development of the SUMC Project's transportation demand management (TDM) scheme.* Please refer to Master Response 1, which explains that SUMC's employee zip code data was applied assessing the effectiveness of the GO Pass mitigation measure.

The commentor also asks why there is no scheme to assist East Bay employees to take transit. As discussed in Master Response 1, Mitigation Measure TR-2.3 includes provision of parking spaces at the Ardenwood park-and-ride lot or an equivalent facility to encourage East Bay employees to use transit.

PTC4.2 *The commentor asks why there is no analysis on the viability of Caltrain's future and requests a back-up plan to the GO Pass should Caltrain cease its services.* Please refer to Master Response 1 for a discussion of the viability of Caltrain and steps that would be taken if the mode split requirements were not achieved.

PTC4.3 *The commentor states that Figure 3.4-9, on page 3.4-48 of the Draft EIR, shows that the majority of regional commuters would access the SUMC Sites from US 101 and that Draft EIR should include incentives to use I-280 instead.* There is no effective means of dictating to employees what routes they can travel to reach their place of employment. Each employee will choose a travel path that minimizes their travel time, whether via US 101 or alternatively via I-280, taking into account necessary or desirable detours and additional destinations. Please also refer to Master Response 2 for a discussion of remote parking.

PTC4.4 *The commentor asks why no discussion of No Net New Trips is included in the Draft EIR, which is a requirement of the Stanford University 2000 Community Plan and General Use Permit (CP/GUP).* Please refer to Master Response 2 for a discussion of a No Net New Trips requirement.

PTC4.5 *The commentor asks why the effects of construction emissions on SUMC patients and visitors were not considered in the Draft EIR.* In general, health risks associated with air emissions during construction are primarily associated with exposure of sensitive receptors to emissions of toxic air pollutants (TACs), in particular diesel particulate emissions (DPM). However, the effects of TAC emissions on SUMC patients and visitors were not considered in the construction-phase health risk assessment (HRA), as prepared for the Draft EIR for two reasons. First, the primary TAC responsible for most of the health impacts associated with construction is the fine particulate matter present in the diesel-powered equipment/truck exhaust (termed DPM) and the hospital and medical office buildings where most patients reside are equipped with air filtration systems that remove most if not all of the DPM before the air is distributed to patient rooms and offices. Second, the health impacts of most concern from the TACs in the equipment/truck exhaust are those that occur only after relatively long exposure (i.e., years) while the typical time

on site for patients and visitors is relatively short (i.e., days or weeks); thus, the receptors potentially most impacted by the SUMC construction TAC emissions are on-site outdoor workers and nearby residential and other off-site receptors.

The commentor is correct in stating that the construction planned for the SUMC site will occur in phases over a period of 12 years. A horizontal bar chart showing the amount of DPM emitted per year for the construction of each SUMC Project component, which was used to estimate health risk, is given in the HRA's Table 3.1, titled: Estimated Diesel Particulate Matter Emissions - Construction Activities Stanford University Medical Center Facilities Renewal and Replacement Project Palo Alto, California. Please refer to Appendix F of the Draft EIR for the complete HRA.

PTC4.6 *The commentor expresses doubts about whether GO Pass and other TDM strategies will be as effective as indicated in the Draft EIR in reducing motor vehicle trips and the air pollutants they generate.* The trip reduction effectiveness of the GO Pass and other TDM strategies presented in the Draft EIR are the best estimates available. The air pollutant emissions based on them are presented in Table 3.5-7 of the Draft EIR, page 3.5-20. They show that even with the full effectiveness assumed, SUMC Project emissions would still exceed the Bay Area Air Quality Management District (BAAQMD) significance criteria and would do so even if the trip reduction strategies are less effective than assumed. In contrast, the local Carbon Monoxide (CO) levels from traffic in the SUMC Project vicinity are so far below the CO standards that no standard violations would occur even if no project trip reduction strategies were implemented.

PTC4.7 *The commentor asks the reason why future baseline CO levels, as shown in Table 3.5-8, page 3.5-21 of the Draft EIR, are substantially lower than existing CO levels.* The introduction of oxygenated motor vehicle fuels in the Bay Area more than 10 years ago, and the continuing improvements in emission control technology and their mandated application to the newer vehicles joining the State's motor vehicle fleet (together with the gradual retirement of older, more polluting vehicles as time goes on) is responsible for this improvement. As the Draft EIR notes on page 3.5-21, "CO standards in the Bay Area have not been exceeded for almost 20 years, and the EPA has designated the entire Bay Area as 'Attainment' with regard to the CO air quality standards."

The commentor asks why only the six intersections shown in Table 3.5-8 were chosen and why the analysis did not include intersections east of El Camino Real or near Highway 101. These six intersections were selected because these have the largest Peak Hour traffic volumes, the lowest LOS, and would have the largest fraction of SUMC Project traffic as part of their total volumes. Worst-case CO levels at receptor points very close to these intersections were modeled for the PM Peak Hour and peak eight-hour traffic conditions. The rationale for this choice was that if no standard violations were predicted there, it was extremely unlikely that violations would occur anywhere else at any other times of the day.

Page 3.5-21 the Draft EIR states, "CO levels, even at their highest as measured at Bay Area monitoring stations, are typically only a quarter to a third of the ambient standards; since these relatively low values are added to the CO modeling results as being representative of local background concentration, local emissions of CO by vehicles using the intersections would have to be very high to result in a local standard violations." Local CO levels at the six intersections modeled were not high enough when added to the estimated CO background to violate CO standards; this is expected to be the case near any other intersections in the SUMC Project area and near Highway 101, now and in the future. Eight-hour CO emissions were calculated using the BAAQMD methodology, which takes into account the Peak Hour CO emissions and applies a persistence factor.

PTC4.8 *The commentor asked whether the SUMC's transportation source air pollutant estimates were gross or net, the latter being the pollutant emissions remaining after the emissions from the trips generated by the existing SUMC facilities are subtracted out.* It was confirmed at the hearing that transportation source air pollutant estimates were net.

PTC4.9 *The commentor asks whether to the SUMC Project would be more polluting than the existing buildings, which presumably have inefficient systems since they were designed 50 years ago.* It was pointed out at the hearing that a finding of significance only meant that a project's emissions had exceeded the fixed BAAQMD thresholds established for CEQA review. These thresholds are relatively small and would apply to every project type. Thus, for example, a 100-unit residential project might contain no pollutant controls or TDM measures and yet be under the thresholds, while a very large project that includes state-of-the-art pollutant control systems or extensive TDM measures could exceed the thresholds (as the SUMC Project would) and be considered significant.

PTC4.10 *The commentor asks whether explicit calculations for the air pollutant emissions of the existing SUMC had been performed.* It was pointed out at the hearing that although there were data (i.e., square footages for existing land uses, trip generation rates, etc.) for the existing SUMC that would allow such estimates to be made, the emission estimates in the Draft EIR (apart from the SUMC Project construction emissions; without the SUMC Project there would be no construction) were only from additional floor area, additional power demand, additional trips, etc., resulting from the SUMC Project.

PTC4.11 *The commentor questions how the Draft EIR can have less-than-significant traffic impacts, but significant air quality impacts.* All SUMC Project traffic impacts (e.g., congested traffic flows on streets, longer delays at intersections, etc.) would be local to the SUMC Project area. These impacts are generally related to the overall capacity of the existing roadways and intersections, and the SUMC Project's contribution to the overall traffic volumes on each roadway or intersection. In contrast, air pollutant emissions can have impacts on a regional scale, in addition to local impacts (e.g., increasing CO levels near intersections). The type of air quality impacts identified as significant by the Draft EIR are

regional, not local impacts that are traffic-related. These regional impacts are related to specific criteria developed by the BAAQMD to help them meet their emissions reductions goals and would be unrelated to the local traffic volumes.

PTC4.12 *The commentor asks if the health impacts of fly ash, which is often a constituent of concrete, has been considered with respect to the SUMC patients.* Any significant emissions of fly ash from demolition of existing concrete structures on site would be controlled by the standard dust control measures required by the BAAQMD and included in the Draft EIR as Mitigation Measure AQ-1.1 on page 3.5-16. Any fly-ash-containing concrete brought on site during construction would be a pre-mixed, wet slurry, which would not emit fly ash. Once such concrete were poured, hardened, painted, enclosed, etc. the fly ash would be trapped within it and pose no significant danger to the patients.

PTC4.13 *The commentor asks about how power is supplied to the Cardinal Cogeneration Plant and if there are contingencies to allow the hospital to operate in the event of power failure due to flooding or earthquakes resulting in damage to off-site electrical facilities.* The SUMC facilities do not receive power from the Cardinal Cogeneration Plant. Rather, they receive power from City of Palo Alto Utilities. The City's off-site electrical facilities in question are in a floodplain area on soils subject to liquefaction and extreme ground shaking. The facility in question and related on-site existing hydrologic and geologic conditions are an existing condition and not a new feature proposed under the SUMC Project. Accordingly, the Draft EIR does not address potential effects related to the City's facility nor provide mitigation to improve the existing conditions. With regard to electricity supply in the event of an emergency or power outage, the State of California and the Joint Commission on Accreditation of Healthcare Organizations require 92 to 96 hours of emergency generator capacity for all life safety systems, and predominantly for most systems within the Hospital.[1]

The Cardinal Cogeneration Plant produces electric and thermal energy to the Stanford campus using natural gas fuel. Stanford has completed exhaustive studies of long-term energy supply options to succeed the cogeneration plant when its contract expires in 2015 and has decided to install a "regeneration" plant that utilizes waste heat recovery to achieve 40 percent to 50 percent more fuel efficiency and use 70 percent less water than the existing cogeneration plant. The regeneration plant would no longer generate electricity and would not be able to serve as a backup generator because electricity would not be generated at the facility. Electricity for the regeneration facility would be purchased from PG&E or other providers.[2]

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[1] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, July 19, 2010.

[2] Dan Stober, Stanford Report, *Stanford moves aggressively to cut energy use, reduce carbon impact,* October 19, 2009, available at: http://news.stanford.edu/news/2009/october19/stanford-carbon-footprint-101909.html?view=print, accessed October 13, 2010.

PTC4.14 *The commentor questions whether substantial air pollutant emissions during construction could be offset by a TDM program that would reduce construction worker motor vehicle trips to the SUMC Sites.* It was pointed out at the hearing that emissions from the construction equipment and haul trucks are typically responsible for the great majority of the air pollutant emissions from construction-related fuel combustion sources. Elimination of all worker commute trips would result in a small percentage reduction in the emissions at most.

The commentor also asks if the Draft EIR had taken into account the effect of construction worker vehicles idling in congested traffic during their commutes. It was pointed out at the hearing that construction emission modeling only took into account the daily number of construction workers expected and the average length of their commute trips to determine the impact of trips on the regional emissions. Localized impacts from construction worker trips were not accounted in the Draft EIR. However, as noted in the Draft EIR on page 3.5-21 local emissions of CO by vehicles using the intersections would have to be very high to result in a local standard violation. Since the SUMC Project daily vehicle trips during operation would be greater than the number of daily vehicle trips during construction, and because the Draft EIR did not identify any significant localized emissions of CO during operation, localized CO impacts during construction would also be less than significant.

PTC4.15 *The commentor questions whether the SUMC Project's inclusion of Energy Star standard made any substantial difference to the air pollutant estimates presented in the Draft EIR.* It was incorrectly stated at the hearing that most of the energy used during operation of the SUMC Project would be supplied by Stanford's Central Energy Facility (CEF). This is not the case. The SUMC facilities receive electricity from City of Palo Alto Utilities. However, the SUMC receives steam and chilled water from the CEF. Just as with worker commute emissions in comparison to equipment emissions during construction, the energy saved through application of Energy Star standards would be small in comparison to the overall energy supplied by City of Palo Alto.

PTC4.16 *The commentor states that the maintenance and operation of the building is estimated to represent approximately 85 percent of the emissions. Further, the commentor questions if the higher efficiency standards would change the proportion between construction and operation/maintenance or if the cost of fossil fuel increasing would result in a reduction of emissions.* With respect to the SUMC Project, a hospital by nature is energy intensive; therefore, a limited amount of emissions reductions can be addressed. For example fuel consumption used for the operation of helicopters and ambulances cannot be reduced. Also, until the technology catches up with the required energy efficiencies, equipment such as MRI units would continue to require the current energy loads. These require energy consumption that in another type of building might be offset by more robust reduction strategies.

Because hospitals are unique in energy requirements, they require a unique solution toward energy efficiency. By providing innovative engineering solutions to air circulation, energy efficient improvements to the existing chillers, and overall design of the building, the SUMC Project sponsors would succeed in providing an energy efficient hospital facility. The SUMC Project has greater energy efficiency within the design of the SUMC Project than would have been achieved by applying conventional energy efficiency techniques.

Emissions from vehicles are determined from the number of vehicle miles traveled (VMT) irrespective of the cost of fuel. It is acknowledged that a rising cost in fuel may encourage people to find alternate means of transportation. However, because the amount fuel prices would increase by 2020 is unknown, a conservative emissions estimate was used by not representing a decrease in vehicle usage from cost increases. Emissions with respect to vehicle fleet would be reduced due to the efficiency of the vehicles as well as the implementation of the GO Pass mitigation measure (Mitigation Measure TR-2.3). These emissions reductions were accounted for either through the Emission Factor Model or else through the reduction calculations as presented in the Draft EIR and in Staff-Initiated Change 4.

PTC4.17 *The commentor asks if natural-gas-powered equipment could be recommended as part of Mitigation Measure AQ-1.2(a), as well as electric-powered equipment.* It is correct that equipment using natural gas as a fuel would offer limited advantages over the use of diesel-powered equipment. However, natural gas-fueled equipment would still emit air pollutants locally in contrast with electric-powered equipment, which would not emit local air pollutants. Note that with the use of electric-powered equipment, emissions would still be generated off-site for the production of electricity. BAAQMD's CEQA Guidelines do not include a requirement to use natural gas-powered equipment as opposed to diesel-powered equipment.

PTC4.18 *The commentor states that reducing construction worker commute trips is likely to have a substantial effect on improving local air quality considering the long-term (i.e., 12-year) SUMC Project construction schedule.* Given that the significance of SUMC Project construction on air quality is based on BAAQMD CEQA thresholds, there is no indication that a reduction in the emissions of air pollutants due to construction worker commute would be large enough to alter the significance conclusions reached by the Draft EIR. However, the Draft EIR does include Mitigation Measure TR-1.8, which would allow the SUMC Project sponsors to develop a Construction Impact Mitigation Plan. Details about construction worker arrival and departure times would be included in the plan. Please refer to Master Response 4 for a discussion on construction traffic.

PTC4.19 *The commentor asks whether alternative project sites in Redwood City, Mountain View, or Sunnyvale would offer any air quality advantages over the current SUMC Sites in Palo Alto.* The Draft EIR summary of local air quality monitoring provided in Table 3.5-3 on

page 3.5-7, is taken from the BAAQMD's Redwood City station, which is closest to the SUMC Sites (there is no BAAQMD station in Palo Alto). From a survey of BAAQMD monitoring data summaries from other stations as far north as San Francisco and as far south as San Jose, it can be concluded that, although there is a slight deterioration in air quality as one moves from north to south on the Peninsula (i.e., ozone and particulate matter standards, which are rarely exceeded in San Francisco, can be exceeded a few more times a year in San Jose than in San Francisco), there would be no significant local air quality advantages to an alternative site in the three cities mentioned above.

In terms of regional emissions, if an alternative project site were selected, there could be some changes to the trip length for patients and employees to travel to the site. However, this is largely dependent on the origin of the trips and because the SUMC Project trips could originate from anywhere within the region, an alternative site location would likely result in shorter trips for some patients and employees, but longer trips for other patients and employees. Also, an alternative project site could affect the locations from which SUMC draws its patients and employees, or motivate changes in the choice of residential locations by its employees. Thus, any initial trip length advantage with the choice of an alternative site could decrease with time as the patient and worker population adjusted to the site change. The dominant factor determining the size of the SUMC Project's regional emissions is the size of the facility, not its location. An alternate site is not likely to result in an emissions reduction large enough to yield a different significance conclusion than that reached in the Draft EIR.

An off-site alternative was considered for the analysis in the Draft EIR but rejected from further review because it would be infeasible, would not attain most of the basic SUMC Project objectives, and would not sufficiently reduce SUMC Project impacts. As explained on pages 5-38 through 5-39 of the Draft EIR, the SUMC Project components are designed to function together with the existing Hospitals and SoM buildings at the SUMC Sites and the Stanford campus. Construction of the SUMC Project components at an off-site location would be infeasible because the components are not designed to stand alone. In addition, locating the proposed buildings away from the Stanford University campus would hinder the Hospitals' ability to maintain their position as leading providers of complex care and to deliver high quality health care services and related teaching and research, which are objectives of the SUMC Project. Further, within the City, there are no alternative sites in the area surrounding the SUMC Sites that could accommodate the development intensity proposed under the SUMC Project given the City's existing land use designations and zoning. Therefore, the Draft EIR does not analyze an off-site location alternative.

PTC4.20 *The commentor asks whether additional air quality improvements could be had from extension of shuttle service to patients coming to the SUMC Sites from the surrounding areas.* A shuttle service is most feasible for serving patients that live relatively close to the SUMC Sites. But most of the workers, patients, and visitors come from relatively more

distant locations where the greater length of their motor vehicle trips contributes proportionally to their greater contributions to the SUMC Project's pollutant emissions. The radius of shuttle service usually hinges on the economic feasibility of providing it. The current and assumed future radius of service for the existing shuttle system has been incorporated into the traffic analysis that provided input data for the Draft EIR emissions estimates.

The commentor also asks whether the promotion of alternative fueled vehicles by Palo Alto and surrounding jurisdictions would result in a reduction of SUMC Project emissions. This type of program is being suggested by the commentor for implementation by the local jurisdictions not the SUMC Project sponsors, and thus is outside the scope of the Draft EIR. However, if SUMC Project-related trips included the use of more alternative fueled vehicles, there could be a small reduction in the emissions associated with the SUMC Project.

PTC4.21 *The commentor questions if the Cardinal Cogeneration Plant generates power from natural gases.* The Cardinal Cogeneration Plant produces electric and thermal energy using natural gas fuel. However, as described in Response to Comment PTC4.13, the plant will be converted to a regeneration plant after 2015. The regeneration plant would no longer generate electricity and would not be able to serve as a backup generator because electricity would not be generated at the facility. Electricity for the regeneration facility would be purchased from PG&E or other providers.[3]

The commentor also asks how power will be supplied to the SUMC Sites during an emergency or power outage. The State of California and the Joint Commission on Accreditation of Healthcare Organizations require 92 to 96 hours of emergency generator capacity for all life safety systems, and predominantly for most systems within the hospital.[4] The SUMC Sites currently maintain 12 emergency generators that have a total capacity of 9.4 megawatts. However, in order to meet the increased demand for backup energy under the SUMC Project, up to an additional 21 megawatts of emergency generator capacity would be installed. As described on pages 2-50 and 2-52 of the Draft EIR, ten new 2-megawatt generators would be provided within the Main SUMC Site; seven for SHC between Welch Road and the proposed new hospital, and three for LPCH adjacent to the existing generators near Quarry Road. In addition, each of the proposed SoM buildings (FIM 1, 2, and 3) would have an emergency generator in proximity to the proposed building with no more than two generators at any location. In total, the SUMC Project would add 13 emergency generators to the Main SUMC Site. The existing and new

[3] Dan Stober, Stanford Report, *Stanford moves aggressively to cut energy use, reduce carbon impact,* October 19, 2009, available at: http://news.stanford.edu/news/2009/october19/stanford-carbon-footprint-101909.html?view=print, accessed October 13, 2010.

[4] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, July 19, 2010.

emergency generators are shown in Figure 2-17 of the Draft EIR on page 2-51. In the case of an emergency or power outage, these generators would be able to provide energy to the SUMC Project facilities.

PTC4.22 *The commentor asks how many nonattainment days for ozone and carbon monoxide standards are recorded yearly at BAAQMD monitoring stations and the likelihood that the SUMC Project would increase the number of non-attainment days.* A summary of local air quality monitoring data is provided in Table 3.5-3, page 3.5-7 of the Draft EIR, and is taken from the BAAQMD's Redwood City station, which is closest to the SUMC Sites (there is no BAAQMD station in Palo Alto). This table shows the number of times per year that the federal and/or State standards for ozone and carbon monoxide were exceeded at the Redwood City station for the most recent three years (2007 through 2009) for which data is available. There were no violations of the ozone and carbon monoxide standards at the Redwood City station during this time.

Summaries of air quality data for all Bay Area stations are available on the BAAQMD website.[5] According to these summaries, violations of the federal and State 8-hour ozone standard have been recorded 12 times and 20 times, respectively, in 2008; the carbon monoxide standards have not been violated at any Bay Area monitoring station in almost 20 years, as stated on page 3.5-21 of the Draft EIR. The BAAQMD notes that the region's nonattainment status is attributable to the region's development history, and that new development projects would contribute to the region's adverse air quality impacts only on a cumulative basis. The BAAQMD notes that no single project is sufficient in size to, by itself, to result in nonattainment of ambient air quality standards.[6]

PTC4.23 *The commentor seeks mechanisms to create mitigation measures to reduce the impact on the City's jobs to employed residents ratio, which the commentor believes is the heart of air quality and traffic impacts.* Please see Master Response 7 for a discussion of Mitigation Measure PH-3.1. Also, see Staff-Initiated Change 4 for a revised quantification of the SUMC Project's greenhouse gas emissions, which now shows the SUMC Project would reduce greenhouse gas emissions by more than 30 percent compared to Business as Usual (BAU) emissions. The primary mitigation for reducing the SUMC Project's impacts pertaining to mobile source air pollutants is Mitigation Measure TR-2.3, which involves enhancement of the Hospitals' TDM program to reduce project trips. As indicated in Master Response 7, Mitigation Measure PH-3.1 is of doubtful feasibility.

The commentor also questions the methodology for determining that eight percent of SUMC Project employees would seek to live in Palo Alto. As shown in Table 3.13-8 on page

[5] Bay Area Air Quality Management District (BAAQMD), "Annual Bay Area Air Quality Summaries," accessed at http://www.baaqmd.gov/Divisions/Communications-and-Outreach/Air-Quality-in-the-Bay-Area/Air-Quality-Summaries.aspx on November 12, 2010.

[6] Bay Area Air Quality Management District (BAAQMD), California Environmental Quality Act Air Quality Guidelines, June 2010, page 2-1.

3.13-12 of the Draft EIR, eight percent of the housing demand, or 104 units, would occur in Palo Alto and would comprise a small 1.7 percent of the projected housing growth in Palo Alto. The data in Table 3.13-8 are based on historical evidence, comprised of SUMC's data on the residential distribution of their employees (see Appendix L of the Draft EIR).[7] As such, it is appropriate to apply the eight percent when determining how many new SUMC employees would seek to live in Palo Alto.

PTC4.24 *The commentor asks whether the SUMC Project sponsors will be improving the SUMC buildings that will remain in place*. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the ventilation system, as explained by the SUMC Project sponsors at the public hearing. The SUMC Project would remove and demolish a significant portion of the existing SUMC in order to construct new efficient facilities. As such, the replacement hospitals would comply with the more stringent Office of Statewide Health Planning and Development (OSHPD) standards regarding the number of airflow and air exchange units. The Hospital Modernization Project (HMP) building that would remain under the SUMC Project would not be extensively renovated for energy efficiency purposes. However, the energy performance would be improved because of the lower occupant load at this building (due to converting rooms to single-patient rooms).

The commentor also questions if there is a way to separate the noninfectious treatment areas from the infectious treatment areas. It is not feasible to segment the building between different disease types in any manageable way. The infection control rules are administered by OSHPD; however, they are also administered by the SHC and LPCH and by the joint commission that evaluates and certifies hospitals as fit to be operated.[8]

PTC4.25 *The commentor asks whether air pollutant emissions and greenhouse gases during construction could be substantially reduced by finding a closer area to dump soils and other materials excavated from the SUMC Sites*. It was pointed out at the hearing that most of the air pollutant emissions emitted during construction were found to come from the diesel-powered equipment that would operate on the SUMC Sites. Therefore, reducing the trip length of the haul trucks hauling material off site would have a relatively small effect on total regional emissions during construction. Such reductions also would not substantially affect construction-related greenhouse gas emissions.

PTC4.26 *The commentor asks whether the BAAQMD could in the SUMC case, or has ever in other cases, imposed punitive sanctions on development projects that exceeded their CEQA thresholds*. It was pointed out at the hearing that the difficulty of a project staying under

[7] Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.

[8] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 24, 2010.

the CEQA thresholds increases with the size of the project and that the BAAQMD, being aware of this, would likely focus on the quality and completeness of the mitigations imposed on the project before comment or other actions. The SUMC Project includes substantial mitigations relating to motor vehicle trip reductions, and energy efficiency measures, which would inform BAAQMD of the SUMC Project sponsors and City's efforts to reduce the impact to the extent feasible, should the SUMC Project be approved with a statement of overriding considerations for the identified regional air quality impacts. It also should be noted that the BAAQMD significance standards are not mandatory requirements, and there is no penalty for exceeding the standards. Rather, if the standards are expected to be exceeded, CEQA requires an analysis of feasible mitigation, as has been provided in the EIR.

PTC4.27 *The commentor questions whether SUMC Project air pollutant emissions would vary from day to day and whether the Draft EIR analysis took account of this considering the variation of air quality locally*. It was pointed out at the hearing that operational emissions estimates were done for the average daily and annual emissions at full project buildout. The analyses in the Draft EIR do not address the daily or annual fluctuations that may occur, nor is such an analysis required in order to apply the applicable significance thresholds.

PTC4.28 *The commentor asks whether the BAAQMD had ever recommended the suspension or cutback of construction activities as part of a Spare the Air alert*. It was pointed out at the hearing the two common recommendations on Spare the Air days/nights were the avoidance of unnecessary motor vehicle use on warm days when ozone levels are projected to be high and the avoidance of fireplace or woodstove use on cold nights when particulate levels are projected to be high.

PTC4.29 *The commentor questions whether the BAAQMD had ever applied its regional CEQA threshold differently to different subareas in the Bay Area because of regional variations in microclimate*. It was pointed out at the hearing that the BAAQMD has adopted a one-size-fits-all threshold because of the linkages in air quality among the various subareas. Pollutants emitted on a cool foggy day in San Francisco may not affect ozone levels in this area, but as the wind carries the pollutants farther inland where the temperature is much warmer and sunnier they may increase ozone levels in those areas.

PTC4.30 *The commentor states that the SUMC Project sponsors should consider suspending or reducing construction activities on a Spare the Air day*. As part of the Spare the Air program, the BAAQMD asks Bay Area residents to reduce pollution on certain days when air quality standards are especially threatened by making voluntary choices that reduce pollutant emissions on that day. The most commonly suggested ways of reducing emissions on those days are reductions in the use of motor vehicles or of equipment that requires electric power to function. As far as is known, the BAAQMD has not suggested

that construction activity be suspended on Spare the Air days (although construction workers commuting to a job site would come under the same general recommendations to use mass transit, carpools, etc. for the work commute on Spare the Air days). Suspension of SUMC Project construction activity on Spare the Air days would not alleviate the significant and unavoidable construction air quality impacts, as identified in the Draft EIR on pages 3.5-14 through 3.5-17, since Spare the Air days would only constitute a small fraction of the days during the construction period.

PTC4.31 *The commentor asks if the provision of housing near the SUMC Sites under the Village Concept Alternative is included as a way to reduce air quality impacts*. The Draft EIR, page 5-205, notes that "… the development of housing on three nearby sites with preferential occupancy by SUMC employees would slightly lessen the additional new motor vehicle trips and air pollutant emissions associated with hospital and medical offices, as shown in Table 5-12." Because the fraction of vehicle trips associated with residents of the proposed housing who work at the hospitals and medical offices is small in comparison to the total trips associated with the Village Concept Alternative, the reduction in air pollutant emissions would only equate to about 1 percent. The Draft EIR, page 5-205, notes further that operational "NO_x and PM_{10} emissions would remain significant; daily ROG emissions would also remain significant, but annual ROG would fall just below the BAAQMD significance threshold." However, since the publication of the Draft EIR, the traffic analysis for the Village Concept Alternative has been revised to include the following additional motor vehicle trips: 1) trips by the household members who cohabit with SUMC employees living in the housing built on the three sites, but are not SUMC employees themselves; and 2) trips by the Stanford University graduate students and faculty who would have lived in the housing built on the three sites, but have been displaced by SUMC employees and now must commute to the area from more distant residential sites. Thus, the VMT for the Village Concept Alternative is expected to be greater than that of the SUMC Project.

The following revisions have been made to the text on page 5-205, first paragraph, and Table 5-12 of the Draft EIR:

> **Operational Criteria Air Pollutant Emissions**. The new structures would contain the same new stationary pollutant sources and would require the same amounts of chilled water/steam from the Central Energy Facility with the same associated air pollutant emissions as the SUMC Project. However, the development of housing on three nearby sites with preferential occupancy by SUMC employees would ~~slightly~~ not lessen the additional new motor vehicle trips and air pollutant emissions associated with hospital and medical offices. In fact, vehicle trips and VMT would increase because of the trips added by 1) household members who cohabit with SUMC employees living in the housing built on the three sites, but are not SUMC employees themselves; and 2) Stanford University graduate students and faculty who would have lived in the housing built on the three sites, but have been displaced by SUMC employees and now must

commute to the area from more distant residential sites. ~~, a~~As shown in Table 5-12,~~. T~~the Village Concept Alternative's ROG, NO_X, and PM_{10} emissions would all remain significant, just as they were for the SUMC Project~~; daily ROG emissions would also remain significant, but annual ROG would fall just below the BAAQMD significance threshold~~. Although the new residents at the three housing sites would add slightly to traffic on local streets, CO modeling for the SUMC Project shows that CO concentrations there are so far below the air quality standards that there is no potential for violations. This alternative would have a less-than-significant impact associated with localized concentrations of CO.

Table 5-12
Village Concept Alternative Daily Operational Stationary and Mobile Source Emissions (with Mitigation Involving an Enhanced TDM Program)

	Emissions (Pounds per Day/Tons per Year)					
Emission Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Stationary (On-Site)	5.67/ 1.04	5.86/ 1.07	6.45/ 1.18	0.00/ 0.00	0.02/ 0.00	0.02/ 0.00
Central Energy Facility	----	110/ 20.08	37/ 6.75	----	----	----
Mobile	~~78.28/ 13.81~~ 83.62/ 14.75	~~94.70/ 16.13~~ 101.03/ 17.21	~~886.77/ 162.61~~ 947.02/ 173.93	~~2.07/ 0.39~~ 2.56/ 0.42	~~404.29/ 73.79~~ 430.67/ 78.59	~~75.98/ 13.86~~ 80.94/ 14.77
Total Emissions	**~~83.95/ 14.85~~ 89.29/ 15.79**	**~~210.56/ 37.28~~ 216.89/ 38.35**	**~~930.22/ 170.54~~ 990.47/ 181.86**	**~~2.07/ 0.39~~ 2.93/ 0.48**	**~~404.31/ 73.79~~ 430.69/ 78.58**	**~~76.00/ 13.86~~ 80.96/ 14.77**
BAAQMD Thresholds	**80/15**	**80/15**	**NT**	**NT**	**80/15**	**NT**
Significant Impact?	**Yes/~~No~~Yes**	**Yes/Yes**	**NT**	**NT**	**Yes/Yes**	**NT**

Source: PBS&J, ~~2010~~ 2011. Based on year 2025 emission factors.

Notes:

NT = No threshold.

Estimates are results of modeling using the CARB URBEMIS 2007 version 9.2.4.

PTC4.32 *The commentor states that the Climate Change Analysis has not included a discussion of the energy that is "embedded" in the materials used to construct the SUMC Project and see this as an error in the analysis.* The commentor is suggesting that the Draft EIR analysis should have conducted a life-cycle analysis for project emissions. A life-cycle analysis attempts to identify and quantify the greenhouse gas emissions associated the energy and materials used at all stages of the SUMC Project's life, from the gathering of raw materials, through fabrication, distribution, use, and the ultimate disposal at the end of the SUMC Project's useful life. Life-cycle analysis is not used for CEQA analysis of a project for several reasons, the most prominent of which is that the processes, and therefore emissions, embedded in the material is not under the control of the project sponsors or the Lead Agency. In addition, a realistic life-cycle analysis requires knowing exactly what type and quantity of material is being used, where all material used in construction originated, and how it would be transported to the SUMC Sites in order to calculate the embedded energy within the construction material.

At the time of preparation of the Draft EIR, the actual types of materials to be used, the origin of those materials, and the transportation routes for those materials were unknown. Because these facts were unknown at the time of the Draft EIR analysis, it was not possible to correctly calculate the embedded energy within the building materials. Further, there is not a standardized agreement on the appropriate methodology for analyzing the life-cycle of projects. For these reasons, the Draft EIR analyzes the emissions resulting from the operation of construction vehicles, as well as the operation of the SUMC Project on an annual basis, which is consistent with the standard methodologies for conducting greenhouse gas emission inventories.

PTC4.33 *The commentor states that there is an error in Table 3.6-2, page 3.6-7 of the Draft EIR, with respect to the greenhouse gas target for 2050.* Currently the 2050 goal is not a threshold because it is technologically infeasible. The entire State of California would have to be carbon neutral in order to achieve that goal. Therefore, the analysis in the Draft EIR uses the aggressive 2020 goal, which is technologically feasible. The 2050 goal is the ultimate point that needs to be achieved in order to keep climate change at a 2° Celsius rise. Since it is currently technologically infeasible to reach the 2050 goal, stair-step goals (such as the 2020 goal of reaching 1990 levels) that can be achieved have been implemented. These goals would continue to decrease emissions as the technology becomes available. Although there is an error in Table 3.6-2 on page 3.6-7 of the Draft EIR, this error does not impact the rest of the analysis. Table 3.6-2 has been revised, as indicated below, to correct the error and define the units of measure for the emission levels.

Draft EIR Table 3.6-2 on page 3.6-7 is revised as follows:

Table 3.6-2
California Greenhouse Gas Reductions Targets

Year[a]	Estimated California Population	Reduction Goal	Greenhouse Gas Target (Tg CO_2e)[b]
1990	29,828,000	N/A	427.0
2000	34,105,437	N/A	452.3
2010	39,135,676	GHG emissions at or below 2000 levels[~~b~~c]	452.3
2020	44,135,923	GHG emissions at or below 1990 levels	427.0
2050	59,507,876	GHG emissions 80 percent below 1990 levels	~~341.6~~ 85.4[~~c~~d]

Source: Population data are from California Department of Finance, 2007; greenhouse gas targets are derived from CARB, 2007. Greenhouse Gas Emissions Inventory Summary [1990 - 2004].

Notes:

a. Target years specified in Executive Order S-3-05 and/or AB 32. 1990 and 2000 data are provided as a baseline.

b. Tg CO_2e stands for teragrams of carbon dioxide equivalents.

~~b~~c. Based on 2004 estimate.

~~c~~ d. Calculated by multiplying 427.0 x ~~8~~ 20 percent.

PTC4.34 *The commentor is concerned about the impacts of the SUMC Project on the City's ability to meet Executive Order S-3-05's goal of reaching 80 percent below 1990 greenhouse gas emission levels by 2050. The commentor is also concerned that the City of Palo Alto would need to revise its reduction goals based on the increase from the implementation of the SUMC Project.* Currently, the 2050 goal is not a threshold because it is technologically infeasible. Please refer to Response PTC4.33, above, for a detailed description and edits to the Draft EIR.

The commentor also suggests that Stanford University should coordinate with Palo Alto in order to achieve as much greenhouse gas reduction as possible in order to offset the added emissions from the SUMC Project. All new development and new growth within the City will result in an increase in greenhouse gas emissions because the technology to be carbon neutral is not currently available. As such, there needs to be a balance that allows feasible mitigation to reduce the emissions to as low as technically feasible without jeopardizing the overarching goals of a proposed project.

A hospital does not fit well within a Climate Change analysis because activities such as recycling are not as achievable as they are with other uses. With biohazards, there is not the opportunity for recycling and therefore, a 70 percent reduction in solid waste from hospitals is not achievable. Energy consumption is high as well because there is equipment and processes within a hospital that require high levels of electricity to operate. The particular needs of a hospital require a unique solution toward energy efficiency. By providing innovative engineering solutions to air circulation, and overall design of the building, the SUMC Project sponsors would provide an energy efficiency hospital facility. The SUMC Project has greater energy efficiency within the design than would have been

achieved by applying conventional energy efficiency techniques. In addition, it is possible that more energy efficient MRI equipment and operating room equipment will become available in the future. As technology advances, there will likely be ways to reduce the energy consumption of these necessary pieces of equipment, which will further reduce the necessary energy consumption of a hospital.

PTC4.35 *The commentor indicates that the SUMC Project may be more energy efficient because it looks at Energy Star compliance rather than LEED compliance.* The SUMC Project not only relies on compliance with Energy Star efficiencies, but also upon the SUMC Project's emissions reduction program. The SUMC Project sponsors have used innovative engineering solutions to air circulation and overall design of the building, which would provide an energy efficient hospital facility, as explained in Response PTC4.15, above. The SUMC Project has greater energy efficiency within the design than would be achieved by applying conventional energy efficiency techniques. Similar to LEED, design standards and engineering techniques that would be used in the SUMC Project would reduce overall consumption of energy. However, these design standards would be able to accommodate the unique nature of a hospital that could not be achieved by LEED.

PTC4.36 *The commentor states that there is "great risk" in including engineering design features in the SUMC Project, such as the displacement ventilation system and double building envelope.* Ventilation within a hospital is an important component in containing or spreading contagious disease. One way ventilation systems in conventional buildings conserve energy is to recirculate most of the air within the building. However, this is not possible within a hospital setting. A displacement ventilation system is able to provide ventilation without mixing and spreading the air from one room to the rest of the hospital building.

The Draft EIR takes into consideration the energy efficiency of a displacement ventilation system within the overall energy calculations, but does not single out that specific design feature. The feature that the commentor refers to as the double building envelope is actually a combination of design features that allows more natural light from larger windows and skylights to be included. However, these design features also have insulating capabilities, such as duel panes and adjustable shading (window overhangs and adjustable blind mechanisms between the window panes), to allow better energy efficiency and temperature control within the buildings. These features were included in the overall energy efficiency analysis of the SUMC Project. The SUMC Project would be able to demonstrate an approximately 30 percent increase in energy efficiency as compared to a typical hospital building due to these innovative engineering techniques.

However, the Draft EIR analysis of SUMC Project energy efficiency provides a summary of overall energy efficiency without singling out these features contributing to that overall energy efficiency. Upon publication of this document, the energy calculations for these

specific features of the SUMC Project are not available, but the overall energy efficiency of the SUMC Project would remain at approximately 30 percent better than a typical hospital facility.

PTC4.37 *The commentor supports that the SUMC Project is located within a half-mile of the PAITS.* This comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

PTC4.38 *The commentor questions if there could be a tradeoff in transportation emissions by having people live closer to the work and thereby cutting down per person emissions.* The Village Concept Alternative provides recommendations for housing dedicated to the SUMC employees. The analysis of the Village Concept Alternative presented in the Draft EIR on page 5-206 addresses the VMT and the change in vehicle miles compared to the SUMC Project without nearby housing. Since the publication of the Draft EIR, there have been revisions made to the analysis presented in the Draft EIR, as described in detail in Staff-Initiated Change 4 and Staff-Initiated Change 8. As determined in this document, over emissions under the Village Concept Alternative would be greater than under the SUMC Project.

PTC4.39 *The commentor questions the potential of having a greater efficiency and reduction of greenhouse gas emissions by having all functions of the Hospitals operating 24 hours a day.* In the rooms or sections of the Hospitals where daily operations would be limited to certain hours of the day, the lights, computers, and other smaller electrical equipment would be turned off outside of the hours of operation. Therefore, these electrical features would consume less electricity than if they were on 24 hours per day. However, some of the larger pieces of equipment such as MRI machines need to be set to a stand-by mode rather than being turned off completely in order for them to be useful in emergency diagnosis that could occur at any time of the day. The analysis in the Draft EIR is based on the electrical consumption of current and expected operating practices of the Hospitals. It should be noted that the Hospitals provide medical service on a 24-hour basis.

PTC4.40 *The commentor questions why carbon offsets are not considered with climate change and suggests that the SUMC Project sponsors mitigate some of the carbon impacts through offsets.* Offsets through planting trees have been examined; however, unless planting occurs in a natural vegetation area where water and fertilizer is not needed, the maintenance required to keep the trees could potentially produce more emissions than they would sequester.

The BAAQMD and the California Climate Action Registry are in the beginning stages of setting up offset programs, however they are in the very early stages. Offsets can currently be purchased through the Chicago Climate Exchange and a few other existing markets, but the legitimacy of credit purchases need to be reviewed prior to purchase. Not all credits in

the current markets are credible. Because of this situation, a lot of research needs to be placed on purchasing credible carbon credits. In particular, information on what exactly is offsetting emissions needs to be known; if additional funds are needed to offset emissions associated with the credit, how they are being funded and implemented; and the scheduling for implementation needs to be known. For example, the preservation of rain forests is not really offsetting emissions but abating the further degradation of sequestration. On the other hand there are offsets such as renewable energy which truly offers emissions offsets.

Please see Staff-Initiated Change 4 for revisions to Mitigation Measure CC-1.2, involving participation in a renewable energy program to partially offset emissions from energy consumption. A revised climate change analysis in Staff-Initiated Change 4 shows that the SUMC Project emissions are being reduced or offset considerably (from 46,085 MT CO_2e to 29,453 MT CO_2e annually, for BAU emissions, which does not include patient and visitor trips). The analysis shows that greenhouse gas emissions from the SUMC Project would achieve greater than an approximately 36 percent reduction compared to BAU emissions, although mitigation would be required to ensure consistency with some of the individual policies in the City's Climate Protection Plan.

PTC4.41 *The commentor suggests implementing strategies that use the lower nighttime temperatures to cool the building. Measures such as making ice in the basement at night to use during the day to cool server or other rooms are being employed by other commercial buildings.* The increased energy efficiency of the SUMC Project as a whole would reduce the need for steam and chilled water, thereby reducing energy consumption from these systems. The SUMC Project would not include any changes to the existing CEF process for producing steam and chilled water.

PTC4.42 *The commentor questions whether the Village Concept Alternative would reduce the trip miles taken without a requirement for building additional housing nearby.* Without the housing component, the Village Concept Alternative would be comprised of the SUMC Project plus enhanced bicycle and pedestrian linkages. The enhanced bicycle and pedestrian linkages may offer an increased level of convenience for nearby employees that are currently using alternative means to transportation, however would not independently reduce the VMT. The Village Concept Alternative would increase the VMT, accounting for the recommended housing component, which would trigger increased trips from the housing due by SUMC employee spouses and which would displace postdoctoral fellows and medical students that would occupy the housing as originally contemplated under the CP/GUP.

PTC4.43 *The commentor asks if emissions from the implementation of the GO Pass and the associated increase in ridership should be counted in the emissions inventory for the SUMC Project.* Currently, Caltrain ridership is so low that the increase in ridership resulting from the SUMC Project participation in GO Pass program would not result in the need for

additional trains or cars. In fact, the SUMC Project participation in the GO Pass program would incrementally help make Caltrain financially viable. The analysis in the Draft EIR focuses on those emission sources where the SUMC Project proponent has control. Given the current ridership in Caltrain, the SUMC Project participation in the GO Pass program would not result in additional trains, and therefore, would not increase Caltrain emissions.

PTC4.44 *The commentor requests a new section to be included in the Comprehensive Plan Amendment that addresses sustainability and climate change*. This comment addresses the requirements of the City's Comprehensive Plan Amendment process, which does not pertain to the adequacy of the Draft EIR. Please refer to Master Response 10 for a discussion of non-CEQA issues.

It is important to note that the Comprehensive Plan Amendment is on a separate schedule than the SUMC Project. Please refer to Master Response 11 for the review process of the SUMC Project in relation to the City's Comprehensive Plan Amendment.

PTC4.45 *The commentor questions the use of the term "mixed-use development" in Section 3.6 of the Draft EIR, Climate Change*. On page 3.3-36 of the Draft EIR, Table 3.6-5 describes the City's Climate Protection Plan goal of developing land use patterns that reduce travel-related emissions and enhance the potential for mixed-use development. It is important to note that the SUMC Project is not considered a "mixed-use development" project. Rather, the SUMC Project would facilitate and improve the potential for other mixed-use development in the surrounding area and would reduce travel-related emissions, thereby meeting the Climate Protection Plan goal.

As explained in the Draft EIR, expansion of the development at the SUMC Sites would provide additional employment opportunities within walking distance of existing residential development. In addition, new development at the SUMC Sites would be proximate to existing services. Retail and food services are within walking distance and/or a short shuttle ride from the SUMC Sites, including establishments at the adjacent Stanford Shopping Center. Additionally, the new and expanded hospital buildings proposed as part of the SUMC Project would have internal retail and cafeteria services, minimizing travel by staff and visitors to other locations to obtain these services. Although the SUMC Project as proposed would not be considered a mixed-use development, the SUMC Project would *facilitate* and *enhance* the potential for future mixed-use development, as required by the Climate Protection Plan goal.

PTC4.46 *The commentor is concerned that the assumptions of a 20 percent reduction in vehicle trips due to the implementation of the GO Pass may be too high*. The SUMC Project TDM mitigation (Mitigation Measure TR-2.3 on pages 3.4-67 through 3.4-69 of the Draft EIR) requires the enhancement of the current TDM program to increase the percentage of Hospital employees who commute by Caltrain. Offering the Caltrain GO Pass to eligible Hospital employees would increase Caltrain ridership from 3.6 percent to 15.8 percent.

Stanford University already offers employees GO Passes and Caltrain ridership is at 15.8 percent, with 52 percent of the University employees living within a city that is served by Caltrain. In comparison, approximately 65 percent of Hospital employees live within a Caltrain served city. With the implementation of the Caltrain GO Pass, it is estimated that the Hospitals would meet the 15.8 percent ridership level consistent with the University and would increase Hospital employee commutes by alternative modes of transportation to 35.1 percent.

PTC4.47 *The commentor asks about the possibility of expanding shuttle services such as the Palo Alto Shuttle, East Palo Alto, Menlo Park, or the Marguerite shuttle*. In their Development Agreement proposal, the SUMC Project sponsors have committed to expanding the Marguerite shuttle service when implementation of the GO Pass mitigation increases demand beyond existing capacity. Please see Master Response 2 regarding expanded shuttle service.

PTC4.48 *The commentor questions the employee zip code data provided in Appendix L of the Draft EIR*. The SUMC employee zip code data are broken up based on which city the employee is from and further divided into the individual zip codes. Several zip codes traverse more than one jurisdiction and this is considered in the employee zip code distribution in the Draft EIR. The spelling of the cities in the table is reflective of how the individual employees spelled the places that they live. Therefore, for the purposes of the table, the different spellings of the same cities are irrelevant.

Regarding the zip code 94303, as shown in Appendix L of the Draft EIR, 124 employees in the 94303 zip code are from Palo Alto and 158 SUMC employees in the 94303 zip code are from East Palo Alto. Therefore, the table makes a distinction between the two cities, although they share the same zip code. The zip code data provided is accurate and does not change the information provided in the Draft EIR. No further revisions are required.

PTC4.49 *The commentor states that not all uses, including community physician offices, need to be located in the vicinity of the SHC and LPCH Hospitals and suggests that some of these uses be located at a different site*. The SUMC Project does not include new or expanded space for community physicians within the Main SUMC Site. Space for community physicians at the Hoover Pavilion site is intended for practitioners who would benefit from close proximity to the SUMC.

PTC4.50 *The commentor is unclear as to what the VMT included and also indicates that incentives for employees to use transit services are necessary to encourage its use*. Please see Staff-Initiated Changes 4 and 8, which revise the analysis and application of VMT in the analysis of the SUMC Project and Village Concept Alternative.

The SUMC Project sponsors have offered, as part of the Development Agreement, to provide GO Passes for all eligible employees. In addition, based on the requirements in

Mitigation Measure TR-2.3, as revised under Master Response 1, the SUMC Project sponsors would expand the operations of the Marguerite Shuttle to meet increased demand resulting from the GO Pass incentive. The implementation of the GO Pass program and the expanded shuttle service is anticipated to reduce VMT by employees of the SUMC Project by 13.5 percent.

The commentor also suggests the use of telemedicine to reduce VMT. Determining appropriate methods to provide medical service is beyond the scope of the EIR.

PTC4.51 *The commentor is concerned that Stanford may increase shuttle service, resulting in fewer riders per shuttle, and suggests that the service should be open to patients as well.* The Marguerite Shuttle is currently available for patient use. With the implementation of the GO Pass mitigation measure, the SUMC Project sponsors would increase service of the Marguerite shuttle to meet demand.

PTC4.52 *The commentor suggests that the implementation of the GO Pass be expanded to include the Hoover Pavilion and the Stanford Shopping Center employees in order to further capitalize on the reduction of VMT with the implementation of the SUMC Project.* The implementation of the GO Pass for the SUMC employees is included as mitigation in the Draft EIR because the SUMC Project sponsors have control over the employee programs for the hospital buildings. It should be noted that some of these employees already receive GO Passes. The tenants within the Hoover Pavilion and the Stanford Shopping Center are not under the control of the SUMC Project sponsors and, therefore, the SUMC Project mitigation cannot dictate the incorporation of the GO Pass mitigation to these tenants.

PTC4.53 *The commentor states that a hotel should be included in the SUMC Project.* Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

PTC4.54 *The commentor inquires if the use of green roofs under the SUMC Project is counted towards their carbon offsets.* Carbon offsets with respect to vegetation in general, and specifically with respect to green roofs, is speculative. Vegetation planted in a natural area that does not require the addition of water and/or fertilizer to maintain the plant growth would sequester CO_2 and result in a net decrease in emissions. However, the amount of CO_2 sequestered by planting vegetation is minimal and is highly dependent on the type and age of the vegetation selected. In the case of a green roof, or other urbanized landscape where trees and other vegetation require the use of water and/or fertilizer, the emissions of CO_2 sequestered by the vegetation is often expended in energy required to treat and pump the water used and the generation of methane from fertilizer. The main advantage of green roofs with respect to minimizing CO_2 emissions is that they have the added advantage of cooling the building and reducing the need of air conditioning. As such, the analysis presented in the Draft EIR does not need to be updated to account for green roofs.

PTC4.55 *The commentor suggests that the rooftops of the proposed buildings be utilized for additional purposes*. In addition to the green roofs, roof terraces, and the heliport, the roofs of the SUMC Project buildings would contain roof-mounted mechanical equipment such as heating and cooling units, vents, electrical fans, and noise shields. Staff-Initiated Change 4 shows that, with identified mitigation, the SUMC Project would be consistent with the City's Climate Protection Plan. No further mitigation measures such as installing photovoltaic or solar powered equipment would be required.

PTC4.56 *The commentor suggests that the SUMC Project sponsors implement rainwater harvesting in the building design*. As explained on page 3.6-43 of the Draft EIR, the SHC and LPCH Hospital buildings would be required to provide empty tanks for storage of wastewater during an earthquake. The SUMC Project sponsors have explored using these tanks to store rainwater in the interim. However, such use would be subject to OSHPD approval.

PTC4.57 *The commentor suggests that the greenhouse gas emissions for an off-site location alternative be considered as part of the alternative's analysis*. As explained in more detail in Response PTC4.19, above, an off-site location alternative was considered in Section 5 of the Draft EIR on pages 5-38 through 5-39. If the SUMC Project were to be located elsewhere, the SUMC Project would need to be redesigned to function as a stand-alone hospital/research center. Therefore, the SUMC Project would increase the greenhouse gas emissions from operations.

PTC4.58 *The commentor suggests that the EIR examine how the SUMC Project's contribution would be allocated to the City of Palo Alto since the Hospitals provide regional care*. Current methodology indicates that each city is accountable for the greenhouse gas emission sources that are within the city's jurisdiction. Although the Hospitals serve the regional community, the Hospitals are within the City of Palo Alto. Therefore, emissions from Hospital operations are included in the City-wide emissions estimates.

PTC4.59 *The commentor states that the TDM program should include incentives for clean fuel vehicles and to employees who use their GO Pass*. By reducing vehicle trips, the GO Pass mitigation measure would reduce greenhouse gas and criteria air pollutant emissions from employee trips. Please also refer to Master Response 2 of a discussion of other TDM measures.

PTC4.60 *The commentor requests that the SUMC Project support the concept of living local and supporting the local community*. Please see Master Response 7 for a discussion of the SUMC Project's impact on the City's jobs to employed residents ratio and Mitigation Measure PH-3.1, on page 3.13-19 of the Draft EIR. Also, the proposed SUMC Project does not include constructing new housing units. One of the SUMC Project alternatives, the Village Concept Alternative, includes housing dedication. Nonetheless, creating the incentive for employees of the SUMC to live locally or in nearby cities is beyond the scope of CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues.

PTC4.61 *The commentor suggests that the TDM measures implemented at Stanford University be considered for the SUMC Project and asks that the measures be considered for the community physicians nurses and office workers as well.* With the exception of the GO Pass, the Hospitals have the same TDM measures as Stanford University, including carpool promotion and vanpool subsidies. Community physicians are not Hospital employees and are therefore not subject to this mitigation measure. Please refer to Master Response 2 for a discussion of other TDM measures.

PTC4.62 *The commentor indicates that offsets should be considered as in-kind offset.* The SUMC Project sponsors would increase the Marguerite shuttle service as demand from the GO Pass increases the needs for shuttles. The implementation of the GO Pass per Mitigation Measure TR-2.3, revised under Master Response 1, is anticipated to reduce VMT, and hence greenhouse gas emissions from transportation by 44.5 percent. This is a significant reduction in emissions from transportation.

Housing may provide a benefit in both reduction of VMT as well as accessibility if there is a natural disaster such as an earthquake. However, the Draft EIR analysis of greenhouse gases must deal with the implications of day-to-day operations. While it is true that employees who live closer to the SUMC Project would reduce VMT, there is the potential that their spouses may have to drive further to their jobs and thereby negate any savings in VMT due to relocating workers closer to the facility. As shown with respect to the revised analysis of the Village Concept Alternative (see Staff-Initiated Changes 4 and 8), emissions from VMT would be increased with implementation of the Village Concept Alternative after accounting for spousal trips and displacement of postdoctoral fellow and medical residents.

Finally, as detailed in the Staff-Initiated Change 4, the revised analysis shows that the SUMC Project would achieve more than a 30 percent reduction in greenhouse gas emissions compared to BAU emissions. Also, identified mitigation measures would ensure compliance with the individual policies of the City's Climate Protection Plan. Therefore, the suggested additional offset of VMT with respect to non-SUMC Project-related traffic is not required under CEQA.

PTC4.63 *The commentor suggests that increasing the benefits from using alternative fueled vehicles would increase the use of these vehicles and thereby further reduce VMT.* Use of alternative fueled vehicles would not reduce VMT, but could reduce emissions. The increase in the use of clean-fueled vehicles would be hampered in the fact that they are not as readily available. While several hybrid models are available that reduce fuel consumption, these vehicles do not entirely eliminate the need for gasoline. Electric cars and other alternatively fueled vehicles are not readily available at this time. While the technology exists, and the availability of electric cars on the commercial market is anticipated to begin in 2011 and 2012; data are not available regarding the availability and

sales of the electric vehicles in Palo Alto. As such, even if the SUMC Project sponsors reactivate or add to the number of electrical charging stations accessible to employees, the benefits of this action would be speculative since user statistics are not available.

Offering a parking permit that would allow free parking in otherwise paid parking spaces for alternative and/or reduced emissions vehicles would be a benefit to those who already own fuel-efficient automobiles. However, with the option of the GO Pass and the availability of other parking, there would not necessarily be an incentive for employees to purchase these alternative fueled vehicles.

In addition, as the revised analysis in Staff-Initiated Change 4 demonstrates, the SUMC Project impacts would be less than significant with respect to greenhouse gas emissions, with mitigation. Therefore, while implementation of additional benefits for users of alternative fueled/reduced emissions vehicles could factor into the further reduction of vehicle emissions, its implementation is not required to meet the City's climate change goals.

PTC4.64 *The commentor states that there should be connectivity served by the Marguerite shuttle between the Palo Alto Medical Foundation (PAMF) and the SUMC.* The connection between PAMF and SUMC already exists. Line B links the SUMC with PAMF and provides service to and from the PAITS, Town & Country Village, Tresidder, and Stanford Shopping Center.

PTC4.65 *The commentor questions the impact on greenhouse gas sequestration by the removal or replacement of Protected Trees.* As discussed in Response PTC4.54, above, carbon sequestration varies by the age and type of vegetation that is planted. In addition, the amount of greenhouse gases emitted to maintain trees that are not planted in natural areas can be equal to, if not greater than, the amount of CO_2 sequestered as a result of having been planted. As such, the removal of trees under the SUMC Project is not considered in the greenhouse gas and climate change analysis of the Draft EIR.

PTC4.66 *The commentor indicates that the Village Concept Alternative is an important way in which impacts from greenhouse gas emissions can be reduced.* As shown in the Staff-Initiated Change 4, the Village Concept Alternative would result in an increase in emissions over the SUMC Project and therefore does not reduce impacts with respect to greenhouse gas emissions.

PTC 5

Special Meeting of Wednesday, June 30, 2010
6:00 PM, Council Chambers, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

***ROLL CALL:* 6:10 PM**

Commissioners:	***Staff:***
Daniel Garber - Chair	*Steven Turner, Advance Planning Manager*
Samir Tuma – conflicted	*Cara Silver, Sr. Assistant City Attorney*
Susan Fineberg	*Roland Ekstrand, Senior Project Engineer*
Eduardo Martinez	*Joe Teresi, Senior Engineer*
Arthur Keller	*Tom Finch, Senior Electric Project Engineer*
Lee I. Lippert – absent	*Zariah Betten, Secretary*
Greg Tanaka	*PBS&J Consultants*

AGENDIZED ITEM:
1. Stanford University Medical Center Facilities Renewal and Replacement Project

Chair Garber: I would like to welcome everyone to the Palo Alto Planning and Transportation Commission meeting of Wednesday, June 30, 2010. Would the Secretary please call roll? Thank you.

Now would be the time for persons that would like to speak to the Planning Commission on items not on our agenda. I see no cards.

ORAL COMMUNICATIONS. Members of the public may speak to any item not on the agenda with a limitation of three (3) minutes per speaker. Those who desire to speak must complete a speaker request card available from the secretary of the Commission. The Planning and Transportation Commission reserves the right to limit the oral communications period to 15 minutes.

AGENDA CHANGES, ADDITIONS AND DELETIONS. The agenda may have additional items added to it up until 72 hours prior to meeting time.

Chair Garber: We will move to item number one. Item number one is the Stanford University Medical Center Facilities Renewal and Replacement Project. This evening we are going to be reviewing the chapters Noise, Geology, Soils and seismicity, Hydrology, Hazardous Materials, and Utilities. Those are the chapters in the DEIR. Would Staff like to make a presentation?

NEW BUSINESS.
Public Hearing:

1. **Stanford University Medical Center Facilities Renewal and Replacement Project**: Meeting to accept comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an overview of the Noise, Geology, Soils & seismicity, Hydrology, Hazardous materials, and Utilities chapters of the DEIR.

Mr. Steven Turner, Advance Planning Manager: Thank you Chair Garber and Commissioners. My name is Steven Turner, Advance Planning Manager, and Project Manager for the Stanford University Medical Center Projects. Tonight we are continuing our discussion and public comment for the Draft EIR for the SUMC projects. As the Commissioner and hopefully the public know the Draft EIR was released for a public review starting on May 20 for 69 days with an end of the public review period being Tuesday, July 27, 2010. We are breaking down the review of the Draft EIR into chapter so that we may get ample opportunity to review and comment, and accept comments and questions regarding each chapter.

So for tonight we are looking at, as Chair Garber mentioned, Noise, Geology, Soils and seismicity, Hydrology, Hazardous Materials, and Utilities chapters. The purpose of the meeting tonight is collect comments and questions on the Draft EIR. It is not intended to discuss or debate the merits of the project. It would be helpful for the Commissioner and members of the public to keep the comments and questions on the topics identified in the Staff Report, but certainly we will accept comments and questions on all chapters of the Draft EIR. Once the public review period has concluded at the end of July all of the comments and questions will be addressed during the preparation of the Final EIR.

Just a little bit about the format for tonight's meeting. We will have Trixie Martelino from PBS&J provide an overview of the chapters. After Trixie's presentation we will hear from Stanford University. They will have a short presentation. Then we will open it up to the Commissioners for question and comments. With that I will had the presentation to Trixie Martelino.

Ms. Trixie Martelino, PBS&J Consulting: Thank you Steven, and good evening. With me tonight is Rod Jeung, and also we have here Goeff Hornek who prepared the Noise Analysis and Leanne Albe who prepared the water supply related discussions in the EIR. Leanne also worked on the water supply assessment which fed into the EIR water supply discussions, and which was approved by City Council in March.

So as mentioned by Steven, we are delving into the Noise, Geology, Soils, and Seismicity, Hydrology, Hazardous Material, and Utilities sections. The first topic we will get into in Noise. The table above summarizes the noise impacts of the SUMC project. As previously discussed NI on the above table stands for No Impact, LTS for Less Than Significant, S/LTS is a Significant Impact without mitigation but less than Significant after mitigation, and SU indicates a Significant Unavoidable impact that cannot be mitigated to Less Than Significant levels.

As Shown in the table vibrations emitted during construction would be less than significant however, during construction of the project there would be significant impacts from noise emissions that cannot be mitigated to less than significant. During operation of the project there would be significant impacts from stationary noise sources, particularly mechanical equipment, which would have significant impacts on nearby residential uses. There would also be significant impact from ambulance noise due to the creation of a new ambulance route along Sand Hill Road. The noise generated would increase ambient noise levels along sensitive uses therein, and the noise cannot be mitigated to less than significant levels.

I would like to delve in a little bit more to the significant unavoidable impacts. During construction, which would last approximately 12 years, there would be use of heavy construction equipment. Noise from construction activities would have a less than significant impact on sensitive receptors outside the project sites, but would significantly impact sensitive receptors within the project site, especially inpatients.

As mentioned earlier, the project would create a new ambulance route along Sand Hill Road between El Camino Real and the proposed Durand Way extension. There are sensitive receptors along this route including Stanford West Apartments, the Hyatt Classic Residences for senior living, and the Ronald McDonald House. Assuming that one ambulance siren per day would be experienced along this route the increase in average noise levels would exceed the allowable limit as specified in the Comprehensive Plan. There is no feasible mitigation that would reduce ambulance noise given the emergency nature of this noise source.

In the cumulative scenario if construction at the larger Stanford University campus would occur concurrently with SUMC project construction than cumulative construction noise would be significant at nearby residences such as the 1100 Welch Road apartments. Mitigation measures that have been identified for significant noise impacts are summarized above. For construction noise Measure NO-1.1 requires best management practices such as noise shielding, using quieter equipment, and provisions of the Noise Disturbance Coordinator to respond to any noise complaints. However, even with such measures noise levels would remain significant and unavoidable.

During operation of mechanical equipment Mitigation Measure NO-4.1 requires acoustical shielding, which would sufficiently reduce noise from mechanical equipment to less than significant.

The next topic is Geology, Soils, and Seismicity. Before we get into the summary of Geology related impacts it should be noted that one of the foremost reasons the project is being proposed is to comply with state law for seismic safety. The Alquist Hospital Facility Seismic Safety Act and Senate Bill 1953 require that acute care hospitals throughout the state need heightened seismic safety standards by certain deadlines so that they remain standing and operable after a major earthquake. The Office of Statewide Health Planning and Development, or OSHPD, would review the project for compliance with design standards for the hospital components. Non-hospital facilities at the Medical Center would be subject to design requirements under the City's Building Code. As such, the project would upgrade seismic safety design at the Medical Center and reduce geologic hazards to staff, patients, and visitors. Given the design improvements as shown in the above table, impacts related to seismic hazards and other geotechnical hazards would be less than significant. Also, impacts related to erosion would be less than significant.

The next topic is Hydrology. In general, hydrology impacts would be less than significant with the exception of potentially degrading groundwater quality. Previous investigations have identified contamination concerns at 701 and 703 Welch Road, and at the Hoover Pavilion site. It is possible that unknown remnant contamination may occur at the SUMC sites. Construction could expose contaminated soils and pollutants, which could then infiltrate into groundwater during rainfall or through runoff. As such the EIR

conservatively concludes that there could be significant impacts on groundwater quality during construction. As shown in the table other hydrology related impacts regarding impeding flood flow, increase erosion, exceedance of stormwater capacity, and degradation of surface water quality would be less than significant. Other hydrology impacts including dam failure and inundation risk resulting in stream bank instability or violation of water quality standards would also be less than significant.

Mitigation Measure HW-3.1 requires measure to reduce potential risk of groundwater contamination. The measure requires that construction ceases if suspected contaminated soils are encountered. At that time a site safety plan and sampling work plan would be developed and implemented. If results show that there are contaminated soils a removal action plan would be required. All these actions would be subject to approval by the Department of Toxic Substances Control.

Next is Hazardous Materials. The above slide shows a summary of impacts related to hazardous materials. Impacts related to disturbance of hazardous materials during construction would be significant but mitigated to less than significant. In specific, the demolition of older buildings could release asbestos, lead, and mercury and expose workers or members of the public to these substances. These impacts would be significant but mitigable on both the project level and cumulative level.

The project could also disturb contaminated soils during excavation. As stated previously soil contamination concerns have been identified at 701 and 703 Welch Road, and at the Hoover Pavilion site. Ground disturbance at or near these areas could potentially encounter unknown contaminated soils and expose workers or the public. This impact would be significant but mitigable to less than significant on both project level and cumulative level. Other impacts would be less than significant due to the various regulations that the hospital and other uses onsite would be subject to, these include handling of hazardous materials, exposure to the public of hazardous waste, emissions of hazardous materials within one-quarter mile of a school.

The above slide is a continuation of the impact summary. As shown, there would be a significant impact related to construction on the site and the Cortese List. The Cortese List is an annually updated list of sites with known hazardous materials releases or spills. It is updated annually primarily by the California EPA. The Hoover Pavilion site is on the Cortese List as such impacts would be significant but mitigable to less than significant.

Lastly, due to the large construction efforts, construction traffic, and post-construction traffic would potentially hinder the City's emergency response plans. The above slide summarizes some of the mitigation measures that have been identified to prevent the release of hazardous substances during demolition efforts. Mitigation Measure HM-2.1 requires the applicant to conduct as asbestos survey at the sites to reduce risk related to exposure of contaminated soils. Mitigation Measures HM-3.1 through HM-3.4 require various measures such as performing of Phase II Environmental Site Assessment, excavation of contaminated soil, conducting a soil vapor program, and developing a site management plan for the Hoover Pavilion site. As shown above, Mitigation Measures HM-3.3 and HM-3.4 again pertain to the Hoover Pavilion site and prevent risk of hazardous materials exposure at the site.

As mentioned earlier one of the impacts would be potential interference with emergency plans. Mitigation Measure HM-10.1, Mitigation Measures TR-1.1 through 1.8 and Mitigation Measure TR-1.9 would alleviate potential impacts to emergency evacuation plans through coordination of construction activities with the City of Palo Alto, through provision of a Transportation Management plan during construction, and through provision of providing the Opticom technology, which would enable emergency vehicles to pass through congested intersections.

The last subject is Utilities. As shown in the above slide utilities impacts would be less than significant. The Utilities analysis looked at the need for expanded entitlements for water supply, exceedances of wastewater treatment requirements, or the need for expanded wastewater facilities, the need for expanded stormwater facilities, exceedance of landfill capacity, or the need for expanded energy facilities. Under all these subjects impacts would be less than significant and no mitigation measures would be necessary. That concludes the presentation.

Mr. Turner: Next we will hear from the project applicant.

Chair Garber: Will you need more than 15 minutes?

Mr. Mark Tortorich, Vice President, Design and Construction, Stanford Medical Center: No, 15 minutes ought to be just fine. Good evening Chair Garber and members of the Planning Commission. We wanted to cover two of the topics this evening with you, obviously reviewing first Seismic Safety and then Water Conservation Measures.

So one of the principle drivers of our project is to make earthquake safe buildings for Stanford Medical Center. What drives this is the state law, SB 1953. State law categorizes existing buildings into five categories from the worst being SPC1 characterized as a potential collapse hazard, to the best being SPC5. It is the state's desire to have hospitals over time be fully compliant with the SPC5 criteria for hospitals. Stanford buildings fall into the categories of 1, 2, 3, and 4, and our proposed projects obviously would fall into category 5.

We have a significant component of our existing 1959 hospital that is a category 1, and SPC1 category. We also have portions of the 1959 hospital that category 2. Under the state law the particular structural elements of the 1959 building, it is a concrete frame, cannot be retrofit to move into the SPC3 category, which would allow you to use those buildings beyond 2030. So there is no retrofit strategy possible under current law to retrofit the 1959 buildings to operate beyond 2030.

Our 1973 buildings fit into the SPC3 category. Here the state says the buildings are not a collapse hazard and will protect life and limb during a major earthquake but may not be serviceable after a major earthquake. So obviously that is a building that ultimately needs replacement to meet with the new criteria.

Then category 4 and category 5 buildings will perform better. Obviously the category 5 buildings are designed to meet the standards in existence today, which are standards that are continually being updated based upon knowledge learned from recent earthquakes,

such as those in Northridge. Our 1989 and our Children's Hospital building meet the category 4 standard.

So the map gives you a bit of an orientation as to how this puzzle works. So orienting you to the Medical Center, this is Welch Road, the Pasteur Mall entrance, and then this U-shaped structure is the 1959 building. So as you can see the majority of the 1959 structure is actually that category 1. We should be compliant currently by January 1, 2013 with a replacement facility. That 2013 date may be extended to 2015 if we meet certain milestones of progress as viewed by the State of California.

So as you can see those are our School of Medicine buildings, and a component of the Stanford Hospital. Another component of that 1959 hospital, and this just purely based upon the geometry, fits into the category 2. So this is the where actually all of the patient beds in the 1959 structure fit into this region, but again that building cannot be used beyond 2030 no matter what we do it. It is not eligible for a retrofit.

Our core expansion, which was built in 1973, is here. As you know, as part of our proposal we are proposing replacement. We are not proposing replacement of the 1989 structure or of the Children's Hospital structure. We feel after consulting with our engineers that the buildings are of sufficient strength to withstand major earthquakes and should be serviceable after a major earthquake, although they don't meet the current standards for hospitals that are under design.

Obviously, California is at risk for a major earthquake. I remember feeling after the Loma Prieta earthquake in 1989 that wasn't the big one but it certainly would postpone it for another 20 or 30 years. Well, guess what? It was 20 years ago or more that it was Loma Prieta. So we clearly are eligible and we predict obviously, or the engineers predict that we are ready for a major earthquake. The map to the right sort of gives you the geographic location of Palo Alto in between the San Andreas Fault and the Hayward Fault, as well as the prediction of a 62 percent chance of a major earthquake on one of those faults between now and I believe that is 2032.

The State of California reviews our geologic reports and assesses the hazards and establishes the design criteria for our buildings. They have been reviewing our reports for over a year. In fact probably 18 months at this point. They have come to us very recently and said they don't think that we have accurately assessed the maximum credible earthquake predicted for this San Andreas Fault. We have used obviously what conventional wisdom uses, which is it is a 7.8 earthquake, which is the maximum credible. They wanted us to increase that force level to about 8.04, which there is order of magnitudes of greater force level. We have negotiated with them to use what we think is reasonable at 7.9. There is also a Monte Vista Fault, one that I wasn't fully aware of that is just on the uphill side of 280. Again, the state geologists have questioned whether there would be a simultaneous rupture of the Monte Vista Fault and the San Andreas Fault. They have asked us to upgrade the design of the building to accommodate that eventuality. So there is quite a level of scrutiny that goes through our geologic reports and our building designs have to accommodate the judgments of the state as they evaluate these hospital facilities.

Many lessons were learned from the Northridge Earthquake. Those lessons are that hospitals can be evacuated not just for structural damage but for nonstructural damage. As you look at the tally of eight hospitals that had partial or full evacuations after the Northridge Earthquake you will see that many of those evacuations were the result of nonstructural damage. So you can see the large numbers of patients that are being transferred from these hospitals because of nonstructural damage or structural damage. All of our facilities at some point have to go through a nonstructural upgrade. There are certain provisions of the law, which we just don't meet yet. Our strategy obviously for the Children's Hospital expansion and for the replacement for the adult hospital is to accommodate both the nonstructural criteria and the structural criteria simultaneously through the new construction.

This is obviously the more famous hospital building collapse in the San Fernando Earthquake. Just to give you sort of some rules of thumb, hospital building structures are designed to be at least 50 percent stronger than conventional structures. That obviously follows through all the structural elements and nonstructural elements. Not only do we have to brace the nonstructural elements of the building but OSHPD has also decided now that major pieces of medical equipment have to be certified for the internal workings to survive the predictable force of the earthquakes. So the MRI now has to be certified by the manufacturer that the internal components will withstand the force of an earthquake, not just the room in which that MRI sits. Obviously construction costs reflect the added levels of safety. Construction costs excluding the equipment are nearly twice what they are for conventional office buildings, and probably that factor grows even more as OSHPD develops new and newer requirements for earthquake safety.

So in the adult hospital, which is the larger of the two buildings, we are using a base isolation system. That has been used on a number of projects in earthquake country. The most recent and relevant projects to us that are good examples to look at are Mills Peninsula Hospital and San Francisco International Airport. The base isolators actually separate the structural frame from the foundation. They are gigantic shock absorbers so they will diminish the force that the structural frame feels through an earthquake. To accommodate the shock absorbers we actually have to build a moat around the building so that the building can move separately from the ground that surrounds it. So it is a fairly complicated system but one worth the investment when you consider the value of these buildings in a natural disaster.

So changing topics slightly to water conservation, and some of the measures we are employing in our design. So clearly the new hospital buildings and the medical office structures and the other structures that we are proposing in this entitlement will conserve water by their design and their use. Here are some of the features. Obviously the automatic sensors on faucets and urinals, low flow fixtures, the use of dual flush systems, but we are also using different methods to wash your hands. The antimicrobial hand rinse pumps are already in current practice within the hospital. So we are trying to minimize water use whenever we can.

Our new hospital grounds are being designed to incorporate obviously sustainable features. You have seen our green roofs, and you have seen our landscaping design. We are obviously going to incorporate maximum use of drought tolerant landscape as possible. Look at how we manage water use, and I will talk a little bit later about some of the

features within the building design to actually capture water, but then also features like using lawn mowers that will recycle the grass clippings.

So our water planning strategies. We are taking some fairly aggressive steps in planning to harvest rainwater and capture the rainwater for irrigation. We are also taking aggressive steps to capture condensate water from mechanical equipment and use it for irrigation. So I will have to provide the cautionary and customary note, this is all subject to the approval of OSHPD. These are systems they have not traditionally approved before. I think one of the great inventions of the project is to try to capture the condensate water. So you can see during the period of which we have high water demand there is also high water generation from the air conditioning units, and the condensate water, which they throw off. If we are able to capture that water and store it in an underground tank both hospital facilities will be able to use that water to irrigate the landscaping. So it is something we are willing to make an investment in. We are hoping that OSHPD will give us the approval to use these systems, and we think it will provide great benefit in minimizing our water use in the facility.

So these are some figures basically from the environmental analysis. Our project demand estimate is approximately 177,000 gallons per day. This is for the SUMC project as it is defined. We think through conservation measures, very aggressive conservation measures we can get that water use down to less than 100,000 gallons per day. We believe that there is sufficient water supply within the City to support the demands of the SUMC projects and to serve existing and planned customers, obviously through 2030.

Our forecast of water use, on a per square footage basis, is approximately .204 gallons per day per square foot for the adult hospital and a slightly larger use than that for the Children's Hospital. Again, these are estimates that are incorporated in the environmental analysis, but you can also see how we are benchmarking against other facilities. It is a fairly comparable statistic to other facilities that you see around the state. We think it is reasonable. We also think that we can improve on these estimates through aggressive conservation measures, and we have mentioned that in the water supply assessment.

So that concludes my formal presentation, and obviously as always am happy to answer any questions you might have.

Chair Garber: Thank you. Staff, anything else? Commissioners, let's go through this chapter-by-chapter. We have two members of Palo Alto's Utility Department here who have asked if we would do their chapter first. Since we have had no more other requests from any of the other departments why don't we do that? Do Commissioners have questions and comments on the Utility Chapter? Commissioner Keller? Commissioner Martinez do you have any? Commissioners Fineberg and Tanaka do you have some? Well let's start with Commissioner Keller and then we will go to me.

PTC5.1 Commissioner Keller: Thank you. So the current water use from the DEIR is 362,000 gallons per day, and based on the conservation measures that is going up to 461,000 gallons per day. By the way, I recognize that there are a lot of good conservation measures being put into place, and it is kind of difficult to conserve water in this environment. I am impressed with the measures being taken, particularly using the water from various other systems in the hospital.

PTC5.1 Con't

What I am wondering about is there are pending regulations that would mandate a 20 percent reduction in urban water use. I am not sure if that is 20 percent in terms of communities, or in terms of per capita, or whatever. I am not sure exactly how that works. What I am wondering is what is the baseline for that 20 percent? Is it the 13 million gallons per day that the city is currently using or is it the 17 million gallons per day that the city is entitled to use? I am confused about this because there is a whole notion of water rights that people have, and it is pretty clear that the Hetch-Hetchy Reservoir is going to have less capacity as global warming continues the amount of water available will be less because the snow pack will melt sooner and the snow pack will be smaller, and therefore the total amount of water available will be less. So I am trying to understand what the baseline is because if the baseline is 17 million we don't have anything to worry about, but that is sort of like cutting vacant positions in order to save money on the budget. On the other hand, if the baseline is 13 million and we have to go down to 10.4 million by a 20 percent reduction in gallons per day that is a significant impact. So can somebody answer that question?

Mr. Roland Ekstrand, Senior Project Engineer: I am in the Engineering Group. I am not sure we have anybody with the Water Resources Group here today. We deal with replacements and installing utilities to new developments in the Engineering Group. We will have to get back to you on that Mr. Keller. I don't think there is anybody here who is qualified to answer that specific question.

Commissioner Keller: Okay, that's fine. I think it would be worthwhile if this were answered in the FEIR. I think that is something particularly worthwhile considering. In terms of potential mitigation for this Stanford on its land provides a wonderful resource of the Stanford Industrial Park, and to the extent that Stanford could work with Industrial Park customers to try to reduce their water use particularly in terms of outdoor irrigation is sort of the low-hanging fruit there, pun not intended. The issue is that that might be a good mitigation that could help the City reduce its water use. So thank you. That is the main question I have about water. Thank you.

PTC5.2

Chair Garber: The only thing that I would ask that would be helpful to see a bit more clearly in the DEIR is a statement, and this is very simple but of the capacity of the City to generate its water supply and what percent this project takes of that relative to some background use of that water so we can understand what the capacities are one way or the other. Then I would have that same desire to see that relative to our ability to manage wastewater, electricity, stormwater, etc. It may be buried in here but to be able to sort of see that clearly so that I can understand the demand and the capacity to meet that demand I think would be helpful. Commissioner Fineberg.

PTC5.3

Commissioner Fineberg: I have talked about this before in other sections of our discussion on the project, but I continue to have concerns about the safety and reliability of the electrical supply given that the source is in an area that is in a floodplain, in soils that are subject to liquefaction, and extreme ground shaking. How is the hospital going to remain serviceable long-term if the City of Palo Alto can't provide power? I understand those conditions are offsite, they are out in the Baylands, but does this DEIR need to consider the reliability of single-source power when we know it is subject to extreme conditions during either flooding or earthquake events?

PTC5.4

I have a question on page 3.15-8, a statement in the DEIR about wastewater. It says that the Regional Waste Quality Treatment Plant does not experience any major system constraints and has no planned capacity expansions. That was per Rick Wetzel in 2007. I don't know if this could be answered tonight or in the DEIR but it is my understanding we are currently working on a new UV treatment plant to replace the chlorine gases. I am remembering that one of the components in that was also increasing capacity. So if we are increasing capacity, I understand the project is approved and not yet constructed, is it fair to say that we have no plans for capacity expansions on the treatment facility when pieces of it are being expanded and improved?

PTC5.5

Then electricity, page 3.15-13, I have the same question Chair Garber raised. I would like to see not just what our peak capacity is. They are saying the load can be 385 megawatts, but is our current peak demand? What proportion of that will be from the Stanford project? What is our cushion during peak demand periods, and is that adequate?

PTC5.6

The last thing is as a mitigation for some of the demands on water, the demands on wastewater treatment, and electrical needs can the DEIR consider and anaerobic digestion facility collocated with a power generation facility? There is a researcher at HP Labs who is espousing that concept for data farms where they generate a tremendous amount of heat. I know this is a little off topic but if you collocate cows and computers you generate electricity from the composting in the anaerobic digester. You can use the excess heat from the building to generate electricity and then you use the electricity generated from that heat to power the building. I know the Stanford Hospital won't have the cows but it has people, so could there or should there be a consideration of that? The advantage also of collocation of the anaerobic digester and the facility creating the waste is that you don't have transmission losses. So it is an incredibly efficient system. So that's it.

Chair Garber: Nothing like thinking from the bottom up. Commissioner Tanaka.

PTC5.7

Commissioner Tanaka: Thank you. Some of my questions have already been covered by the Chair and other Commissioners. So these are following on to the questions that have been asked. I was also looking at 3.15-8 and I saw that our RWQC serves Mountain View, East Palo Alto, Stanford University, Los Altos, and Los Altos Hills. I assume that those other entities pay their share for this service, right? My question though is I know residentially wastewater is not metered. So I was looking at the allocation on the next page and it was saying a certain amount of allocation is given to each of these entities. I was just curious to know if certain entities, let's say for instance the hospital increases their share maybe more than expected, how is that accounted for, and is that metered somehow? Is there a portion of their fee increased? Let's say they do better. Let's say they are very aggressive in their savings, do their rates drop? How does it work?

Mr. Ekstrand: For the commercial customers the sewage is metered.

Commissioner Tanaka: Okay, I didn't know that.

Mr. Ekstrand: Even for the residential we could meter it because it is based on the water usage. It is directly related to the amount of water they use through their water meters. What was the rest of the question there?

Commissioner Tanaka: I was just curious to know. So basically these different entities are metered. So East Palo Alto we are metering their wastewater and we meter all the other cities and they pay according to how much they use then.

Mr. Ekstrand: Right.

Commissioner Tanaka: Okay, that's fine.

Mr. Ekstrand: The plant is jointly owned by all the entities. We own a share of the plant, Palo Alto does.

Commissioner Tanaka: And everyone pays for their usage.

Mr. Ekstrand: Yes.

Commissioner Tanaka: Perfect, thank you. Then the second question is a quick one.

Chair Garber: Commissioner, Commissioner Fineberg had a follow up.

PTC5.7 Con't

Commissioner Fineberg: Thank you. Can you tell me if Stanford's wastewater is currently metered and would this project's wastewater be segregated from and measured separately, or it is just the entire university gets metered in one place? Or how is it?

Mr. Ekstrand: We do have different metering places in the city but it is not broken down to just Stanford Hospital. We can quantify what their sewage output is based on the amount of domestic water that they are taking in. We do separate the irrigation meters and the fire services from the domestic water. Pretty much all the domestic water goes back into the sewage system. So we can quantify exactly how much they are inputting into the wastewater treatment plant. We can call up that data.

Commissioner Fineberg: I am sorry. I thought before you had said that commercial customers the wastewater is metered. So is Stanford not considered a commercial customer then?

Mr. Ekstrand: They are definitely commercial customers. The way we meter the commercial customer's sewage usage is via their domestic water meter. That is the way we track that.

Chair Garber: You make the assumption that what comes in goes out.

Mr. Ekstrand: Yes. We separate the irrigation out from that because they have separate irrigation meters.

Chair Garber: Commissioner Tanaka.

PTC5.8

Commissioner Tanaka: So my second question is about gray water. I don't know if given this is a hospital if that is practical or even possible but I was just wondering if that is – although right now it is already less than significant so it is not critical, but of course a

PTC5.8 Con't

gallon saved is a gallon created. Whether that could be something that is contemplated by this project as well.

Mr. Tortorich: I would be happy to answer that. We actually did look at a gray water system and tried to talk to OSHPD about it, and were told flatly absolutely not. We are not ready for that.

Commissioner Tanaka: Thank you. That is all I had.

Chair Garber: Commissioner Keller, a final word.

Commissioner Keller: Thank you. To follow up on what Commissioner Fineberg mentioned in terms of electricity reliability there already is the Cardinal COGEN plant. To the extent that that COGEN plant, which not only provides chilled water and hot water for the hospital I understand there could be inter-ties so that could be a backup generator for the hospital. I am not sure to the extent that that makes sense but that could be an alternative onto sort of diesel type generators as a potential.

The other issue that has been talked about is to the extent that there could be a cross-connection at SLAC providing a different direction to bring Palo Alto power in the event of an outage through the primary thing that goes by the airport.

PTC5.9

The second thing is I would like to expand slightly on the comment made by Commissioner Fineberg about the idea of using biomaterial for cogeneration. It is my understanding that COGEN plant currently generates electricity and the processed heat is instead of being used to generate additional electricity it is used to generate the hot and chilled water. That is my understanding of how the Cardinal COGEN plant works. Is that correct? I am seeing nods from Stanford.

I am wondering rather then thinking about biosolids, which come from sewage, the extent to which a COGEN facility could be expanded to take into account compostable materials, which would be easier to transport and not require manipulation of the sewage treatment plant by the Baylands, but actually to have compost from Palo Alto and from Stanford go and be raw material for the COGEN plant. That would use an existing facility, expanded somewhat, for the cogeneration ability for composting. I think that is perhaps more feasible then dealing with sewage, and would also deal with the siting issue of where the COGEN facility for anaerobic digestion for compost could be sited. So that could provide additional electricity that would offset the hospital's electricity and also provide an emergency source of electricity in the event that Palo Alto had a power outage. Thank you.

Chair Garber: Commissioners, let's first thank the members of the Utilities Department. You are excused unless of course you would like to stick around.

Let's return to the chapter on Noise. Before we do I suspect the City Attorney is going to suggest that I do something that I forgot before, which is to ask if there are members of the public that would like to speak, and we would open the public hearing to do so. I see no cards. If anyone from the public would like to speak? I see one card in preparation. You can submit afterwards. Mr. Moss.

Mr. Robert Moss, Palo Alto: Thank you. I just had a couple of comments on the hazardous materials that caught my eye. One of the mitigation measures, HM-2.1 is to conduct an asbestos survey.

Chair Garber: This is under the Hazardous Materials Chapter?

PTC5.10 Mr. Moss: Yes, this is the Hazardous Material on page 8 of the Staff Report. While it is nice to do a survey if you find it you have to have an action you take. So there should be another mitigation that says, if we find it we will then do so and so. One of the things obviously is the people who do demolition then have to wear protective clothing, and you have to make sure that the demolished material is taken to a proper dump and so on. So right now it is incomplete.

PTC5.11 Second, it doesn't say anything about lead paint. At the time these buildings were built lead paint was common. So there should be a review also to verify whether or not there is lead paint. If lead paint is found then you have to do proper demolition precautions.

PTC5.12 Then HM-7 is a mitigation measure to HM-3.3, Conduct a soil vapor program at the Hoover Pavilion site. Well, again while it is probably a low probability that they are going find soil recontamination, if they do what happens? So you have to have a next step. If we find contamination we will then do this and do that. If the contamination is severe then you will have to redesign the building, so for example you put down a vapor barrier between the contaminated soil and groundwater and the actual structure. So the mitigations that are listed here are nice but they are only the first step. So you should have a mitigation that is complete which takes me down if this was a problem then I will do so and so. Otherwise you are kind of left hanging. They find asbestos, so? In every case where they are doing an investigation you should have an additional mitigation that says if found we will remedy it by whatever. I am not going to get into the details of whatever tonight. I am just saying you have to go through the proper procedures and steps. Thank you.

Chair Garber: Thank you. Commissioners, do you have questions or comments about Noise in particular here? Commissioner Fineberg, Tanaka? Okay. Commissioner Tanaka why don't you start off.

PTC5.13 Commissioner Tanaka: So I have a few quick questions. This question may have been asked before but I am going to ask it again because I don't know the answer. In terms of construction noise are there construction routes as to where heavy trucks are going to be going versus regular construction traffic? So while you are looking that up I saw that they have kind of like a heat map of the noise, of the helicopter flight, perhaps that can also show a more legible flight path of how the helicopters fly. It looked like they kind of go up to the north but it wasn't really clear to me. Do you want to go to the first question?

Ms. Martelino: Yes. Figure 3.4-5 in the Transportation section provides a map of truck routes.

Commissioner Tanaka: Figure 3.4-what?

Ms. Martelino: Dash 5.

PTC5.14 Commissioner Tanaka: Okay, I will look it up later. Is there also one of the helicopter flight paths?

Ms. Martelino: No, it doesn't specify the helicopter flight path.

PTC5.15 Commissioner Tanaka: Okay. Then also in regard to Noise, one other thought is one of the mitigation factors for some of the traffic is to have more buses or shuttles running around, which I think is a good idea. Some of the comments I have heard from other residents though about the buses and shuttles are sometimes they are a little bit noisy. So that is maybe something you could consider in terms of a mitigation to the mitigation as part of the Noise impacts. So that is all I have so far. Thank you.

Chair Garber: Just for clarification, Figure 3.4-5 appears to be existing transit route network as opposed to construction.

Ms. Martelino: It is expected that those are the truck routes that they would take. I am sorry.

Commissioner Keller: It is on 3.4-6 is the figure on page 3.4-41.

Chair Garber: Thank you.

Ms. Martelino: Thank you.

Chair Garber: Commissioner Fineberg your comments and questions.

PTC5.16 Commissioner Fineberg: I may have missed it if it is in the text but are there plans or requirements for monitoring of noise levels during construction and during ongoing operations? I understand that there are limits on what is allowable but will that be monitored?

Ms. Martelino: There are no specified mitigation measures for the construction period to monitor noise.

Commissioner Fineberg: Is there a reason why? Would it be feasible to have a monitoring program and should that be incorporated into the DEIR for both during construction period and operations?

Ms. Martelino: It is something we can look at in preparation of the Final EIR.

PTC5.17 Commissioner Fineberg: Please. Okay, then page 3.7-37 it talks about cumulative construction noise impacts. It states, "The only reasonably foreseeable probable future projects in close proximity to the SUMC sites are 1) approved but un-constructed academic facilities, housing units, parking, and associated utilities, roadways, and bikeways in the adjacent Stanford University property." Two, just to paraphrase, demolition of 777 Welch. So the first thing that came to my mind in reading that is what about the Performing Arts Center? That is a significant known foreseeable, probable, all the jargon project that will

be happening in the immediate vicinity. Is that considered an academic facility? If that is then everything in the universe comes under academic facilities, housing units, parking, and associated utilities, and roadways. So should there be a listing of the major un-constructed academic, and all the other types? I guess I am just wondering is it adequate to say there is no cumulative noise because everything is in this category and there we go?

Ms. Cara Silver, Senior Assistant City Attorney: Commissioner Fineberg, just to clarify the Performing Arts Center project has come up in your and Council's discussions in the past. That was a project that came online after the NOP was issued so we did not view it as a foreseeable project for the purposes of this analysis, but there have been comments that have come in regarding that project. So we will take another look at it in the EIR.

Commissioner Fineberg: Great, thank you. I am not sure the right way to frame this, but it goes on in the discussion in this section to talk about I believe it was 1,655,000 additional square feet of academic land use. That seems to be significant. I am wondering if there should be an elaboration of what makes that up, what the construction schedules are, whether they are concurrent with this project. My hunch is there will be and I am concerned about, and I think the DEIR may need to address whether the cumulative impacts are properly identified and understood given that we are simply lumping it together with 1.5 million additional square feet in adjacent areas.

PTC5.17 Con't

Ms. Martelino: The over 1.0 million square feet of development refers to cumulative development that is part of the Stanford General Use Permit. There is a more specific list of what is currently projected to potentially occur or be constructed concurrently as the SUMC project construction within the Stanford campus. That discussion is provided in section 3.1 of the Draft EIR.

Commissioner Fineberg: Okay. Thank you and I can look at that later. I still wonder whether the cumulative impacts need to better analyze not just the Stanford University Medical Center but the other projects in the immediate vicinity even if they are in their inner sphere of influence, and covered under the County's GUP they still are part of the cumulative impacts and I believe the DEIR should analyze them in more detail.

Going to page 3.7-39, NO-6 is the cumulative vibration impacts, again, the same kind of issues. Are we adequately looking at the cumulative impacts on sensitive receptors in the area given the numbers of projects, the amount of square footage? What is the sphere of influence of the vibrations? I understand that the further you get the less they are, but having lived through being within a half a mile of several projects building hundreds of houses, those pile drivers shake you a half a mile away. I don't know that they would rise to the level of waking you up at three in the morning but 12 years of pile drivers may exceed what standards tolerate. So I think there needs to be more analysis of the cumulative impacts of all the projects in the area over the extended time period, and then kind of unless I missed it, something showing a map of who is where and how far out the vibrations go rather than just saying when you get far away they don't bother you, don't worry about it.

PTC5.18

Commissioner Martinez: Just out of curiosity are there going to be deep driven piles proposed for the foundation?

Mr. Tortorich: For purposes of the EIR we have asked to have driven piles studied, and they would be fairly deep piles. We would prefer to use an auger cast pile method, however, our friends at OSHPD have only approved that method in one other project. So we are skeptical about whether they will approve it for this but we wanted to have the worst condition studied.

Just to issue of noise and vibration, pile driving activity would not be going on for 12 years. It would go on for a period of just a few months. Believe me the Chief Nursing Officers of both hospitals will call me as soon as the vibration or noise is unacceptable. They are very sensitive receptors.

Commissioner Fineberg: Thank you. The last comment I have on this is Staff earlier stated, and forgive me if I didn't quite catch this perfectly, but I thought I heard you say that there is no mitigation for ambulance noise due to the emergency nature and the absolute unequivocal need for their source. I am wondering though whether there aren't mitigations, the same kinds of things that airports install when they generate noise, funds to insulate people's homes, funds to pay for double-hung windows, whatever the construction methods are to soundproof the sensitive receptors. So should there be consideration where whatever our thresholds of significance are exceeded, and if they are in very concentrated focal area should there be funds to improve those properties so that they comply with whatever our codes say interior noise should not exceed from those 45 decibels so that those homes or residences or whatever not be impacted by the helicopter and ambulance noise.

PTC5.19

Ms. Silver: Commissioner Fineberg, as a clarification our Noise Ordinance does exempt ambulatory noise, but not helicopter noise.

Chair Garber: As was just noted the project exists over 12 years, and does not exist in every location all at the same time over that 12 years, which suggests that some of the unavoidable impacts of noise can in fact be planned for, and the critical topic here or the sort of critical mitigation it seems to me is going to be management of those potential receptors of that. Therefore it might be appropriate to include in a list of mitigations a plan that maps out where the noise occurs at what times. I am not talking day-to-day I am talking month-by-month or something of that sort such that those potential receptors can anticipate when those things can happen and where.

It also occurs to me that it may not be something that can obviously be planned for right now, but it could be planned for at some time rolling time schedule, six months before it occurs or something of that sort. In any case, all I am suggesting is that there is a plan that occurs in time and space that could allow that to happen. Commissioner Martinez.

Commissioner Martinez: First I would like to ask the City Attorney if she could explain to all of us once again, as you did in our pre-Commission meeting, the difference between the noise of the limits of the Comprehensive Plan versus the Municipal Code.

PTC5.20

Ms. Silver: Yes, Commissioner Martinez I would be happy to do that. The Comprehensive Plan sets forth general policies regarding noise, and it does not contain prescriptive requirements that prohibit particular noise. Instead what it does is it actually incorporates and addresses the CEQA threshold guidelines that should be applied to

various projects. So in general terms it has a policy that says that development shall minimize noise in general as it comes online. Then in particular in Policy N-41 it states that when a proposed project is subject to CEQA, such as this, and requires an EIR the noise impact of the project on existing residential land uses should be evaluated in terms of the increase in existing noise levels and potential for adverse community impact regardless of existing background noise levels. Then it contains some detailed criteria that should be applied when evaluating the project's impact on noise. So basically what the Comprehensive Plan does is just sets for the criteria that needs to be used and that is what the EIR does.

Then the Noise Ordinance has a specific exemption for ambulance noise and siren noise. So the way we approach the EIR chapter is we disclose that the ambulance noise when taken into account with all the other noise generated by the project would trigger a significance criteria, but the project itself because the noise was attributable to the sirens would be exempt from any prescriptive requirements in the Noise Ordinance. Hope that clarifies it.

Commissioner Martinez: Thank you. I wanted to go to the heliport and ambulance noise issue because those are the two items that we don't seem like we are going to be able to fully mitigate. I am sure regarding these two types of transportation that this comes up at every major hospital project. Did you look at, in preparing the EIR, some of our neighboring hospitals to see if they addressed this at all? Are you familiar with other plans?

Ms. Rod Jeung, PBS&J Consulting: Commissioner Martinez, we have probably done five or six other hospital environmental documents for the very same reasons that Stanford has submitted this application in terms of trying to comply with SB 1953. So there have been hospital projects that we have done in Palo Alto, ones that we have done in San Carlos, ones we have done up in Burlingame for Mills Peninsula. In each of those instances it is pretty much the same scenario where we have identified the need for additional ambulance traffic, because in most cases, in all the cases the hospitals were expanding their emergency departments. So there was an expectation consistent with population forecast
PTC5.21 that the number of ambulances would be increasing, and that the noise associated would also be increasing. Like Palo Alto all of those cities have ordinances that typically exempt sirens.

The helicopter noise is a little bit different. In those particular instances, particularly in Burlingame at Mills Peninsula we did look at some alternative locations and talked to the hospital operation folks about modifying their flight paths to see if there was a way to avoid some of the incoming noise, and I think some of the downwash, the wind patterns from the helicopter rotors. So we did consider that in some of the other locations where it was a significant concern.

Commissioner Martinez: In our case here did you look at any difference between having a rooftop heliport versus keeping it on the ground, and is there any significant difference in terms of noise?

Mr. Jeung: Was that considered in the plan application?

Ms. Martelino: I believe in this case, as well as I can recall this project involves the highest rooftop heliport that we have looked at.

Commissioner Martinez: Did you look at having it located on the ground as a mitigation if indeed it were a mitigation? Or at a lower elevation?

Ms. Martelino: No we previously have not looked at mitigation to put heliports at a lower elevation.

Commissioner Martinez: In terms of noise impacts on patients I would assume that it makes more sense to keep it higher, having been in a room right next to a heliport.

Considering the impact on the apartments at 1100 Welch Road I wanted to follow up with what Commissioner Fineberg had suggested. Did you look at the construction or whether these apartments had double pane windows, or roof insulation, and whether that could be a mitigation to kind of lower the impacts on the residents?

Mr. Geoff Hornek, PBS&J Consulting: I had a good part in the noise section. The issue with the helicopter noise is we didn't identify a significant noise impact due to the project so we didn't look into the mitigations present or increase insulation for the building across the street.

PTC5.21 Con't Commissioner Martinez: I thought it did. I could be wrong because I read it a couple of nights ago. I thought 1100 Welch Road that there was a significant noise impact.

Mr. Hornek: Not a helicopter noise impact, no.

Commissioner Martinez: Okay. Then regarding the ambulances, currently there are 21 trips per day, ten percent so two are with sirens. The build out projects 39 trips per day.

Mr. Hornek: Right.

Commissioner Martinez: We are not doubling in population so where are these extra trips coming from?

Mr. Hornek: I can't speak to the extra trips but one critical factor in identifying a significant ambulance noise impact was the opening of a new ambulance route that would take it by sensitive receptors that are not exposed to any ambulance noise directly now. That is the primary reason why the ambulance noise impact was identified. Again, it relates to the Comprehensive Plan standard for exposure of those units.

Commissioner Martinez: Okay, thank you, but can I get an answer to my question about the doubling of the number of trips?

Mr. Hornek: That is something I can't speak to.

Ms. Martelino: The number of treatment spaces within the emergency department would increase so there is an accompanying increase in ambulance trips that are expected.

Mr. Jeung: I think the other consideration just to keep in mind is that even though the City of Palo Alto's population is not doubling as you might infer from looking at the number of ambulance trips, the hospital facilities are a regional facility and serves a larger population service area than just Palo Alto. If you think about the demographics of the communities and the aging of the communities the number of ambulance trips would tend to increase. So it is not tied specifically to the exact population within the city but a larger service area and its demographics.

Chair Garber: Mr. Tortorich.

Mr. Tortorich: Thank you. Commissioner Martinez, one of the issues that we have with our current facility is we have to be on diversion quite frequently. So ambulances are diverted to other hospitals. By expanding the emergency department we won't have to be on diversion and we can then treat the patients that we should be treating.

Also state law in the future is going to make it, from what we understand, more difficult for hospitals to close their emergency departments to new admits. So that volume of traffic there, frequently it is diverted because we are full. We don't want to be full any more so we can accept the volume of traffic from the community.

Commissioner Martinez: I appreciate that. Thank you.

Chair Garber: Commissioner Fineberg, you had a follow up.

PTC5.21 Con't

Commissioner Fineberg: Excuse me sir, could you come back to the podium. You mentioned briefly that there would be a new ambulance route with new sensitive receptors. Could you either tell me where that is in this discussion or just elaborate a little bit? I know earlier someone said it was on El Camino. Is that northbound or southbound?

Mr. Hornek: The part of the project description, the emergency room would be relocated to a site closer to Sand Hill Road, and that would open up Sand Hill Road from El Camino to Durand as an ambulance route where it currently is not an ambulance route for the present SUMC emergency room.

Commissioner Fineberg: Okay, so if you are El Camino heading north, if I am thinking clearly, you cannot now turn left onto Sand Hill?

Mr. Hornek: Well, I guess you could but I guess if you were in a hurry the Quarry route, you would take El Camino to Quarry and then go right down and that would take you to the emergency room a lot quicker. You wouldn't have to detour through the campus.

Commissioner Fineberg: So is there any re-jiggering of the Sand Hill intersection and sort of how you can't cross over to Alma Way.

Mr. Hornek: You mean is there any way to redefine the ambulance route so it won't take that section of Sand Hill Road?

Commissioner Fineberg: I am just trying to figure out what your redefined route is beyond Durand. Are they reaching as far as El Camino or that is staying as it is?

Mr. Turner: Excuse me Commissioner Fineberg. I just want to highlight the pages in the EIR that show the existing and proposed routes. So those are Figures 3.7-6 on page 31 of the Noise Chapter. That shows the existing route. Then on the following page Figure 3.7-7 is the proposed ambulance route so you can see the change between existing and proposed.

Commissioner Fineberg: Okay, so I think what I am seeing then is that the ambulances would not have a new route onto Sand Hill going northbound, and they would not be able to come from Alma. Is that correct? I'm sorry I am looking at this sideways. It is not on the map. So let me word that as a question. Are the new ambulance routes going to in any way impact Alma Way, is it Alma Way when it is in Downtown? Whatever Alma. Is it going to allow ambulances to have a new route on northbound hanging a left? I am not proposing that it should I just want the route clarified so we can understand it a little further from the project site.

Mr. Hornek: Okay.

Chair Garber: Commissioner Martinez, did you have anything else?

Commissioner Martinez: No, that's it for now.

PTC5.21 Con't

Chair Garber: Commissioner Keller.

Commissioner Keller: Thank you. The first comment about ambulance noise is that it is highly dependent on traffic. So I presume that there is not much ambulance noise that happens in the middle of the night because there is not much traffic. If I were an ambulance driver I would turn on the siren when I wanted to get traffic out of the way so I can get to the emergency room. There is some issue about turning on and off the siren and whether that is jolting to the patient, but certainly keeping the siren off is less traumatic to the patient in general. So the issue of continuing to discourage sirens at night is a potential mitigation.

The other issue is depending on traffic Quarry Road is a four-lane road from El Camino to Arboretum, while Sand Hill Road is a two-lane road from much of El Camino to Arboretum. So the consideration is that that does not seem like a good place to go to as a route during rush hour traffic. Therefore there might be an idea of during periods of extreme traffic to relocate it so that the ambulance route goes along the current route essentially of Quarry Road to Welch Road and uses that to go there. That is also a potential mitigation for the ambulance noise along the new Sand Hill Road path.

Finally, along these lines, the issue is that I would expect that the amount of time that there is siren for an ambulance that would increase more than linearly. The reason is, as I mentioned earlier, ambulance noise is related to traffic and traffic is expected to increase. Therefore I would expect that as traffic increases, congestion increases, and therefore ambulance noise would increase more than linearly. That should be taken into account. So that is it on ambulance noise.

The next thing is with respect to construction noise. A lot of Commissioners have talked about construction noise already. I would like to, I believe it was Commissioner Martinez who talked about the construction routes. I am sorry it was Commissioner Tanaka. Thank you. Commissioner Tanaka talked about construction routes. I think this is important because construction route towards – a lot of construction presumably would come up or traffic would come along 101 from the south, from San Jose, and then presumably take San Antonio Road and either Alma Street or El Camino. However, San Antonio Road is not one of the road levels that is in Table 3.7-11, and it should be in there because the trucks rumbling along that – there are residences along San Antonio Road that would be impacted. So that needs to be considered. Also whether the requirement is that the traffic go along El Camino rather than on Alma because the construction noise of these trucks along Alma has not been considered either. There is some residential along El Camino that needs to be considered, particularly some residential for example the Evergreen neighborhood, and College Terrace, and further along south there are various residential like Ventura, Barron Park, also further south in Palo Alto there is residential. So that needs to be considered as well.

So with respect to the noise impact of these construction vehicles there is the consideration of time of day. Are these construction vehicles going to be limited to certain times of day where the impacts would be less? Would they be encouraged to avoid rush hour times so that the congestion would be less from these vehicles? Furthermore, there are some considerations that have sometimes happened where there is physical impact of road impact. When you are running along a lot of heavy construction vehicles along San Antonio Road and El Camino you are lessening the life of those roads. Currently a
PTC5.22 significant investment is being made in San Antonio Road to improve it and that is being done with a significant amount of stimulus funds. The extent to which that road will deteriorate with the construction vehicles and require the appropriate mitigation or the appropriate impacts of the construction vehicles is worthwhile considering.

Similarly with El Camino that has not had a similar repaving as San Antonio Road is undergoing. In particular, an agreement that these trucks do not go along Alma Street makes sense. Alma Street is much more impactful in terms of traffic and also in terms of noise and residential, and probably has a lower existing ambient noise than El Camino does. Thank you.

Chair Garber: Commissioner Fineberg one last comment.

Commissioner Fineberg: There is a project going in at the corner of San Antonio, the Mayfield Mall residential homes. I do not know, but I am wondering has there been consideration, does the DEIR need to consider whether there is going to be any plan for either road closures or changes at the intersection that would impact Stanford's use of that route for construction vehicles. My guess is that it would be happening concurrently within the 12-year window. So it is possible that ought to be considered.

Chair Garber: Commissioner Tanaka a final comment and then we will go to Geology.

Commissioner Tanaka: Thank you. These are quick comments. I did have a chance to look at the Figure 3.4-6, the construction routes. I agree with some of the comments that my fellow Commissioner made in regards to not going through all the neighborhoods. So I

PTC5.22 Con't would suggest as a possible mitigation for the noise of the construction trucks, especially the heavy truck carrying a lot of tonnage, is to have the trucks if they are going onto the 101 or 280 to go onto Willow Road and Sand Hill Road versus going all the way down Alma and El Camino to Page Mill or San Antonio. It looks shorter to me on the map here and it looks like it would be less impactful on the residential neighborhoods. So if that could be considered it would be appreciated for trucks over a certain tonnage.

If I was not clear before then I want to make sure it is clear, I think it would make sense to also have the flight path of the helicopters in the next draft. I think that is actually very important.

PTC5.23 Just to follow onto my other Commissioner's comment about what is more noisy a rooftop helicopter or a ground helicopter pad. My dad used to be a helicopter mechanic so I grew up around helicopters. I can tell you that a ground one is a hell of a lot noisier than a rooftop one. So you want a rooftop one if you can. Thank you.

Chair Garber: Alright, let's go to Geology, Soils, and Seismicity. Yes.

Mr. Jeung: I am really, really sensitive to what all of you are saying about the importance of understanding sort of the combined effects of having different construction projects occurring at the same time and the resultant effect on residents, commercial businesses, etc. I do want to point out that there is a mitigation measure that is included in the Traffic section. So you may not have seen it in Noise or some of the others.

There is a Traffic Mitigation Measure TR-1.8 that talks about developing and implementing a construction impact mitigation plan. It is a pretty standard mitigation measure that Palo Alto has used on a number of other projects including the one at San Antonio. So the intent of these mitigation plans is that at the point where we are right now it is really hard to be able to predict what the construction staging is going to be and when construction materials are going to be coming in and when construction crews are going to be actively involved. Similarly if you are thinking about all these other projects how to coordinate all that.

So what each of these individual projects is asked to do, and because this one is so long over a 12-year period, there is a desire to have that plan implemented over various phases. So every time there is a new construction phase that is being considered by SUMC or Stanford there is a need to go ahead and refine this plan specifically looking at the scheduled activities, the construction workers, the road openings, the road closures, and see what else is occurring in the vicinity. So I just wanted to point that out.

Chair Garber: Thank you. Commissioners, do we have questions on Geology, Soils, and Seismicity? Commissioner Keller. Commissioner Fineberg. Commissioner Martinez. Commissioner Keller, why don't start off?

Commissioner Keller: Thank you. The first thing is that although this is an existing hazard, Searsville dam seems to be at issue. It does indicate that that is an existing hazard
PTC5.24 that exists. There is potential for dam failure, which would apparently inundate the hospital if I read that correctly. One of the things about that is there is the potential to upgrade Searsville dam so that it would reduce the risk of dam failure causing inundation

PTC5.24 Con't

of the Stanford University Medical Center. If that were to be the case the improvement to the Searsville dam could also be used to provide additional flood protection for the San Francisquito Creek. That would have an ancillary benefit there too. So I think what needs to be considered is the upgrade of the Searsville dam and the potential improvement of that as an additional public benefit of this project and the potential reduction of that earthquake risk of inundation.

PTC5.25

It is interesting about the comment about the moat around the Stanford Hospital. To the extent that there is actually a literal moat I am wondering what kind of digging or whatever is necessary to create that moat. I am actually intrigued by that because in the Mexico City earthquake one of the buildings that withstood that without hardly any damage is the United States Embassy. That was also built on a structure that would move somewhat with the earthquake. What I understand, is what they did is they actually designed it so that the soils would flow a little bit and absorb some of the impact. They did that by actually watering the soils. So they pumped water down there to make it more absorptive of the shaking. So that gets to the issue of when we have the base of the foundation resting underneath the water table. To what extent does that affect the nature of the transmissiveness of the shaking or not? I don't know the answer to that. I am not geologist and I am not a structural engineer, and I will bring up the issue of foundation extending below the water use for another issue.

PTC5.26

Finally, one of the considerations that I think is worthwhile pointing out is the – and this is not something that Stanford should mitigate but it is something that should be identified as part of this. That is the extent to which the access routes for emergency access not only locally but further out to the Stanford University Medical Center complex and particularly to the emergency room, whether those access routes are potentially impacted by failure due to the structures that that route goes over. So to the extent that for example if the bridge over the San Francisquito Creek at El Camino were to fail during an earthquake that would impact the ability of Menlo Park residents to reach the emergency department. If people are coming from Palo Alto the extent to which the University Avenue overpass over El Camino, the failure of that and the collapse of that could effect the ability of people arriving through ambulance. Now they could presumably go around that by taking other routes such as Churchill to El Camino, to Galvez and Arboretum. But still the understanding of alternative routes in the event of an earthquake and having plans for that certainly is a worthwhile consideration. It is not an exercise that requires actual mitigation per se but I think it is a worthwhile exercise so that in the event of these outages there are appropriate plans in place for handling them. Thank you.

Chair Garber: Commissioner Martinez and then Fineberg.

PTC5.27

Commissioner Martinez: In this section there was a description that a parking structure could be built below grade in excess of 40 feet. Along side it was a comment that the assumed water table was 30 feet. I didn't really see how that was going to be mitigated, or wasn't a problem, or could be dealt with in construction. You don't have to answer that now but maybe just clarify it in that section. Thank you.

Chair Garber: Commissioner Fineberg.

PTC5.27 Con't

Commissioner Fineberg: On page 3.10-8 it says the state geologist has identified that about two-thirds of the area surrounding the Stanford University Medical site are zones with potential liquefaction irrespective of the surface soils due to the water table being within 50 feet of the ground surface. I understand that the construction methods and building design will address much of that. My questions, two of them, are does the DEIR and/or the building designs and construction methods take into account any changes in the water table that might occur due to High-Speed Rail building a deep underground tunnel? I do not know if it will have any impact. If they do a deep bore method it probably won't impact the surface water, but if they are doing a cut and cover, or cut and there is effectively a wall for the first 50-feet of grade is that going to change the water table?

Then the second question is will sea level rise impact the height of the water table? Do current construction methods consider that? I am sure there is some answer in code but I hadn't seen any discussion of that.

PTC5.28

Of course, just be a broken record on this, this is another section where Palo Alto being in a floodplain and having its power supply subject to earthquake and flooding risks. Here again in Geology do we need to have a reliable power supply so the hospital can have continuing long-term ongoing operations if Palo Alto's power supply fails to be reliable in a flood or an earthquake?

Then I also would concur with Commissioner Keller's comments earlier, and I am having a brain hiccup, and I am forgetting which ones. I will echo his earlier comments because there was something there I agreed with but I can't remember what it is now.

Chair Garber: Alright, let's move to the Hydrology Chapter. Anyone have comments on that? Commissioner Tanaka. Commissioner Fineberg you do. Commissioner Martinez and Keller. Commissioner Fineberg why don't you go ahead. Commissioner Tanaka you did not have comments.

PTC5.29

Commissioner Fineberg: Turn the page and now I know what that comment was. It was on the dam failure inundation area. I had my notes on that under Hydrology. I would concur that it is Comprehensive Plan Map N-8 identifies that the project area is in a dam failure inundation area. Maybe I missed it but I am not sure I saw analysis considering that or what potential mitigations would be, and if they are significant any work there to make the project safer, and then obviously the ancillary benefit of a water retention facility to improve San Francisquito Creek conditions would be good.

PTC5.30

Also, under Hydrology has there been appropriate consideration of the primary evacuation routes from the areas near to bay level west to higher ground? What impact, especially during construction, would there be on evacuation routes? That is was it on Hydrology.

PTC5.31

Chair Garber: I have a brief comment regarding Mitigation Measure HW-3.1, develop a work plan for any unknown contaminated sites. This is not necessarily an additional mitigation to be considered but the topic in general of groundwater contamination is one that our community is very sensitive about. I would be interested in seeing the findings of the various excavations that occur be published in some way that they can become easily seen. Now, if my memory serves, I believe there are a variety of requirements but none of them really raise them to the surface. The findings could be published to a website, or

PTC5.31 Con't

some other way to make it evident. I just think having some daylight on that information that is found would lend just that much more credence to the work that is being done there over the next 12 years. Commissioner Martinez.

PTC5.32

Commissioner Martinez: A couple of things. There is a discussion in a couple of places about surface runoff and impervious surfaces. On page 3.11-34 it says only one to two percent increase in impervious area. Then on page 3.11-40 it says there is a 26 percent increase in impervious area. Both of those statements might be true but they seem contradictory so can you just edit that a little bit so we understand what you are saying?

PTC5.33

Then on page 3.11-42 under Operations it talks about the project submitting final grading plans. I understood that operations means after occupancy, not about during the planning or design phase. So I am sort of a little confused about that. I think it should be addressing surface runoff from the streets, maintenance of the sewer systems, things of that nature, but not still be talking about plans. Thank you.

Chair Garber: Commissioner Keller and then Commissioner Tanaka has a comment as well.

PTC5.34

Commissioner Keller: Thank you. So my first comment is related to the potential for construction dewatering. It was pointed out that there would not be an ongoing dewatering because of the flood proofing of the underground structures, but the idea that the underground structures will protrude below the water table doesn't indicate to me that there is likely to be dewatering. Typically the City of Palo Alto has rules for when you can do dewatering so that they are only done during the non-rainy months so as not to impact the storm drain system when there is rain. I am not sure how that fits in with the construction project schedule. So I think that is something that has to be considered. In particular, in the event of a severe rain event that happens while there is construction dewatering the impact of the combination needs to be considered.

PTC5.35

Also, it would be helpful to have a map indicating where the foundations and where the underground parking or whatever intersects the water table. So the decent below the water table, a picture or a map of that would indicate to some extent where the water streaming that is coming from the hills underground is blocked, and might have affects on downstream. So this project is of significant size to the effect that water needs to go around this project, and to the extent that that might have some downstream effects on the underground water flow is worthwhile considering.

I am assuming that this is not the case but the consideration that if water backs up behind such a structure some sort of diversion to keep it from backing up and whether there could be upstream kinds of flooding from underground water flow. I don't really understand that but I am sure the geologists understand the issues better than I do.

PTC5.36

A second consideration, which I guess goes under the category of flooding. Currently to my understanding the helicopters are transporting patients among other places between the Palo Alto Airport and the Stanford Hospital. Is that correct? Is that one of the ways that they go?

Mr. Tortorich: Commissioner Keller, they will refuel at the Palo Alto Airport but I don't believe they are frequently moving patients from the Palo Alto Airport.

Commissioner Keller: Okay, thank you. So to the extent that there are fueling operations at the Palo Alto Airport and the Palo Alto Airport is subject to flooding, which is a potential issue, then alternative mechanisms for fueling the helicopters needs to be considered. Perhaps that could be Moffett Field or some other place like that. To the extent that patients are flown in through the Palo Alto Airport, I am not sure if they are flown in through other airports. I am seeing a nod. They are not flown in through Palo Alto Airport?

Mr. Tortorich: Commissioner Keller, if they are capable enough to fly in an airplane to an airport typically they would come by car to the hospital. So the life flight will bring somebody who has been in an accident to the hospital, or if there is a patient transfer from another hospital, but typically if you are able to fly on an airplane we can get you here by car.

PTC5.36 Con't

Commissioner Keller: Okay, thank you. I appreciate that. Yes?

Commissioner Fineberg: I am not sure where your line of questions are going but one thing, and correct me if I am wrong, don't organs get flown in on major commercial routes, and then the organ is brought over by helicopter? I don't know if they would go through the Palo Alto Airport.

Chair Garber: Commissioner Keller, why don't you get to your point and then if we need further conversation with the applicant we can do that.

Commissioner Keller: My question is to the extent that the Palo Alto Airport was necessary to the operations and there was flooding there I wanted to understand that there were alternative measures in place for continued operation. So whether it is patient transport or organs or simply refueling the helicopter that is of import, particularly as sea level rises and the likelihood of Palo Alto Airport being under water in significant events. Currently it is within the 100-year floodplain and probably worse than that. Thank you.

PTC5.37

Chair Garber: One thing before we go to Commissioner Tanaka, I had missed the dewatering comment in the chapter. If that is in fact incurred it seems to me that there would be potentially a mitigation plan for that water depending on what is encountered. This site is of such a size that it seems to me reintroducing it to the water table at a different location would potentially be reasonable depending on what the conditions were. In any case, if those conditions are encountered it seems to me there are a variety of ways of dealing with that. Commissioner Tanaka.

PTC5.38

Commissioner Tanaka: Thank you. I just have a few quick comments here. As for the green roof, the rainwater harvesting, as well as the condensate from the chillers seem like a really great way to actually try to conserve water. So I think that is actually really nice that the applicant is taking action in this area. One question I have for PBS&J is is this taken into account in the Draft EIR? It sounds like they are still trying to get OSHPD approval for some of these technologies. So is that taken into account in the Hydrology and other sections, the fact that they are doing all these things to recycle water?

PTC5.38 Con't

Ms. Martelino: Our hydrologist did consider the green roofs in analyzing the total permeable and impermeable area and how that would affect runoff.

Commissioner Tanaka: It sounds like they are doing extensive rainwater harvesting as well, which is great. Is that also taken into account? If not, maybe you guys can look at it and make sure.

Ms. Martelino: We will look at that.

PTC5.39

Commissioner Tanaka: One aspect I didn't see in this, and maybe it is in there already, if they are doing permeable pavers as well on the ground. If they are that is a bigger bonus. Those are all the questions I had on this section.

Chair Garber: Commissioners, we have been at this almost two hours. We would normally take a break, but given that we really only have one more chapter I suggest we just move forward. Our last chapter is Hazardous Materials. Do all the Commissioners have comments? Commissioner Keller, Martinez, Fineberg. Commissioner Keller why don't you start?

PTC5.40

Commissioner Keller: So there was a comment here about the Lucile Packard Children's Hospital school. On the one hand it says there are no schools within a quarter of a mile, but that is school. So you can't have it both ways. It is worthwhile evaluating that. I think the evaluation should be straightforward because whatever mitigations you have for the sensitive receptors the hospitals should also suffice for the Lucile Packard Children's Hospital.

There is also a statement that says that you are not going to build a school within a quarter of a mile of this. That means I presume that the Lucile Packard Children's Hospital school is not going to be located all within the new facility but it is only located within the existing buildings. It would just be worthwhile confirming that.

The related thing to that is that obviously this site is within a quarter-mile of a University. In fact, years ago I used to have an office on the Stanford campus that was probably within a quarter-mile of this site. I am wondering if there are issues with respect to the fact that there are students located there.

Furthermore, one thing that wasn't mentioned I guess it is the – is it the Arboretum Children's Center that is located adjacent to the Hoover Pavilion? That is not considered with respect to this and I think it needs to be. It is not a school per se but it effectively operates as a school. It is a preschool facility I believe, and that should certainly qualify in the same characteristic.

PTC5.41

One final comment, I am not sure which section what was mentioned as the Cortese List is. If it is pronounced the same way that Santa Clara County Supervisor Dave Cortese pronounces his name then I assume it is pronounced as Cortese as Cortese. Thank you.

Chair Garber: Commissioner Martinez.

PTC5.42

Commissioner Martinez: When I first started as an architect one of my first projects was to do some redesign for the Stanford Hematology Lab. One of our greatest challenges was to rebuild this, a 24-hour operation that could not be shutdown with the presence of asbestos that would contaminate the equipment that was running. So even back in the early 1980s Stanford had a very profound knowledge of the presence of asbestos, and probably had a pretty aggressive program to remove it as they remodeled.

On page 3.12-37 it talks about asbestos surveys prior to construction. I would say that Stanford likely has a lot of information about the building content of asbestos, and that really should be made part of the EIR now. A table, a paragraph mentioning the existing hazard and the mitigation measures that you talk about to mitigate it. Thank you.

Yes, I am certain there were surveys done to know the presence. In general, we know that in buildings of this era asbestos was the material of choice. So you are going to find it everywhere. Thank you.

PTC5.43

Chair Garber: The only comment I have is related to the cumulative analysis, HM-12, and it is the same as I had for Hydrology, which is the release of findings to increase the confidence of the way the project is being managed on an ongoing basis. Commissioner Fineberg.

PTC5.44

Commissioner Fineberg: Comprehensive Plan Map N-9 shows that the project area is within 2,500 feet of a toxic gas facility. What is that? Does it have any impact on the project? Does it have any impact in emergencies? Does anyone here now know what that toxic gas facility is? I have the map from the Comprehensive Plan that I would be happy to share with Staff or consultants. What is it, and what does it mean, and do we need to do anything about it, is it going to impact operations, or is it just if there is a leak in an emergency? I don't even know what questions to ask because don't know what it is.

Ms. Martelino: We can take a look at that map and take a look at what the implications would be.

PTC5.45

Commissioner Fineberg: Thank you. Commissioner Keller earlier was talking about the preschool that is at the base of Hoover Pavilion. I don't know if they are within a quarter of a mile throw, but there are a couple of other preschools pretty close. Escondido School, which actually a PAUSD school to the south, and then there is another one, forgive me I don't know the name, but another preschool located in the Stanford West Apartment area. I think it is a children's something or other. So I don't know if preschools get the same consideration as public schools but those may be additional locations to consider.

PTC5.46

Then also I have a concern about the transportation of the hazardous materials via the truck routes. I understand it is highly regulated. I understand there are codes. But I also understand that to be human is to err, and having lived with a bunch of projects building hundreds of houses, I can tell you there were tons of construction vehicles driving down my little one-block long cul-de-sac street that sometimes I would be frustrated and I would hop in my car and I would follow them, and they would be going to a big construction site. They didn't belong in a residential neighborhood. They didn't belong on residential streets. They were not delivering materials in the residential area. I understand there are Code Enforcement mechanisms but it is too late that point.

PTC5.46 Con't

So if there can be some kind of consideration within the DEIR of, I don't know that it would be monitoring, but a mitigation that would be proactive education for the drivers of the vehicles for the construction companies rather than just assuming that the routes were distributed to the construction companies that there actually be real handshakes between the folks on the site and the folks in the trucks so that there be true compliance. I understand that the code requires that but enhanced implementation of that to get compliance for hauling even the non-hazardous materials, but especially if there are a bunch of trucks hauling hazardous materials, hazardous groundwater, removing the asbestos, removing lead. Those things are going to be crossing our streets, and there are countless sensitive receptors and countless potentials for unforeseen consequences. So the more vigilant we can be about that in whatever ways are possible, if the DEIR could put some consideration into that.

Chair Garber: Commissioner Tanaka.

PTC5.47

Commissioner Tanaka: My main point has already been covered so I am not going to repeat it. I do know that there are after school right next to College Terrace. It is called Peppertree. I don't think it is a quarter-mile. If there are other after schools near the site you should also look at that as well. Thank you.

Chair Garber: Commissioner Keller, a final comment.

PTC5.48

Commissioner Keller: Yes. First I agree with Commissioner Fineberg, it should be specifically noted that Embarcadero Road and Oregon Expressway and Charleston are not to be used for construction vehicles because those are not truck routes. I think it is important that we say that today's topic exemplifies why the project is being done. We are doing this, as mentioned by Stanford, for earthquakes because we live in earthquake territory. That is the whole reason for Stanford investing over $3.0 billion in this project so that in the event of an earthquake you and I and people all over will have a place to go still after that earthquake still, after that earthquake in the event that we need medical attention. So I think here is a particular situation as was mentioned that not only is in some sense the issues of the potential impacts of an earthquake but that this is actually a great improvement in the earthquake safety of the Stanford Hospital. I only wish that we had received this earlier rather than having Stanford having a rush project that they have to go through in order to meet the very quick, very soon deadline. So perhaps the delays in getting the EIR processed because of the Stanford Shopping Center and such unfortunately that has an impact here. I think this is important that this does greatly improve the benefit to the community by having an earthquake safety hospital in our community. Thank you.

Chair Garber: With that we will close the item. Let's thank the applicant and Staff. Commissioners, we have just a little bit of work. We have no minutes to approve.

APPROVAL OF MINUTES: None.

COMMISSION MEMBER QUESTIONS, COMMENTS, AND/OR ANNOUNCEMENTS.

Chair Garber: June is coming to a close. July the representative to the Council is myself.

REPORTS FROM OFFICIALS/COMMITTEES.

Chair Garber: Are there reports? I know that there is one report and that is on the Comprehensive Plan Subcommittee, which met for the first time this afternoon. We did a kickoff with the Staff. We will be returning in the next meeting or two to share with you our work plan. Anything else?

NEXT MEETING: Special Meeting of July 7, 2010 at 6:00 PM

Chair Garber: Then we are adjourned at 8:10. Thanks very much.

ADJOURNED: **8:12 PM**

PTC 5. Planning and Transportation Commission, June 30, 2010

PTC5.1 The commentor asks how the regulations mandating a 20 percent reduction in urban water use would affect the SUMC Project and the conclusions from the Draft EIR. The commentor also asks how the baseline water use will be determined. As noted on page 3.15-15 of the Draft EIR, SB 7 modifies the California Water Code (commencing with Section 10608) to require that water agencies achieve a 20 percent reduction in urban per capita water use by 2020. The 20 percent reduction is relative to a baseline to be determined by each water agency using one of four methodologies described in the law. Water agencies have until July 1, 2011 to develop plans for achieving the required reductions. As the City of Palo Alto Utilities (CPAU) will be developing plans for complying with SB 7 as part of its upcoming Urban Water Management Plan update process, the methodology for determining the Citywide baseline water use has not yet been identified. Each methodology evaluates existing water use in determining a baseline for the target.

PTC5.2 The commentor requests clarification as to what percent of the City of Palo Alto's water supply the SUMC Project would require and the capacity of the City to generate its own water supply. The City of Palo Alto currently does not have the capacity to generate its own water supply for the purposes of potable water service during years of normal rainfall. As noted on page 3.15-5 of the Draft EIR, the City has approved the development of the Emergency Water Supply and Storage Project (EWSS), which would develop groundwater capacity for use during water supply emergency conditions. The City currently receives all of its potable water supply from the San Francisco Public Utilities Commission (SFPUC). The SUMC Project would create an increase in potable water demand of 0.18 million gallons per day (mgd) above existing demands. As noted on page 3.15-19 of the Draft EIR, the projected water supply allocation from SFPUC by year 2030 is 13.18 mgd, of which 1.4 percent would be used by the SUMC Project facilities.

The commentor also requests similar information relative to other utilities such as stormwater, electricity, and wastewater. Wastewater from the City of Palo Alto is treated by the Palo Alto Regional Water Quality Control Plant (RWQCP), which allocates 13.2 mgd of treatment capacity to the City. As noted on page 3.15-23 of the Draft EIR, the SUMC Project would create an increase of 262,950 gallons per day (0.26 mgd) in wastewater flow. The current average flow from the City is 9.3 mgd and the SUMC Project would increase that flow to 9.56 mgd. The SUMC Project increase amounts to 2.7 percent of the total wastewater flow from the City.

As noted on page 3.15-29 of the Draft EIR, the SUMC Project at full buildout would have a net increased peak electricity demand of 9.04 megawatts (MW), or a new total peak demand of 20.2 MW. This net increase is less than five percent of the City's 2007 peak

load demand of 185 MW and also less than five percent of the City's remaining peak load capacity of 200 MW.

The stormwater impacts from the SUMC Project have been evaluated based on the percentage of pervious land surfaces on the SUMC Sites. Stanford University's stormwater conveyance system serves the SUMC Sites and has the capacity to convey a 6-hour 10-year storm event without flooding. Page 3.15-24 of the Draft EIR states that the SUMC Site is currently 27 percent pervious land surfaces with 3 percent of green roofs. Implementation of the Main SUMC Project would ultimately create about 26 percent pervious land surfaces and about 11 percent of green roofs, increasing the total amount of pervious land surfaces on the Main SUMC Site by 7 percent.

PTC5.3 *The commentor asks if the hospital would remain serviceable long-term if the City of Palo Alto could not provide power in the event of flooding or earthquakes resulting in damage to off-site electrical facilities*. The SUMC facilities receive power from the City of Palo Alto Utilities Department. The off-site electrical facilities in question are City of Palo Alto utilities facilities in a floodplain area on soils subject to liquefaction and extreme ground shaking. The facility in question and related on-site existing hydrologic and geologic conditions are an existing condition and not a new feature proposed under the SUMC Project. Accordingly, the Draft EIR does not address potential effects related to the facility nor provide mitigation to improve the existing conditions. With regard to electricity supply in the event of an emergency or power outage, the State of California and the Joint Commission on Accreditation of Healthcare Organizations require 92 to 96 hours of emergency generator capacity for all life safety systems, and predominantly for most systems within the hospital.[1]

The Cardinal Cogeneration Plant produces electric and thermal energy for the Stanford central campus using natural gas fuel. The existing plant could serve as a backup generator to supply electricity to the campus in the event that Palo Alto had a power outage. However, Stanford has completed exhaustive studies of long-term energy supply options to succeed the cogeneration plant when its contract expires in 2015 and has decided to install a "regeneration" plant that utilizes waste heat recovery to achieve 40 percent to 50 percent more fuel efficiency and use 70 percent less water than the existing cogeneration plant. The regeneration plant would no longer generate electricity and would not be able to serve as a backup generator because electricity would not be generated at the facility. Electricity for the regeneration facility would be purchased from PG&E or other providers.[2]

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[1] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, July 19, 2010.

[2] Dan Stober, Stanford Report, *Stanford moves aggressively to cut energy use, reduce carbon impact,* October 19, 2009, available at: http://news.stanford.edu/news/2009/october19/stanford-carbon-footprint-101909. html?view=print, accessed October 13, 2010.

As noted, the State of California and the Joint Commission on Accreditation of Healthcare Organizations require 92 to 96 hours of emergency generator capacity for all life safety systems, and predominantly for most systems within the hospital. The SUMC Sites are currently served by 12 emergency generators that have a total capacity of 9.4 MW. However, in order to meet the increased demand for backup emergency power under the SUMC Project, up to an additional 21 MW of emergency generator capacity would be required. As described on pages 2-50 and 2-52 of the Draft EIR, ten new 2-megawatt generators would be provided within the Main SUMC Site; seven for SHC between Welch Road and the proposed hospital, and three for LPCH adjacent to the existing generators near Quarry Road. In addition, each of the proposed SoM buildings (FIM 1, 2, and 3) would have an emergency generator in proximity to the proposed building with no more than two generators at any location. In total, the SUMC Project would add 13 emergency generators to the Main SUMC Site. The existing and new emergency generators are shown in Figure 2-17 of the Draft EIR on page 2-51. In the case of an emergency or power outage, these generators would be able to provide energy to the SUMC Project facilities would comply with the State requirements for emergency generators for life safety systems.

PTC5.4 *The commentor asks for confirmation that the City of Palo Alto does not have plans for wastewater capacity expansions at the Regional Water Quality Treatment Plant as part of the new Ultraviolet (UV) Disinfection Facility system.* The UV Disinfection Facility system was constructed and went into operation August 2010. The UV disinfection system did not increase plant capacity at the Regional Water Quality Control Plant. Current maximum capacity is 80 million gallons per day hydraulically in a peak wet weather event. The City of Palo Alto Public Works Department does not anticipate the need to increase plant capacity and, at this time, there are no plans to increase plant capacity.[3]

PTC5.5 *The commentor requests clarification as to what percent of the peak electricity capacity the SUMC Project would require.* As noted on page 3.15-29 of the Draft EIR, the SUMC Project at full buildout would have a net increased peak electricity demand of 9.04 MW, or a new total peak demand of 20.2 MW. This net increase is less than five percent of the City's 2007 peak load demand of 185 MW and also less than five percent of the City's remaining peak load capacity of 200 MW.

PTC5.6 *The commentor suggests anaerobic digestion as mitigation for the SUMC Project demands on water, wastewater treatment, and energy.* According to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for impacts that are not found to be significant. Therefore, since less-than-significant utility impacts would occur under the SUMC Project, mitigation measures are not required under CEQA.

[3] Jamie Allen, Plant Manager, Regional Water Quality Control Plant, City of Palo Alto Public Works Department, electronic communication with PBS&J, October 14, 2010.

Anaerobic digestion is not currently included in Stanford's long-term Central Energy Facility plans. Stanford continues to investigate this option and other waste-to-energy options such as biomass as it is working out the details of its long-term energy plans.[4]

PTC5.7 *The commentor asks if hospital wastewater is metered and if the SUMC pays for the wastewater treatment according to how much they use.* As explained on pages 3.15-8 through 3.15-9 of the Draft EIR, Utilities, the RWQCP serves Palo Alto and other neighboring jurisdictions. All wastewater generated is metered by the CPAU, which oversees the RWQCP. Wastewater metering monitors commercial customers, which includes hospital uses, and each entity pays for their usage.

The RWQCP quantifies the SUMC's sewage output based on the amount of domestic water that the SUMC receives. Water used for irrigation and fire services are separated from the domestic water since these water uses would not return to the system. However, it is assumed that almost all of the domestic water used by the SUMC is discharged into the sewage system. As a result, the RWQCP quantifies how much wastewater the SUMC inputs into the wastewater treatment plant.[5]

PTC5.8 *The commentor asks if the SUMC Project sponsors examined the use of greywater.* Greywater is used domestic water (except for sewage) that is recycled for irrigation purposes. The SUMC Project sponsors considered a greywater system under the SUMC Project. However, based on discussions with OSHPD, hospitals are not allowed to use greywater systems since there is a risk of potential errors.[6] In addition, all the fixtures would need to be double-piped, which would create a significant financial burden on the SUMC Project sponsors.[7] As such, greywater systems would not be installed under the SUMC Project due to regulatory and fiscal concerns.

PTC5.9 *The commentor asks if the Cardinal Cogeneration Plant could be used as a backup generator for the hospital.* The Cardinal Cogeneration Plant produces electric and thermal energy for the Stanford central campus using natural gas fuel. Therefore, the existing plant could serve as a backup generator to supply electricity to the campus in the event that Palo Alto had a power outage. However, Stanford has completed exhaustive studies of long-term energy supply options to succeed the cogeneration plant when its contract expires in 2015 and has decided to install a "regeneration" plant that utilizes waste heat recovery to achieve 40 percent to 50 percent more fuel efficiency and use 70 percent less water than the existing cogeneration plant. The regeneration plant would no longer generate electricity

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4 Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

5 Roland Ekstrand, Senior Project Engineer, City of Palo Alto Utilities Department, Planning and Transportation Commission hearing, June 30, 2010.

6 Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 30, 2010.

7 Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, City Council Hearing, July 19, 2010.

and would not be able to serve as a backup generator because electricity would not be generated at the facility. Electricity for the regeneration facility would be purchased from PG&E or other providers.

The commentor also asks if the Cardinal Cogeneration Plant could be expanded to include compostable materials in order to supply additional electricity. Stanford has itemized its solid waste stream and investigated waste-to-energy technologies that might be feasible for extracting energy. While no specific technologies for this have yet been selected and incorporated into Stanford's energy and waste management plans, the university continues to explore and consider such technologies and management practices.

PTC5.10 *The commentor questions the asbestos survey and actions proposed under Mitigation Measure HM-2.1 on pages 3.12-37 through 3.12-38 of the Draft EIR.* As described under Mitigation Measure HM-2.1, an asbestos survey would be performed on all areas of the buildings anticipated to be demolished and/or renovated. This survey would be performed by a licensed asbestos abatement contractor. As also included in HM-2.1, in the event that asbestos is identified in the buildings proposed to be demolished and/or renovated, all asbestos containing materials would be removed and appropriately disposed of by a licensed asbestos abatement contractor. A site health and safety plan to ensure worker safety, in compliance with California Occupational Safety and Health Administration (OSHA) requirements (8 CCR 5208),[8] would be developed by the SUMC Project sponsors and in place prior to commencing renovation or demolition work on portions of buildings containing asbestos.

PTC5.11 *The commentor requests information regarding the potential for lead paint in the buildings proposed for demolition.* As described on pages 3.12-36 through 3.12-37 of the Draft EIR, the SUMC Project would require demolition of about 1.2 million square feet of existing buildings, some of which date back to 1953. Because it was common building practice to use materials containing lead, as well as Polychlorinated Biphenyl (PCBs) and mercury in structures built prior to 1981, demolition of the existing buildings (which were built prior to 1981) could disturb these hazardous building materials causing a potential adverse health or safety effects to construction workers, the public, and/or the environment.

As noted under Impact HM-2 on page 3.12-36 of the Draft EIR, if hazardous materials were found upon construction inspection at levels that require special handling (i.e., any building material containing 0.1 percent asbestos, paint that contains more than 5,000 parts per million of lead, or any building materials known or suspected to contain any amount of PCBs or mercury), then the SUMC Project sponsors must manage these materials as required by law and according to federal and State regulations and guidelines, including those of the Department of Toxic Substance Control (DTSC), Bay Area Air Quality

[8] California Code of Regulations, Title 8, Section 5208.

Management District (BAAQMD), OSHA, Santa Clara County Office of Emergency Services (OES), and any other agency with jurisdiction over these hazardous materials.

Additionally, in sufficient concentrations, lead, as well as mercury and PCBs, are regulated as hazardous wastes. Lead, PCBs, and mercury are regulated under the federal Toxic Substances Control Act of 1976, and OSHA standards establish a maximum safe exposure level for types of construction work where lead exposure may occur. Adherence to applicable health and safety requirements for these substances would ensure that potential exposure impacts from lead, as well as PCBs, and/or mercury would be less than significant, as described on page 3.12-37 of the Draft EIR.

PTC5.12 *The commentor requests more information regarding additional steps that would take place in the event that contaminated soils are encountered during construction*. As described on page 3.12-41, Mitigation Measure HM-3.3 requires several corrective actions in the case that contaminated media is encountered during construction activities. These actions include removal of all buried underground storage tanks from the property, conducting soils sampling to determine the health risks and develop disposal criteria and, if warranted, developing a Site Health and Safety Plan to ensure worker safety in compliance with OSHA.

Please see Response 2.2 in Section 4, Written Comments and Responses, of this document for additional information regarding soils contamination and mitigation.

PTC5.13 *The commentor asks whether the Draft EIR includes a figure showing the truck routes during construction of the SUMC Project*. The applicable designated truck routes in the City of Palo Alto are depicted in Figure 3.4-6 on page 3.4-41 of the Draft EIR. In addition, the designated truck routes in the City of Menlo Park are shown in Figure 3.4-7 on page 3.4-42 of the Draft EIR.

The commentor also requests a legible helicopter flight path figure. As explained on page 2-49 of the Draft EIR, Project Description, the future helicopter approach and departure paths would generally remain the same as the current paths, although the SUMC Project sponsors anticipate that heliport operations would increase by 28 percent at full occupancy of the SUMC Project. Figures 3.7-3 and 3.7-5 on pages 3.7-14 and 3.7-29 of the Draft EIR, respectively, depict the existing and future sound contours regarding helicopter noise. A comparison of Figures 3.7-3 and 3.7-5 shows that the exposure of the surrounding area to maximum helicopter noise at or above 85 dBA SEL would stay approximately the same as existing conditions because the approach/departure paths of the helicopters would not change substantially with the SUMC Project.

Although Figures 3.7-3 and 3.7-5 do not show the helicopter flight path, this path can be reliably inferred from the shape of the noise contours. The flight path is the median line that symmetrically divides the central (purple) band defining the area exposed to 85 dB

SEL during helicopter approach or departure. The departure path is to the northeast from the heliport, with the helicopters staying south of Sand Hill Road and over Stanford University property. The approach path to the heliport is from the southwest. According to SUMC Project sponsors, flight paths do not, and in the future would not, overfly residential areas north of Sand Hill Road.

PTC5.14 *The commentor asks if the Draft EIR includes a figure that illustrates the helicopter flight path.* Please refer to Response PTC5.13, above, for a description of the helicopter flight path and the associated figures in the Draft EIR.

PTC5.15 *The commentor notes that the Draft EIR identifies shuttle buses as a mitigation to reduce motor vehicle trips from the SUMC Project, such as those described under Mitigation Measure TR-2.3 starting on page 3.4-67. The commentor also suggests additional mitigation be considered to mitigate potential noise impacts from the additional shuttle buses that would be considered under that mitigation measure.* SUMC Project-related traffic was evaluated in the Draft EIR. The analysis assumes that there would be a mix of new vehicles associated with the SUMC Project, such as delivery trucks and shuttle buses, similar to the existing conditions along the roadways. Except for ambulance noise impacts at residential units along the new Sand Hill Road ambulance route, the Draft EIR does not identify any cases where significant operational motor vehicle noise impacts are expected. As shown in Table 3.7-11, noise increments from SUMC Project traffic along all of the major site access routes, as estimated by application of the Federal Highway Administration (FHWA's) Traffic Noise Model (TNM) model, would be no larger than 0.3 dBA, far short of the City's 3 dBA significance criterion. Other sources of SUMC Project-related transportation-source noise, specifically medical helicopters and delivery truck loading activity, are considered in Impact NO-3, on page 3.7-26 of the Draft EIR, and Impact NO-4, on page 3.7-36 of the Draft EIR, respectively; these impacts were found to be less than significant. According to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for impacts that are not found to be significant. Therefore, since less-than-significant traffic noise impacts would occur under the SUMC Project, mitigation measures are not required under CEQA.

PTC5.16 *The commentor asks that provision be made for monitoring of noise levels during SUMC construction.* The Draft EIR did not require noise monitoring as part of the construction noise mitigation measures because the noise generated during construction would only have the potential to exceed the City standard (i.e., 10 dBA above ambient) at on-site locations during the 12-year construction schedule. Since the likely affected receptors would be SUMC Project patients and since the construction contractors would be working under the authority of the SUMC Project sponsors, solutions to these conflicts could likely be worked out internally. In contrast, there would be a low potential to exceed City standards at off-site sensitive receptors. Should this happen occasionally, Mitigation Measure NO-1.1g, on page 3.7-24 of the Draft EIR, requires there be a noise disturbance coordinator designated

for the construction period. Therefore, there would be a channel for complaints and their resolution should complaints arise during the construction period.

In addition, under the Tree Preservation Alternative, where construction activities could include pile driving, there could be additional impacts to off-site sensitive receptors. Under this alternative, additional mitigation measures to reduce pile driving noise are proposed.

PTC5.17 *The commentor expresses concern that the list of cumulative construction projects considered in the Draft EIR was not inclusive of all known projects that might produce construction noise.* On page 3.7-38, the Draft EIR identifies the residential use at 1100 Welch Road as the use that would most likely be affected by construction noise from the SUMC Project and from other projects constructed simultaneously under the Stanford University 2000 Community Plan and General Use Permit (CP/GUP), resulting in a significant cumulative noise impact. In addition, construction at 777 Welch Road could also contribute to a significant cumulative noise impact. In general, significant cumulative noise impacts should be expected at any other locations where two or more projects are under construction simultaneously in close proximity to noise-sensitive uses. The Draft EIR includes a list in Section 3.1 of the projects that could be constructed concurrently with SUMC Project construction, as presented on pages 3.1-4 through 3.1-5.

PTC5.18 *The commentor expresses a similar concern about the Draft EIR's failure to be specific about where significant cumulative vibration impacts could occur.* In the case of vibration, unless simultaneous construction activity would occur on multiple sites within a hundred feet of a vibration-sensitive receptor, there would be little potential for cumulative vibration impacts. In contrast, for noise the radius of concern would be several hundred feet or greater. Please see Response PTC5.17, above, for additional information about construction projects in the vicinity of the SUMC Sites.

PTC5.19 *The commentor expresses concern that the Draft EIR did not offer any mitigation for the identified ambulance noise impact along Sand Hill Road.* Table 3.2-2 on page 3.2-25 compares the SUMC Project to Comprehensive Plan policies and includes Policy N-36, which encourages the location of land uses in areas with compatible noise environments. The SUMC Project would emit significant and unavoidable ambulance noise on residential uses off a portion of Sand Hill Road. However, as noted in Table 3.2-2, ambulance noise is not considered to be incompatible in residential or other developed areas. In this case, the Comprehensive Plan threshold was exceeded only because this portion of Sand Hill Road would be a new ambulance route after the new hospital is built. Moreover, the ambulance noise would be sporadic and would not justify the installation of additional acoustic insulation. Policy N-39 does not prohibit location of land uses with incompatible noise sources; rather, it calls for encouraging location of land uses in areas with compatible

noise environments. As such, the SUMC Project would not conflict with the Comprehensive Plan with regards to ambulance noise in residential areas.

As stated on page 3.7-33 of the Draft EIR, no feasible mitigation measures would prevent or reduce the identified SUMC Project-related ambulance noise impact at the residential uses along Sand Hill Road. One way to reduce ambulance noise would be to forbid ambulance access to the new emergency room via Durand Way. However, this would be practically impossible given the emergency nature of ambulance activity. Another way would be to erect a sound wall between Sand Hill Road and the residences located along Sand Hill Road. But this would be unsightly and could result in a new environmental impact. As such, no mitigation measures are feasible, resulting in a significant and unavoidable noise impact.

The commentors also express an interest in a timeline for noise sources on when and where they would occur throughout the 12-year construction period. Project-specific construction details such as these are not available at this time.

PTC5.20 *The commentor requests an explanation of the difference between the noise limits of the Comprehensive Plan versus the Municipal Code.* The Natural Environment Element of the Comprehensive Plan contains noise-related policies, programs, and guidelines to address the City's desire to locate new land uses and development projects in areas with compatible noise levels, minimize the noise created by new development and its impacts on existing land uses, and minimize disturbances within the City due to excessive noise. In particular, noise impacts associated with new development include both short-term construction impacts and long-term operational impacts, including traffic. Policies in the Natural Environment Element of the Comprehensive Plan address both of these sources. Construction activities are regulated to minimize disturbances to surrounding uses. Long-term impacts are reduced through a number of measures, including design and construction methods that reflect or absorb sound, landscaping and barriers, and site planning to reduce noise exposure.

The Noise Ordinance defines standards to address the amount of noise, duration of noise, and source of sounds other than ambient noise that affect the community. A noise ordinance defines which sounds are and are not acceptable at certain times so that residents can live comfortably within a community in terms of the audible sounds. The Noise Ordinance is primarily enforced by police patrol officers. Common residential noise sources include music, parties, barking dogs, and power equipment such as leaf blowers, lawn mowers, and swimming pool pumps. The controls in the Noise Ordinance apply to each of these disturbances. Common commercial and industrial noise sources include pumps and air compressors, air conditioners, and construction equipment. Most noise complaints about industry are made by residents of nearby areas when machinery is run

during the evenings. These problems can usually be reduced by restricting operating hours or making engineering modifications.

PTC5.21 *The commentor asks for clarification of the Draft EIR findings on helicopter and ambulance noise impacts.* With regard to mitigations for helicopter noise impacts at 1100 Welch Road, helicopter noise was considered as part of the analysis for Impact NO-3 on pages 3.7-26 through 3.7-30 of the Draft EIR. The Draft EIR concludes that helicopter noise impacts to the sensitive receptors would be less than significant and, therefore, the installation of additional noise control features for nearby residents would not be required.

With regard to ambulance noise impacts, the commentor asks for clarification of where the existing ambulance routes are and where they would be directed with completion of the SUMC Project. Figure 3.7-6 (page 3.7-31 of the Draft EIR) and Figure 3.7-7 (page 3.7-32 of the Draft EIR) show the existing and future ambulance routes. The commentor also notes that additional mitigation for ambulance noise relating to restrictions on siren use based on time of day and patient condition, and on recommendations to resume the old ambulance route on Quarry Road could apply under certain conditions. These mitigation measures were not added to the Draft EIR because use of sirens is a safety measure. Ambulance operations already follow protocols for siren use based upon patient needs and safety concerns. Ambulance routes similarly are chosen to transport patients in need of emergency treatment as quickly and efficiently as possible. Choice of route should be left to the discretion of ambulance drivers based on their knowledge of traffic conditions, delays, and timing.

PTC5.22 *The commentor requests that additional mitigations be added to the Draft EIR to further reduce the noise impacts of construction trucks.* The Draft EIR does not identify any significant noise impacts caused by construction truck traffic. Under the Comprehensive Plan noise policies, project construction would have to contribute an additional traffic volume comparable to the existing baseline volume before the noise increment would approach the 3-5 dBA standard. Consequently, no significant contribution from construction trucks to the baseline traffic noise levels along the access routes are expected.

According to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for impacts that are not found to be significant. Therefore, since less-than-significant traffic noise impacts would occur during the construction and operational phases under the SUMC Project, mitigation measures are not required under CEQA.

PTC5.23 *The commentor requests information regarding the flight path of the helicopters under the SUMC Project.* Please refer to Response PTC5.14, above, for an explanation of the existing and future helicopter flight paths.

The commentor also states that a helicopter at a ground-level helicopter pad is louder than a helicopter at a rooftop helicopter pad. As described on page 2-39 of the Draft EIR, the

existing heliport that serves both hospitals at the roof of the Hospital Modernization Project (HMP) building would continue to operate as a secondary heliport under the SUMC Project. A new, additional heliport would be located about 700 feet to the northwest of the existing heliport, at a height of up to 130 feet on the roof of the new SHC Hospital building. Therefore, no heliports under the SUMC Project would be located at ground-level.

PTC5.24 *The commentor suggests consideration of improvements to the Searsville dam as an additional public benefit of the SUMC Project, which would also reduce potential risk of dam failure inundation.* Typical dam failure inundation studies are conducted assuming the dam fails to the base. The Draft EIR on page 3.11-8, notes that the Searsville dam design has withstood two major earthquakes (1906 and 1989) because the structure allows dissipation of seismic shocks. As identified in the same paragraph, the Searsville dam is regularly inspected by the State of California and Stanford University. Thus, the overall risk of dam failure for the Searsville dam failing to its base is remote and is considered an existing condition.

As identified in the Draft EIR on page 3.11-48, under Impact HW-8, even though the risk of dam failure is an existing condition, the SUMC Project would increase the number of people exposed to this risk. However, the analysis further notes that the City of Palo Alto Emergency Plan and emergency preparedness would reduce the potential for risks to people. As such, because potential risks are remote and emergency plans would inform and protect people, impacts associated with dam failure inundation remain less than significant. According to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for impacts that are not found to be significant. Therefore, since less-than-significant dam failure impacts would occur under the SUMC Project, mitigation measures are not warranted required under CEQA.

PTC5.25 *The commentor questions the proposed moat around the SHC Hospital building in order to absorb shocks from earthquakes.* Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues. The following is a description of the shock absorbers. The lateral system of the proposed SHC Hospital building would consist of steel movement resisting frames, with a base isolation system located below the basement level. The base isolators would be supported by reinforced concrete pedestals, located in a crawl space below the basement floor. In addition, there would be a moat surrounding the entire foundation. The width of the moat would be sized such that it is slightly larger than the base isolation system's maximum possible displacement capacity. The top of the foundation slab would be 25 feet above the measured water table; therefore water infiltration and seismic transmission is not a concern. An under-slab drainage system

would be designed into the foundation slab that would prevent groundwater from infiltrating the concrete foundation.[9]

PTC5.26 *The commentor requests to know how citizens of neighboring jurisdictions would access the SUMC Sites in the event that a natural disaster would impede the emergency access routes.* Jurisdictions in the vicinity of the SUMC Project have emergency evacuation and access plans already in place. Although the SUMC Project would increase operations at the SUMC Sites, the SUMC Project would not impair existing emergency plans of neighboring cities during an earthquake.

PTC5.27 *This commentor requests clarification of how construction of underground structures more than 40 feet below ground surface would be mitigated assuming that groundwater was 30 feet below ground surface. This comment further asks whether or not the Draft EIR analysis takes into account potential effects from the High Speed Train (HST) deep cut-and-cover tunnels that may affect groundwater and sea level rise effects on groundwater levels.*

The depth to groundwater at the SUMC Site is more than 30 feet below ground surface, as presented in the Draft EIR on page 3.11-18. Because fluctuations in groundwater levels can occur, the design groundwater depth is recommended to be 30 feet below ground surface. The Draft EIR on page 3.11-33 notes that groundwater dewatering may be required in order to construct deep facilities and discusses the existing regulatory requirements to ensure that any groundwater dewatering would not have substantial effects. As noted in the Draft EIR on page 3.11-34, last partial paragraph continuing to the top of page 3.11-35, underground structures would require flood-proofing where they extend below the design groundwater depth of 30 feet below ground surface or measured groundwater depths. Flood-proofing practices would prevent underground structures from groundwater-induced flooding. Please see Response PTC 5.35, below, for an explanation why SUMC Project facilities would not impede groundwater flow.

As noted in the Draft EIR on page 3.11-49, the HST project is included in the cumulative impacts analysis. However, potential effects on groundwater flows and the water table associated with development of the HST project were not addressed in this Draft EIR. At the time of this Draft EIR preparation, the HST project configurations and selected alternative had not been identified and impact analysis regarding potential groundwater table effects would be speculative. However, portions of the HST track areas could be in deep cut-and-cover tunnels or open trenches that could affect local groundwater flow and groundwater gradients in certain areas, depending upon the selected alternative. Deep open trenches would more likely impede groundwater flow because groundwater would not be able to flow both over and under the long structures. If the HST would result in substantial effects on groundwater flow and groundwater gradients, mitigation measures would be required in the environmental document for the HST to mitigate any potential effects.

[9] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

Effects from the HST project would not combine with effects from the SUMC Project because the SUMC Project would not impede groundwater flow.

Potential effects of sea level rise are addressed in the Draft EIR on page 3.6-12; however, the Draft EIR does not provide an analysis of potential effects of sea level rise on groundwater levels. The Bay Conservation and Development Commission (BCDC) has predicted that sea level rise could be 16 inches by 2050 and 55 inches by 2100.[10] There are currently no construction codes that would take into account potential sea-level rise effects on groundwater levels. Potential groundwater effects associated with sea level rise would depend on both the magnitude and timing of the sea level rise, as well as geohydrologic characteristics. An increase in sea level could have a similar, greater, or lesser effect on shallow groundwater levels at the SUMC Sites, depending on how quickly groundwater flows through the shallow groundwater system, the amount of water storage capacity in the underlying materials, the percolation rate through aquifer layers, and whether or not other factors serve to lower groundwater levels (e.g., pumping) or raise groundwater levels (e.g., recharge). Because the magnitude and timing of sea level rise and other factors that would affect groundwater levels are unknown, potential effects of sea level rise on groundwater levels are speculative. However, it can be expected that groundwater levels would remain at least 25 feet below ground surface (five feet shallower groundwater than existing conditions design groundwater level). The SUMC Project features that could be affected by higher groundwater levels induced by sea level rise would include parking structures, and effects on parking structures would not be substantial. Furthermore, sea level rise effects would not be an episodic event; if substantial sea level rise were to occur that could affect SUMC Project features, remedial actions could be implemented (e.g., extended flood-proofing) when and if groundwater level effects are identified.

PTC5.28 *The commentor raises the issue of long-term electricity service to the SUMC Project if the City of Palo Alto cannot provide power in the event of flooding or earthquakes identified in comment PTC5.3.* In response to this comment, please refer to Response PTC5.3, above.

PTC5.29 *The commentor addresses the potential dam failure inundation issues of comment PTC5.24.* In response to this comment, please refer to Response PTC5.24, above. The potential impacts associated with dam failure inundation are addressed in Impact HY-8 on page 3.11-48 of the Draft EIR.

PTC5.30 *The commentor asks what impacts, especially during construction, would occur on evacuation routes under the SUMC Project.* The impact on emergency plans is discussed in the Hazardous Materials Section of the Draft EIR. As explained on pages 3.12-48 through 3.12-50 of the Draft EIR, under Impact HM-10, the SUMC Project would have a significant impact on emergency access routes due to truck traffic during construction and

[10] Bay Conservation and Development Commission, "Living with a Rising Bay: Vulnerability and Adaptation in San Francisco Bay and on the Shoreline," April 7, 2009.

degradation of the level of service (LOS) at several intersections during operation. Mitigation Measure HM-10.1 would require advanced coordination with the City of Palo Alto on construction routes. This measure, together with Mitigation Measures TR-1.1, TR-1.4 through TR-1.6, and TR-1.8, presented in Section 3.4, Transportation, would reduce the significant impacts to a less-than-significant level. In addition, Mitigation Measure TR-9.1, also presented in Section 3.4, would involve the installation of emergency vehicle traffic signal priority (OptiCom) at all intersections significantly impacted by the operations of the SUMC Project. Therefore, implementation of these measures would reduce the SUMC Project's impact on emergency evacuation and response plans to less than significant.

PTC5.31 *The commentor requests public disclosure if potentially contaminated areas are identified. The commentor further suggests that a website or other mechanism be used to inform the public regarding findings of the various excavations.* The Santa Clara County Department of Environmental Health (DEH) manages the Local Oversight Program. Contaminated site investigation and cleanup documents are posted for public review and use at: http://lustop.sccgov.org/. The DTSC or San Francisco Regional Water Quality Control Board (RWQCB) have lead clean-up oversight and the City of Palo Alto Fire Department (PAFD) has local agency oversight of hazardous materials contaminated sites and their remediation. Contaminated site investigation and clean up documents prepared under the oversight of the RWQCB and DTSC are posted for public review and use at: http://geotracker. swrcb.ca.gov and at: http://www.envirostor.dtsc.ca.gov/public, respectively.

PTC5.32 *The commentor requests clarification regarding the amount of impervious surface area and suggests a contradiction in listed amounts on page 3.11-34 and 3.11-40 of the Draft EIR.* The value listed on page 3.11-34 of the Draft EIR is the amount of new *impervious land* surfaces and the values listed on page 3.11-40 of the Draft EIR is the total amount of *pervious* surfaces. This can be confusing to the reader. On page 3.11-34 of the Draft EIR, the impact discussion regards groundwater recharge. Therefore, any surface that would impede groundwater recharge is considered, including green roofs (percolating water would be retained in the green roofs and not available for groundwater recharge). As presented in footnote 101 on page 3.11-34 of the Draft EIR, "'Land surface' refers to the footprint area of structures and landscaping. While green roofs would be considered a pervious surface for runoff reduction, green roofs would not be available for groundwater recharge as would pervious land surfaces."

On page 3.11-40 of the Draft EIR, the impacts analysis discusses potential effects on stormwater runoff. As such, the pervious green roofs, which could infiltrate and store some runoff, is a relevant portion of the overall site pervious surfaces. Overall, the amount of new pervious surfaces that could infiltrate runoff water would increase by about seven percent (as noted on page 3.11-41). Although the text on page 3.11-40 of the Draft

EIR does not state that there would be an increase or decrease in impervious or pervious area, the text can lead to some confusion. As such, the following text has been added as the third sentence of the first paragraph on page 3.11-34 of the Draft EIR in order to clarify the differences and applicability of numbers presented.

> *Groundwater Recharge*. During construction, the balance between pervious and impervious land surfaces[101] would repeatedly change. Consequently, there is a potential for a temporary increase in impervious land surfaces and therefore, temporary reduction in groundwater recharge. Impervious land surfaces, including green roof areas, would prevent the downward percolation of rainfall and groundwater recharge.

Page 3.11-40, last partial paragraph, and continuing on to page 3.11-41, first partial paragraph of the Draft EIR:

> The SUMC Site surface is currently about 27 percent pervious land surfaces (refer footnote 101 on page 3.11-34) with about 3 percent of green roofs for a total of 70 percent impervious surfaces that could contribute to stormwater runoff. Both pervious land surfaces and other pervious surfaces, such as green roofs, would allow for percolation and storage of rainfall and reduce runoff by effectively reducing the amount of impervious surfaces that could contribute to stormwater runoff. Implementation of the SUMC Project would replace existing buildings and surface parking lots with new buildings, underground parking, and a new parking structure, and ultimately ~~create~~ result in about 26 percent pervious land surfaces and about 11 percent of green roofs for a total of 63 percent impervious surfaces that could contribute to stormwater runoff.[106] Green roofs can detain 60 to 100 percent of precipitation, depending upon the substrate and size of storm event.[107] The ~~increased~~ reduced amount of impervious surfaces that could contribute to stormwater runoff (~~land surface plus green roof area; a~~ (7 percent total ~~increase~~ reduction in effective impervious surfaces) would reduce the amount of stormwater runoff from the SUMC Project compared to existing conditions. Because there would be no net-increase in directly-connected impervious surfaces and the SUMC Sites are within an area designated as exempt from HM controls on the County HM map, the SUMC Project would be exempt from the HM stormwater controls requirements; a no-net-increase-indirectly-connected-impervious-area condition is considered to be sufficient to determine that there would be no increase in runoff rates, volume, or flow duration (maintenance of the preexisting hydrograph) for the small (less than two-year) to medium (10-year) storm events. Because the pre-development hydrograph would be maintained, post-construction conditions under the SUMC Project would not substantially increase off-site bed or bank erosion or sedimentation in San Francisquito Creek.

PTC5.33 *The commentor expresses confusion regarding the mention of final grading plans during a discussion of operational impacts*. The final grading and drainage plan requirements are discussed under the operational impacts analysis to demonstrate that prior to construction,

the adequacy of planned on-site permanent drainage must be demonstrated. By demonstrating the adequacy of the planned permanent drainage system, the operational effects would be minimized once the development is completed and in operation. The potential for increased runoff from the SUMC Sites to off-site areas is addressed under Impact HY-4 starting on page 3.11-40 and continuing to page 3.11-41 of the Draft EIR.

PTC5.34 *The commentor suggests that because some excavations could intrude upon the local shallow groundwater table construction dewatering during a severe rain event needs to be considered and notes that the City of Palo Alto has rules for when dewatering can be performed.* The City of Palo Alto Public Works Department requirements for groundwater dewatering are specified on page 3.11-33 of the Draft EIR, including limitations on groundwater dewatering during the wet-weather season (November through March) and the requirement of a dewatering plan and Street Work Permit. As noted on pages 3.11-41 through 3.11-42 of the Draft EIR, existing regulations would ensure that dewatering did not contribute to conveyance capacity constraints in off-site storm drain systems and impacts remain less than significant.

PTC5.35 *The commentor requests a map or figure identifying the areas of deep excavation and where SUMC Project features would intersect groundwater levels in order to indicate where underground water streaming down from the hills is effectively blocked.* This comment suggests that the significant size of the SUMC Project may affect groundwater movement around the SUMC Sites and affect downstream areas. Although the overall SUMC Sites are large, Figure 2-9 on page 2-33 of the Draft EIR shows the location and footprint of underground parking structures (SHC Parking Structure, Clinic structure, and LPCH structure). From this figure, it is evident that underground parking structures would not create a substantial impediment to groundwater flow. As noted in the Draft EIR on page 3.11-13, the direction of groundwater flow is generally from inland towards the San Francisco Bay. Additionally, these underground structures would only extend, at most, 10 to 15 feet into the shallow groundwater table. As such, these isolated underground structures would not present a large transverse barrier to groundwater flow (across the direction of groundwater flow) and groundwater would continue to be able to flow around and under these structures

PTC5.36 *The commentor asks if the Life Flight emergency helicopter service could continue to serve the SUMC Project with patient or organ transport if the Palo Alto Airport were disabled due to flooding.* As responded to during the hearing by the SUMC Project sponsors, patients and organs are not transported through the Palo Alto Airport. The primary refueling station for the Life Flight helicopters are at the Palo Alto Airport; however, if the airport is disabled and refueling cannot occur, the Life Flight helicopter can refuel at other airports throughout the Bay Area. Use of the Palo Alto Airport is an existing condition and not a new feature proposed under the SUMC Project. The flooding potential of the airport

is also an existing condition. Accordingly, the Draft EIR does not address potential effects related to the facility nor provide mitigation to improve the existing conditions.

PTC5.37 *The commentor notes that if dewatering is required, a mitigation plan may be required and on-site recharge of dewatering water could be feasible, if conditions allow.* Please refer to Master Response 10 for a discussion of non-CEQA issues. Dewatering water could not be returned to groundwater by discharge to the land surface or to groundwater wells, as suggested by the commentor, without receiving approval/permits from the San Francisco RWQCB.

PTC5.38 *The commentor notes that SUMC Project features such as the green roof, rainwater harvesting, and chiller condensation would be preferable water conservation practices and questions if these were accounted for in the Draft EIR.* The exact features that would be used in the SUMC Project is currently unknown because of the need for OSHPD approval. While the use of green roofs is certain, the use of a condensate system is less so. SUMC Project features such as green roofs, rainwater harvesting, and chiller condensation are not included in the utilities analysis in Section 3.15 of the Draft EIR in order to reflect conservative estimates. As such, since the Draft EIR analyzes a conservative scenario.

In addition, the hydrology analysis in Section 3.11 of the Draft EIR pertains to natural water systems rather than water generated and/or used by the SUMC Project and therefore, water conservation systems were not analyzed in that section. Rainwater harvesting could reduce runoff; however, even without rainwater harvesting, impacts were found to be less than significant, as stated in the Draft EIR on pages 3.11-41 through 3.11-42. However, the use of green roofs was identified and assessed in terms of potential effects on hydrology and water quality. As described on pages 3.11-46 and 3.11-48 of the Draft EIR, site design measures have been incorporated into the SUMC Project that would reduce the overall amount of impervious surfaces by about 7 percent and increase the amount of green roofs by about 6 acres (8 percent of the SUMC Sites), which would reduce the amount of runoff, and hence, stormwater pollution potential. Therefore, SUMC Project characteristics and existing regulatory requirements would ensure that impacts of the SUMC Project on stormwater degradation of surface water quality would be less than significant.

In addition, rainwater harvesting and green roofs are discussed in the Draft EIR in Section 3.6, Climate Change. As explained on page 3.6-41 through 3.6-42 of the Draft EIR, the SUMC Project sponsors propose to invest in a number of green building design features that would increase the efficiency of energy and water use when compared to the use of these resources by existing structures.

The buildings would have a minimally engineered green roof section designed to minimize heat island effects and reduce ambient temperatures near mechanical intakes. This system would minimize roof water runoff and provide insulation for the building, thus reducing

energy consumption required to heat and cool the building. While energy reduction is quantified in the Climate Change section, carbon sequestration from green roofs is not included in the climate change analysis of the Draft EIR, Section 3.6. Carbon offsets with respect to vegetation in general, and specifically with respect to green roofs, is speculative at best. Vegetation planted in a natural area that does not require the addition of water and/or fertilizer to maintain the plant growth would sequester CO_2 and result in a net decrease in emissions. However, the amount of CO_2 sequestered by planting vegetation is minimal and is highly dependent on the type and age of the vegetation selected. In the case of a green roof, the emissions of CO_2 sequestered by the vegetation are often expended in energy required to treat and pump the water used and the generation of methane from fertilizer.

Condensation from coolers, as mentioned by the commentor, is not discussed in the Draft EIR. During the design development phase for the SUMC Project, which is currently undergoing review, the design teams for both hospitals have been studying the potential for capturing condensation from the rooftop air handler units and recycling it for irrigation purposes. However, this system is still being analyzed, as it requires an entirely separate plumbing system to distribute the water from the rooftop to other landscape areas throughout the buildings.[11] As such, the Draft EIR does not include condensation from coolers in the utilities calculations. Since condensation from coolers would slightly decrease SUMC Project water use, the analysis in the Utilities Section, Section 3.15 of the Draft EIR, represents a conservative estimate.

PTC5.39 *The commentor asks if the SUMC Project would apply permeable pavers, which are solid ground surfaces that allow water infiltration.* The conservation features included in the SUMC Project include use of permeable concrete pavers. Please see Draft EIR, page 3.6-40, last bullet in Table 3.6-5.

PTC5.40 *The commentor requests further information regarding additional schools located within one-quarter of a mile of the proposed SUMC and Hoover Pavilion site and the impacts of the SUMC Project on the LPCH school, the Arboretum Children's Center, and Stanford University.* The Draft EIR, on page 3.12-47, describes the LPCH school and states that the LPCH includes an on-site school within the facility and acknowledges that this facility is an existing school within one-quarter mile of the SUMC Sites.

The Stanford Arboretum Children's Center is a childcare center located on 215 Quarry Road at the Hoover Pavilion Site. It is open to Stanford affiliates only, which includes faculty, students, and staff of Stanford University, Stanford Hospital and Clinics, Lucile Packard Children's Hospital, and the SLAC National Accelerator Laboratory. The Stanford Arboretum Children's Center would continue to operate after the SUMC Project is constructed.

[11] Stanford University Medical Center, correspondence with PBS&J, November 1, 2010.

Stanford University is located immediately adjacent to the Main SUMC Site. However, because Stanford University is a college campus, it would not be considered a sensitive receptor in relation to exposure of a school to hazardous materials, which generally addresses exposure of K-12 schools and daycare centers.

The text under Impact Statement HM-5, starting on pages 3.12-46 to 3.12-47 of the Draft EIR, is revised as follows:

> The SUMC Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. ~~No existing K-12 schools are located within one-quarter mile of the SUMC Sites.~~ Two school facilities, including a child care center, are located within one-quarter mile of the SUMC Sites: the LPCH school, located within in the LPCH, and the Stanford Arboretum Children's Center, located on 215 Quarry Road at the Hoover Pavilion Site. The closest off-site schools to the SUMC Sites are Palo Alto High School, approximately 0.7 mile east of the SUMC Sites, and Addison Elementary School, approximately 1.2 miles northeast. The nearest private schools are Castilleja School, 1.1 miles northeast, and Montessori School, approximately 1.0 mile northeast.
>
> ~~The LPCH includes an on-site school within the facility. This is an existing school within one-quarter mile of the SUMC Sites.~~ As discussed above, implementation of the SUMC Project would increase the amount of hazardous materials used on the SUMC Sites and hazardous waste generated at the SUMC Sites. Regulations and operational practices that minimize hazard risks to this existing facility would continue to ensure that associated risks are not substantially increased. As such, impacts associated with ~~a~~ school facilities within one-quarter mile of the SUMC Sites would be less than significant.

PTC5.41 *The commentor questions the pronunciation of Cortese.* As noted by the commentor, it is pronounced the same way that Santa Clara County Supervisor Dave Cortese pronounces his name.

PTC5.42 *The commentor would like further information regarding the potential for asbestos exposure during the demolition and construction phase of the SUMC Project.* On page 3.12-36, the Draft EIR acknowledges that it was building practice to use materials containing asbestos in structures built prior to 1981, and that demolition and construction activities could disturb these hazardous buildings materials, which could cause adverse health or safety effects to construction workers, the public, and/or the environment.

However, as described on the second paragraph of page 3.12-36 of the Draft EIR, if hazardous materials were found upon inspection at levels that require special handling (i.e., any building material containing 0.1 percent asbestos, paint that contains more than 5,000 parts per million of lead, or any building materials known or suspected to contain any amount of PCBs or mercury), the SUMC Project sponsors must manage these materials as

required by law and according to federal and State regulations and guidelines, including those of DTSC, BAAQMD, Cal/OSHA, Santa Clara County OES, and any other agency with jurisdiction over these hazardous materials. In addition, BAAQMD's Regulation 11 – Hazardous Pollutants, Rule 2 – Asbestos Demolition, Renovation, and Manufacturing establishes an allowable asbestos emissions threshold from asbestos-related demolition or construction activities, and specifies precautions and safe work practices to be followed in order to minimize the potential release of asbestos fibers. Please see Responses PTC5.10 and PTC5.11, above, for further information.

As noted in Response PTC5.10, above, Mitigation Measure HM-2.1 calls for conducting an asbestos survey on all areas of the building anticipated to be demolished and/or renovated. This survey would be performed by a licensed asbestos abatement contractor. In addition, Mitigation Measure HM-2.1 states that in the event that asbestos is identified in the buildings proposed to be demolished and/or renovated, all asbestos containing materials would be removed and appropriately disposed of by a licensed asbestos abatement contractor. A site health and safety plan, to ensure worker safety, in compliance with OSHA requirements (8 CCR 5208) would be developed by the SUMC Project sponsors and in place prior to commencing renovation or demolition work on portions of buildings containing asbestos.

PTC5.43 *The commentor requests public disclosure if potentially contaminated areas are identified.* As noted in Response PTC5.31, the commentor further suggests that a website or other mechanism be used to inform the public regarding findings of the various excavations and findings of the soil sampling. It should also be noted that the Santa Clara County Department of Environmental Health (DEH) manages the Local Oversight Program. Contaminated site investigation and cleanup documents are posted for public review and use at: http://lustop.sccgov.org/. In addition, the California DTSC or San Francisco RWQCB have lead clean-up oversight and the PAFD has local agency oversight of hazardous materials contaminated sites and their remediation. Contaminated site investigation and clean up documents are posted for public review and use at: http://geotracker.swrcb.ca.gov and at: http://www.envirostor. dtsc.ca.gov/public.

PTC5.44 *The commentor requests more information on the toxic gas facility depicted on the Comprehensive Plan Map N-9 Hazardous Materials Facilities.* The toxic gas facility depicted on the Comprehensive Plan Map N-9 Hazardous Materials Facilities refers to the laboratory facilities located at Stanford University. Research laboratories on campus use hazardous materials, including toxic gases, for research, development, and other laboratory practices. Refer to the Toxic Gas Ordinance Data Table[12] for a sample of toxic gases used at Stanford University campus.

[12] Stanford University. Stanford TGO Data Table. May 23, 2008. Access October 20, 2010. http://www.stanford.edu/dept/EHS/prod/researchlab/lab/tgo/tgodata.html.

All toxic gases within Santa Clara County, including at Stanford University, are governed by Santa Clara County's Toxic Gas Ordinance (TGO). In September 1990, Santa Clara County adopted the TGO to prevent, control and respond to potentially dangerous conditions related to toxic gases and to protect the public from acute exposure due to accidental releases of toxic gases.[13] The TGO governs the storage, use and manufacturing of regulated materials in greater than specified threshold quantities. In addition, it contains specific provisions mandating engineering controls, protective equipment, storage requirements, emergency response plans, warning systems and employee training based on the type and quantity of toxic gas used. The Santa Clara County TGO ordinance sets forth general controls measures and reporting procedures in the event of an accidental release or leak. Santa Clara County TGO can be viewed at: http://www.sccgov.org/scc_ordinance/31114000.HTM.

PTC5.45 *The commentor requests more information about additional schools and childcare centers located near the SUMC Sites*. As noted in Response PTC5.40, above, the LPCH school is located within the LPCH, the Stanford Arboretum Children's Center is located on 215 Quarry Road at the Hoover Pavilion Site, and Stanford University is located immediately west of the SUMC Project Site. Additionally, Escondido Elementary School is located approximately 1.2 miles southwest of the SUMC Sites. The nearest offsite childcare center is Children's Creative Learning Center located within the Stanford West Apartment complex, approximately 0.3 miles north of the SUMC Sites (north of Sand Hill Road).

As discussed on page 3.12-47 of the Draft EIR, implementation of the SUMC Project would increase the amount of hazardous materials used on the SUMC Sites and hazardous waste generated at the SUMC Sites. Regulations and operational practices that minimize hazard risks to this existing facility would continue to ensure that associated risks are not substantially increased. As such, impacts to all schools within one-quarter mile of the SUMC Sites, including the LPCH school and the Stanford Arboretum Children's Center, would be less than significant.

PTC5.46 *The commentor is concerned about the transportation of construction and hazardous materials associated with the SUMC Project*. As discussed on page 3.4-40 of the Draft EIR, SUMC Project-related construction traffic may create an operational hazard. During the construction period, impacts might arise from a substantial increase in heavy truck travel, as materials are brought in to the SUMC Sites, and demolished or excavated materials are hauled out. These impacts would be significant, although would be limited to the construction phase of the SUMC Project.

Mitigation Measure TR-1.5, however, would mitigate any significant construction-related traffic impacts associated with the transport of hazardous or construction materials. As described under Mitigation Measure TR-1.5, on page 3.4-44 of the Draft EIR, the SUMC

[13] Stanford University. Background on Santa Clara's Toxic Gas Ordinance. August 21, 2009.

Project sponsors would require delivery and removal of all construction-related equipment and materials on truck routes designated by the cities of Palo Alto and Menlo Park. Heavy construction vehicles would be prohibited from accessing the site from other routes. Figure 3-9 of the Draft EIR, illustrates the Stanford Area Truck Routes which must be used by all trucks.

Furthermore, as noted on page 3.12-34 of the Draft EIR, hazardous waste transporters are subject to both U.S. Department of Transportation (DOT) and United States Environmental Protection Agency (USEPA) enforcement of the regulations. The USEPA has set forth standards applicable to transporters of hazardous wastes in 40 CFR 263. The DOT's regulations are documented in 49 CFR 171-180 and implemented by the Research and Special Programs Administration (RSPA) within the DOT. These USEPA standards incorporate and require compliance with the DOT provisions on labeling, marking, placarding, using proper containers, and reporting discharges.

As noted on page 3.12-35 of the Draft EIR, a transporter must comply with the following in accordance with USEPA regulations: comply with the manifest system; maintain the appropriate records (signed manifests) for three years; take immediate action to protect human health and the environment (e.g., notify local authorities or initiate interim measures) in the case of a discharge; in the event of a hazardous waste discharge, notify the National Response Center and submit a report to the DOT Office of Hazardous Materials Regulations; and clean up any discharges to the environment and take any actions required by the appropriate government officials for mitigating the discharge effects on human health and environment.

Transporters of hazardous wastes must also adhere to all of the Federal Motor Carrier Safety Regulations which DOT has adopted under the Motor Carrier Safety Act of 1984. This Act specifies more requisites that apply to the transport vehicle and the driver, including concise specifications for vehicle parts and accessories, such as lighting devices, brakes, glazing and windows, fuel systems, tires, and horns.

These existing regulations would ensure that the increase in hazardous waste materials would not substantially increase exposure to the community and surrounding environment. Furthermore, in the event of an accident or spill, the SUMC Project would implement its required emergency response plan (as part of the Hazardous Materials Business Plan [HMBP]) in coordination with the PAFD.

PTC5.47 *The commentor requests additional information about nearby schools.* Please refer to Response PTC5.40 above, for further information about schools, childcare centers, and other educational institutions located near the SUMC Sites.

PTC5.48 *The commentor does not agree that Embarcadero Road, Oregon Expressway, and Charleston Road should be used for construction vehicles because they are not truck routes.*

As depicted on Figure 3.4-6, Embarcadero Road and Oregon Expressway are not designated as truck routes. Additionally, according to the City of Palo Truck Route Map,[14] Charleston Road is not designated as a truck route.

As described on page under Mitigation Measure TR-1.5, on page 3.4-44 of the Draft EIR, the SUMC Project sponsors would require delivery and removal of all construction-related equipment and materials on truck routes designated by the City of Palo Alto. Heavy construction vehicles would be prohibited from accessing the SUMC Sites from other routes. Figure 3.4-6 of the Draft EIR illustrates the SUMC Project Truck Routes, which must be used by all trucks. In addition, Figure 3.4-7 of the Draft EIR shows the Menlo Park truck routes.

[14] City of Palo Alto. California Truck Route Map. Chapter 10.48 P.A.M.C. August 22, 2002.

PTC 6

Special Meeting of Wednesday, July 7, 2010
6:00 PM, Council Chambers, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

***ROLL CALL:* 6:02 PM**

Commissioners:	***Staff:***
Daniel Garber - Chair	*Curtis Williams, Planning Director – 7:15 arrival*
Samir Tuma – conflicted	*Cara Silver, Sr. Assistant City Attorney*
Susan Fineberg – late 6:10 PM	*Steven Turner, Advance Planning Manager*
Eduardo Martinez	*Zariah Betten, Admin Associate*
Arthur Keller	*PBS&J Consultants*
Lee I. Lippert	
Greg Tanaka	

AGENDIZED ITEMS:
1. Stanford University Medical Center Facilities Renewal and Replacement Project
APPROVAL OF MINUTES: Minutes of June 16 and 17, 2010.

Chair Garber: I'd like to welcome everyone to the Planning and Transportation Commission meeting for Wednesday, July 7. Would the Secretary please call roll? Thank you.

We will note that Commissioner Fineberg will be a few minutes late. She will join us when she gets here. Just before we move to item number one, Commissioners I failed to send out my process and procedure email so let me just walk through how we are planning on organizing this evening's activities.

The first thing is to note that this is a final wrap-up of the DEIR. The Commissioners as well as the public can continue to make comments so long as they are written up until July 27, 2010. Our objective this evening is to comment obviously on the Alternatives that are being presented but also to have some discussion about the Alternatives, and through our comments make

suggestions to the City Council on what Alternative, Alternatives, or parts of which Alternatives appear to be the most viable to pursue.

We will start as we normally do with the Staff, and consultant, and applicant making a presentation. I believe we had asked at pre-Commission if a map showing the various building heights of the Alternatives could be produced. Do we know if that was done? Okay. From there we will open the public hearing and hear comments from the public, at which point we thought we would return to the Commission and organize our discussion into four pieces. The first of which is questions regarding the DEIR process and procedure itself, and its schedule. The second will be to then focus on each of the Alternatives separately to the degree that we can. We won't limit conversation that occurs across many of them, but we will sort of march through each one of them separately to see if there are specific comments that should be gleaned. Third, will be a discussion about Mitigations, and we will ask the City Attorney to discuss the use of the CEQA document as a tool for mitigation, as well as to re-brief on the utility and use of the Development Agreement, and then the Statement of Overriding Considerations, and how those all play a part. Finally, you are also going to brief us on how we should deal with Attachment E at that time. Then finally, we will have a general discussion on anything else that was missed which includes mixing and matching Alternatives, orphan topics, crosscutting, etc. Commissioner Keller, have I missed anything?

Commissioner Keller: I believe we had said that we were going to go through the individual Alternatives and then discuss mixing and matching of the Alternatives right after the individual

Alternatives. Then the last issue or the fourth topic was anything that we have not covered already, or crosscutting issues in general, or orphan topics.

ORAL COMMUNICATIONS. Members of the public may speak to any item not on the agenda with a limitation of three (3) minutes per speaker. Those who desire to speak must complete a speaker request card available from the secretary of the Commission. The Planning and Transportation Commission reserves the right to limit the oral communications period to 15 minutes.

AGENDA CHANGES, ADDITIONS AND DELETIONS. The agenda may have additional items added to it up until 72 hours prior to meeting time.

Chair Garber: Yes, okay. That's fine. With that let us go to item number one, Stanford University Medical Center Facilities Renewal and Replacement Project. This meeting is specifically about the chapter on Alternatives and Mitigation Measures of the DEIR. Would Staff like to make a presentation?

NEW BUSINESS.
Public Hearing:

1. **Stanford University Medical Center Facilities Renewal and Replacement Project**: Meeting to accept comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an overview of the Alternative Chapter and Mitigation Measures of the DEIR.

Mr. Steven Turner, Advance Planning Manager: Yes, thank you Chair Garber and Commissioners. My name is Steven Turner, Advance Planning Manager, and Project Manager for the Stanford University Medical Center Project.

Tonight we are as Chair Garber mentioned to review the Alternative Chapter and an overview of the Mitigations contained within the Draft EIR. As Commissioners know, the Draft EIR was released for a public review on May 20, 2010. That public review period is lasting 69 days and

will end at the close of business on Tuesday, July 27, 2010. Commissioners also know that we have been breaking the review of the Draft EIR into smaller chunks for easier review. This is the final scheduled meeting with the Planning and Transportation Commission on the Draft EIR, but it is not the final opportunity to submit comments as July 27 is the last day for that. Written comments can be submitted to the City on any chapter or any part of the information within the Draft EIR.

The purpose of tonight's meeting again is to collect comments on the Draft EIR. It is not intended to discuss or debate the merits of the project. It would be helpful to keep questions and comments specifically to the topics that we have identified in the Staff Report and in the presentation tonight.

All of the comments that we receive through this process will be addressed during the preparation of the Final Environmental Impact Report, which will begin once the public comment period has closed. From that I just wanted to provide an overview of where we will be going with the rest of the entitlement review for this project for the remainder of the year. I have a slide up on the wall that just summarizes where we are. Again, we will have the public review period that ends on July 27. On a parallel track with that are a couple of items. The Development Agreement discussions with the applicant will be ongoing and really will be continuing up until the point where the entitlements go to the Planning and Transportation Commission and City Council for a final and formal review at the end of the year, late December.

A second parallel track is the Architectural review process. We are going through a preliminary review process throughout the summer that should last into late August or September. At that point the preliminary review Architectural review process will cease until after the preparation of the Final Environmental Impact Report. As I mentioned, the preparation of the Final Environmental Impact Report will take place once the public comment period has closed and we expect that we will probably get a Final EIR in mid to late October. The Final EIR doesn't have a review process of its own. However, CEQA law requires that we make it publicly available for ten days. I think the way that we have outlined our process that it will be available for at least ten days, and more likely 30 days or slightly more, prior to any formal action being taken on the Final EIR.

Then we hope to wrap-up this project with a very aggressive schedule by the Planning and Transportation Commission and Council review in November and December of this year. So that is essentially where we will be going once the public review period is complete.

As Chair Garber mentioned the format for tonight's meeting, PBS&J is here to provide an overview of the Alternative's Chapter and Mitigations. The applicants have a presentation as well that will last between 15 and 20 minutes. Then we would open the item up for public comment and Commissioner comments. So with that I will hand the presentation over to Rod.

Mr. Rod Jeung, Project Director, PBS&J Consulting: Thank you, Steven. Chair Garber, members of the Commission, members of the public good evening.

Chair Garber: Let me interrupt just briefly. Commissioner Lippert, you had a clarifying question.

Commissioner Lippert: Steven, where in this do we actually recommend certifying or not certifying the adequacy of the document?

Mr. Turner: That would take place once the Final EIR has been prepared and released. We would take that to a public hearing with the Planning and Transportation Commission. You would be able to review all of the responses to comments that are contained within the Final EIR, have your deliberations, and make that recommendation to Council whether or not to certify the Environmental Impact Report.

Commissioner Lippert: Okay, great.

Chair Garber: I apologize for interrupting. Let us also note for the Secretary that Commissioner Fineberg has arrived.

Mr. Jeung: Thank you Chair Garber, members of the Commission, members of the public good evening. Tonight is a really important evening. We are wrapping up the hearings on the Draft Environmental Impact Report. As Chair Garber said it is a catch up meeting, and some of the more substantive topics have to do with the Alternatives and the various Mitigation Measures. So I hope, and I am looking forward to a very fruitful, productive discussion.

Just by way of introduction, the Alternatives tonight, and in the environmental document are really keyed to address significant unavoidable impacts that are identified in the Draft Environmental Impact Report. So with us tonight are the individual team members who have been instrumental in helping to formulate those Alternatives to respond to some of the significant unavoidable impacts.

So just by way of introduction again, Trixie Martelino, our Project Manager, Kirsten Chapman to my left who helped assemble the entire Alternatives section with help from the technical team Goeff Hornek, whom you have heard from before, also with PBS&J on Air and Noise. From AECOM who did the Transportation Analysis we have Dennis Struecker and Nicole Sou. On the Preservation Alternative from ARG we have Jodi Stock and Charles Chase. So with that as an introduction I am going to turn it over to Trixie who will do the overview.

Ms. Trixie Martelino, Project Manager, PBS&J: Thank you and good evening. As was mentioned earlier we are talking about the Alternatives and the Mitigation Measures. So first off are the Alternatives. The California Environmental Quality Act requires an EIR to identify and analyze a range of reasonable alternatives to a project. The alternatives must attain the basic objectives of the project while avoiding or reducing significant impacts that have been identified. Not every conceivable alternative needs to be analyzed in the EIR. There is a section in the Alternatives Chapter that addresses alternatives that were considered but rejected as infeasible, and as mentioned before alternative locations were rejected as infeasible. Also, the Alternatives Analysis must identify a 'no project' alternative, which is comprised of the reasonably foreseeable scenario that would occur if the project were not approved.

So the Draft EIR identifies seven alternatives to the SUMC project. We have two No Project Alternatives, two Reduced Intensity Alternatives, one Historic Preservation Alternative, a Tree Preservation Alternative, and the Village Concept Alternative. I am going to highlight some notable descriptions of each.

The first No Project Alternative is the No Project Alternative A. It essentially involves retrofitting noncompliant hospital facilities to comply with SB 1953. Under this Alternative no new buildings would be constructed, there would be no increases in expansions or floor area, no work at the Hoover Pavilion site would occur. The hospitals would be enabled to operate beyond the 2013 deadline under SB 1953, but by 2030 one or both of the hospitals would have to close.

No Project Alternative B involves replacement of noncompliant hospital facilities with new structures and build out to the maximum allowable floor area ratio. The current zoning of the SUMC site allows for a modest additional 9,000 square feet of floor area. It is reasonably foreseeable that the applicants would seek to build out to this maximum allowable floor space. Under this Alternative no work at the Hoover Pavilion site would occur. The School of Medicine facilities would be separated from the hospitals and retrofitted. There would be a decrease in patient beds at the Stanford Hospital. The Lucile Packard Children's Hospital would continue to operate at current capacity or at reduced capacity. So under both No Project Alternatives there would be some decrease in medical services compared to current conditions.

1 Reduced Intensity Alternative A essentially involves right sizing the hospital facilities with no
2 increases in operation. As you know, right sizing involves additional space per bed or per
3 service unit with no increase in operations. The right sizing of the hospital facilities would add
4 additional 446,000 square feet. Under this Alternative no new buildings at the Hoover site
5 would be constructed but the Hoover Pavilion would be renovated. The School of Medicine
6 facilities would be replaced with structures with the same square footage. There would be no
7 increase in operations under this Alternative.
8
9 Reduced Intensity Alternative B involves an expansion in development and operations but to a
10 lesser degree than what would occur under the SUMC Project. Under this Alternative
11 noncompliant hospital facilities would be replaced with new structures. There would be an
12 increase in square footage of 924,000. There would be no new buildings at the Hoover Pavilion
13 site, but the Hoover Pavilion would be renovated. School of Medicine facilities would be
14 replaced with buildings of the same square footage. The increase in operations under this
15 Alternative would be approximately 60 percent of the increase in operations that would occur
16 under the SUMC Project.
17
18 Next is the Historic Preservation Alternative. This Alternative was developed to avoid the
19 demolition of the historically significant Stone Building complex that would otherwise be
20 demolished under the proposed project. This Alternative would seek to preserve the historic
21 aspects of the 1959 Stone Building complex as well as Pasteur Drive. Under this Alternative a
22 new SHC hospital would be constructed. The Stanford Hospital Clinics and School of Medicine
23 facilities would occupy the Stone Building complex. The Lucile Packard Children's Hospital

1 and Hoover Pavilion site would be expanded as proposed under the main project. The increase
2 in development and operations under this Alternative would be the same as the SUMC Project.
3
4 Next is the Tree Preservation Alternative. Under this Alternative there is a modified site plan
5 that is aimed to reduce impacts on protected trees. The modifications in the site plans are
6 summarized in the above three bullets. First, the hospital module that is proposed within Kaplan
7 Lawn at the median of Pasteur Drive would be removed and embedded within the main hospital
8 facility. The Stanford Hospital garage would be reconfigured to be narrower and now would be
9 partially above ground, whereas it was previously below ground. Also the Foundations in
10 Medicine Building 1, which is off Pasteur Drive, would be reconfigured.
11
12 The modifications to the site plan under this Alternative have been developed especially to
13 preserve a certain category of protected trees that the City has identified as biologically and
14 aesthetically significant, and thus requiring special protection. Under this Alternative, as a result
15 of the modifications, 13 biologically and aesthetically significant protected trees would be
16 retained in comparison to the SUMC Project. Under this Alternative there would be the same
17 increase in development and operations as would occur under the main SUMC Project.
18
19 Lastly, the applicant has identified that this Alternative is the preferred site plan. As such, going
20 forward, refinements in design would be focused on this site plan rather than the main site plan.
21
22 Lastly, we have the Village Concept Alternative. This was developed mainly to reduce the
23 vehicle miles traveled and associated air pollutant and greenhouse gas emissions that result from

employees commuting to the SUMC sites. As described in the EIR the Village Concept Alternative is comprised of the SUMC project as proposed. It also includes recommended dedication of 490 previously approved housing units for occupancy by SUMC employees. Recommendations also include that the housing units be constructed within a certain timeline in time for occupancy. This Alternative also involves pedestrian linkages that would enhance connectivity between and around the sites, and the Palo Alto Intermodal Transit Station.

Given those seven Alternatives I would just like to highlight some differences in impacts between the SUMC Project and the Tree Preservation Alternative. I will be doing the same between the SUMC Project and the Village Concept Alternative because these Alternatives are of special interest to both the applicant and the City.

So for the Tree Preservation Alternative I am highlighting Construction, Air Quality, Air Emission, Construction Noise and Vibration, and impacts related to Protected Trees. For Construction Emissions of nitrous oxides the SUMC Project would result in significant impacts during early stages of construction. However, under the Tree Preservation Alternative this impact would now be less than significant mainly due to less excavation needed for the Stanford Hospital garage. Also, there is a difference in Construction Noise and Vibration impacts between the SUMC Project and the Tree Preservation Alternative. This is mainly due to the application of pile driving in the Tree Preservation Alternative. As mentioned earlier, refinements in project design are now focused on the Tree Preservation Alternative whether these refinements are required or recommended by OSHPD, whether they are required by the City, or initiated by the applicant.

OSHPD has recommended potential pile driving for the Stanford Hospital, and as such, pile driving has been addressed as part of the Tree Preservation Alternative. As shown in the above slide under the analysis of the main SUMC Project there would be significant and unavoidable noise onsite, and less than significant vibration impacts. However, under the Tree Preservation Alternative due to pile driving there would now be significant and unavoidable noise onsite and offsite, and there would be significant and unavoidable vibration onsite and offsite.

Lastly, as mentioned earlier this Alternative is aimed at reducing the impact on those protected trees that have been identified as biologically and aesthetically significant. Under the SUMC Project there would be a loss of 23 such protected trees. Under the Tree Preservation Alternative the loss would be reduced to ten trees.

I would also like to point out some additional Mitigation Measures that have been identified in the EIR for the Tree Preservation Alternative that were not identified for the main SUMC Project. The bulk of these Mitigation Measures pertain to pile driving. As you see from the above slide, these measures involve best management practices to reduce construction pile driving noise, as well as best management practices to reduce construction pile driving vibration. They also involve avoidance of or repair of structural damage to SUMC structures in the vicinity of the potential pile driving sites. Of particular interest is the Blake Wilbur Clinic, which is in proximity to potential pile driving sites, and the measures involve relocating occupants during pile driving, assessing structural conditions of the Blake Wilbur Clinic and repairing any damage as needed.

Also, of note is an additional mitigation in the Hydrology Analysis of the Tree Preservation Alternative. The measure involves insuring that no net increase in runoff would occur under this revised site plan.

Now for an impact comparison between the SUMC Project and the Village Concept Alternative. It should be noted that the Village Concept Alternative Analysis assumes as mentioned before that the recommendations for the housing units would be implemented. Given these assumptions for intersection congestion the SUMC Project was identified to have significant but mitigable impacts on five intersections in the AM peak hour and 12 intersections in the PM peak hour. I would just like to note, as was discussed in the previous Transportation hearing that the Draft EIR identified the impacts on intersections as significant and unavoidable, but based on input from Menlo Park these impacts would be mitigable to less than significant.

The Village Concept Alternative will result in significant impacts on more intersections than were identified for the SUMC Project. This is mainly due to accounting of spousal trips at the housing sites, so the spouses of the employees, and also increased pedestrian crossing time due to the enhanced pedestrian connections.

In terms of pedestrian and bicycle safety both the SUMC Project and the Village Concept Alternative would have significant but mitigable impacts due to increased traffic plus increased pedestrian and bicycle activity. The difference would be that the Village Concept Alternative would have enhanced pedestrian safety features and so the impact would not be a severe.

As mentioned earlier, the main purpose for developing the Village Concept Alternative is to reduce vehicle miles traveled. The employees and patients of the SUMC Project were identified to generate approximately 276,000 daily miles. If the housing units were dedicated to SUMC employees the vehicle miles traveled would then be reduced to 265,000 daily miles. The reduction in vehicle miles traveled from the employees and patients result in a reduction in greenhouse gas emissions. Under the SUMC Project there would approximately 63,000 metric tons of CO2 equivalent generated, and under the Village Concept Alternative these emissions would be reduced by about 3,000 metric tons of CO2 equivalent. Nonetheless, under both scenarios the impact would be significant and unavoidable.

In terms of the jobs to employed residents ratio, it was determined in the analysis that the SUMC Project would increase the ratio by .05, and under the Village Concept Alternative if you account for the 70 housing units at the Sand Hill Road housing site the ratio increase would be .04. It should be noted that the housing sites at Quarry Road are within jurisdiction of the County and so would not count towards the City's jobs to employed residents ratio.

The California Environmental Quality Act requires EIRs to identify an environmentally superior alternative, which is the alternative with the least amount of impact. If this alternative is a No Project Alternative then an alternative other than the No Project Alternative would need to be identified. The Reduced Intensity Alternative A has been identified as the environmentally superior alternative. As you recall, this alternative involves right sizing the hospital components with no increases in operations. As a result this alternative avoids the significant impacts of the

SUMC project related to increased traffic on Menlo Park roadways, emissions of criteria air pollutants during operation, and emissions of greenhouse gases during operation.

Next I would like to talk briefly about the Mitigation Measures. The various mitigation measures for the various sections have been identified in previous hearings. So I am not going to reiterate all the mitigation measures again at this point. Basically the identified mitigation measures in the EIR minimize, avoid, rectify, or compensate for the significant impacts that have been identified. CEQA requires that mitigation measures be feasible and have a nexus to the impact. For a summary of all the mitigation measures you can refer to Table S-4 in the EIR, which is also attached to the Staff Report. Essentially, if the SUMC Project is approved the City must adopt a mitigation monitoring and reporting program to ensure implementation of all the mitigation measures.

At this point I would like to turn the presentation over to Cara Silver who will discuss application of Transportation Demand Management as mitigation.

Ms. Cara Silver, Senior Assistant City Attorney: Thank you Trixie. As you know, one of the major mitigations that is proposed for the traffic impacts on this project is the implementation of the Go Pass or an equivalent program. The Go Pass is considered a Transportation Demand Management Program, what we call a TDM Program. There is a state law, it is rather an esoteric state law, and is something that we believe is rather outdated, but there is a law that is on the books that states that cities cannot impose TDM as mitigation.

So we have consulted with our outside legal counsel regarding the application of this particular law to Charter cities and to this particular project. As Chair Garber mentioned, the Staff Report does contain Attachment E, which is a memo regarding the application of this particular law to Charter cities. The memo concludes that it is possible for charter cities to impose TDM. Palo Alto, as you probably know, has imposed TDM on other projects in connection with the CEQA process.

TDM can encompass a range of different measures, and there are many different TDM measures that are proposed for this particular project. The Go Pass of course being the major mitigation. We believe that is a very effective way to mitigate the traffic impacts. There are also TDM measures that are suggested to be considered such as expansion of the shuttle program, the installation of bike rakes, and a hiring of a TDM Coordinator for the hospital.

So it ultimately is up to the City to determine whether this particular TDM measure, and other TDM measures, are feasible and whether they are effective in mitigating the identified impacts associated with Traffic and Air Quality.

Also, if I could I would like to just briefly amplify on some of the comments that Trixie made regarding Alternatives. As Trixie mentioned, the purpose of an EIR, one of the primary purposes of an EIR is to identify a range of alternatives that will serve to mitigate some of the impacts that have been identified in the EIR. The driver for identifying alternatives is that the Alternatives need to feasibly accomplish most of the basic objectives of the project. So it is very important to analyze the project objectives when you look at whether the Alternatives are feasible. When you

are looking at Project Objectives, the Project Objectives are included in the Project Description, and those Project Objectives were vetted with the City. We believe that they are very well crafted, and that they are broad enough to focus on a reasonable range of alternatives. You will note that the Project Objectives include Applicant sponsored objectives as well as City objectives. So it is a very balanced set of objectives.

The EIR need not analyze every permeation or every conceivable variation of an alternative. The Alternatives Chapter is intended to essentially bookend impacts, range of impacts. So certainly there will be other permutations that you can consider, but the alternatives in the EIR are designed as prototypes or models to gauge the variations of the impacts.

Finally, we need to distinguish between the Alternative Analysis in the EIR and then the findings that ultimately will be adopted by the City Council with your input. The EIR is intended to analyze the range of alternatives. Then after that, after certification of the EIR and in conjunction with project approval the Council needs to make specific findings regarding whether there are any feasible mitigations that can reduce the impacts identified in the EIR, and also whether there are any feasible alternatives that can reduce the impacts that have not been mitigated through Mitigation Measures. So those are two significant findings that need to be separated from the Alternative Analysis itself in the EIR.

So with that I think the applicant has a presentation that we would like to go forward with.

Mr. Mark Tortorich, Vice President, Design and Construction, Stanford Hospital and Lucile Packard Children's Hospital: Good evening Chair Garber and Commissioners. I am not sure what I am going to do with myself next Wednesday.

So we wanted to review with you a few comments on the Alternative section of the Draft EIR. Bill Philips of Stanford University and I will be reviewing three key alternatives and our perspective on those.

So first is the Tree Preservation Alternative. I think an important point needs to be made about the pile driving activities that may be attributable to this alternative. The pile driving really is attributable to the soils condition and would be a structural solution for both the base proposal and the Tree Preservation Alternative. We are trying to avoid pile driving because of the serious disruptions that would occur to the hospital occupants, but right now OSHPD is very suspicious of alternative methods of building the foundation. So that is just something we will have to work through. That would be a consistent issue whether it was the proposed project or the Tree Preservation Alternative.

As you know, we did re-plan the hospital building, the Stanford Hospital replacement building, to preserve what we believe are 15 trees instead of 13. So I think the statement is we will preserve at least 13 trees through this Alternative. We did that by removing the sixth pavilion that is here on Pasteur Mall, Kaplan Lawn, and by condensing the parking structure from being an entirely below grade structure to one that is partially below and partially above grade in that

1 location. We also redesigned the first School of Medicine building, FIM 1, to preserve trees in
2 this location.
3
4 So this is the map that is shown as the Tree Preservation Alternative in the Draft EIR. As has
5 been stated this now our preferred design alternative and we are at about a 50 percent design
6 development level in the development of this Alternative. So obviously we have made a
7 substantial investment in this Alternative. What we have done is taken the square footage of that
8 sixth pavilion and we have placed it within the surface of the five pavilions, and we have
9 expanded a little bit the diagnostic and treatment block, and then condensed the parking structure
10 again to save two trees here in this region. We have also realigned the perimeter of the first
11 School of Medicine building to preserve trees in that location. I think you have seen those
12 studies both in plan elevation diagram and also in our photorealistic simulation.
13
14 Our next comments come to the Historic Preservation Alternative. As described the Historic
15 Preservation Alternative suggests that we would retain the 1959 structure, about 850,000 square
16 feet, and use it for clinics, medical offices, and School of Medicine research buildings. That is a
17 significant challenge. The buildings don't meet the criteria for use as a hospital in any event. So
18 that issue is put aside. The buildings structurally don't meet the majority – or the majority of the
19 buildings of the 1959 structure don't meet the seismic ordinances from the City of Palo Alto.
20 They are really not well-structured buildings by today's modern earthquake standards.
21 Additionally, we believe, and we I think have shown you some diagrams of the significant
22 challenges of putting research labs in these buildings and modern clinics that also have
23 significant ventilation requirements.

1
2 So our proposed project has been, and to show you the existing diagram on the slide, our
3 proposed project has been to replace the footprint of that 1959 structure with the medical
4 facilities necessary, contained within pretty much the same building area. So the School of
5 Medicine buildings would be in this region, and the future clinical buildings would be in this
6 region, and you can see that dissolves there. So within the footprint of the Stone Building is our
7 future 429,000 square foot clinic building, our School of Medicine, research buildings, and
8 underground parking. So that site is really necessary to regenerate these facilities into modern
9 structures suitable for the technologies and forecasting what our technologies are going to be into
10 the future.
11
12 Then one of the illustrations that we like to provide is this is what we have been doing to the
13 1959 building to accommodate current and past programs. There is a building designed
14 predominantly for natural ventilation and state codes certainly don't allow our hospital licensed
15 clinics to have natural ventilation in the clinical areas. Certainly, the research functions don't
16 allow for natural ventilation. So these will be mechanically ventilated buildings, very efficiently
17 mechanically ventilated buildings, but nonetheless not very suitable for that 1959 structure.
18
19 Then finally we wanted to comment on some of the linkage components to the Village Concept
20 Alternative. We feel the linkage components are very valuable components of the Village
21 Concept. We have suggested in our offer for the Development Agreement that we would put
22 money towards developing these linkages, and just wanted to review with you some of the key

linkages and some of the strategies that we believe appropriate in the Village Concept Alternative.

The primary linkage comes from the El Camino Real and Quarry Road intersection through the Quarry Road corridor and pathways through the Stanford Barn. So I will take these one by one. The first is the existing. The blue lines show the pedestrian and bicycle paths from the intersection of Quarry and El Camino through the transit center to Downtown Palo Alto. You can see they are a sort of series of maybe haphazard paths through these sites. What we have proposed and what we have considered to be appropriate within the Village Concept Alternative is a more direct alignment that will align with the tunnel. I know that Palo Alto is proposing and funding the Everett Street Tunnel. So there will be a stronger linkage, I think a better-landscaped element to allow for pedestrian and bicycle movements from town across the El Camino and down Quarry Road.

So moving onto the Quarry Road corridor there are a couple of elements here that we have suggested. The first to align with our proposed facilities and renovation of the Hoover Pavilion would be an area of transit linkage where we would have bus shelters and drop-offs. So that people coming to these buildings could come by public transportation. They don't have to come by car. We certainly would encourage that. The value of having these buildings so close to the transit mall is the fact that you can take alternate means to see your doctor for primary care purposes.

Then moving on down towards the Stanford Barn and the important connection that I know many members of my staff take daily from the Stanford Shopping Center through to Lucile Packard Children's Hospital is providing a better designed pathway through the parking lot adjacent to the Stanford Barn. So here is Welch Road, Stanford Barn, 730 Welch Road, which are the Children's Hospital clinics, and there is again a path that comes through the parking lots, sort of meanders through the paved vehicle roads. Then you sort of take your chances as you cross the street. We have a signalized, well not really a signalized, but a pedestrian signal intersection here. We have sponsored a crossing guard who is there to help monitor patients and families to cross the street there because we have been concerned about the conflicts with vehicles. What we are proposing to make this condition much better, and I believe this is part of the Village Concept Alternative, is to aggregate the two driveway entrances here within the Barn into 730 Welch into a signalized intersection, create separate pathways along 730 Welch property to Vineyard Lane, as well as to provide an alternative path that is a little bit more structured and pleasant up against the Stanford Barn, and then for allowing for the movement of vehicles. So realignment of the parking, additional landscaping, and some dedicated pathways that then terminate into a signalized intersection and just a much more rational way of crossing Welch Road.

So Bill Philips would like to talk a little bit about some of the housing components of the Village Concept Alternative.

Mr. Bill Philips, Senior Associate Vice President, Land Buildings and Real Estate, Stanford: It is nice to be here this evening. I want to echo Mark's comments starting with the linkages and

1 going back to the Tree Preservation Alternative. I think we have ended up some very significant,
2 very substantial improvements, and advantages that occur with these new design components.
3 That has been done with a strong collaboration and help and assistance, maybe sometimes even
4 the pushing of Staff. I think where we have ended up is very, very positive.
5
6 Having said something positive, I want to say that on the housing component of the Village
7 Concept Alternative we do have some concerns. I am going to mention those, and I think they
8 basically have to do with the kind of scrutiny we put into some of the assumptions on the
9 housing component, layout what we think we saw, and then you can judge what you think results
10 from that analysis.
11
12 The DEIR states that the demand for housing per se as a result of the SUMC Project would be
13 less than significant. We also note the DEIR says that the key goal of the Village Concept
14 Alternative is to create this urban transit-oriented village that can capture travel behavior, air
15 quality protection, and greenhouse gas reduction in such a way that benefits the performance of
16 the project as part of the performance of a well-designed urban village.
17
18 Here are the basic travel behavior assumptions as we see them. The Village Concept Alternative
19 for the housing component shifts the occupancy of what is already planned and approved
20 housing on the Stanford campus, and by shifting that occupancy it doesn't produce any
21 significant additional net benefits. The Quarry housing sites that are the reference of the 420
22 units are already approved for other Stanford programs and populations. The Village Concept
23 Alternative has housing at exactly the same density on the same sites, but simply switches the

1 housing from University employees that is medical residents and postdoctoral students to
2 Medical Center employees. So we are going from employees of one campus, the Stanford
3 campus, to employees of another campus, the Medical Center campus. Either way the residents
4 of the Quarry sites are in a transit rich environment, they are part of a village, and they are going
5 to benefit from the proximity to transit, and thereby reduce non-campus trips.
6
7 The DEIR concludes that the Village Concept Alternative slightly reduces trips, but results in
8 one additional intersection impact. The reduction in trips is 14 in the AM and 37 in the PM. The
9 additional impacted intersection that is caused by trip generation is the Alpine-280 off ramp.
10 The DEIR concludes that the Village Concept Alternative reduces vehicle miles traveled by less
11 than one percent for employee and patient trips. That is when we look at it assuming Go Pass for
12 both the project and for the Village Concept Alternative.
13
14 Contrary to the DEIR assumption the Village Concept Alternative wouldn't significantly reduce
15 VMT or CO2, greenhouse gases for other household members compared with approved GUP
16 housing. This is where they suggest there is a difference, but when the difference is scrutinized
17 you can see that you are just simply moving the other household members of these employees to
18 different locations. So the advantage you gain for one is offset by the disadvantage that now
19 occurs for the other.
20
21 So in summary, you have this kind of comparison which I think shows that the additional change
22 with the Village Concept Alternative on most of these aspects is fairly insignificant. Trips in the
23 AM go down in comparison with the project with Go Pass. The change is down 1.8 percent for

trips in the AM, down a fairly significant five percent for trips in the PM. Intersection impacts go up for the Village Concept Alternative by 20 percent because of that one intersection that is added. You have a nil increase for intersection impacts. I like that nil these days. For VMT patients and visitors we are talking about a less than one percent reduction for the Village Concept Alternative.

So we would remind everybody that the Go Pass is probably the all-important aspect of what is going on here in terms of trying to achieve some of the important climate change, and trip reduction, and other benefits of moving to a different program, particularly one that is focused on shifting traffic away from single occupancy vehicles and into transit. DEIR demonstrates the Go Pass is the most effective thing at reducing traffic congestion, air pollution, and greenhouse gases. Changing the occupancy of already previously approved housing has very insignificant effect. We also are, as part of our proposal, providing $23 million toward the City's affordable housing fund. That is the big difference maker we think because that would allow new housing to be built in Palo Alto helping the City achieve ABAG requirements, increasing the City's housing supply, and doing something far more than simply changing housing unit occupancy. Thanks very much.

Chair Garber: Is that it?

Mr. Turner: I think so, yes.

Chair Garber: Commissioners, as a reminder we will first focus on questions regarding the DEIR process. Let's also open up for just general questions as well. Thank you Commissioner Keller, we will go to the public first and then we will come back to our questions. I have no cards, however. If there are members of the public that would like to speak they should fill out a card and we will hear you. I have one card. We will keep the public hearing open should someone else also like to speak. Mr. Moss, you will have three minutes.

PTC6.1

Mr. Robert Moss, Palo Alto: Thank you Chairman Garber. I thought that was an interesting presentation. Looking at the various Alternatives my preference is the Reduced Alternative A because that eliminates a number of otherwise very undesirable negative impacts. Although I might be able to be persuaded that something close to Alternative B is also acceptable.

PTC6.2

Let me make a few comments. First of all, we keep being told that the project is important because it serves Palo Alto. It does serve Palo Alto, but Palo Alto is a small portion of the service area. This is a regional facility and they get patients from not only all over the county but all over the state, and even all over the western United States and even occasionally from foreign countries. So we don't need to expand the facility significantly in order to serve just the people of Palo Alto and Menlo Park, and neighboring communities. I think there obviously is a need to upgrade it and make is safe seismically and to increase the emergency facilities, but when you talk about bed count that gets a lot more problematic.

PTC6.3

They constantly say that it is not going to have a negative impact on the housing demand. That is false. They are projecting almost 10,000 additional workers. That is about 12 percent of our

PTC6.3 Con't

current employees. Let me backup. ABAG has projection for how many employees we have in Palo Alto. The number is pulled out of thin air because nobody knows how many jobs or how many businesses we have, but that is the number that is going on. So if that is increased they are going to give us another bogy for housing. The additional housing they are talking about providing, that $23 million, might provide 40 or 50 low-income housing units. We are going to be asked to provide between 400 and 500. One of the ways to provide that is, instead of taking the 420 units, which have already been approved for other Stanford uses and just assign them to the hospital so there is no net increase in housing. Require additional housing beyond the 420, at least another 300, or 400. That will start addressing the housing impact, traffic, and the job/housing imbalance.

PTC6.4

Now in terms of problems with traffic and parking I don't think any of the mitigations that are proposed with any of the new expanded projects are going to reduce the traffic impacts. They are going to have major traffic problems regardless when this project is built. So I think we should go for the alternative that gives us the lowest impacts for traffic analysis, and I see that as Alternative A.

Chair Garber: If you have something more to finish up feel free. Alright, Commissioners, questions. We are going to the DEIR Process and Procedure as well as other questions. Commissioner Keller.

PTC6.5

Commissioner Keller: Mr. Turner, could you pleas put up the schedule chart that was in the beginning of your presentation? Thank you. What appears to me is happening here is that there

PTC6.5 Con't

will be a formal ARB review after the Final EIR is released. Now, my understanding from hearing what our City Attorney said is that there are from the FEIR multiple alternatives of which some may be more feasible than others, and some may be preferred environmentally than others, and that from the Alternatives as part of perhaps the Development Agreement, perhaps the City Council will then choose among those Alternatives, or mix and match or whatever, and say this is what we are going to agree on being built. So what I am wondering is if the formal entitlement reviews by the PTC and Council how can the ARB review precede the formal entitlement reviews where I assume it is decided which of the Alternatives, or what combination of the Alternatives will be chosen.

Mr. Turner: The ARB is reviewing the project that has been applied for to the City by the applicants. So the applicants have provided an application that includes expansion of the Lucile Packard Children's Hospital, expansion of the Medical Center, replacement of the School of Medicine buildings, and new structures at the Hoover Pavilion. The ARB would be reviewing essentially that project. They are not reviewing or making a recommendation on any Alternative in the Environmental Impact Report. They are simply making a recommendation on what is essentially the project that is presented to them.

Now, they could make that recommendation to the Planning and Transportation Commission, and once the EIR goes through the process and is ultimately certified then the City Council can decide on a project that is either the main project that they have applied for, or an Alternative, or a mix of Alternatives. If that is the case then the applicants would need to go through the

PTC6.5 Con't

Architectural review process again in order to show the project that ultimately is approved by the City.

So what the applicant is doing is really presenting the main project for review, but with the understanding that if a smaller project is ultimately approved they would need to go through the discretionary review process again with ARB to show a project that meets what was approved.

Commissioner Keller: So am I to understand that while there is a review of essentially what is the proposed final project by the applicant that final architectural review won't be granted until after the entitlement review process happens or later depending on which Alternative is ultimately decided.

Mr. Turner: That is correct. It should be noted and reminded to Commissioners and the public that the architectural review Board does not make decisions on the project. They make recommendations to the Planning Commission and to the Council. So the Planning Commission may vote to deny that architectural review and have them start over, and the City Council could make that final decision whether to approve or deny the architectural review process. If they do not approve the architectural review project that has been coming forward then the applicants have to essentially go through architectural review again for whatever project is approved.

Commissioner Keller: Well, I am a little confused because I have been on the Planning Commission now for practically four years, and I have never been given the opportunity to

PTC6.5 Con't

review an architectural review by the ARB, and given the opportunity to approve or deny it. So I am not sure I really understand that process.

Mr. Turner: Perhaps Curtis can assist, but essentially if you think of a Planned Community process it is similar to that where you are presented with a development plan, and often an environmental analysis, sometimes it is an EIR. The recommendation is forwarded from the Architectural Review Board to the Planning and Transportation Commission, and ultimately to the City Council. Now, you would be making a recommendation to Council on whether or not you find the architectural review process to have been adequately analyzed and the findings for architectural review have been made before it gets sent to Council for final approval.

Mr. Curtis Williams, Director of Planning and Community Environment: I think that is a good summary that Steven gave. I would just add that this is just a level of complexity that has the zoning implications with it that the Commission does have to review that it is very difficult to separate those from one another, so it is appropriate here for the Commission to weigh in on that as well. It is also part of the EIR, the aesthetics part of the EIR. So it is appropriate in this kind of situation.

I also think that we have Public Facility zoning in most of this area right now. Most of our Public Facility zoning is a Site and Design process, which does include Planning Commission as well. So I think there are number of reasons why it makes sense to do that.

Now, as you go through particularly the zoning aspect of it and determine whether a Conditional Use Permit for a hospital is appropriate, and what the review process should be for say amendments to the plans, etc., etc. there may be components of this, and we certainly suspect that not every detail, architectural detail, is going to be wrapped up here by the time it gets through you and Council. So there may be components of it that ARB recommends to the Director on subsequently to address specifics, or there may be components of that zoning that says that as certain substantive changes are made that has to come back through this whole process too. So it is just too difficult to pull it all out and treat it as something only to be dealt with in a typical architectural review process at a later date.

Chair Garber: Yes, I figure that we will go through a couple of times here. I have Commissioners Martinez, Tanaka, Fineberg, Lippert, and Garber. Commissioner Martinez.

PTC6.6

Commissioner Martinez: Thank you. I only have a couple of questions. What is the level of review required for the Alternatives? It seems that some of the assumptions and conclusions seem a little questionable. Can you answer that?

Ms. Martelino: Alternatives need not be analyzed to the same level of specificity as the main proposed project. Essentially, what needs to be provided is a comparison of the significant impacts under the proposed project versus the significant impacts under the Alternative.

PTC6.7

Commissioner Martinez: I understand that. One of the surprising things say under Alternative A, the No Project Alternative, was the impact of losing our hospital. I didn't see that addressed. Was that in there and I missed it?

Ms. Martelino: There is mention of the No Project Alternative A not being able to comply with certain policies in the Comprehensive Plan that seek to provide medical services.

Commissioner Martinez: And the mitigation for that was?

Ms. Martelino: It was identified to be a significant and unavoidable impact that cannot be mitigated under the No Project.

Commissioner Martinez: Finally, in Table S-4 under No Projects there are a number of less than significant impacts. How is that derived when there is no project? What are you thinking about or observing when there is no project?

Ms. Martelino: Well, the conclusions are based on what would occur in the No Project scenario. Under the No Project scenario what we have assumed to occur would be necessary compliance with state law requiring seismic retrofit, seismic upgrading of the hospital facilities, and construction up to the modest allowable increase in floor area ratio at the SUMC sites. So under the No Project Alternatives there is still some degree of work, of construction. There would however be no increases in operational levels. In fact, there are foreseeable decreases in the operation levels compared to existing conditions. So when we look at the impacts from the No

Project we are essentially looking at impacts from the physical construction activities that would occur, and essentially you can conclude that there would be no additional impact resulting from increased operations because that would not occur.

Commissioner Martinez: Okay, I get it. That's it for now.

Chair Garber: Commissioner Tanaka, and then Fineberg. Commissioner Fineberg and then Lippert.

PTC6.8

Commissioner Fineberg: I am a little confused about the role of PTC comments and these sorts of processes that the review is going through. We are not recommending any actions now, which means we are not picking between Alternatives, nor are we recommending between the different Alternatives. We are commenting on specific details in each Alternative. So it appears to me Staff and the applicant are kind of picking the Alternative that will be proposed as the desirable project. I am not sure how that gives room for the desirable Alternatives that the applicant and Staff are not moving forward with. I know we will be able to discuss that, but if we never state for instance that we want 100 percent of trees protected, or 100 percent of an historic preservation option, not recommending that, but if that was something the body did want or did not want and we never state it, it is not going to move forward if the applicant and Staff don't focus on that. So how does it ever get changed off what applicant and Staff are coordinating?

Ms. Martelino: Well, it is possible at this point to comment on the adequacy of the range of Alternatives that have been addressed in the Draft EIR. So if you feel that additional alternatives

PTC6.8 Con't

would need to be looked at or should be looked at it is a comment you can make and it is a comment we would need to respond to in the Final EIR.

Commissioner Fineberg: Any comment for instance that I might make would have the weight of one individual member of the community who happens to be a Planning Commissioner. There is no like vote of the body. There is no measure of – is there a straw vote or a head nod? Let's say there was one combination of something that we all thought was the best. Are we ever going to express that until there is some final project that is an up or down vote?

Mr. Williams: I think that is a good question. I know it is confusing, sort of the timing, and the cart and the horse here. As Trixie said, no that is not what is being done through this process. If you said there should be X Alternative also looked at then these folks would go back and look and look at that, and either would add another alternative to the Final EIR and analyze that, or would indicate why that did not seem to be appropriate to do that. Maybe two of the existing Alternatives cover all the ground that that would cover anyway. It is just a matter of sort of putting those together. Or it clearly wouldn't meet certain other objectives or give some reasoning as the EIR does in terms of other alternatives that were not included. So the point here is to look at the adequacy of what has been presented both in terms of the analysis that has been done on the Alternatives as well as the range, as she said, of Alternatives. Then I would argue that you to sort of pick an Alternative or a couple of Alternatives is premature until you have an Environmental Impact Report that you feel can be certified.

PTC6.8 Con't

Commissioner Fineberg: Okay. I agree that we are not picking the most favorable one now, but there are components of each that in combination might sort of filter to a hybrid alternative.

PTC6.9

My last question is the City and Stanford has a list of goals, of objectives, of the project. There is descriptive analysis of them starting at about page 5-40 in the DEIR. I might have missed it, but is there any chart that shows which of those objectives are met or are not met by each Alternative? I see in our Staff Report and in places in the text where it says the majority of objectives are or are not, or some are and some not, but is there just a check, check, check, it is met, it is met, or not it is not? Which objective satisfies? Pick any objective, and which Alternative satisfies those objectives? I can't tell.

Ms. Martelino: In the Draft EIR it is purely provided in the text paragraphs. No table is provided currently in the EIR that provides that checklist of which objectives are met or not.

Commissioner Fineberg: Okay. Just to reconfirm, the text only highlights general statements like most of them or many of them. So there is no way to tell now which Alternative satisfied any particular objective of either Stanford or the City. I can reiterate that as a comment later or just take it now, but I think that needs to be something that is easily gotten out of the document.

Chair Garber: Commissioner Lippert and then Garber.

PTC6.10

Commissioner Lippert: Steven, if I go through your schedule here what is the role of the HRB in this? Do they get to weigh in on the Draft EIR at any point or do they have involvement after?

PTC6.10 Con't

Mr. Turner: Well, actually this morning the HRB did get an opportunity to weigh in on the Draft EIR. This meeting was held after comments received from the Commission and the City Council regarding that question, regarding the HRB's role in this process. The HRB is limited by the Historic Preservation Ordinance which really applies to the structures in Palo Alto that are on the City's Historic Inventory List that are designated as Categories 1, 2, 3, or 4.

The Stone Building and the Hoover Pavilion are not on the City's Historic Preservation List and are not Category buildings. However, they are historic resources as defined by CEQA. They are eligible for the California National Register. So CEQA had looked those two buildings in compliance with the Secretary's Standards. However, the Historic Preservation Ordinance of the City of Palo Alto does not allow the HRB to make recommendations on non-Category buildings.

However, given that these two structures are important to the City of Palo Alto, that they are eligible for the California National Register it did make sense for us to bring the projects to the HRB for their comment. So we accomplished that this morning. We brought to the HRB a description of the renovations that would be happening to the Hoover Pavilion, the two new structures adjacent to Hoover Pavilion, the medical office building and parking garage, as well as an opportunity for the HRB to comment on the Cultural Resources Chapter of the Draft EIR, as well as any other cultural resource or historic aspects that were identified within the Draft EIR. I think it was a productive meeting today. We received a lot of good comments from the HRB on each of those three topics. Those comments will be factored in as we continue the review of this project. So at this point we don't see ourselves going back to the HRB for any other formal

PTC6.10 Con't

review. They did request that a qualified historic preservation consultant review the renovations at Hoover Pavilion to make sure that they are consistent with the Secretary's Standards, and there is a possibility we might bring those findings back to the HRB. With regard to the Draft EIR and the rest of the entitlements there would be no other HRB planned reviews.

Commissioner Lippert: Okay. The significance of the HRB, I think as you know, when it comes to making those improvements on the building or any modifications to the building they are really the decision-making body in terms of well, they make a recommendation to the City Council in terms of whether they comply or they don't comply with the Secretary of the Interior's Standards. So I guess where I am going with this and I really need to hear a little bit more about it is number one, is an historic structures report or historic structure evaluation been prepared for either the Stone Building or the Hoover Pavilion.

Mr. Turner: There is the peer review analysis performed by ARG on the Hoover Pavilion that is contained within the EIR as well as ARG's peer review of Stanford's historic report that is also contained in the applicant's application to the project.

Commissioner Lippert: Would that be deemed sufficient?

Mr. Turner: That has been deemed sufficient in terms of its consistency with CEQA.

Commissioner Lippert: What about the Historic Resources Board review of those documents?

PTC6.10 Con't

Mr. Turner: The comments that we received this morning seem to indicate that the Board feels that ARG's review is adequate and satisfactory. The findings of the peer review consultant have adequately addressed the buildings.

Commissioner Lippert: Okay. I have one other question then I will pass it on. With regard to one of the Alternatives, well multiple Alternatives, which are not non-historic alternatives, it really calls for the demolition basically of the Stone Building unless it is being preserved. In that aspect when would the Historic Resources Board make their review of the adequacy or the importance of that building in order to make a recommendation in terms of a Finding of Overriding Considerations of City Council?

Mr. Turner: Well, HRB did comment with regard to the Historic Preservation Alternative. It is not too surprising that most of them were in favor of the Historic Preservation Alternative as the preferred alternative for the project. However, I would say that about half of the HRB members were also realistic with regard to the feasibility of the retention of the Stone Building. So I think that although they preferred to have the Stone Building remain there was a sense that the retention of the Stone Building may not feasible and therefore would I think from their point of view could be a resource that could be a reason for Council adopting a Statement of Overriding Considerations. Again, since the Stone Building is not an historic building on the City's Inventory the HRB would not be making a formal recommendation to the City Council with regard to that Alternative. However, the comments that we received today would be forwarded to the Council for their consideration.

PTC6.10 Con't

Commissioner Lippert: I just have one other comment. I don't want to lose sight of things, but Lawrence Halperin also was very significant as a landscape architect of that building.

PTC6.11

Chair Garber: On page 5-2, the Description of Alternatives considered in a similar vein as Commissioner Fineberg. It would be nice to be able to see the list of significant and unavoidable project specific and cumulative impacts as a chart against the various project Alternatives. Just help me out though, the bottom bullet, removal of up to 71 protected trees, that would be slightly modified as a result of the Tree Alternative if that were being pursued. It would still not avoid the significant impacts and unavoidable impacts, correct?

The next bullet up, demolition of historic structure that would be avoided if we were to pursue the Historical Alternative there. So that would knock off one of those bullets.

Let me start at the top here. Deterioration of the intersection level of service during peak hour conditions at the three Menlo Park intersections. Do the No Project Alternatives A and B mean that we do not have unavoidable impacts there on those two?

Ms. Martelino: Under the No Project correct there would be no significant impacts.

Chair Garber: Both Alternatives?

Ms. Martelino: Yes.

PTC6.11 Con't

Chair Garber: Okay. Any of the other ones accomplish that? I don't believe they do I am just confirming.

Ms. Martelino: Well, I would like to clarify first off that based on recent input from Menlo Park as was discussed in pervious hearings that the significant unavoidable on intersections now goes away because of mitigation measures that now have been deemed feasible in Menlo Park.

Chair Garber: In Menlo Park.

Ms. Martelino: Correct.

Chair Garber: But relative to the impacts in Palo Alto?

Ms. Martelino: In Palo Alto under the No Projects yes, the intersection impacts go away. There would be some level of intersection impact under the Reduced Intensity Alternative B.

Chair Garber: That is in the S-4 list.

Ms. Martelino: Yes. Under all other Alternatives that would construct to the same level of increase in operations as the SUMC Project would also result in the same level of intersection impacts as the proposed project.

PTC6.11 Con't

Chair Garber: So the only project Alternative that would take that bullet point off is No Project Alternative A then. Am I understanding that correctly?

Ms. Martelino: And the Reduced Intensity A.

Chair Garber: Okay, so it is both. Then the increased average daily traffic on the four Menlo Park roadway segments, does that go away then as a result of Menlo Park's…?

Ms. Martelino: No. The impacts on the Menlo Park roadways stay significant and unavoidable under the proposed project.

Chair Garber: Under the proposed project.

Ms. Martelino: And it would also stay significant and unavoidable under the Tree Preservation Alternative, the Historic Preservation Alternative, and the Village Concept Alternative. Those three basically.

If I could just add, as you are asking these really important questions and being able to understand and distinguish among the Alternatives, what we are referring to is Table S-5.

Chair Garber: I apologize.

PTC6.11 Con't

Mr. Jeung: So there beginning on page S-98 is a very handy comparison among the different Alternatives. You can see in the first column where the proposed project may result in a significant unavoidable impact. You can see across the different columns which Alternatives might alleviate that particular significant unavoidable impact.

Chair Garber: Yes, I actually looked at that and there are significantly more line items in that chart than there are on the nine of so bullets there. I was just trying to be able to cut through it a little bit. So if you will forgive me I have one more minute left in my time so I am going to keep plowing through this.

Mr. Jeung: So bullet point number two, the increased daily traffic. The No Project Alternatives essentially mitigate that as well as, I am sorry there was a third one as well?

Ms. Martelino: The Reduced Intensity Alternative A, which would involve no increase in operations.

Chair Garber: Then the emission criteria, the air pollutants, I believe that can't be mitigated by any Alternative. Well, the No Project I guess.

Mr. Jeung: Only No Project Alternative A would allow that impact to be reduced to less than significant.

Chair Garber: I believe the same is true for the following bullet point.

Ms. Martelino: If I may add for during construction the Tree Preservation Alternative does reduce the impact of construction emissions of air pollutants, particularly nitrous oxide.

Chair Garber: That is which one? Tree Preservation, thank you. Commissioner Keller, you had some more questions.

PTC6.12

Commissioner Keller: Yes. So just for example is Lucie Stern Theater is that on the list of historic resources for the City?

Mr. Turner: Without having the list in front of me I think that it is. I can't tell you which Category it is.

Commissioner Keller: So that was evaluated but the Hoover Pavilion and the Stone Building were evaluated or not evaluated? I am just trying to understand whether those were evaluated or not for the purposes of being on the list. In other words, were they deliberately omitted from the list or they were just not categorically put on the list?

Mr. Turner: Well, our Historic Preservation Planner could probably better answer this but I think the way that the ordinance works is that it is a property owner driven process to add essentially a building to the City's Historic Preservation Inventory. There is not, as I am aware, a direct process where the City can designate a building without owner consent.

PTC6.13

Commissioner Keller: I see, thank you. So what we seem to have here is what I would refer to as a multi-constrained problem. It is essentially a multidimensional optimization problem. As an engineer type when you do multi-constrained optimization problems you have various weightings that you apply to things and then you try to find the overall match that has the lowest badness ratio, or whatever kind of formula you want to pick. What is interesting about that is that when you are considering among the Alternatives in this process there are Alternatives that you will consider for CEQA purposes, and say okay here is something that makes sense from CEQA. We want to basically consider the ranges of this. If you think about this it is sort of the boundaries of a space. So the various CEQA Alternatives essentially define boundaries of a multidimensional space, but something in the interior of the multidimensional space might have a goodness rate or lowest badness rate that is better than something that is one of the points on the Alternative.

So what I am wondering is from this process while it won't be the point that we can at this juncture decide that a particular alternative or combination of alternatives will be best, because the FEIR process is supposed to wind up with the evaluation of that. But because the FEIR process only evaluates fixed alternatives that are at the boundaries I am wondering how we can find out a point on the interior that is actually better if such a point exits, or multiple such points exist that are better than any of the alternatives chosen. So I am wondering, to follow up on Commissioner Fineberg brought up, if it makes sense for the Commission to identify some alternative or some combination of alternatives which is not currently one of the eight or so that have been studied, which the Commission feels in a straw vote would be promising to consider as a candidate for evaluation and comparison to the others for their impacts in order to determine

PTC6.13 Con't

maybe there is an alternative that will bubble up to the top that we can identify to be considered. At this juncture we won't identify it and say it will be better, but we can perhaps identify an alternative that might be better to be evaluated and that might become the preferred alternative in the overall evaluation, better than any of the ones that have been so far identified. So if you posit my hypothetical condition that there are some additional better ones than the ones identified how do we identify those, how do we get them studied, what is the role of those in the FEIR process?

Mr. Williams: I will let others chime in if they would like to but the role of those in the FEIR process is for us to respond to any of those suggestions whether it be from the Commission as a whole or from one individual. We are going to respond in any event as to whether the impacts, this differs in some significant way from an Alternative that is there, and then whether or not it meets the criteria for reducing impacts and meeting most of the objectives of the project. Then if we don't feel that it does then we would indicate that we have other Alternatives that have been excluded. So the Commission again could go through that exercise, but at this point the role in the FEIR is to take those suggestions and look at whether or not another Alternative is viable and should be added to the FEIR.

Mr. Jeung: Let me preface this by saying I am going to step gingerly into this area, because I am very, very sympathetic to exactly the points that you are bringing up even though I didn't do particularly well in math and I really got lost with vector spaces and things like that.

One of the things we do as part of the CEQA process, and I think Attorney Silver brought it up really well earlier, as part of these Alternatives we are trying to create bookends. We are trying

PTC6.13 Con't

to identify the range of the potential impacts and to address those from very unique, distinct perspectives so we do have an Alternative that specifically addresses historic resources. We have another Alternative that specifically addresses trees. There are others that speak to getting better linkages.

I think the point that you are trying to bring up is that as we go through this exercise and we look at the environmental document it is supposed to be an informational document. It is intended to help fashion solutions that can help inform the Commission and the Council. So to the extent that I can draw upon experiences from some other jurisdictions, and again I am not saying this is how Palo Alto will do it, but in other communities where we have had multiple Alternatives and we have looked at those, we have asked Commissions or the Councils in those jurisdictions to say are there aspects of these different alternatives that are before you that if we were to composite them in another alternative it could be identified as a mitigated alternative, for example. So you could take the best of the Tree Preservation Alternative or you could take the best of the Reduced Intensity Alternative. Each of those different Alternatives has already been evaluated in the Environmental Impact Report. To the extent that we have already done the analysis of the bookends or sort of the boundaries as you put it, then the combined impacts or the composite impacts of an alternative that is within the interior of that boundary should be presumably already addressed in the environmental document. So to the extent that the Commission, if I am losing you let me know. So to the extent that the Commission decides that there is some combination or composite alternative that collectively you think is preferable or something that should be considered, not preferable, but something that should be considered then what we would do in the Final Environmental Impact Report is to say that there are aspects

PTC6.13 Con't

of each of these different Alternatives that have been evaluated in the Draft environmental document. We have now constructed something that is a little bit different. It is this hybrid that we have created and we will go through the environmental document and see whether there are components of this hybrid that have not been adequately addressed. We will have to go ahead and provide that additional supplemental environmental analysis. If it doesn't result in significant new impacts, new mitigation measures that in and of themselves create impacts, then we can say that the Draft environmental document is solid, and that it sufficiently addresses the impacts that might be associated with this hybrid. So what I am saying is I am sympathetic to what you and Commissioner Fineberg have brought up and we applied this in other jurisdictions where that was kind of the desire because the Council wanted to hear input from the Commission in that fashion.

Commissioner Keller: Thank you. If I may? So what is interesting about this is that there is sort of a gradient that comes when you have a surface for a multidimensional space, if you will. So when you are coming in from the boundary you might want to think about taking different alternatives and understanding how to choose among them by taking some of these combinations and alternatives.

PTC6.14

Two other quick things. One is with respect to the additional workers. I believe it was mentioned by somebody 10,000 additional workers. I believe it is more like 2,000 and change additional workers. If somebody could verify that just to correct the record. I think there is a total of 10,000 plus/minus and 2,000 plus/minus additional if I remember correctly.

PTC6.15

With respect to the program of objectives that are in Attachment A and also on page 2-4 of the EIR document. There are ones with bullets and ones with dashes. The ones with dashes are sort of sub underneath the ones with bullets. I am assuming that the major objectives, if you will, are the ones will bullets, and that the ones with dashes are sort of ways of implementing what is really on in terms of bullets. So for example the third bullet on page 2-4 is achieve timely compliance with the requirements of Senate Bill 1953, and other applicable code requirements. The first dash under that is replace the SHC portion of the 1959 hospital building, etc. It seems to me the idea behind that is really to replace the function of that as opposed to necessarily replace the building. For example, the Preservation Alternative does not replace the building but it replaces that function. It reuses the building for something else and therefore essentially complies with the spirit of that requirement, of that objective, but it doesn't implement it in the way that the proposed project does. So I am trying to understand the scope of exactly what was meant by substantially complying that these things are to be read I am assuming conceptually and not literally. They don't have to be read literally. Is that correct?

Mr. Jeung: Maybe answering you indirectly. An analogy might be the analysis that you go through with a development project and understanding whether it substantially complies with the Comprehensive Plan policies and goals and objectives. The Comprehensive Plan goals and objectives provide information, direction, guidance just as these objectives are intended to provide direction and guidance. As you go through an evaluation of the project you are making certain judgments about how satisfactorily it complies with those program objectives. So it is similar in that same fashion that you don't have to specifically comply to the letter, but if you are intending to comply with the spirit as you would with a Comprehensive Plan policy.

PTC6.15 Con't

In this case, I don't know if Stanford needs to address this, but part of the reason that there is a program goal to comply with SB 1953 is because there are buildings that do require seismic retrofitting. Those specific buildings are what are identified in the dashes I think.

Commissioner Keller: Thank you. I assume that there is no program objective that specifically says 600 beds or whatever that a slightly smaller number would substantially comply.

Mr. Jeung: Right. I think the attorney brought it out earlier in terms of coming up with these objectives. You can't be too specific so much as to preclude different ways of accomplishing those set of objectives. They are setup at the outset just like the Comprehensive Plan.

Chair Garber: Commissioner Fineberg you had a brief follow up and then we will get back to Commissioner Martinez.

Commissioner Fineberg: Can I just get confirmation? Are the items listed under the Objectives that have dashes in front of those, are those objectives and are the various Alternatives going to be measured against those dashed items, or will the Alternatives only be measured against the bullet dotted items?

Ms. Silver: We look at the Objectives as a whole. So we look at both the bulleted and the dashed language to determine compliance with the Objectives.

PTC6.15 Con't

Commissioner Fineberg: So if an Objective is stated that we are going to replace the 1959 structure, we are going to increase the number of beds, keep going the list one could define as the set of objectives something that could only be satisfied with a desired outcome and no other Alternative could satisfy that. So how is that handled?

Ms. Silver: Well, the Objectives have been reviewed so that they, we believe, are written broadly enough to allow for a range of Alternatives. When we reviewed the Objectives we reviewed sort of the broad-brush objectives that are highlighted in the bullet points, and we also reviewed the more detailed amplification of those broad-brush points that are in the dashed language. I hope that answers your question.

Chair Garber: Commissioner Martinez, and Commissioners it is 20 of eight at which point we will have been here for two hours. Let's see if we can try and wrap up our remaining questions perhaps by eight and then we can take a brief break and continue on. Go ahead.

PTC6.16

Commissioner Martinez: Okay. I want to focus my comments at this point on the Village Concept Alternative. I really want to encourage my fellow Commissioners to kind of pile on on this one. The conclusions that building housing near work increases traffic and traffic impacts really flies in the face of all conventional wisdom about planning, and tells us we should really stop working on our Comprehensive Plan and go in another direction. I just don't get it, to use Commissioner Fineberg's words from last time. Maybe I should have gone to Cornell.

PTC6.16 Con't

I don't get the conclusions that by providing nearly 500 housing units for employees that we create additional traffic impacts on another intersection and that the vehicle mile trips only goes down one percent. I think you would have to make some startling conclusions about what are these spouses doing. Do they work in Livermore? Just some things that are non-sequitur. We are proposing to suggest to build housing near where doctors and healthcare workers and doctorial students will work. Yet we are not also saying that this is also near Caltrain and substantially good transit. If we make such a conclusion we should make the conclusion on the other side that says Go Passes will fail.

So I am really not following. I am not appreciating. I am not supporting this argument that if these housing units were given or built for the Stanford Hospital workers that somehow this would not make a significant impact on traffic. I don't know if anybody can explain that away. Even if you could, you are saying that those 490 housing units are going to be occupied by other Stanford employees and we are going to be looking at the same impacts somewhere else. Maybe for the sake of this EIR it is not to be considered but for the sake of our streets and the city and mitigations that need to come it is there regardless. Thank you.

Chair Garber: Commissioner Tanaka followed by Lippert.

Commissioner Tanaka: I have two questions for the Chair. The first question is should we start moving on to start talking about Alternatives or are we still on the Draft EIR process?

Chair Garber: We are just on the process and general questions for the moment until we can get back down the line here and then we will move to the individual Alternatives and go through each one.

Commissioner Tanaka: Okay. Then the second question is given some of the discussion that has gone on so far do you recommend that we take a straw poll or try to give some guidance to Stanford and Staff as to which Alternative is good to focus on or a hybrid of Alternatives that is good to focus on?

Chair Garber: We can discuss once we get through the Alternatives. If there is some desire to do so we can entertain it at that time.

Commissioner Tanaka: Great, thank you.

Chair Garber: Commissioner Lippert.

PTC6.17

Commissioner Lippert: I want to finish up with my questions on the historic again. Just to clarify, regardless of whether these buildings are on the City's Historic Inventory they are potentially eligible as a state historic resource, or they are a state historic resource. They would have to be reviewed by our Historic Resources Board as long as they are within Palo Alto's jurisdiction. Is that not correct?

PTC6.17 Con't

Mr. Turner: I do not believe that that is correct. The HRB reviews only resources that are on the City's Historic Inventory. Those two buildings are not on the City's Historic Inventory.

Commissioner Lippert: So who would have the jurisdiction then if they were potentially eligible or actually state historic resources?

Mr. Jeung: Whenever we do an analysis in a community, if we identify a property as being potentially eligible for inclusion on either the State or the National Register regardless of the local circumstances and ordinances it still then becomes the purview of the local lead agency to consider that in the environmental document. So as we are going through and reviewing the environmental document and pointing out that there are potentially significant unavoidable impacts associated with the loss of this resource then the City Council would have to consider a Statement of Overriding Consideration that they wanted to move forward with the project.

Commissioner Lippert: Okay. So again, I feel like I am making a circular point here, because it would then come back to the Historic Resources Board that would have to make a recommendation to the City Council. Is that not correct?

Mr. Turner: Well, again our hands are pretty tied actually with regards to the Historic Preservation Ordinance and what the purview of the HRB is. So we are limited. However, we do recognize the fact that these structures are historically significant with regard to CEQA. We feel that the HRB should be inserted into the process, albeit not in a formal way, but at least in a way where their comments can be transmitted to the various Boards and Commissions for their

consideration. So we have done that. If you feel that there needs to be more review by the HRB then you may recommend that and Staff will take that into consideration, but the Historic Ordinance itself does not provide us with a pathway for review by the HRB of these buildings.

PTC6.17 Con't

Commissioner Lippert: Okay. So again, I am trying to get some clarity on this. According to the consultant it would have to be, if it was potentially eligible which these are potentially eligible, it would have to be reviewed by the City Council, but the City Council doesn't really make those determinations without the Historic Resources Board first making a recommendation. Have we had a situation like this before where the Historic Resources Board has not weighed in on potentially eligible buildings along the same lines?

Mr. Turner: No, I don't recall a situation like this. I think previously on the High Street project the Creamery building was on the Historic Inventory and that was reviewed by the HRB and the City Council. I don't recall any other examples of non-listed buildings going through the process without HRB review.

Commissioner Lippert: Wasted a lot of time on this one. I apologize. My time is almost up. I will just pass onto the next Commissioner. I have other questions but we can come back.

PTC6.18

Chair Garber: Commissioner Fineberg you were going to wait until the item itself? Commissioner Keller? In the applicant's presentation on their page 20 there was a bullet point number two, Stanford University Medical Center Proposal includes, and the second bullet point states, provision of $23 million towards City affordable housing projects unlike Quarry site

PTC6.18 Con't

PTC6.19

housing would be in Palo Alto helping City achieve ABAG requirements, would increase City housing supply rather than simply changing occupancy.

One, would that money be specifically assigned to housing projects or can it be used for anything? Does it matter? Two, how would we evaluate the significance of that money relative to it helping the City achieve our ABAG requirements? Three, is it true that by looking at the Alternative for replacing housing on Stanford sites that are not in Palo Alto that we are simply changing or swapping occupancy versus increasing it? That is the first I have heard of that and I am just curious if there is another plan that the applicant has that is not apart of this project but includes housing of some significant amount, and if that has been made part of the EIR and the potential cumulative impacts that were to be evaluated. So there are three questions there.

Mr. Williams: I will just indicate that there isn't another plan as far as what specifically would be done with that $23 million, and how far that would go to produce housing, which would be separate from housing on these sites that have been designated. It depends on a lot of assumptions in terms of how much the City could leverage that money, what land is available because there are not sites that go along with that money at this point. So essentially the City would need to use that for land and construction costs, and again how far that would go would depend on a lot of factors.

PTC6.20

Chair Garber: We would need to assemble the criteria in order to make the evaluation as to whether that would really be a significant amount and have a significant impact on us alleviating our ABAG disparity.

PTC6.20 Con't

Mr. Williams: We can make some assumptions and probably provide a range that that might provide, but I don't think we have done that at this point.

Chair Garber: I am not sure we should have. I am just trying to figure out how we would get into that question. So that was number one. One moment, we have two follow ups coming. Then to my first question, which is does that money need to be or is it required to be specifically assigned to housing projects versus anything else the City wants to do with that money?

Mr. Williams: That is what it is intended for at this point it is specifically for that. I think that would be, if the Development Agreement went according to what Stanford Medical Center has offered in that, there would be some condition that it be used in that way. So that leaves open the question of how the Development Agreement actually reads in the end but that is what certainly the intent is to focus it on housing.

Chair Garber: So that is the intent. The Development Agreement can be utilized to use that money in other ways should the City decide to.

Ms. Silver: Currently, Stanford's offer is that the money be dedicated to housing. The City has not yet accepted that offer. We are still in negotiations. There will be additional hearings on the extent of that offer. So we just can't answer that question at this point.

As to you other question about the ABAG requirements, we do have some documentation from ABAG that states that the current 2007 through 2014 ABAG cycle includes the Stanford Project development. So that is good. However, when the 2015 RHNA cycle comes out it may or may not include some additional employment projections attributable to this project. ABAG will not guarantee that there will be no additional allocation in the next cycle. We do have some confirmation that the current cycle does include some employment growth.

Chair Garber: Then to the third question, which is are we simply swapping housing but having to deal with the impacts either on this project or some other project that we don't know about, is that a true statement? If it is a true statement, is the City aware or maybe the applicant can speak to it, is that something that we should be taking into consideration as part of our 15-year, our 20-year outlook relative to the impacts that this project has on our community?

PTC6.21

Ms. Silver: Yes, Chair Garber, the GUP permit actually requires Stanford to build a certain number of units. I believe it is 2,200, I may be off a couple of hundred. Then it permits Stanford to build an additional 600 units. So we believe that the 600 units are not required to be built under the GUP. We have determined that we characterize that as an overage. So what the Village Concept Alternative looks at is taking those unprogrammed 600 units and restricting them to hospital employees. So I think there is a difference of opinion as to whether we are just swapping out housing units or whether they are housing units that are not currently on the ground and constructed, they are entitled, and they are permitted under the GUP. Village Concept looks at just restricting those to hospital employees.

PTC6.21 Con't

Chair Garber: That is the third follow up. For our consultants, has the work that you have done relative to impacts of the GUP, whether it is occurring as part of this project or not, is that apart of the DEIR? I would assume it would come under Cumulative Impacts if it is not apart of this project directly.

Ms. Martelino: Well, development under the GUP is considered in the Cumulative Analysis. Going back to the Village Concept Alternative the analysis of that Alternative does identify where the recommended dedication of housing towards SUMC employees could potentially have implications on the previous GUP analysis, particularly trip generation associated with the occupancy of the housing.

Chair Garber: Let me pause here. Mr. Philips, do you have some thoughts to share with us?

Mr. Philips: Yes, thank you. I just want to characterize the GUP so-called requirement and what the program is under the GUP. What we applied for and received under the GUP, which was program driven was for 3,000 units. That is what the University desired. That is what the University was granted. There was a linkage requirement because the GUP also addresses University facilities to be built. There was a linkage requirement the County imposed saying we don't want all the University facilities built out before the University develops its housing. So a certain amount of that housing program had to be driven along with the development of the facilities. That is what that is.

It is not that you have build so many housing units in order to do whatever you want to do. It is that there has been some para-pursue approach to both facilities and housing, but the program at the University is for the 3,000 units. So our view is that the units are Quarry are part of those 3,000 and if those are displaced then we have a hole in what our total need is as far as program is concerned. Thanks.

Chair Garber: We have three follow-ups. Commissioner Keller, Martinez, Lippert. Commissioner Keller.

PTC6.22

Commissioner Keller: Yes, quickly, the issue is that there was a statement that the Quarry Road housing was used for hospital housing, presumably for married employees, that that would add additional trips. If that Quarry housing were used for married student housing or married students on campus presumably that would involve the same number of additional trips, and therefore would have already been analyzed under the GUP. Is that a reasonable assumption?

Chair Garber: If you would identify yourself when you begin.

Mr. Dennis Struecker, AECOM: Yes, that is pretty close. The GUP used a lower trip rate than we used for the medical employees in this analysis but you are essentially correct.

Commissioner Keller: Spouses of medical employees tend to range further a field than spouses of students, I presume. Thank you. In terms of the GUP range of housing I would assume that

PTC6.23

with respect to Mr. Philips' comment that all of those 3,000 have an allocated purpose in Stanford's plans. I am seeing nods from people from Stanford. Thank you.

Chair Garber: Commissioner Martinez, and then Lippert.

PTC6.24

Commissioner Martinez: I just wanted to follow up on something that the Planning Director said in terms of leverage. Typically the City won't take $23 million and build a housing project. It will typically leverage it to help write down the cost of land, to help with development costs working with a partner, a nonprofit. Therefore rather than 50 units we might be looking at 200 units that could be constructed under a wise strategy to increase our housing supply.

Chair Garber: Commissioner Lippert.

PTC6.25

Commissioner Lippert: For the City Attorney. Can you clarify for me, I believe under California State law you can take very low, low, and moderate-income housing and actually transfer those to other communities in terms of being built. They don't necessarily have to be built within the geographical boundaries of Palo Alto. It could be shifted to another community. Is that not correct.

Ms. Silver: I think you are talking about a particular aspect of the redevelopment law and the City does not have a redevelopment area. We have a redevelopment agency but we don't yet have a designated redevelopment area.

PTC6.25 Con't

Commissioner Lippert: Okay. Then the other aspect is under SB 375, because of the proximity of Quarry Road to the transit center if these are allocated as very low, to low, to moderate-income housing units the housing bonus density law could also kick-in in terms of allowing for higher density housing. So in fact it could be that it could be graduate student housing with another component that could be dedicated to worker housing for the hospital if they were deemed to be very low to moderate income housing. Correct?

Ms. Silver: That is possible. The Quarry Road sites are located in the County jurisdiction and there is CEQA clearance for 420 units. There would have to additional CEQA clearance for any additional density bonus laws and the density bonus would have to be granted by the County.

Commissioner Lippert: Then again under SB 375 if they were identified as TPP, Transit Priority Project, sites by the regional planning group then it would be entitled to relief from a certain amount, a streamlining, through the CEQA process. I believe it is also an exemption from certain cascading provisions of CEQA.

Mr. Williams: That potential is out there. It requires that this would have to be or we would have to have plans developed that are compliant with the sustainable communities strategy under SB 375 that is adopted by the region. The City has also adopted that. So if we have that in place then yes, they would be eligible for some CEQA relief and density bonus applies really regardless of the SCS SB 375.

Commissioner Lippert: Thank you.

Chair Garber: Commissioners, let's take a brief three-minute break. We will take another one at ten o'clock. When we come back, let's start going through our various project alternatives with comments. Thank you.

Commissioners, let's provide some comments. We have seven different Alternatives. I will query you at the beginning of each to find out if people have comments. If they do, let's try and get all of our comments into package and ideally within five minutes if we can manage it. If we have to we will come back but otherwise we are going to be here until the wee hours of the night, and I would like to try and not do that. So who would like to go first on Alternative A Retrofitting Only? Does anybody have comments on A? I am seeing no head nods. You have one? Commissioner Fineberg.

PTC6.26

Commissioner Fineberg: this isn't going to be very technical and I think it is just going to affirm what is in the DEIR. This Alternative doesn't satisfy anybody's objectives to accomplish anything so ex-nay.

Chair Garber: Moving on. Anyone have comments on No Project Alternative B? Could we put up a slide for that? I am looking on page 5-3 if that helps you at all. So no comments on No Project Alternative B, which was about noncompliant structures. How about Reduced Intensity Alternative, the right sizing of Stanford Hospital and the Lucile Packard Children's Hospital? Commissioner Fineberg.

PTC6.27

Commissioner Fineberg: I am blind on the better part of how to consider the attainment of objectives versus the Reduced Intensity Alternatives A and B without detail of understanding what objectives are being met, and what objectives are not being met. I don't know. I don't know what the City or the applicant consider their significant objectives and which of the objectives are not significant objectives. I don't know which, A or B, satisfies each of those objectives or not. So it is hard for me to constructively draw any conclusions.

Chair Garber: Commissioners, how about Reduced Intensity Alternative B? Commissioner Keller.

PTC6.28

Commissioner Keller: What is interesting about Reduced Intensity Alternative A is you can pick some numbers basically it is not based on the number of current beds. What is interesting about Reduced Intensity Alternative B is it is an arbitrary number. In other words, a growth of 60 percent of the number of beds and that seems to be a very arbitrarily chosen number. So perhaps what might be considered as a variation of this Alternative for further evaluation is if you look at Figure 2-11 of the DEIR you will notice that there a five towers that are 130 feet. I believe it is about 18 feet or so is the floor-to-floor height of a floor, if I remember correctly it is somewhere in that range. So if we were to lop off a floor from each of those five towers, which would make the highest be 112 or so, which is the height of one the office towers I am wondering whether that is an alternative that should be evaluated as being perhaps better than the 130 foot alterative. It in some sense has some logical coherence as to why you would want to do that. I think I would ask my fellow Commissioners, whether… yes?

PTC6.28 Con't

Chair Garber: Restate your logic again. What does lopping off the top floor do and tell me how you got there again?

Commissioner Keller: Well, if you look at Figure 2-11 there are five towers at 130 feet.

Chair Garber: Yes.

Commissioner Keller: So lopping off one story from each of those five towers would mean that the highest of all the buildings would be about 112 feet, which would reduce some of the impact and it would be somewhat more of a feasible alternative than some arbitrary number like 60 percent. It is based on this design. I don't know exactly how many beds it turns out to be reducing the main hospital, but it is something that would not require a lot of redesign and I am wondering the degree to which the impacts on traffic, the impacts on housing, and the impacts on other things would be reduced.

Chair Garber: I appreciate your general comment that it is hard to know why B is at whatever number it ends up being. I am not sure that just taking off a floor – it doesn't get you all that much closer to like say the 50-foot height limit or something of that sort versus some other objective.

Commissioner Keller: I understand. I am not sure. I don't know exactly how many rooms or beds it would remove. If you think about it from a point of view of sort of a coherent design of what is already there it would retain that notion of a coherent design. It is a logical amount to

PTC6.28 Con't

reduce it by based on the design. The question is, we would like to know, I would like to know personally and I am not sure whether anybody else would, but I would like to know how many beds does that reduce it by and what are the corresponding impacts of that.

Chair Garber: You are using the phrase 'coherent design' again I appreciate what you are trying to do. I am not sure you and I, or you and I or anybody else could establish what that is as a baseline. I am not really arguing with you just sort of having a discussion. It would seem to me that you would want to find something that is not sort of design driven and that is planning driven, and say like what happens if the project were not go above a 50-foot height limit, and then look at the impacts.

Commissioner Keller: Let me state it as if suppose the project was to go above 112-feet. I think it is going to be very hard to build a building that is not above 50-feet.

Chair Garber: I don't disagree I am just saying that is a number that exists, and somebody could say we looked at what the impact is and therefore here are the results and why we didn't choose it.

Commissioner Keller: I understand. I am just suggesting 112-feet as a number to consider because one of the other towers is that height and it is something that would not require a great amount of redesign to accomplish.

Chair Garber: Commissioner Lippert, you have something to add?

PTC6.29

Commissioner Lippert: I had another question earlier on that I was going to ask and I sort of dismissed it. I thought at the time it wasn't going to make much of a difference but I think it does make a difference here. Stanford University Project that is what the applicant is proposing. That is the A-1 prime metric here. Then all the other Alternatives here, and it was alluded to by Commissioner Fineberg that those were somehow convoluted and made up by the applicant along with Staff. I may be paraphrasing that incorrectly, but as though they were just drummed up and pulled out of a hat. This is just Alternatives. I think it would be helpful if maybe Trixie went through and just identified where each of those Alternatives came from and how particularly the Reduced Intensity Alternatives were arrived at. I think that would basically answer Commissioner Keller's line of questioning as to why we are looking at a 60 percent reduction here. I think that these are Alternatives. There is rationale behind them, and understanding what the rationale of those are, and they are only snapshots.

Chair Garber: Commissioner Keller, just as a point of clarification, your reference to Commissioner Fineberg was in supporting something that you thought she said? Commissioner Fineberg, you had a concern about that?

Commissioner Fineberg: Yes. I didn't say that Staff cooked up various alternatives. What I was saying is that they were working with the applicant to determine what the favorite alternative would be, and that what would be analyzed going forward and what the proposed project would be was a collaborative effort and maybe not getting input from the Commission. But no, I don't think they in any way arbitrarily cooked up alternatives.

PTC6.29 Con't

Chair Garber: Well, let's not get into that just now. I think Commissioner Lippert's suggestion may not a bad one, which is to review the attributes of the Alternative relative to this conversation. Could you, Trixie, just review the attributes of Reduced Intensity Alternative B for us, and what the objectives were that the team was trying to solve in that Alternative? Or Rod or Steve? Trixie.

Commissioner Lippert: It isn't so much attributes as to how they arrived at, and I think it goes back to what Commissioner Keller was trying to get at, and Commissioner Fineberg was trying get at also, which is that there are certain programmatic requirements or aspects of the project. I think identifying how they arrived at these Alternatives will illuminate or illustrate more clearly why they were selected.

Chair Garber: Why this Alternative.

Ms. Martelino: I will make an attempt answering this as accurately as I can. It has been awhile since we developed these Alternatives. In general, when dealing hospital projects there is, yes, a collaborative effort with the applicant in arriving at Alternatives. The reason is that hospitals are a special case compared say to an office project, or a residential project. Where a hospital is a very tightly knit unit with necessary functional adjacencies and program requirements that the applicants are really most qualified or in the best position to determine what feasible alternatives can be developed. The collaboration on Staff's end and on the consultant's end comes in where we also look at these alternatives against the requirements of CEQA. Would they reduce

significant impacts? Would they attain close to the project's objectives? So there was a collaborative effort there in arriving at the Alternatives.

Specifically for Reduced Intensity Alternative B this came about as the fruit of a sequence of steps that occurred much earlier in the EIR preparation process. The analysis looked at the midpoint of development of the SUMC Project. Specifically the 2015 deadline for when the hospitals would need to meet seismic requirements under SB 1953. The Reduced Intensity Alternative B was sort of a parallel level of development as what would happen at that 2015 point. So it is not as arbitrary as it may seem because the basis of this came at point where there is a certain deadline that would need to be met and what level of development could potentially be foreseen at that midpoint, the 2015 midpoint?

PTC6.30

Chair Garber: Am I understanding you to say that you were looking at a construction period of whatever it is, and you were looking at how much square footage was accomplished by the end of that complete construction period. Then you took a point midway through that construction period and looked at how many square feet was available at that point, and that is where you came up with Reduced Intensity Alternative B.

Ms. Martelino: Right.

Chair Garber: So when it satisfied the SB 1953 the noncompliant structures, when it completed that is when you stopped and you evaluated just that project at that point.

PTC6.30 Con't

Ms. Martelino: Right. Well yes in terms of what would be developed for the hospital components, the medical office components.

Mr. Williams: If I could?

Chair Garber: Yes.

Mr. Williams: We picked that date and I think now that I hear it again that did have a bearing on the 60 percent. When you are doing this kind of determination of alternatives it is very standard to have a Reduced Intensity Alternative whether it is a residential or commercial project or whatever. So what you want to try to achieve is an option, and it doesn't mean it is a preferred option but just an option that has some significant reduction that is going to achieve some reduced impacts for you. So saying a 90 percent or a 95 percent instead of a 60 percent is not going to do much in terms of reducing impact. So 60 percent is something that is significant. It could be 50 percent. It could be 70 percent. You are trying to pick a number that has some impact. That is why I think when you compare it to reducing a floor, we look at 60 percent and say well, okay that is going to have an impact on traffic. It is going to reduce traffic whether it is enough to eliminate significant unavoidable impacts, maybe. We don't know that right off but at least it is a pretty substantial number. It is going to have some impact on height because if you only have 60 percent of the project it may not mean that 130, there isn't still a 130-foot tower, but you are not going to have everything be 130 feet at that point.

PTC6.30 Con't

So when you then go to something has been suggested, let's take off one story of height that is probably a ten percent impact on the project. It really probably doesn't do much for the other types of impacts. So we just see that is a more substantial alternative to review than removing one floor of the height, which is probably covered in many respects already by the Alternatives that we looked at.

Chair Garber: So in other words, maybe the question for the Commission relative to this Alternative is 60 percent the right number and what is the argument that you would make for that? So a suggestion for instance that I made, what is the impact if we make it all 50 feet high? The reality is that is probably 30 percent of the project or something so it is way too low and unreasonable versus a suggestion by Commissioner Keller which is take off one floor, which is more 90 to 95 percent and is not significant in the other direction. So there we are at 30. Commissioner Keller, a follow up.

PTC6.31

Commissioner Keller: I think in terms of considering some of the height issues the Children's Hospital is much less of an impact than is Stanford Hospital itself. So I was thinking about in terms of some of the height issues of what happens if we lowered it. I do realize that applying 60 percent of both would do it but in some sense the 60 percent analysis that was done Reduced Intensity Alternative B there are no heights, there are no numbers, I didn't even see it exact saying we will have X number of beds in each hospital. I don't see a specific detail on that. So I was trying to specify something that is concrete. There is square footage but not beds. At least I couldn't find the number of beds. So I was trying to think in terms of a concrete definition since essentially the upper floors are beds and the lower floors are other kinds of facilities, operating

PTC6.31 Con't

rooms, and labs, and stuff like that. It seemed to make sense that that was something coherent and that it might be somewhat linear but it is somewhat more specific than the 60 percent alternative, which was very vague.

Chair Garber: You are looking to assign something functional to that number as opposed to just an arbitrary one.

Commissioner Keller: Right. So it seems to me that since I was concerned about some of the impacts and concerned about the impact of height in particular then why not choose that as a way of having something that we can evaluate, and say okay how many beds is that, how many square feet is that, and what kind of impact is quantified with that.

Chair Garber: Okay. Commissioner Martinez.

Commissioner Martinez: I think we are kind of going the wrong direction looking at that 60 percent. When I looked at these different Alternatives it was different construction, or non-construction scenarios. This scenario is to build essentially the hospitals. Not 60 percent. Sixty percent is the outcome of that because we are not doing work at Hoover Pavilion and the School of Medicine and whatever comes later. So I think saying well, why not 50 percent misses the point because the direction of this Alternative is let's get the hospitals built.

Chair Garber: Thank you for that. Any other comments? Commissioner Fineberg.

PTC6.31 Con't

Commissioner Fineberg: Commissioner Keller's direction of questions I think having the view of an Alternative that is functionally different, I shouldn't say functionally, structurally different with the goal of reducing the height might be one that should be considered in a slightly different light. I don't see that the Alternative should be remove the top floor and then lose the square footage associated with it because then you also lose the objectives of what those floors yield. Should there be an alternative with the goal of reducing the impact of the extra height? Then that space would be spread. It would have some additional impacts of possibly taking out more trees, using up more land, maybe being a little less compact, but you could reduce the height impacts. Still it wouldn't change the traffic and it wouldn't change the air pollution. Well maybe it might change the air pollution during construction. It would still achieve the goals of the facility. If we don't analyze something that is at a lower height how do we know whether it is a viable alternative? So I would kind of like to see Commissioner Keller's idea of lopping off the top be make it lower, spread it, and whether that should be analyzed would be a question maybe other Commissioners could comment on.

Chair Garber: Commissioner Keller and then let's move on.

Commissioner Keller: I understand the objective of Commissioner Fineberg, but I was actually trying to solve multiple problems at once. I was trying to reduce the intensity, reduce the height, and several other things at the same time. That is why I thought it made sense.

Also, the issue is that it does seem to make sense to me that some reduced intensity of the hospital being the biggest thing that is being built is something that is worthwhile considering

PTC6.31 Con't

and evaluating that. I think that I want to separate out the notion, as we did earlier, what is necessary in order to figure out the purposes from the point of view of CEQA for which this theoretically adequately studied than from the point of view of giving input to the decision process of choosing an alternative to move forward with. The 60 percent Alternative is not well enough defined to be an alternative anybody would consider choosing, while the alternative that I am proposing actually may be an alternative that the Council might consider choosing, and that is why I am proposing it.

Chair Garber: I think to your point the 60 percent is arbitrary and very hard to define. Although, I don't find simply taking off one floor compelling enough to be different than some of the other Alternatives we already have in there. Again, we can take it as a comment and move on.

Okay, let's go to the Tree Preservation Alternative. Commissioner Tanaka.

PTC6.32

Commissioner Tanaka: Yes, thank you. I found this Alternative, which I guess is the preferred Alternative, to overall be quite compelling. There were several things that I wasn't quite clear on. I will take one at a time. First of all, it looked like there would be a higher parking lot, which I didn't quite understand why there would be. Why would the parking lot be raised for this Alternative to happen? Can someone speak to that?

Mr. Tortorich: Yes, I would be happy to answer the question. We might have a graphic for it. Our original proposal had a parking structure below grade. To put that structure below grade we would have to remove two protected trees. So by reducing the footprint of the parking structure

without going any deeper below grade we had to bring it up above grade. So what we did then is decided to make something special out of it so we extended that third floor garden on the top of the garage.

Commissioner Tanaka: I see, so it is a narrower project so you had to go up another floor. I understand.

Mr. Tortorich: Yes.

PTC6.33

Commissioner Tanaka: The other thing is was thinking about, and it is hard to tell because I couldn't figure out where the trees are. I notice some buildings are going to be made taller to make up for the loss of one of the modules.

Mr. Tortorich: Right.

Commissioner Tanaka: It seemed that the same could be done with the Foundation Medicine buildings as well. So why not have maybe fewer buildings or reduce the footprints of those buildings and make them higher as well to match?

Mr. Tortorich: Well, we were able to accommodate the School of Medicine buildings on the site without having to increase their height. The height of the School of Medicine buildings sort of matches the character of the buildings built in the County that is right in that surrounding. So there was no need to go up in height for the School of Medicine building.

Commissioner Tanaka: Okay, so where are the trees being lost then? The other trees?

Mr. Tortorich: The trees being lost?

Commissioner Tanaka: Yes.

Mr. Tortorich: There are trees under the footprint of the Stanford Hospital building. Some of those trees are in parking structures or actually surface lots. There are trees on the Lucile Packard Children's Hospital site again in paved parking lots. Then there are some trees that we are removing at the Hoover site again on paved parking lots.

PTC6.34

Commissioner Tanaka: Modifying those footprints couldn't save those trees or making the footprint higher or making buildings higher reducing the footprint couldn't?

Mr. Tortorich: No. If we had the diagram of the Stanford Hospital you can see that base platform, the emergency department, imaging, our interventional platform is a pretty large floor plate and we have shrunk it as much as we can to preserve trees around the perimeter, but there are some protected trees that are just unavoidable in their removal or replacement because they will sit square in the middle of the proposed project.

Commissioner Tanaka: I see. So basically the reason why the footprint can't be made smaller is because you need a certain size floor plate for the equipment and work that has to be done.

Mr. Tortorich: Yes, clearly the programmatic requirements for our emergency department, imaging department on the ground floor coupled with that interventional platform on the second floor, which are our operating rooms and prep and recovery spaces define sort of the envelope of those spaces. You can't quite easily have holes in them or shrink that perimeter any further.

Commissioner Tanaka: Okay, great. Thank you.

Chair Garber: Commissioner Fineberg and then Lippert.

Commissioner Fineberg: Would it be possible for the City Arborist, Dave Dockter, to answer a few questions? I could use some help understanding some terms that are in the DEIR. On page 5-15 and 5-16 it talks about the site plan for this Alternative would avoid 13 biologically and aesthetically significant protected trees. Then on page 5-16 it talks about preserving approximately 23 protected trees. What is the difference between biologically and aesthetically significant tree, and a protected tree? What is the difference between the 13 and the 23? Then I have some more questions.

PTC6.35

Mr. Dave Dockter, Planning Arborist: Good evening Commissioners. The definition of protected trees – well, let me just address the difference between the numbers first. Staff identified approximately 23 trees that were both aesthetically and biologically important that had those characteristics. The project proponents are proposing to save 13 or 15 of those 23 that Staff identified as having both of those characteristics. So in a perfect world we would have all

PTC6.35 Con't

23, or approximately 23, preserved, worked around, or saved somehow. The project is not proposing to save all of those but rather 13 or 15. There are two trees in flux I understand.

The former question was what is the difference between terminology.

Commissioner Fineberg: Between the biologically and aesthetically significant trees versus protected trees. I guess I am wondering are they all protected and there is something more significant about the 13. Is there something about how it is being done that are we saving the best of the best trees, or are we losing the best of the best, and maybe we need to tweak something? I don't know.

Mr. Dockter: Okay, just for the record I will clarify how our interpretation of biological resources was identified, and aesthetic resources. If a tree possesses both of these characteristics that in our minds kind of elevated them to a very, very important tree that should be, again I say in a perfect world, retained, saved, and built around in one way the other. Those are the trees of elevated importance so to speak.

So let me identify how we got to those two categories. Biological resources are simply any tree that is identified in our Tree Ordinance as meeting certain size standards if it is an oak or a redwood. Just by virtue of it being a code protected tree qualifies it as a biological resource according to CEQA. That is true in any city in the state. If it is mentioned in a Tree Ordinance it becomes automatically a significant tree.

PTC6.35 Con't

So now the other category is aesthetic tree resource that is pretty much a discretionary opinion of a tree, in this case. I will just read from one of the memos that was referenced in the document here. Aesthetic tree resources is a tree that is deemed important to the project, as designated by the Department of Planning and Community Environment or the City Council because it has one or more of the following qualities. It functions as an important, prominent visual feature relating to the existing area, proposed conditions, pedestrian or vehicular thoroughfares. The tree contributes to a larger grove or shared canopy, landscape theme, or provides a visual balance to existing buildings, trees, or streetscape. If the tree possesses a unique character as defined in the designation for instance of a Heritage Tree in the Tree Ordinance such as if the tree is an outstanding specimen of a desirable species, distinctive in form, size, age, location, or has some other historical significance. So that is what qualifies an aesthetic resource, if the tree or trees contributed.

So when we looked at the site and evaluated all of the trees, many, many trees though it was an oak or a redwood standing at or near buildings meant most of them did not have this aesthetic resource quality. However, several trees did. For instance in the approach to the Stone Building before you get to the fountain there are groupings of trees on each side that posed a literal bookend entry feature. These became very, very prominent and meeting this aesthetic resource characteristic. We designated those, or it was a discretionary opinion from the Department of many, many people, it wasn't just myself for instance that just came up with this. So that is how this aesthetic resource plays a role.

PTC6.35 Con't

So a tree that has the characteristics of an aesthetic resource and biological resource because it is and ordinance size tree that grouping of trees, small in number is what we elevated to this level of importance to be designed around or retained, or at least recommended that.

Commissioner Fineberg: Thank you, I appreciate that. If the Chair can bear with me I just have a quick wrap up comment. I would like a question as to whether the current Tree Preservation plan preserves an adequate number of trees, and whether it adequately analyzes what might be considered tree preservation. This Alternative is saving something depending on what I am looking at either 13 or 23 out of 71 total trees. Well, the question was raised whether it was 15 but it is talking about preserving 23 protected trees, and yet the map from the applicant is showing three. So let me add a sub-question. Is the Tree Protection plan preserving 13 trees or 23 trees? On page 5-16 it is saying 48 of the trees will be removed, preserving approximately 23 of the protected trees that are considered both biologically and aesthetically significant. So is it 13 or 23? Is that adequate? Should it be called a Tree Preservation Alternative when it is a small percentage of the total at the site?

Chair Garber: Commissioner Lippert.

Commissioner Lippert: I just need a clarification on one minor point here. In Stanford's presentation they talked about 12 to 15 protected trees remaining. Then in the Staff presentation it was 13 biological/aesthetic significant protected trees would be retained. Are we talking about the same trees? Since there are so many trees on the site I want to make sure that we are in

PTC6.35 Con't

agreement with Stanford and Stanford is in agreement with Staff. Dave, do you want to answer that?

Mr. Dockter: The answer is yes. Whether it is 13 or 15 it is the same grouping of trees at the Kaplan Lawn area and at the FIM building, and a couple of others.

PTC6.36

Commissioner Lippert: Okay. Then one other quick question here. Generally there is an Arborist Report that is done evaluating trees, and with that there is an amortization done on each of the trees as to what their monetary value is. What is to keep Stanford Medical Center from just knocking out a couple of trees and paying the penalty on them and chopping them up for cordwood? When you talk about a Medical Center…..

Mr. Dockter: Planning for removal is one thing. That is what we do ahead of time. Doing it defiantly after a project is approved and starting up the chainsaws is another. I assume you are talking about the former where we foresee and we plan for removal. Based on an Arborist Report we can pretty well evaluate if a tree will survive or not. During the actual individual project reviews is where we would render an opinion of can the tree be saved or not, or if it goes to the remove list. That determination of all of these trees to be saved still has yet to be truly verified, because there is a solar access study as well as an arborist assessment of what is happening with the ground and all around a given tree.

If for instance the solar access study reveals that the tree will not tolerate the amount of shade being cast on a tree, and it is denying the solar access basically to the tree, the tree could

foreseeably decline. That would be put in the removal category. We would have to render an opinion at that time whether the roofline would have to be lowered say, or whether the tree would be allowed to be put on the removal list. I mean one of the 13 to 15. So though we are counting that now one of the issues of going parallel with projects and the EIR at the same time is the question is raised, what if the project needs to be changed in order to save one of the 13 or 15 trees? That is answer I don't have for that question, but it does have bearing on your comment and question to me.

Commissioner Lippert: Thank you.

Chair Garber: Anything else?

Commissioner Lippert: Actually, I do but I can hold off.

Chair Garber: Go ahead.

PTC6.37

Commissioner Lippert: Dave, UC Berkeley had quite a bit of controversy over building and I think everybody seems to remember somebody camped out in one of the heritage trees in Berkeley. What were some of the decisions that were underlying in terms of the considerations for removal of those trees? You probably followed that pretty closely. There were people that actually camped out and said no way this tree is going, and yet the university had all the right to remove those trees. In some ways this is almost a similar situation.

Mr. Dockter: My opinion is it doesn't have a lot of bearing on our project here. We are doing it properly by assessing the characteristics and the values and do they apply to our regulations here. There I think it was just purely state land jurisdiction and there was really no local zoning applying to those oak trees. I think it was a lot of popular opinion and people tying themselves to the tree. They had a PR issue to deal with.

In our case, we are going about it a little bit more responsibly by foreseeing and evaluating can the trees be saved, should they, what level of importance they have to the community ahead of time, before permits are issued. This is a big difference in my opinion between Berkeley and Stanford.

Commissioner Lippert: Thank you.

Chair Garber: Commissioner Keller.

PTC6.38

Commissioner Keller: So what seems to me here is that looking at page S-152 and S-153, it appears that out of the 71 trees that were originally considered for removal in the original project proposal 23 of those are considered biologically and aesthetically significant. Some of those are being preserved but it looks like there are ten biologically and aesthetically significant protected trees that are either going to be cut down or removed, and that number may change by one or two depending on the footprint of the building.

PTC6.38 Con't

If I look at this diagram, can we have this diagram put up? It is from the Stanford presentation. It is the diagram that says Historic Preservation Alternative. I like that one because it has numbers on it that I can refer to. I understand. I am not talking about Historic Preservation but I can refer to it because it has numbers, labeled. No, if you can go a few slides further. The very next one. Yes, thank you. The reason I want this one is because the buildings are numbered and I can talk about them.

So what is interesting about this is it appears that most of the aesthetically and biologically, I guess they are all biologically, so the main issue is aesthetically. The main ones that are aesthetically significant are those that are under the footprint of Building 8, which I guess is FIM 1 I believe. It looks like there is a big gap between Buildings 9 and 10, which I guess is FIM 2 and FIM 3. So I am wondering the extent to which Building 8, FIM 1, can be shrunk to preserve more trees. There is a gap between Building 9 and Building 10, FIM 2 and FIM 3, that doesn't seem to have any function except maybe because of the surge capacity issues. It looks like that gap might be usefully filled in to some extent and thereby reduce the footprint of FIM 1 or Building 8. I am wondering whether a design like that might preserve more of the trees in what is refereed to as the FIM 1grove. Mr. Dockter, do you want to comment on that?

Mr. Dockter: I can't comment on the footprint change to 9 and 10, or FIM 2 and 3. Moving away from trees FIM 1 of course would increase the potential for preservation of some of the trees there I would expect.

PTC6.38 Con't

Commissioner Keller: Thank you. So may I suggest that as part of this analysis that further tweaking be done to the footprint of FIM 1 to reduce the impact on the FIM 1 grove? Perhaps decreasing the footprint of that building and increasing the footprint of Buildings 9 and 10 connecting them closer together, making that gap be less and retaining the total square footage, might help in that.

Do you have something you want to add? Identify yourself.

Mr. Rich Tangori, Stanford School of Medicine: I am Rich Tangori with the School of Medicine. I would actually respond to that question if the Commission pleases.

Commissioner Keller: Yes, please.

Mr. Tangori: The footprint between 9 and 10 cannot be expanded for two reasons. One, there is a building on that site right now. If you know, the Stone complex actually sits on that site. There is a tunnel that I believe goes through between those two buildings. That is why the site plan was the way it was.

More importantly, there is a certain size associated with the lab modules and the lab support spaces that give the building number 8, the FIM 1 building, its width. So even if we shrink the building in length that width is not likely to be shrunk. In doing so we may not be able to save any more trees. I couldn't be more specific without actually looking at some more specific

drawings, but given the width of the building from north to south is more or less fixed. It will not help, I do not believe, in saving more trees.

Commissioner Keller: Thank you. I appreciate that and if that is the best we can do, but it is worthwhile at least evaluating that. Thank you. Mr. Dockter?

Mr. Dockter: I think I would like to add as a follow up in support of what this gentleman just that FIM 1 is retaining the largest and biggest trees along that section. They are relocating one tree, which in the eyes of the City would be retained. They are not removing that tree. The other largest trees along Pasteur there would be remaining the way the footprint is now. By narrowing the building it would improve conditions for the trees that remain but it wouldn't be the tipping point whether a tree was removed or staying. So modifying the footprint of that building would not really increase the numbers of trees removed or remaining. It would just improve the conditions for survivability of probably one tree.

PTC6.39 Commissioner Keller: Thank you. Let me just close my comments on this by saying that it would be helpful to actually have a detailed drawing showing where all the trees are and which ones are being removed and which ones are staying, and this as part of the Final EIR process. sort of indicating the degree to why some of them have to be taken down because of a necessary footprint, and also an explanation of what the gentleman from the medical school said regarding the gap between FIM 2 and FIM 3, particularly since there is now a building that encompasses or connects the two together. So I am not sure I understand that but an explanation of that I think would be very helpful. Thank you.

Chair Garber: Commissioner Tanaka.

PTC6.40 Commissioner Tanaka: Thank you. This is a quick follow on to Commissioner Keller's line of questioning. I guess from earlier questions I was under the impression that the FIM buildings were not impacting the trees because they have already been modified. From this line of discussion it sounds like if that building, I guess FIM 1, is on protected trees perhaps the footprint of that building could be eliminated and added onto Building 9 and 10 on that diagram up there, if it is. If there are no trees under FIM 1 then it doesn't matter. Maybe you could address that.

Mr. Tortorich: Let me give you just a quick – I think these two slides, one on top of the other will help show you really the planning of what is happening with the School of Medicine buildings.

So FIM 1 is going to be constructed while the Stone Building is still in place that way you can decamp occupants of the Stone Building into FIM 1. Then we start incrementally demolishing the Stone Building to get into this final condition. Okay?

So the site is not clear. As we start construction the site is still occupied with School of Medicine faculty and staff. While we build a building to move a group into, and then we demolish a portion of the Stone Building, and then continue in a sequential replacement. So it is a truly a replacement effort.

PTC6.40 Con't

Commissioner Tanaka: So are there trees on that footprint right now where that Building 8 is?

Mr. Tortorich: There are some trees. I think we have been able to realign the building to protect the most significant trees and aesthetically valuable trees on that site.

Commissioner Tanaka: Okay. So for decamping reasons then it sounds like the significant trees are being protected.

Mr. Tortorich: We believe so.

PTC6.41

Commissioner Tanaka: Okay, great. Thank you. Then I mentioned this earlier at one of the earlier meetings, but I do think it is very important as part of the Final EIR to have a very good communication plan on the trees so we don't have a Berkeley-like situation. Exactly, California Avenue situation. So I think a very, very clear well publicized communication plan is very important to have.

PTC6.42

Maybe this is already in there but since there are losses of quite a few trees I think having a plan to have additional trees planted other places, which of course I understand is not a full mitigation, but would actually I think be a good PR thing as well. Have additional trees planted at maybe a 2:1 ratio or something where it could maybe in 50 years make up for it I think would be a good thing.

PTC6.43

Actually, I have one other question for Stanford so maybe Mark can come up again to answer quickly. If you were to look at the cost of this Alternative project, I am talking about building cost to Stanford, this Alternative to the original planned project how does it relate? How does it compare? Is it about the same, or a little bit more, or a little bit less?

Mr. Tortorich: The building costs would be comparable because it is the amount of square footage that we are building. As I mentioned, before we are actively pursuing and drawing this Tree Preservation Alternative so that we can comply with state mandates that tell us we have to finish our drawings and get them permitted by the end of this year. So we have made a considerable investment in this Tree Preservation Alternative after working with Staff to certainly save as many trees.

Something else I should point out. The Tree Preservation Alternative saves a certain quantity of trees, 13 to 15 trees. We will have that clarified obviously for the Final EIR. We are relocating a significant number of the other trees that are being disturbed. So we will excavate them, box them, hold them, and then replant them in our landscaping plan. So we are taking a considerable amount of effort to relocate trees that are in the path of construction.

Commissioner Tanaka: I think that is the responsible thing to do, so thank you. Actually, before you leave, I thought because we are losing one building footprint I thought you would actually save some money here, because you are adding it to the heights of the building. You are saying the cost would be about the same?

PTC6.43 Con't

Mr. Tortorich: It would be about the same because really the costs obviously are in the square footage that you are constructing. So the square footage didn't change at all, and within a hospital building there is a significant cost in the medical equipment and the information technology that goes into it, and again that wouldn't change because the square footage has not changed.

Commissioner Tanaka: Okay, great. Thank you.

PTC6.44

Chair Garber: I have no real comments on this item other than to recognize that this seems like a natural outcome of the development of the design and all of the objectives continue to be met in a slightly more efficient way, and has two apparent benefits. One, it saves some trees, and two it reduces the footprint.

So with that let's go to the Historic Preservation Alternative. Commissioners, does anyone have comments on that? Commissioner Tanaka.

PTC6.45

Commissioner Tanaka: I have just a quick comment. I kind of said this earlier. I think what is historically significant about the Stone Building isn't so much the way it looks but it is what happened inside. I think what would be more important is to actually allow these new kind of procedures or discoveries to be made. So I think having the research facilities that enable that I think is far better in recognizing the historic significance of this building versus the way it looks. So that is my comment. Thank you.

Chair Garber: Commissioner Fineberg.

PTC6.46

Commissioner Fineberg: I have a question for Stanford. Please. Thank you. Can you tell me if Memorial Chapel is on the City's list of historic sites?

Mr. Tortorich: I don't know. It is in the County of Santa Clara. It is not in the City of Palo Alto so I don't know that it would be on a City list.

Commissioner Fineberg: Does it meet current PAUSD building code?

Mr. Tortorich: I don't know.

Commissioner Fineberg: I am sorry, not PAUSD, Palo Alto City code or current County code?

Mr. Tortorich: I will look to my colleagues at the University. I am not familiar with the design standards of the University buildings themselves. I know it was damaged in the Loma Prieta Earthquake and had to go through a significant seismic retrofit. So it probably meets the applicable codes at the time of post Loma Prieta.

Commissioner Fineberg: Would that be true for the buildings on the quad also? I would venture to guess they don't meet current code.

Mr. Tortorich: I don't know. I honestly don't know.

PTC6.46 Con't

Commissioner Fineberg: The reason I am asking that is earlier you talked about tearing down the buildings and replacing them because they don't meet code. I am wondering if it is appropriate to have a different standard in different locations because one particular building is not desirable anymore. Whether the historic qualities, the events, the aesthetics trump that, and whether it warrants working around and putting classrooms or other facilities that wouldn't have as tough demands on the facility. I would be curious for your thoughts on that.

Mr. Tortorich: Let me clarify. We are not demolishing the buildings because they don't meet code. If I said that I said that in error. We are demolishing the buildings because they don't fit our needs and the cost of retrofitting these buildings to accommodate even the City of Palo Alto's earthquake standards are extraordinary for two reasons. One, just the physical restructuring of the buildings to accommodate earthquake forces, they are tremendously disruptive interventions that we have to make to the structure. Two, to make those disruptive interventions to the structure we actually have to move everybody out of the building. So for the School of Medicine as we have talked about with this replacement plan we have 420,000 square feet more or less of medical research labs that have to continue to function. How do we relocate those research labs while we restructure a 1959 structure to accommodate current earthquake safety codes, and accommodate all the technology that is necessary to support modern research labs? It is an equation that just doesn't work.

Commissioner Fineberg: Okay. So I guess where I am going, maybe I didn't make it clear, is why do those buildings have to be retrofitted for labs or hospital use? Can they not be used for

PTC6.46 Con't

purposes of the hospital, of the Medical Center that don't require that high level of retrofitting? Other buildings on campus are not always brought up to code. Why do the 1959 structures have to comply with Palo Alto Building Code? Why can't they remain and be repurposed in some way that is useful and beneficial, but not be brought up to code?

Mr. Tortorich: So the code level analysis done for the Stone Building was not to meet any extraordinary requirements of hospital buildings. It was to meet the basic life-safety criteria of safe buildings. So we consider these buildings long-term not to be safe. Not for a long-term occupancy. We would derelict in our fiduciary responsibilities if we didn't undertake a replacement strategy.

Commissioner Fineberg: Okay. So is that the same test that is used on other campus buildings? Are there long-term plans to teardown campus buildings that are not currently safe?

Mr. Tortorich: I don't know that for a fact. I know there are some campus buildings that have been shuttered since the Loma Prieta Earthquake and are not being occupied. I know that the campus through its construction efforts on campus has torn down a number of buildings. I don't know if they tore them down for code reasons or for other reasons, but there has been quite regeneration of facilities on the main campus.

I have worked in a lot of other environments. The Stone Buildings are very vulnerable. They have varying degrees of vulnerability, but they are very vulnerable. I have had an awful lot of

consultation with our structural engineers who have analyzed the buildings, and their advice to me was you need a long-term replacement strategy. These buildings long-term are not safe.

Commissioner Fineberg: Thank you.

Mr. Tortorich: Okay.

Chair Garber: Commissioner Lippert and then Keller.

PTC6.47

Commissioner Lippert: Just digressing a tiny bit. What makes the Stanford campus unique, and particularly the Memorial Chapel is Stanford White's design. Those buildings surely need to be preserved with regard to their historic significance.

With regard to the hospital, the hospital is a whole other kettle of fish. I think what is important here is we need to have clarity on the process for determining whether these buildings are historic resources or not, and their significance in terms of being eligible for either the State Historic Register or the National Register, and whether in fact Edward Durell Stone's design is reaching the threshold of something like Stanford White. For those of you that don't know, Edward Durell Stone did design this building but I don't think there is anything significant about this building. Well, it had a lot of construction flaws in it to begin with that had to be fixed. In addition to that it really is a dumb-down version of the General Motors building which is a very significant building in New York City.

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I think what is important here with regard to the University Hospital and Edward Durell Stone's design is trying to get a handle on two things. Number one is its significance, which I went through. Number two, what the process will be for determining that. I think that whether it is done by our Palo Alto Historic Resources Board with a recommendation to the City Council or whether it goes directly to the City Council. I don't have the basis on which I can make those findings. I think that our Historic Resources Board is better equipped for making those findings. Based on your preliminary investigation or the hearing that you had earlier today it sounds like the Historic Resources Board, which has architects on it, was beginning to finally wrestle with the whole issue of whether there really needs to be some sort of Statement of Overriding Consideration. I think that with that this whole section as to whether Historic Preservation Alternative is appropriate or not is going to either meet the light of day or wind up being just another chapter in the EIR.

Chair Garber: Commissioner, would it be helpful perhaps to ask the historic consultants to give us a brief overview of the historic value of the Stone Building and perhaps the Hoover Pavilion?

Commissioner Lippert: Sure.

Chair Garber: Especially if they are here. If you would introduce yourself. Can you tell us approximately how long this might take? Three minutes or something like that?

Mr. Charles Chase, Director of Planning, Architectural Resources Group: We can be as brief as you would like us to be. We will be very brief.

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Chair Garber: Give it a shot.

Mr. Chase: Good evening Commissioners, my name is Charles Chase. I am the Director of Planning for Architectural Resources Group. With me is Jodi Stock the Architectural Historian who has prepared the information for the Draft EIR. Jodi will tell you about the findings of significance and the criteria that was used to make those findings.

Ms. Jodi Stock, Architectural Historian, Architectural Resources Group: So we conducted research. Actually, we did a peer review of an evaluation that was prepared by Stanford. We evaluated based on the California Register criteria. We found it eligible under – there are four criteria. The fourth one has to do primarily with archeological resources, so didn't look at that one as much. We found the building significant for criterion one and these are similar to the National Register criteria. So criterion one is association with an important event. In this case it was the first heart transplant in the United States.

Under criterion B it was for the association of Dr. Norman Shumway who did the transplant. So that is A and B.

C was as the work of Edward Durell Stone, and it was a very pivotal period in his architectural design development. Does that help?

Commissioner Lippert: It does. Sounds like the hospital needs a coronary bypass.

PTC6.47 Con't

Chair Garber: I think it is getting a replacement, actually. What about the Hoover Pavilion? Did you do an evaluation of the Hoover Pavilion as well?

Ms. Stock: That was in the original evaluation and they found it to be a resource for architecture, and we concurred with that finding.

Commissioner Lippert: I have a follow up on that.

Chair Garber: Please.

Commissioner Lippert: I want to go back to the Stone Building for just a moment if I might. There are also other criteria that come into play, which is number one, the materials that the building has been constructed out of and whether those have been impacted in any way. It is the deterioration of the building, how much of the building has been modified from its original pristine original design. Then there are also other aspects to it which are that as I think Stanford had indicated previously that it really doesn't make today's seismic standards. Can that also be a consideration? I think a really good example of that is falling water, is falling down, and they had to basically rebuild the entire thing because it is deteriorating from the inside out.

Ms. Stock: You are correct. So to be eligible for the California Register or the National Register you have to have significance, which is the criteria I described. You also have to have integrity. There are seven aspects of integrity. I won't go through them all but materials are one of them.

PTC6.47 Con't

So we did look at and went through each of the aspects of integrity and determined whether we thought that it had sufficient integrity. The test is whether it has sufficient integrity to convey the reasons for its significance, and we felt it did.

As far as the current uses, or the current purposes really we are limited to the criteria for significance and integrity and that is pretty much it.

Ms. Silver: Commissioner Lippert, if I could just add one clarification here. For purposes of CEQA if a building is considered eligible for the California Register or the National Register for CEQA purposes it needs to be considered historic. So the EIR does deem the Stone Building and the Hoover building historic.

Then if the City does approve this project there will have to be a Statement of Overriding Considerations.

Commissioner Lippert: I guess what I am trying to get at is the clarity in the process. I think in my line of questioning in the very beginning it is not very clear, because it is not on the City's Historic Register but it is identified in the Draft EIR, and what the process of that would be in terms of its removal. I think it is important to us and it is important to Stanford.

Ms. Silver: Yes, and for CEQA purposes there are several different triggers for designating a building as historic. One is that it is on the City's Historic Inventory. That is not present here so

we look at other factors. ARG has determined that it is eligible for the Registry and so under CEQA we do consider it historic and the EIR analyzes it that way.

In terms of whether the HRB needs to approve the demolition, at this point it does not because the HRB only needs to approve buildings that are on the Inventory. So because this building is not on the Inventory that particular process is not available under the City's Historic Preservation Ordinance.

Commissioner Lippert: Okay.

Chair Garber: Commissioner Keller and then Martinez.

Commissioner Keller: Thank you. So first of all I had the pleasure of spending about 20 years of my life on the Stanford campus both as a grad student and then subsequently as a researcher. I notice that a lot of buildings had been rebuilt on campus and particular care was taken to build the buildings that comprise the quadrangle. In particular I for a number of years had an office in what was called Building 460 Margaret Jacks Hall, which is an original quadrangle building that was rebuilt from the internal and kept the exterior. Maybe it was raised a floor, I am not sure. In any event that obviously has particular significance.

On the other hand a lot of other buildings on campus like the ERL and other buildings like that which may have had significant things happen there were not deemed nearly as historic and have subsequently been replaced by buildings with more lasting value for the University and I would

1 certainly say architecturally. A lot of the buildings that were built in the 1930s, and 1940s, and
2 1950s were not of lasting beauty I would say. The University has the benefit that there are lots
3 of departments and you can shuffle them around in order to be able to when you do one building
4 if you have surplus space you can move departments around from building to building, and it is a
5 lot easier to do. Although there tend to be zones on campus where Engineering is, where
6 Sciences are, where Humanities are, and Arts, etc.
7
8 With respect to the School of Medicine they are sort of clustered around so it would be
9 somewhat awkward to say classroom buildings in the Stone Building and move the School of
10 Medicine elsewhere because there are no classrooms right near there. You might put biology
11 classrooms there but what else would you put there? It would be kind of awkward. So because
12 of the siting and the distances there is some issue about what kinds of things you might put there.
13 It is sort of one of these jigsaw puzzles where you are replacing things in phases, and you are
14 trying to keep the hospital and trying to keep the school available. I understand that is a tricky
15 situation.
16
17 I do think that there are other things that we can think about in terms of preservation. I
18 mentioned earlier the idea of creating scale models and that. I also think the idea of considering
19 that the School of Medicine sort of has as part of its logo the motif of the Edward Durell Stone
20 Building in terms of how that square goes with the rectangles and the square in the middle that
21 that motif be somehow carried forward into the new hospital. Maybe as a pattern on the floor, in
22 terms of walkways and things like that, in terms of tile patterns and things like that that might
23 bring those echoes back in terms of the new building. I think that one of the interesting things is

PTC6.48

1 what is the value of retrofitting the building based on, and how hard it is to retrofit a building.
2 My impression is that it is quite expensive and difficult to retrofit the Stone Buildings, and if
3 they were retrofit they, from what I am hearing, would be of limited value in terms of their future
4 use for the purposes of the objectives of the project. So that is the situation where they become
5 hard in terms of meeting the objectives.
6
7 If I might go briefly to a comment about the lopping off of one story. One comment about that is
8 that the mention of specific number of beds is not an objective. Their objective is about meeting
9 quality of service, and adequate whatever, but those are qualitative in that particular sense rather
10 than quantitative. So with respect to this which I guess would reduce about 25 percent of the bed
11 space approximately of the Stanford Hospital, and none of the Lucile Packard Children's
12 Hospital the question I would like to know, and I am not sure if anybody else would, how well
13 that kind of reduction meets the objectives, and how well it reduces the other impacts. That was
14 my intent there. I don't think you can arbitrarily say it doesn't meet the objective. It might meet
15 the objectives somewhat less well than the full project. But it might reduce for example
16 intersection impacts to less than significant because that is a thresholding effect. It might make
17 some significant impact in reductions of greenhouse gases or things like that. So I think in some
18 sense an evaluation of that as a specific design could help. Thank you.
19
20 Chair Garber: Commissioner Martinez.
21
22 Commissioner Martinez: I come at this historic preservation option from a couple of different
23 directions. One is that I was a great fan of Edward Durell Stone. Growing up in LA I saw a lot

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PTC6.49

of his buildings going up and really got to appreciate probably the greatest part of his career. So I don't really quite understand this sort of this building being at a pivotal stage and what that means. Does it mean this is a good building or mediocre, or he was on a downer? I do recognize that the building has substantial structural issues to it. Structural I am really saying in two ways. One that I know that the exterior walls and the floors of the building are not really tied together, kind of constructed in an odd way, which is to public safety really a disaster waiting to happen. I know from visiting the hospital many, many times that this very horizontality of the building really doesn't work for anything. It doesn't work for the clinics. It definitely doesn't work for the patient and hospital areas. Hospitals just are not built this way anymore. To suggest that there is a reasonable retrofit plan that works for healthcare in this building really I believe are sort of out of touch with the kind of realities that Stanford is faced with.

PTC6.50

From another direction I see it not as a significant or historical resource, because it might be and I appreciate the consultant's analysis of that. I see it as we see most buildings that are part of our community as just something familiar that we have known, that we each have some sense of history like my mother died in that building. So it means something to me. Does it mean that the building should remain standing and Stanford should go to Herculean lengths to try to salvage it? I am not really sure about that. I kind of doubt it.

I am a big fan of preservation, as I said of Stone. I got to work on a great fun Stone building, the Seaside City Hall, which I really enjoyed and respected. I don't feel that kind of passion about this building. I think we have some bigger, bigger objectives to try to support in moving this project along. Thank you.

Chair Garber: Commissioner Lippert and then let's move onto our last Alternative.

Commissioner Lippert: I just want to say that I think without a doubt it can't be argued that Edward Durell Stone has a legacy in this city. The first City Hall and the Art Center was built by him, the main library, the Stanford Medical Center, and this City Hall. So he does have a significant legacy in this city in terms of character defining buildings within this city.

PTC6.51

I am just thinking about something though that I had seen while on vacation in Europe. In Europe they have a great history of preserving buildings, and particularly building façades. The way they do it is they build a steel structure and they support the façade. They demolish the building virtually in its entirety and then they build a brand new building behind that façade that is then tied in. Then they remove the steel armature. So perhaps in reviewing the analysis in the Draft EIR is to look at the potential of retaining the façade and with Stanford's double-walled concept of having a building inside of a building and non-operable windows that very well might work in terms of retaining at least the façade of the building at as a workable approach.

Chair Garber: Commissioner Fineberg.

PTC6.52

Commissioner Fineberg: Thank you for another follow up. This Historic Preservation Alternative as it is is almost a nonstarter because the way it is defined, preservation means the objectives of the project are not met and that is a false choice. Is there a reason the DEIR doesn't analyze an historic preservation alternative that both preserves the historic structures, if it is

PTC6.52 Con't

found they should be preserved, and meets the objectives of the hospital? I am not sure I understand why we defined that the choice has to be made between preservation and meeting the objectives of the project. That means that the conclusion is there is no preservation. So should there be an alternative with a different design that meets the preservation objectives and the objectives of the facility?

PTC6.53

Chair Garber: Alright, let's move to our last Alternative, the Village Concept. I am going to ask the first question here. On Figure 5-5, the Village Concept Urban Design Diagram that is in the DEIR I note that there are brown lines that represent urban street and building frontages that are going down Quarry Road. Is the suggestion there that the zoning change to define that buildings occur at that line, at that urban street? What is actually being suggested there?

Mr. Bruce Fukuji, Consultant: Good evening Commissioners. So what that line is really trying to say is Quarry Road as an arterial street has the traffic volume and width and location to have a more urban street frontage along that. So it is saying the intention there is to orient buildings and entrances of buildings to Quarry Road, without specifying exactly sort of setbacks, and heights, and other characteristics.

Chair Garber: That sort of specification would come later in the process presumably?

Mr. Fukuji: The applicant's design guidelines that they have as part of the application covers the details of how that would be accomplished.

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Chair Garber: Okay. I don't believe we have seen those, right? It has not come before us. It has been apart of the ARB. Okay. I have lights from Commissioner Lippert and then Tanaka.

Commissioner Lippert: I am going to have to pass for the moment. I have an emergency.

Chair Garber: Okay. Commissioner Tanaka and then Fineberg.

Commissioner Tanaka: Thank you. Actually, I do have some follow up on the Chair's questions. It is on Figure 5-4 and I notice that there are lines here, red lines that show some darker red lines and some lighter red lines. What is the difference between the light red lines and dark red lines?

Chair Garber: That is on the same diagram, 5-5?

Commissioner Tanaka: No, 5-4.

Chair Garber: I am sorry.

Commissioner Tanaka: There are lighter ones and darker ones.

Mr. Fukuji: The difference is that the lighter dashed lines are part of the School of Medicine's campus planning but they are not really part of the project application in terms of types of

connections. So it is showing the context of what is going on and the spaces and the connectivity of spaces of how the School of Medicine as part of the campus planning relates to the project.

So the project areas are the ones that have the darker lines. Those are relationships that the project and how it is being designed can influence the characteristics of those connections, as opposed to the lighter ones, which are already part of existing campus planning.

PTC6.54

Commissioner Tanaka: Okay. Then I have a question for our attorney. I notice that some of the Village Concept area is in areas that is County land not Palo Alto land. So can we actually make restrictions or have requirements as part of this project on County land that is not in the city?

Ms. Silver: It would have to be probably through the Development Agreement. Certainly the housing units would have to be a negotiated term in the Development Agreement. There are portions of this project that do plan to be annexed and that is something that also could be explored.

Commissioner Tanaka: I see, so perhaps maybe perhaps annexed or the Development Agreement would, I see.

Can Staff tell us how the study area was selected for this? Does anyone know?

PTC6.55

Chair Garber: Yes, perhaps our consultant can help us out. That was discussed about a year and a half ago or so, but a refresher would be helpful.

PTC6.55 Con't

Mr. Fukuji: The history of the project is that when the Staff and the City initiated exploring the Village Concept at that time the project sponsors had two different projects. You had the Stanford University Medical Center campus project, the Hoover project is the medical projects, and then you had the expansion of the Stanford Shopping Center. So when the scope or the boundary of the Village Concept was defined it was looking at how those two projects could be planned and considered comprehensively together. So in light of that that defined the overall boundary. That is why it goes from San Francisquito Creek and then all the way over encompassing El Camino Park, the transit station, and then along the boundaries of the area that Stanford has defined in the Medical Center plan as the boundaries of their Medical Center planning area. So it took that boundary, two projects, and then took it to the creek, and then up to Downtown.

Commissioner Tanaka: So given that this is only the medical project now would you still keep the boundaries the same?

Mr. Fukuji: Yes.

PTC6.56

Commissioner Tanaka: Okay. I notice that some of the recommended areas are actually on very busy streets like El Camino or Sand Hill Road. So maybe Staff or our consultants can answer, was it thought to have this pure residential or to go mixed use, or what was the idea behind that? I know there is the number of units but is it intended to also have say retail on the bottom for instance for a mixed use design? Especially given that some of this is on very, very busy streets.

PTC6.56 Con't

Mr. Turner: I believe the housing that is recommended for the site would be 100 percent residential housing.

Commissioner Tanaka: I would make the comment then that I think given that these are especially busy streets that we actually do have some sort of mixed use. Thank you.

Chair Garber: Commissioners, Commissioner Lippert is probably going to have to leave us here quickly. I would like to give him an opportunity to speak to this, and if he has any other comments that he would like to make before he goes.

PTC6.57

Commissioner Lippert: I am very intrigued by the Village Concept Alternative. I think that it has a lot of potential here. With regard to that I wanted to ask a couple of questions on the proximity to transit. Earlier I think it was both cited in Stanford's presentation as well as the Draft EIR that the additional I guess it is the spousal jobs would add to the transit both congestion in terms of added traffic so we are not having a net gain in terms of being able to reduce our carbon footprint as much as we think we are, and this is actually making things a little more intense. Can you clarify that a little bit, Bruce?

Mr. Fukuji: I think there are really two parts to the answer to this question. So I think Dennis should also respond to this. The intent here is that you want to take advantage of the opportunity of having commuter rail transit station in the Downtown Palo Alto Intermodal Station by increasing density and mix of use in proximity to the station. In locating housing there and

PTC6.57 Con't

encouraging housing in that location even if it is employee housing has spouses who are going to be there also having their own travel patterns. Having it located adjacent to transit increases the probability or likelihood that they would have the opportunity to use transit to travel to wherever their other employment opportunities are. So it is a good location for locating housing for doing that.

As to the confounding factors as to the calculation as to what the total net trip benefits are I am going to let Dennis respond to that part of the question.

Mr. Struecker: There are two components to the traffic. By concentrating the employee housing in this immediate are we are taking ten households from Mountain View, and ten from Sunnyvale, and ten from Redwood City, and ten from Santa Clara, and wherever they are coming from and concentrating them here. So if they are disbursed around where the existing employees are disbursed the impact of the spousal trips is really not measurable on the study area we are looking at. But if you concentrate them in this are then they are. That is why we did trip one more intersection impact by concentrating the spousal trips in this immediate area.

We did take a reduction though for TOD as Bruce was mentioning. So the spousal trips are only creating about 50 percent of what they would create without the effect of TOD. So we do have that one other impact. The main benefit is a reduction in VMT because now we have the employees that are no longer driving to work, and we have the spouses that are only 50 percent driving to work, and the other 50 percent are on transit. So it is about an eight percent reduction is our calculations in overall VMTs. So the carbon footprint is reduced there.

Commissioner Lippert: Okay. Just thinking out loud here, isn't it likely though that the people that are moving into these units, the spouses, would seek other jobs that might be closer to where they live?

Mr. Struecker: They might. I think the average trip length, Nicole is it 11? The overall Bay Area average work trip is 11 miles. They might. If they currently live in Livermore and one of them was commuting to the hospital they may change their location, but 11 miles still gets you outside of the study area. So they are essentially going to be –going down south on El Camino Real we are only analyzing down to Arastradero/Page Mill area. So the 11 miles on average is longer than that, so they will still be traveling through all these study area intersections.

PTC6.57 Con't

Commissioner Lippert: Okay, but then if we are looking at the cost of housing versus what you are paying in the way of transit or gasoline miles there is a real trade-off there. So by having in some ways subsidized housing or housing that is made available at a price for the Stanford Medical Center, I guess their pay grade or what their income level is, would they not be looking to save those dollars or invest them or do something with them? They are not at such a high pay grade that they would be pumping it back into gasoline to commute all the way out to Livermore.

Mr. Struecker: Right. We took the 50 percent reduction. Yes, we think they will take advantage of the transit.

Commissioner Lippert: Okay.

Mr. Struecker: But still an average of an 11-mile trip is going to fan them out throughout the study area we looked at of essentially Palo Alto and Menlo Park and into East Palo Alto.

Commissioner Lippert: Okay. Then on the flip side of that more and more cities are beginning to implement their own Transit Demand Management programs. So let's say somebody is commuting down to I'll just say Google or Yahoo! down in Mountain. Wouldn't those companies be inclined to subsidize those people who are commuting from Palo Alto rather than having them drive?

PTC6.57 Con't

Mr. Struecker: Yes. So I think your point is that the 50 percent still may be high. The 50 percent reduction. Is that your point?

Commissioner Lippert: Yes it is.

Mr. Struecker: Then that very well could be, yes I agree.

Commissioner Lippert: Then again, I guess it is the last little piece to this, which is we are looking at the Development Agreement including subsidized transit in the way of a Go Pass to prevent people who are on staff from driving from Tracy or Livermore or wherever, and taking public transit in some way, shape, or form, and that would be subsidized. Now we don't have to subsidize those individuals in terms of their transit to Palo Alto because they are within the Stanford environs. They can take Marguerite Shuttle.

PTC6.57 Con't

Mr. Struecker: Yes for those 490. The thing to remember on the Go Pass is that is being given to not only the new employees but the existing employees as well. So there is still a pretty big universe that would need to be provided with Go Passes.

Commissioner Lippert: Okay. So could we in fact take those Go Passes and apply them to the spouses since those spouses are within the Stanford environs? Is that a possibility? I guess that is a question for the City Attorney.

Chair Garber: Or is it something that we should just simply note and add to the evaluation?

Ms. Silver: My understanding of the Go Pass program is that it only applies to employees not spouses.

Commissioner Lippert: Okay, but if it was made as part of the Development Agreement as a mitigation could it not be applied?

Ms. Silver: We could look at some other program through the Development Agreement, yes.

Commissioner Lippert: Okay, thank you.

Chair Garber: Commissioner, anything else because I know you have some pressing.

Commissioner Lippert: I was looking at the Alternative here and I think it is real strong. I think this is something that we will see in the Final EIR. Thank you.

Chair Garber: Okay, good luck. Commissioner Keller and then Martinez. I am sorry, we had gone through Tanaka, Commissioner Fineberg I believe you were next and then Keller.

PTC6.58

Commissioner Fineberg: My first questions relate to whether the DEIR properly analyzes the questions that have been raised about if we put 490 employees in these houses and we are deposing 490 University employees from the houses are we getting any net benefit, or are we just robbing Peter to pay Paul? If the University has an entitlement for 600 homes there and that has been analyzed in the GUP then have those cumulative impacts already been analyzed in the DEIR without the Village Concept? Then are we double counting the impacts if they are already in the baseline of the proposed project and then we are sort of adding them as a Village Concept Alternative because of this project? Does it have to do with whether it is primary or secondary impacts? I don't see how that all unwinds itself in a way that I understand that it is covered. So if something can be done there to bring some clarity to that.

PTC6.59

The other question I would have relating to this is on page 5-197 it talks about the cumulative impacts of the Village Concept Alternatives. As long as I have the right page cited. This is something I brought up on another issue many, many meetings ago. Where it talks about ARB review process of any major development ensuring that the SUMC Project will not contribute to cumulative land use conflicts, my comment on this is same as before. The ARB has no purview over land use. I do not understand how ARB review will ensure that there are no land use

PTC6.59 Con't

conflicts. I would like to generalize this comment to the analysis of all of the Alternatives. Any comment that says that ARB review will minimize land use conflicts needs to either be reworded, or better explained, or something needs to be done where that comment occurs in any or all of the Alternatives.

PTC6.60

I am also wondering if there is any way to yield a Village Concept Alternative that has the linkages and the walkways that Stanford has shown but doesn't necessarily mandate who lives in the homes. It is the linkages and the walkways and the access to the transit for both the residents and the folks in the hospital facilities that I believe it give it the most significance, and whether it is a University employee or a medical facility employee you are going to get 490 people off the roads. You are going to have 490 people yielding a vital community. You are going to build the things that yield the benefits. I am not understanding where it is better that they work for the hospital than the University. Now if Stanford has absolutely zero plans of ever building that housing then I understand how having the Medical Center people kind of tipping the hand to force it to get built is a benefit. But if the applicant is stating that they are going to put University employees there anyhow the significant thing is all those linkages and beneficial things that would surround the housing. So I don't know if there is a way to get that without mandating who lives in the house. Thank you.

Chair Garber: Commissioner Keller and then Martinez.

PTC6.61

Commissioner Keller: Thank you. First let me use this opportunity to say that one of the other things I would like considered is moving the additional buildings and parking that is proposed

PTC6.61 Con't

for adjacent to the Hoover Pavilion moving that either to within the project area on the Stanford University Medical Center, that whole complex site, or alternatively on the outbound of Quarry Road closer to the hospital as opposed to closer to El Camino as an alternative to be considered. I am not sure that is within the bounds of existing alternatives.

PTC6.62

The second thing is it is my understanding and I will ask the appropriate people from Stanford to nod appropriately whether I am correct or not. It is my understanding that Stanford Medical Center employees as well as Stanford Medical Center students such as residents, interns, grad students, and such are eligible for the comparable housing on campus at the appropriate rank and titles that are comparable to the rest of the University. Is that correct? Do you want to respond to that? Thank you.

Mr. Philips: My understanding is that the employees of the hospitals per se are not eligible for the housing on campus. The persons that are eligible for the housing on campus are qualified faculty and staff. So if you are a faculty member out the School of Medicine and also happen as a result to work at the hospitals then you would be qualified as an individual as an employee who could seek housing on campus.

Commissioner Keller: For example, when you say qualified I assume that for example on the main campus that lower level administrative staff are not eligible for housing on campus in general.

Mr. Philips: That is correct.

PTC6.62 Con't

Commissioner Keller: So if you think about it by rank in some sense it might make sense. Would medical grad students be eligible for the student housing on campus?

Mr. Philips: For student housing?

Commissioner Keller: Yes.

Mr. Philips: I know that we do have postdoctoral candidates and we do have some medical residents living on campus. So they qualify for some of the graduate student housing. It is a very small number.

Commissioner Keller: Great. So one of the things that might be, if you will, a grand compromise in terms of these 490 units, I am not sure exactly how many, but I have heard the number 490. Suppose that some number of them might be allocated to people who are currently within the pools of being eligible for housing. In particular if medical residents and interns who work ungodly hours and it probably is not that safe for them to go long distances, if some of the housing were allocated to these groups that seems to be within the realm of where the 3,000 units might be allocated. If that were to be a use that seems to be better because it is closer proximate to the hospital than this being used for people who are working further away from the hospital for example.

Mr. Philips: Right.

PTC6.62 Con't

Commissioner Keller: That might enable a three-way agreement, which I will ask our City Attorney to see if this is legal, between Stanford, and Palo Alto, and the County because this is County jurisdiction land, to indicate that because some number, whatever we decide makes sense, of housing that Stanford intends to build anyway, because I understand you intend to build all 3,000 housing units. Is that right?

Mr. Philips: That was the intent. That was the request per the GUP.

Commissioner Keller: Exactly, so since it is your intent to build the housing units if we allocate them to these medical residents and interns who are working at the hospital essentially. They are working there. Then that sort of qualifies as housing in some sense for people who are working in Palo Alto. Therefore make an agreement between Stanford that that is what some amount of the housing is used for, and agreement between Palo Alto, and Santa Clara County to allocate these housing units to the Stanford ABAG housing allowance. Thereby in some sense we can, if there are 490 for discussion sake, we can say 490 of the units that are on the Housing Element are in fact on County land as far as these two sections of units are concerned. Thereby they apply to our requirement for producing housing. In fact it makes sense from a jurisdiction point of view because they are housing for Palo Alto workers logically. Since the County doesn't really have a requirement why should it care? That will help us be able to better satisfy our ABAG numbers. So I will ask the City Attorney whether that would actually be something we can do?

PTC6.62 Con't

Ms. Silver: Well, it is certainly worthwhile pursuing. It would require ABAG's approval for the allocation. ABAG does allocate housing units to the County, but the County has satisfied its ABAG requirements historically. So I think that it would be something that the County would be interested in pursuing. It would just need to be approved by ABAG to get actual credit for those units.

Commissioner Keller: Thank you. Is that something that Stanford might entertain?

Mr. Philips: I think Commissioner Keller the issue there is probably whether the County feels that it could entertain and additional shift of units, which it probably believes it has already made in reducing the ABAG RHNA number now down to the 2,800 units. In other words, it went down simply because it was requested of the County that they reevaluate this housing including the medical resident postdoctoral housing on the Quarry sites in terms of how much of that could be credited to reducing the Palo Alto ABAG requirement. So they did draw those down. So in essence they did make a shift if you will. I think what you are suggesting is can they make a further shift, and I don't know the answer to that.

Commissioner Keller: Thank you. I think my understanding is the reason that some of the shift happened to the County is because the ABAG numbers were including Stanford employment not just the employment of the hospital within Palo Alto.

Mr. Philips: That is correct.

PTC6.62 Con't

Commissioner Keller: So if you think about the 2,200 or 2,400 units that are being built on campus for the million or two million square feet on the Stanford campus that that is what is going on there. Then these 490 are not towards that so they could be towards this. Anyway, I am just leaving this open. I don't think we can resolve this now but I think it is an interesting thing that could be a win/win for Stanford and for Palo Alto. Thank you.

Chair Garber: Commissioner Martinez.

Commissioner Martinez: I have been a fan of this Alternative studies because I didn't really stress too much on sort of whether this was the right Alternative, or if this should be more of this or more of that. But given these No Project, or not very much project, or smaller hospital, or all of the hospital but nothing else, or the Village Concept we could look at the impacts of that. I thought that was completely useful. I think your summary of that was good.

PTC6.63

I felt that way about this Village Concept too until I realized tonight that we may just be displacing other residents that would down the road incur the same kind of impacts to the streets and air quality and other aspects. If the Village Concept included 490 new housing units that didn't have an attachment to another group of Stanford people that would be a breakthrough I think, because I think we would then be able to assess really the cumulative impacts without having to sort of wonder who is being displaced if we do this kind of thing.

So I am a little disheartened that this very promising Alternative really becomes a kind of non-Alternative because it doesn't really give us what we think we are buying. So I really don't

PTC6.63 Con't

know sort of where we go with this. It is a great idea. It sounds good. It is win/win because we build all of the hospital facilities, but then when you look at the detail it doesn't really satisfy the traffic issue for anyone. Thank you.

Chair Garber: I have another comment and then we have Tanaka. I guess what I am about to say is supporting somewhat Commissioner Martinez's comments. I looked down Table 5-8 and if I look down the Impacts of the SUMC Project and then I look down the Village Concept Alternative the impacts are identical with the one exception of stormwater generation, all the way down, which is not what I was expecting to find.

PTC6.64

Now, it may be that in fact the way that it has been defined causes that to occur. I guess the other thing that that means is that if I go back to the very beginning and the Significant and Unavoidable Project Specific and Cumulative Impacts where we were recognizing that at least on three or four of the bullet points the Village Concept was reducing if not eliminating some of the impacts regarding air pollution, during construction, during operation, and cumulative emissions, and emission of greenhouse gases. But I guess what I am reading is that even with the addition of the housing, or let's say that you were to take the housing out, you would still have these same alternatives because you are really just left with the SUMC Project except for the linkages that are beneficial but they don't really have any impact on the issues that we are trying to mitigate.

So what is the point? I guess one of the points is that you could add it without incurring additional mitigations, or incurring additional impacts that have to be mitigated. But to

Commissioner Martinez's point my gosh, I would have expected there to be a quantity – I would have expected to see the difference, and I am not seeing that anywhere. So either my expectation was misplaced, which is one outcome, or there is something about the definition that we are not taking into account here.

Yes, Commissioner Keller and then Tanaka.

PTC6.64 Con't

Commissioner Keller: The problem Chair Garber is that summary chart is binary and what you are saying is basically that the Village Concept does not flip anything that changes a result from yes to no, or from no to yes if you will. On the other hand it could make a qualitative difference that could reduce the amount of some impact. So the issue for me is not so much whether you eliminate an impact, make it less than significant instead of significant, but if you reduce it and it is still significant is that a good thing? I think it could be.

Chair Garber: Yes, I don't mean to argue against it, because I do believe that your comment is right. It does reduce it. But the binary issue here is significant and unavoidable or is it not. So it doesn't flip anything from page 5-2. However, I have four choices and some of them have been on Chart 5-8 it is not binary. I have actually four choices and some of them are divided further, and it hasn't flipped any of those either. So where is the sensitivity? Is it really that gross?

Commissioner Keller: Well, it may be that the project has impacts so bad that you have to move the needle significantly a lot in order to flip any of them. So that is what the problem is you are moving the needle somewhat but you are not moving the needle enough.

PTC6.64 Con't

Chair Garber: Yes, clearly. So at any rate that is just one comment there. it would be nice to have some further explanation or exploration as to what or if there is a definitional problem there that allows for less impacts to be realized along the lines that Commissioner Martinez is suggesting or asking to be explored, or if in fact it really is that it does not have that sort of impact on the project. Commissioner Tanaka.

PTC6.65

Commissioner Tanaka: Thank you. I have some similar comments to Commissioner Martinez and Chair Garber here but from a slightly different angle. First let me start with a question to our City Attorney. It is a follow up to a question I asked earlier, which is if we were to annex some of this land or Stanford was willing to annex it, how does that impact their GUP numbers? I understand their concern that they have 3,000 units allocated. They have to build it. If it becomes annexed as part of Palo Alto how does that affect their number?

Ms. Silver: Well, I can speak to some of that. I can't fully answer your question. As Mr. Philips mentioned earlier there is a linkage requirement in the GUP. So to the extent they build out the academic uses on the campus they have to provide housing. Some of that housing is programmed for the Quarry sites. If they don't build the housing at the Quarry sites they will have to build it somewhere else. I believe that there is sufficient sites on campus to satisfy the linkage requirement, but we would have to look at that further.

PTC6.66

Commissioner Tanaka: Okay. So I guess I have a comment here. Perhaps one thing for let's say the El Camino-Quarry site that is right next to the transit center or even the TOD area

PTC6.66 Con't

district, perhaps there could be a density bonus given so that there actually can be 400 more units being built than could be built before, or was already allowed by the County. So that they could get their GUP numbers as well as additional numbers that could help mitigate some of the housing/job imbalance. So maybe that is something that could be considered as a possible mitigation/I am not sure what to call it.

Where I am kind of going on this, and I have talked about this before, but maybe what kind of makes sense near the transit center is some sort of condo/hotel. I am thinking a lot of these workers they live where they live not necessarily because of where they work but because they know people there, they have family there, they have friends there. They may buy a small unit near where they work perhaps during the workweek and live there, and rent or buy that perhaps, and go back home. A condo/hotel situation would allow them to perhaps rent it out during the weekends when they are not there. So it gives some flexibility for the workers. I am a little bit suspect of whether people move housing because of jobs. I realize that is a different issue with ABAG. I think perhaps having a density bonus with some sort of condo/hotel situation might make a lot of sense here, especially given that as our City Manager has told us several times, that residential housing, especially multifamily residential housing, costs the City money annually, reoccurring forever. So I think having a hotel there would also help decrease that burden because we would get some sort of hotel tax as well. So perhaps the density bonus could help justify the building of such a structure. So it could be a win for all parties, perhaps.

I have some other questions for Staff. Were the units contemplated here were they going to be rentals or are they going to be for sale properties, or is it just units?

PTC6.66 Con't

Chair Garber: Maybe if it were one or the other you could create a statement that we could have the EIR respond to when it comes back.

Commissioner Tanaka: Okay, that sounds good. I think the other thing is if there is no requirement on the size of the unit, perhaps the units could be quite small, studio size or smaller. I think a lot of workers would be willing to rent or buy perhaps a unit near work that they could stay in part-time during the workweek, as I said earlier. So that is another consideration. It wouldn't have the same massing as let's say a three-bedroom condo would have. So I think that is another possibility. You would have a high density of units but not necessarily a lot of square footage.

With that thought in mind we actually had a project here under our review earlier for senior housing. One thing I noticed about the senior housing is that the units are very, very small. In fact one of the recommended housing sites on Sand Hill Road near Pasteur Drive perhaps that would be an ideal location for high-density senior housing. They don't need very, very large units it is basically just a room, and it could satisfy a lot of the ABAG numbers. Of course it wouldn't help the jobs/housing imbalance but it would certainly help reduce I think traffic between maybe a place where they may need medical attention and a place where they give medical attention. I think it would be very attractive to a lot of seniors who may have health problems. So that is another possibility.

PTC6.66 Con't

Overall, I think anything that is near these high traffic areas should have some sort of mixed use. Thank you.

Chair Garber: Commissioners, let's take a two-minute break and then let's try and get through Mitigations and anything else in 30 minutes or so. I apologize for the lateness of hour everyone. Let's take a two-minute break and then we will reconvene.

Let's talk about Mitigations first, and perhaps we can do that quickly. Then I would like to get to a point where we talk about our proceedings here and see if we can give, either through some straw poll or some simple head nods from the Commissioners, on the Alternatives and/or bits and pieces of the Alternatives that we believe have the most viability for pursuit, if I can say that in a very general way. So Commissioner Keller, Mitigations.

PTC6.67

Commissioner Keller: Yes. First I would like a straw poll if I may on the Commissions sense that Go Passes are a feasible but not necessarily adequate mitigation for transportation impacts.

Chair Garber: Commissioners, I think a head nod is all we need here. Is there general support for that?

Commissioner Keller: Feasible but not necessarily adequate. This has to do with Appendix E, that attachment there. So it turns out that I understand that the City Attorney has said that this would be helpful for us to make such a statement.

Chair Garber: Just for clarification here, if I have read it correctly as well as understood the Attorney's comments the City would probably look to pursuing that with the applicants not through the CEQA document but the Development Agreement as the tool there. Is that correct?

Ms. Silver: There are a variety of ways to pursue that. One is the Development Agreement, and one would be a condition of approval through the entitlement process. Ultimately what the City needs to make a finding on is whether that particular Mitigation is in fact feasible.

Chair Garber: Well I for one am in general agreement with that. Commissioners? Fineberg.

Commissioner Fineberg: I would agree that the Go Passes are feasible as a mitigation measure. If we are sort of doing this as a group, I would like a little bit of a clarification about whether the comment of 'not necessarily adequate,' does that mean we are not commenting on the adequacy or is that traveling into the 'it is inadequate?'

Chair Garber: I suspect all that we really need to give here are some comments that are directed to this.

Ms. Silver: That is correct.

Chair Garber: Commissioner Keller.

PTC6.67 Con't

Commissioner Keller: Firstly, I think that I don't take the statement that the Go Passes are necessarily part of the Development Agreement and not part of the CEQA process. In particular, if they are part of the CEQA process then they are considered a mitigation. So the intent of my statement is that they could be considered a CEQA mitigation for transportation or they could be handled as part of the Development Agreement if that is desired, but this is certainly eligible for a CEQA mitigation.

Chair Garber: Right, we are recognizing that the City may take a flexible approach but in general the concept here is using the Go Pass to mitigate traffic impacts.

Commissioner Keller: Yes, it is a mitigation and whether it is a CEQA mitigation or not is a decision to be made later, but that it is a feasible mitigation for some of the transportation impacts.

Chair Garber: Commissioner Fineberg.

Commissioner Fineberg: Thank you. So I believe then Commissioner Keller didn't comment about our statement that it is not necessarily adequate. We are not stating that it is an inadequate mitigation. We are simply not commenting on the adequacy now.

Commissioner Keller: What I am saying is that it may or may not be adequate but that we are not saying that it is. That is correct.

PTC6.67 Con't

Commissioner Fineberg: Okay, thank you. I would also like to add the comment that its feasibility at the present time is obviously contingent on the continued existence of Caltrain, which is not 100 percent certainty.

Chair Garber: Commissioner Martinez.

Commissioner Martinez: In the summary Table S-4 I think the Go Passes are listed seven times under Air Quality Mitigation, Traffic Mitigation, and other things. It just seems we are putting a lot of eggs in one basket, or as Commissioner Fineberg says, something we don't know in ten, or 15 years is even going to be there. I am not sort of comfortable saying it is feasible. I want it to work obviously. I want other mitigations as well.

Chair Garber: Commissioner Tanaka, any comments on that?

Commissioner Tanaka: In general, it seems like the Go Pass is a reasonable mitigation. Whether it is sufficient or not, I don't know, but it does seem reasonable.

Chair Garber: Commissioner Keller, something else for us to consider?

PTC6.68

Commissioner Keller: Yes. First of all, my understanding is from reading this is that there is need for having a mitigation monitoring process to make sure that the mitigations are in fact adequate. So if the mitigations are not adequate then presumably additional steps would need to be taken appropriately. Therefore what we are simply saying is throw this in the mix and see

PTC6.68 Con't

how well it works. It is in the foreseeable future, subject to various decisions by other bodies that we cannot evaluate, seems to be feasible.

PTC6.69

The other mitigations I would like to refer to is Mitigation PH-3.1, which is on page 3.13-19. Let me get that. First of all let me say what this is. It is reduce the impacts on the jobs to employed residents ratio. That is the item, and the first bullet under it is the City shall explore amending the zoning code to permit more residential uses particularly multifamily uses. There are two problems with this. Firstly this is something the City is doing and there are secondary impacts from doing that, and it is not clear that Stanford is responsible for those secondary impacts. Secondly, this is a separate process the City is doing independently of this. So I would suggest actually striking this item. To the extent that Palo Alto does this it should be considered mitigation for Palo Alto's own job/housing ratio and not as a result of Stanford's additional contributions to the jobs/housing ratio.

PTC6.70

The next point is if you take a look at TR-7.2, which is on pages 3.4-80 through 81. It says provide expanded transit service. I can understand the idea of Marguerite Shuttle and the U-Line. Certainly those are very direct to this. In terms of the cross-town shuttle and the VTA community bus service those are not quantified in terms of what that means. I guess there is a dollar amount. Is that dollar amount a one-time fee or is that an ongoing fee? It is not clear how much this would be and the long-term impact of that. In terms of the community bus service presumably that would be an ongoing cost. So I would like to have this more clarified and quantified to understand what this means.

PTC6.70 Con't

What is interesting is in terms of Menlo Park bus shuttle that is actually clearly an annual amount. So it is interesting to me that the next one I am going to make is that in terms of this Menlo Park being part of San Mateo County has a stricter policies in terms of paying for annual shuttle fees, as opposed to what Palo Alto seems to be which is maybe one shot deals as opposed to annual recurring fees.

In addition, as was mentioned in Attachment E the C/CAG, the City/County Association of Governments for San Mateo County has a policy that if you have additional 100 net trips that you mitigate all the trips, which is much more strict than Palo Alto has and Santa Clara County has, although there is a no new net trips requirement for the Stanford GUP. When we get to this part of the Comprehensive Plan I think we should evaluate whether it makes sense to adopt the kind of policies that Menlo Park and San Mateo County have.

PTC6.71

Two final issues. One is as a potential mitigation or perhaps as a potential public benefit the consideration of including in the OSHPD certified complex, the hospital which is very strong, built to very high standards, those standards are likely to be the standards to which a public safety building would have to satisfy. So the idea of putting in the 911 dispatch center there, making some space available for the 911 dispatch center so that would survive an earthquake. It would be unfortunate for during the earthquake and the hospital were still standing but the 911-dispatch center was not usable. Although you could somehow get help, if you can get help you can get to the hospital, but you can't get the help you need to get there. So that is unfortunate.

PTC6.72

Then finally, as I mentioned the last time or a time or two ago, I think that an interesting mitigation for the greenhouse gas impacts is for Stanford in general, collectively the University, to collaborate with Palo Alto for Stanford to use its wonderful expertise in this area to help Palo Alto reduce both the city's residents and the businesses greenhouse gas impact since there is the idea that we have to reduce our greenhouse gas impact over time, and with the hospital sort of bringing us the other way by increasing its greenhouse gas impact somehow working with Palo Alto or working in terms of the Stanford Industrial Park, or Stanford Research Park that collaboration to try to reduce greenhouse gases overall I think would be fruitful. I think would be a win/win mitigation that would be very cost effective. Thank you.

PTC6.73

Chair Garber: Commissioners, anyone else? I have one regarding the bullet point on emission of greenhouse gases on 5-2. A reminder that one of the consultants from PBS&J who is the climate change expert from Los Angeles, I am not remembering his name, had mentioned the possibility of Palo Alto qualifying its Green Ordinance as a way to help mitigate some of those issues. I don't know what is involved with that but I think that would be a very interesting way of utilizing that ordinance if that can help us. Commissioner Fineberg.

PTC6.74

Commissioner Fineberg: On the Staff Report page 2-8 it states that one of the objectives of the City of Palo Alto is to "address project induced school impacts not mitigated by school impact fees." So thinking about mitigations, which Alternative satisfies this objective? I should say which Alternatives satisfy this objective, and which Alternatives do not? Where is it analyzed in the DEIR, or is it analyzed?

PTC6.75

Then if we do a Village Concept Alternative with 490 additional homes has the DEIR analyzed the impacts on PAUSD of additional students? The impacts on Public Facilities and all other impacts caused by the growth? Has that been handled appropriately? If we do have the 490 folks from the University versus coming in the GUP does that change anything of whether they are considered primary impacts or secondary, or tertiary that don't require mitigations?

Chair Garber: Anything?

Commissioner Fineberg: I am sorry. A procedural question if I could. We are also going to be discussing orphaned items from other elements. Should I hold those for later?

Chair Garber: Yes, let's hold those and see if we can get through the mitigations, and then we will do that. Commissioner Tanaka.

Commissioner Tanaka: I was going to talk about my thoughts on the Alternatives in terms of trying to get a straw poll on that, but if you want to do that later let's do that later then.

Chair Garber: Well, I think we may be there. Commissioner Martinez, anything on mitigations? One to follow up, Commissioner Keller.

Commissioner Keller: Yes. If the 490 units are part of the 3,000 units already part of the Stanford 2000 GUP, then it is my understanding that the impacts for schools were mitigated by the $10 million payment by Stanford collectively for Stanford West and the 3,000 units towards

PTC6.75 Con't

the reopening of Terman. That was a payment that was in excess of the amount that PAUSD gets in terms of standard housing impact fees, and is quite generous in comparison to what any other housing developer has done in Palo Alto ever in the history.

Chair Garber: Okay. Commissioner Tanaka, why don't you start off with the Alternatives?

PTC6.76

Commissioner Tanaka: Okay. The Alternative that I thought made a lot of sense was the Tree Preservation Alternative with the linkages from the Village Concept Alternative. I do agree that having the Village Concept Alternative without actually having more housing is just taking housing from one place and putting it in another doesn't make a whole lot of sense, if that is what is happening. So I think maybe something with some sort of bonus density for a condo/hotel, as I mentioned earlier, makes a lot of sense. I would love to hear my fellow Commissioners' thoughts on that and what they had in mind in terms of Alternatives. Thank you.

Chair Garber: Commissioners? Commissioner Keller.

PTC6.77

Commissioner Keller: Well I had suggested two things. One is considering the Alternative of a variation between Reduced Intensity Alternative B and one of the full size alternatives, namely a reduction of approximately 25 percent of the rooms corresponding to lopping off one floor of the hospital. I am not sure if that – that is a particular quantified kind of design and scope and could be relatively easily accomplished in the timeframe, and could be studied in a quantified way as consistent with the qualified way that Reduced Alternative B currently has.

Ms. Silver: Chair Garber, excuse me. I think if I could just clarify here. In terms of looking at the Alternatives what would be most helpful for Staff is again in the Alternative Analysis what the EIR does is look at the impacts that cannot be mitigated through mitigation measures. If there is a need further, after imposing mitigation measures, if there is still a residual impact then the Alternatives look at other ways to mitigate that impact. Again, we have mentioned that an Alternative should advance most of the Project Objectives. So it would be most helpful if you could zero in on the particular impacts that have been identified in the EIR and then we can assess whether there is further need for Alternative Analysis.

Again, the Alternative Analysis in the EIR is meant to try to address those impacts. There are a range of alternatives in the EIR that accomplish that. So it is possible that an entirely new alternative need not be analyzed but maybe your input would help in terms of clarifying some of the existing Alternatives that we have.

PTC6.78

Chair Garber: So, by way of example, most of my focus has been on this description of the Alternatives considered here on 5-2, and trying to understand. What cannot be mitigated there are these bullet points. Some of the Alternatives are able to mitigate some but not all. So one question that might be asked is is there an Alternative that has not been considered that could mitigate all or most? Commissioner Keller.

Commissioner Keller: In order for an alternative to make sense for consideration if it does a better job of mitigating a significant unavoidable impact, so it doesn't eliminate it, but it does a

PTC6.78 Con't

better job it partially mitigates but it is still significant, and yet still substantially satisfies the alternatives, is that worthwhile to consider? One might argue that the Alternative B does not satisfy the Project Objectives and that something in between the full build out and Project Alternative B might satisfy the Objectives and provide better mitigation than the full build out. So I am not sure I agree with this binary nature if either mitigates something completely or it doesn't mitigate it. Simply mitigating it partially isn't that an improvement?

Ms. Silver: Yes. Alternatives look at lessening or eliminating all together the residual impacts. It might be helpful, I know it is late, but we are getting into a further discussion of Alternatives, we do have our outside counsel, Rick Jarvis here, and he might be able to frame the alternative discussion to optimize your time here.

Chair Garber: Let's give it a shot.

Mr. Rick Jarvis, Jarvis Fay Doporto Gibson, LLP: Thank you members of the Commission. As Cara mentioned, my name is Rick Jarvis. I am outside legal counsel for the City with respect to CEQA matters and bulletproofing and whatnot.

One observation I would have is the purpose of the Alternatives Analysis is not sort of tie the hands of the City and say well these are the only Alternatives set forth in the EIR that City can consider. The Alternatives in the EIR are examples they don't bind the City in terms of what it is ultimately going to do with the project. The purpose is to make sure that whatever the City decides to do at the end of day, whatever action the City takes to approve the project that the EIR

1 satisfies the requirement that it serves as an informational document that provides the City, the
2 City Council, the public with enough information that whatever that project is at the end of the
3 day there is enough information there to make findings as to what its environmental impacts are
4 going to be. So that is one primary objective of the Alternatives Analysis is to make sure there is
5 enough information for whatever project is ultimately approved that you understand the
6 environmental impacts.
7
8 Chair Garber: Forgive me for interrupting. Just for clarification, and part of the reason I am
9 interrupting you is because I think we have tried to have this conversation before in some other
10 forms, but the Alternatives that are being produced here are not actually any of the solutions that
11 may end up being ultimately pursued between the City and the applicant. It could be some other
12 combination of these things. What is important here is that we are looking at a series of
13 scenarios, a series of solutions that presumably would cover any solution set that is allowable.
14
PTC6.79
15 Mr. Jarvis: Right.
16
17 Chair Garber: So we are not pushing the rope. We are just pushing the rope into the corner and
18 finding out how much area it covers. The distinction here I think for the Commissioners as well
19 as the Council is that any one of these solutions isn't ultimately the one that we will end up with.
20
21 Mr. Jarvis: It could be any permutation of them. I mean there could be any combination. You
22 could like one element of the one, one element of the other, take and combine them. You just
23 want to make – the goal of the Alternatives Analysis, or one of the goals, because there is

1 another important one I want to mention. One of the goals of the Alternatives Analysis is to
2 make that whatever permutation is adopted by the City at the end of day the environmental
3 impacts of that are adequately disclosed in the EIR. So one thing the Commission may look at is
4 is there some alternative, some approach that may be of interest to the City at the end of the day
5 whose impacts are not adequately disclosed by the analysis that is done in the EIR.
6
7 The other important purpose of the Alternatives Analysis is to make sure that the City actually
8 considers all reasonably potential alternatives for mitigating environmental impacts. That is sort
9 of the other side of the coin there. To make sure that if you have a project that has certain types
10 of impacts those impacts can't necessarily be mitigated through mitigation measures, are there
PTC6.79 Con't
11 other alternative approaches that would avoid those significant impacts?
12
13 Chair Garber: So, again just to sort of clarify through example here, the conversation that
14 Commissioner Keller and I are having about the Reduced Intensity Alternative B, the reality is
15 that if it is 60 percent or 75 percent the range that we are dealing with there is somewhat
16 irrelevant because you have an example that is less than that, and you have an example that is
17 more than that.
18
19 Mr. Jarvis: Right.
20
21 Chair Garber: So it is somewhat academic where that threshold is taken.
22

PTC6.79 Con't

Mr. Jarvis: Yes, the threshold is always going to be arbitrary. EIRs typically need to look at some sort of reduced project alternative. What that percentage reduction is, there is a certain arbitrariness there. Although there is rationale for how they reached that particular reduced alternative.

Chair Garber: Understood, but relative to the potential impacts what would be more interesting is if you were at a 60 percent or a 75 percent point and that revealed some impact that was not mitigated under some previous scenario then there would actually be, from a CEQA standpoint, a reason to pursue that alternative because it has not been exposed in some other circumstance or scenario.

Mr. Jarvis: Right. What a reduced intensity alternative will often do is identify ways of reducing even though you don't necessarily fully eliminate the environmental impacts. Then of course, you have to weigh that against the fact that or certainly the argument by Stanford that the reduced density alternative does not fully accomplish their objectives for the project, and ultimately it is sort of a policy and factual balance the Commission and the Council have to make in terms of weighing what the environmental benefits are versus the failure to fully achieve what Stanford's objectives for the project are.

Chair Garber: Okay. Commissioners, do you have other questions for the outside counsel? Commissioner Keller.

PTC6.80

Commissioner Keller: Yes, so firstly, although for example in terms of evaluating roadway segments and other transportation issues it still says significant unavoidable. The analysis as far as I can tell was not done as to whether any of the roadway segments are now – maybe just one of the roadway segments are no longer impacted and reduced to less than significant. It looks like it looked at them as a whole but it didn't look at them individually. If one of the roadway segments is less than significant that might be a difference.

The other issue is you mentioned the consideration of …..

Mr. Jarvis: Can I stop you there because the way I would translate that into a comment upon the EIR is, you know it is fair to raise the question do any of these alternatives eliminate any of the roadway segments significant and unavoidable impacts? That is a fair question for the EIR preparers and for Staff to go back to and answer in a response to comments.

Commissioner Keller: Because it doesn't look like they have analyzed it to that level of specificity and analytics.

The second thing is that if it comes out to be that the Reduced Intensity Alternative, while reducing….for example, if you look at Reduced Alternative B it does drive the needle between impacts on roadway segments. It does reduce it from significant to less than significant. That difference between that and either the Tree Preservation Alternative and the Historic Preservation Alternative and the Village Concept are all significant and unavoidable. Therefore that is a difference that I think our Chair would identify as essentially flipping from one to the

PTC6.80 Con't

other. We don't know the degree of specificity of that. So for example if 60 percent eliminates all of the impacts on roadway segments to less than significant what would 75 mean? What would 80 mean? Where is the threshold and where does it happen on each of the segments, firstly?

Mr. Jarvis: That is a little more of a detailed analysis than you would normally see in an EIR's Alternative Analysis calculating out the exact percentage of the size of the project to get to a particular impact. The analysis has be reasonable, provide a reasonable amount of information, but normally an EIR is not going to get that comprehensive and detailed in terms of the threshold for each impact.

Commissioner Keller: I appreciate that but to the extent that the Reduced Intensity Alternative B were deemed not to substantially satisfy the objective of the applicant then the question is is there something in between that does substantially satisfy the objectives of the applicant and yet reduces the impacts on roadway segments, at least some of the roadway segments, to less than significant? Since this does flip the needle here from positive to negative essentially it does toggle the switch here, it does make sense that maybe something in between might be considered, which is considered to be substantially satisfying the project objectives. I doubt that the Reduced Intensity Alternative would be considered substantially satisfying the project alternatives. That is why I think it is important to look at something in between. I am just suggesting something to be considered. If somebody wants to suggest something else to be considered that might be appropriately discriminating I welcome that for consideration.

PTC6.80 Con't

Mr. Jarvis: What I interpret you are saying in terms of the comment upon the EIR is is there another reduced project alternative that better accomplishes the project objectives while still mitigating the roadway segment impacts, for example in this case.

Commissioner Keller: Or at least does a better job than the three biggest alternatives. Thank you.

Chair Garber: There may be more. We will let you know. Commissioners? Commissioner Fineberg.

PTC6.81

Commissioner Fineberg: I said it earlier but I will restate it here while we are discussing the Alternatives Analysis. I believe the alternative on Historic Preservation ought to be one that both preserves the historic Stone structure and satisfies the objectives of the applicant and the City so it is not a false choice. That may mean that the project has either a bigger footprint or it might be bigger. I am not going to get into suggestion how it be designed. If having both the historic preservation objective and the other objectives of the hospital satisfied meant there were additional impacts we need to understand that in the DEIR. I don't know if the consultant has a way I should say that that is in DEIR speak, but it is better than what I said. If he is not getting up I think I got it.

PTC6.82

I would say the same thing for the Tree Preservation Alternative. Tree Preservation Alternative is currently stated that we save either 13, or 15, or 23 trees out of a total of 71. Is there an

PTC6.82 Con't

alternative that would both save more of the best of the trees and meet the objectives of the hospital and the City?

Chair Garber: Commissioner Tanaka.

Commissioner Tanaka: So I think I understood what our attorneys have said about the Draft EIR. I guess there is that context. There is the legal context of what we need to consider. I was just thinking about it in terms of a practical context. We heard from the applicant that they are at 50 percent of design on the tree alternative option right now. I would assume that as time goes on they are going to progress forward. The City Staff is going to spend time. Our consultants are going to spend time analyzing a particular project. So I understand the Draft EIR legal context, and maybe we are done already. Is it helpful, would it be helpful for Staff, would it be helpful for our consultant, would it be helpful for the applicant to understand where the Commission is sitting right now in terms of its feeling on the project so that they could get some guidance beyond just boundary poles. Get some guidance to how to make this project better so that when it does come forth for a real approval it is a higher test of getting approved.

Ms. Silver: Is that a question?

Chair Garber: Do you want us to give our impressions on the solution sets that are being offered here? Is that helpful?

Ms. Silver: This is a public hearing to receive comments on the EIR. It has been agendized for that so it would be helpful just to keep your comments focused on the EIR.

Chair Garber: I think I heard no. Commissioner Keller.

PTC6.83

Commissioner Keller: So let me also point out the discrimination between the Reduced Intensity Alternative and the larger alternatives also comes about in Climate Change where the Reduced Intensity Alternative B is reduced to less than significant for the two Climate Change items, and is significant unavoidable for all the full build out alternatives. So again there again some degree of discrimination is also worthwhile considering.

PTC6.84

With respect to the process, I am reminded of a quote by Chopinhower and that is, "In theory there is no difference between theory and practice. But in practice, there is." In theory the idea is that we will create the FEIR, consider all the alternatives that have been created, then from there go on and say well let's see if we can find a better one or mix and match or whatever. In reality there is no time for that mix and match. Because we are viewing this EIR process essentially six months to a year later than we would have if the Stanford Shopping Center had been included – removal of the Stanford Shopping Center has delayed the process by at least six months. Because Stanford essentially, is my understanding, has to give a submittal to OSHPD by the end of the calendar year, essentially there is no time to come up with alternatives. So my interest in having something in between the Reduced Intensity Alternative that might be deemed not satisfying the Project Objectives and something that is the full build out, unless we consider it now in such a way that is a feasible change to essentially the Tree Preservation Alternative that

PTC6.84 Con't

the applicant is moving forward to the City Council and the Planning Commission will essentially have no choice but to approve the Tree Preservation Alternative as it evolves to that because of the timing considerations. So that is why I think that unless there are additional – unless this example of a Reduced Project Alternative is considered there essentially won't be any time to do it.

My boss in college, I have quoted this before, had a saying, why is there never enough time to do it right, but always enough time to do it over. The interesting thing is while there may be the time to do it over there is rarely the opportunity. This is a situation in which there will not be the opportunity to do it over. There will not be the opportunity in the future to do the kinds of mix and match when the FEIR comes out if we don't identify those now, and do the studies of them now.

Chair Garber: Commissioner Fineberg a follow up and then Commissioner Martinez.

Commissioner Fineberg: Forgive me for having a – this will appear to be a frontal challenge. I am not sure if your statement is correct. I don't know if either City Attorney or outside counsel would want to comment, but if I understood it correctly, the DEIR needs to analyze sort of the impacts of the maximum build out, and determine the mitigations required to make that possible. Does Council have the discretion at the 13th hour to say okay, maximum build out minus X percent? Figure out how to design it and we will approve it and here are the mitigations. The plan hasn't been analyzed but if it is less than what has been analyzed it is covered.

Ms. Silver: Yes. The Final EIR will provide adequate CEQA coverage for the maximum project build out. If the Council decides to approve something less than that there is appropriate CEQA coverage so long as all of the impacts associated with a smaller size project have been adequately discussed and analyzed in the EIR.

Chair Garber: Commissioner Martinez.

PTC6.85

Commissioner Martinez: I kind of agree with Commissioner Keller, and I apologize for that lukewarm kind of support. I agree in terms of that I think there may be some mitigation in looking at this other Alternative that is worth the time to try to consider an alternative that looks at a reduced impact. I am not saying I am in favor of that Alternative but I think there are some significant things, mostly related to traffic, pollution as typically there are in EIRs that I think we need a little bit more digging to see if we can come up with something that works here. I think that might be a vehicle to get us there.

PTC6.86

This is going to be my last statement of the night I hope. So I sort of want to come back to the beginning. The beginning is why are we doing this? The Objectives at the beginning of the Staff Report lay it all out there. I think there are 50-odd reasons why Stanford is doing this, and close to 20 why the City is doing this. It really comes down to four objectives on either side. For Stanford clearly the first is they have to comply with SB 1953. Either that or go out of business and none of us want that.

PTC6.86 Con't

Secondly, and they have talked about this, they want to meet their healthcare spacial program needs. It has been called right sizing but it is more than that. I think if we go through the six weeks of this discussion we know that their third objective is to meet the impacts, to mitigate the impacts as much as it is possible for them to do this.

Let me see what my fourth one was. I think that they want to build in a sustainable way. I was trying to avoid saying it that way, but the intelligent planning and design and consideration of alternative methods really shows that this hospital is going to be significantly different from what we have now.

On the City's side we want to partner with Stanford to retain our community hospital. We don't want it to g away. We don't want it to move somewhere else. We want it to be safe for the public, and we want it to continue.

PTC6.87

Second, if I can just pick one impact we want to mitigate traffic. We know regardless of how we slice it there are going to be cars, there is going to be more congestion, there are going to be delays, and there are going to be the impacts from all that.

PTC6.88

The third and I think I have heard this from the Council, we want to have a vital, economic, jobs based, employment based, tax base going into the future. This project is important to that.

PTC6.89

Then finally, our Climate Protection Plan is kind of the under-riding guiding force in this project. We want it to adhere to that. I wanted to bring that back because we are not so far away from the

PTC6.89 Con't

applicant and the City that we need to seek further delays, that we need more information, that this document needs to be twice as thick. I think we have enough information in what we have been given with the exception that I alluded to that Commissioner Keller has asked for to really be able to support the project going forward. Thank you. Good night.

Chair Garber: Commissioner Keller.

PTC6.90

Commissioner Keller: So one of the objectives of the alternatives is to make sure that we have coverage of whatever alternative is chosen from some combination. One of the things that has not yet been discussed is the, if you will, ranking or the choice of an environmentally preferred alternative. I am wondering not only will having an intermediate alternative allow for better discrimination among those toggles that we identified earlier as flipping from being significant unavoidable to less than significant between the Reduced Intensity Alternative B and any of the full Alternatives, but also from the point of view of identifying an environmentally preferred alternative. If it turns out that this intermediate alternative both meets the objectives of the applicant substantially, and better meets the objectives of Palo Alto with respect for example to Climate Change, and has less impacts either it reduces the significant unavoidable impacts to less than significant or reduces the significant unavoidable impacts to somewhat less than they would have been otherwise. In other words, it is a significant difference but yet still significant and unavoidable. That would seem to indicate that it could be an environmentally preferred alternative over the full build out alternative. So that is another reason why it would be considered.

PTC6.91

One other point is that essentially the way that we mitigate land use issues with the hospital is essentially by definition. Essentially, the intent is we will redefine the Comprehensive Plan land use issues by simply saying they are not an issue. We are going to have the new Comprehensive Plan changed just for the hospital that defines away the problem. It is certainly feasible to do that, but I think we need to be honest with ourselves that that is what we are doing, and it is arguably for a great cause. Essentially, the land use considerations are simply going away by definition and not by actual doing something about it. Thank you.

Chair Garber: A couple of final comments from me. In very general terms I believe that the Alternatives that have been outlined in the DEIR are adequate and have adequately described the various impacts that will be encountered. There have been a variety of additions that have been discussed this evening that add to that but I think in general they do.

PTC6.92

In my mind, the trade-off here is that for the Alternatives that meet the objectives of both the applicant and the City fully are ones that are the full or the Tree, the Historic, or the Village. The trade-off there is dealing with these significant and unavoidable project specific cumulative impacts that then have to be essentially overridden by the unavoidable consequences of them being there. That is the trade-off that we have to make, is the value that the project brings to the City worth that? I will leave that to the City Council, but I think we have recognized or adequately described what those impacts are.

PTC6.93

I think there is for me, personally at any rate, been some surprises and some learnings as a result of going through this. That is in particular that the Village Concept doesn't have a bigger or

PTC6.93 Con't

doesn't create stronger mitigations of a variety of the impacts that the other Alternatives present, which does not mean that it doesn't have value in other ways to us. I think that is an important finding that should be recognized as we go forward here.

I guess the other surprising thing is that even with the housing as part of that project you don't get more significant mitigations, at least as it is being defined in the EIR. We did create the comment that we would like that to be confirmed based on some of Commissioner Martinez's comments as well as mine.

Commissioners, anything else? We have the topic of orphans and anything else. Commissioner Fineberg.

PTC6.94

Commissioner Fineberg: Thank you. This section then is where I am going to make some comments on sections of the DEIR we have reviewed in past meetings. When we talked about the growth-inducing impacts of the project we had talked about the 2,200 employees and about eight percent of them living in Palo Alto generating a certain number of new homes that would then yield as secondary and tertiary impacts students in the schools. When I discussed that before I had questioned whether or not using some kind of County-weighted average would make sense.

I have since thought about it and I don't know if I can retract a comment, or change my comment. I would like to question now whether the method that was used of multiplying the number of new employees by eight percent is appropriate because that mitigates only the impact

PTC6.94 Con't

of the historic yield, the number of employees that historically have lived in Palo Alto rather than the number of employees that will live in Palo Alto as a result of ABAG's demands for us to balance our jobs/housing. So is there some different methodology that we should be using that will more closely match what we know will be future demand for mitigations based on ABAG's models where they are now demanding we balance jobs and housing more so than they have in the past? That method would be something that mitigates more than eight percent of the impact.

PTC6.95

Secondly, my comments about using the County-weighted average, I retract that. I want to say that taking the 2,200 employees and whatever percentage we are saying are going to live here, and then we divided that by the 1.7 number. I believe that it is not a correct method to divide it by the 1.7. What that is saying is that there is an average of 1.7 employees per household in Palo Alto but that would only apply if the 1.7 employees, basically the two adults in the household, work at Stanford. Both of them cohabitate and work at Stanford, at the hospital specifically. I think that we don't have these numbers, but I would venture to guess that the majority of the 2,200 new employees don't live in a household with two Stanford employees. So it is artificially reducing the yield of the number of households. So I would like some further analysis and explanation of why, if that method is used, it is correct, or why if there is let's say 200 new employees why aren't there 200 new homes unless we can say that five percent of the employees cohabitate with another hospital employee.

PTC6.96

I also would like to rephrase some of my questions about the impacts on Palo Alto's schools. In the last five years I believe all projects that have come through City review use the student yield projections based on methodologies developed by Lapkoff & Gobalet, the school district's

PTC6.96 Con't

demographer. This project uses an unrelated method. I would like to know why this project is using a method that has not been used in all other recent projects. If the Lapkoff & Gobalet yield projection methods are used consistently with what we have done would the final yield numbers be significantly different and what would they be? That's it. Thank you.

Chair Garber: Commissioners, let's close the public hearing and conclude this item. Let me thank the Staff and applicant for waiting this out, and sticking with us through the end here.

Commissioners, we have a few other things to do this evening. We have the approval of minutes for June 16 and June 17. Commissioner Keller will need to not take action on the meeting of June 17 because he was absent.

APPROVAL OF MINUTES: Minutes of June 16 and 17, 2010.

Chair Garber: May I get a motion to approve the minutes of the 16th?

MOTION

Commissioner Tanaka: So moved.

Chair Garber: So moved by Commissioner Tanaka. A second by?

SECOND

Commissioner Martinez: Second.

MOTION PASSED (5-0-0-2, Commissioners Tuma and Lippert absent)

Chair Garber: Commissioner Martinez. All those in favor say aye. (ayes) That passes unanimously. A motion to approve minutes of the 17th?

MOTION

Commissioner Fineberg: So moved.

Chair Garber: A second?

SECOND

Commissioner Tanaka: Second.

MOTION PASSED (4-0-1-2, Commissioner Keller not participating, Commissioners Tuma and Lippert absent)

Chair Garber: Commissioner Tanaka. All those in favor say aye. (ayes) With one abstention and two absent the motion passes.

REPORTS FROM OFFICIALS/COMMITTEES.

COMMISSION MEMBER QUESTIONS, COMMENTS, AND/OR ANNOUNCEMENTS.

Chair Garber: We will note that I am the Commission's representative to Council this month. In August the Council does not meet so there isn't a representative there. September we will deal with in August.

Are there any meeting reports? Commissioner Fineberg.

Commissioner Fineberg: I was not able to attend the Housing Element Update Technical Advisory Group meeting last month. This month's will be cancelled. However, and for members of the public who are still with us tonight, the Planning Department will be having two community meetings on I believe it is July 27 and July 29. The first at Cubberley and the second at the Arts Center, both of them at 6:30 for people to learn about the Housing Element Update. It is absolutely imperative that we get as much public participation as possible. It is going to have a huge impact on what the City does and whether the community understands what City plans will look like. So if you can be there please attend.

Chair Garber: With that, Commissioners anything else? Commissioner Martinez.

1 Commissioner Martinez: The Comprehensive Plan Subcommittee met today. We are starting
2 work on the Vision Statements. We have a schedule, and I think our first time to come back to
3 the Planning Commission is August 25, right?
4
5 Mr. Turner: I believe so. We have a meeting on August 11 to present our work on the housing
6 opportunity sites. So we received the direction from Council about how we should go about
7 identifying sites. Staff has begun to implement that direction, and it is now producing a list of
8 sites coming up with recommended densities for those sites. So we expect to bring that work as
9 an update item to the Commission on I believe August 11. Then we would have a meeting
10 scheduled I believe in September to go over kind of the first aspect of the Subcommittee's work
11 which is the Vision Statements for the various chapters of the Comprehensive Plan focusing on
12 the Housing.
13
14 Chair Garber: Thank you. With that it is 11:30 exactly on the clock here, and we will adjourn.
15 Thank you all.
16
17 ***NEXT MEETING:*** Special Meeting of July 14, 2010 at 6:00 PM
18
19 ***ADJOURNED:*** **11:30 PM**

PTC 6. Planning and Transportation Commission, July 7, 2010

PTC6.1 *The commentor expresses support for Reduced Intensity Alternatives A or B.* Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

PTC6.2 *The commentor expresses opposition to the proposed expansion under the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

PTC6.3 *The commentor contests the Draft EIR's conclusions regarding housing demand, and states that the City should require construction of an additional 300 or 400 units above the 420 Stanford University 2000 Community Plan and General Use Permit (CP/GUP) housing units.* As shown in Table 3.13-8 of the Draft EIR, eight percent of the SUMC Project's indirect housing demand, or 104 units, would occur in Palo Alto and would comprise a small 1.7 percent of the projected housing growth in Palo Alto, based on Association of Bay Area Governments (ABAG) Projections 2005. The data in Table 3.13-8 is based on historical evidence, comprised of SUMC's data on the residential distribution of their employees (see Appendix L of the Draft EIR).[1] As such, it is appropriate to apply the eight percent figure when determining how many new SUMC employees would seek to live in Palo Alto. Also, see Master Response 7 for a discussion of Mitigation Measure PH-3.1. The indirect housing demand would be less than significant and would not require mitigation. The primary mitigation measures for significant transportation related impacts are identified in Section 3.4, Transportation of the Draft EIR; Table S-4 of the Draft EIR; Staff-Initiated Changes 1 and 2; and Master Responses 1, 2, 4, and 5. Please also refer to Section 6 of this document for a comprehensive listing of the revisions to the Draft EIR mitigation measures. These measures include Mitigation Measures TR-1.1 through TR-1.9, TR-2.1 through TR-2.4, TR-4.2, TR-6.1, TR-7.1 and TR-7.2, and TR-9.1.

PTC6.4 *The commentor states that, with respect to traffic and parking, none of the mitigations proposed for new expanded projects would reduce traffic impacts.* Please see Staff-Initiated Change 2, which explains that the significant intersection LOS impacts caused by the SUMC Project would be mitigated to less than significant by Mitigation Measures TR-2.1 through TR-2.4 (involving traffic-adaptive signal technology, new bicycle and pedestrian crossings of the Caltrain tracks, an enhanced TDM program, and intersection improvements, respectively). As discussed under Impact TR-8 on pages 3.4-81 through 3.4-83 of the Draft EIR, the SUMC Project would not result in significant impacts related to parking, and so mitigation measures for parking would not be warranted.

The commentor also indicates support for No Project Alternative A. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

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[1] Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.

PTC6.5 *The commentor questions the involvement of the Architectural Review Board (ARB) in the SUMC Project process and what would happen if an alternative were adopted rather than the SUMC Project as proposed.* Please refer to Master Response 11 for a detailed description of the City's review process and ARB's involvement.

PTC6.6 *The commentor questions the level of review for the alternatives in the Draft EIR.* Please refer to Master Response 8 for the process of selecting and analyzing the alternatives presented in the Draft EIR.

PTC6.7 *The commentor asks if the impact of losing the SHC and/or LPCH hospitals under No Project Alternative A is discussed in the Draft EIR.* As discussed on page 5-40 of the Draft EIR, No Project Alternative A would not meet the objectives of the SUMC Project sponsors or the City. No Project Alternative A would force the existing Hospitals to continue to operate at current capacity and the Hospitals would not be able to meet the regional needs for emergency and disaster preparedness. In addition, by 2030 one of the two Hospitals would be required to close in order to vacate Office of Statewide Health Planning and Development (OSHPD)-regulated hospital space in the non-code-compliant portion of the Stone Building complex.

In addition, as shown in Table 5-8 on page 5-51 of the Draft EIR, No Project Alternative A would result in significant and unavoidable conflicts with the Comprehensive Plan. As stated on page 5-50, No Project Alternative A would conflict with Policy L-7, which requires new development to address regional needs and overall City welfare and objectives. Since additional floor area would not be added, the hospitals' combined daily capacity for inpatients would be reduced by up to 456 patients. By failing to meet local and regional demand for medical services, No Project Alternative A would conflict with Policy L-7. Since no mitigation measures would feasibly reduce the impacts, conflicts with the Comprehensive Plan would be significant and unavoidable.

The commentor also questions how the impacts were determined in the Draft EIR for No Project Alternatives A and B. These alternatives are considered to be a "no project" scenario; however, regardless of whether City approvals are granted the hospitals would need to comply with SB 1953 requirements. As such, No Project Alternative A would include the renovation and retrofit of existing non-compliant buildings and No Project Alternative B would involve the demolition and replacement of non-compliant structures. Although the No Project Alternatives would not increase operations at the SUMC Sites, construction would be required to meet the OSHPD standards. Therefore, No Project Alternatives A and B would result in significant and unavoidable air quality, noise, cultural resources, and biological resources impacts during construction. Refer to Table 5-8 on page 5-51 through 5-55 of the Draft EIR for a summary of the SUMC Project Alternatives impacts. In addition, refer to pages 5-50 through 5-90 for an analysis regarding the impacts as a result of No Project Alternatives A and B.

PTC6.8 *The commentor questions the role of the Planning and Transportation Commission (Commission) in reviewing the alternatives as presented in the Draft EIR.* The Commission held hearings during the public review period of the Draft EIR to solicit comments on the Draft EIR. At the hearing on July 7, 2010, the Commission supplied comments on the SUMC Project alternatives and offered other SUMC Project alternatives to be addressed in the Final EIR.

Sections 4 and 5 of this document address all comments and suggestions that were made at the hearings. In addition, Master Response 8 addresses the variations on the alternatives as proposed by commentors. The Commission and City Council can use this document in order to formulate conclusions and final decisions regarding the SUMC Project and alternatives. However, no decisions or recommendations regarding the alternatives will be made by the Commission and City Council until the certification of the EIR. During certification, the Commission can make recommendations regarding the adequacy of the range and evaluation of the alternatives to City Council, as well as whether to approve an alternative to the SUMC Project. It is then at the discretion of City Council whether to approve all or portions of the proposed alternatives that would mitigate or avoid significant environmental impacts, while rejecting the alternatives that are deemed to be infeasible. In addition, the Commission could recommend that the City Council adopt a variation of the SUMC Project that would include components of multiple alternatives. Please refer to Master Response 11 for a description of the SUMC Project review process and the next steps in the EIR review process.

PTC6.9 *The commentor requests a table that clearly outlines whether the alternatives in the Draft EIR would meet the objectives of the SUMC Project.* Pages 5-39 through 5-49 of the Draft EIR, Section 5, describe the extent to which these alternatives would meet or not meet the SUMC Project sponsors objectives, as described in Section 2 of the Draft EIR. In addition, as requested, Table 5-6 is provided below to show a summary comparison between the SUMC Project and the seven alternatives and whether these would fully meet SUMC Project objectives. Such a summary necessarily must be read in conjunction with the more detailed information explaining why and to what extent project objectives are not achieved.

The following table indicates whether the proposed SUMC Project accomplishes the objectives, and then uses plus (+) or minus (-) symbols to indicate the extent to which each alternative accomplishes the objectives in comparison to the SUMC Project.

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
SUMC Project Sponsors Objectives								
Program Objectives								
Optimize delivery of healthcare and services to patients.	Y	–	–	–	–	same	–	same
Maintain each hospital's position as a leading provider of complex care.	Y	–	–	–	–	same	–	same
Achieve timely compliance with the requirements of Senate Bill 1953 and other applicable code requirements:								
- Replace the SHC portion of the 1959 Hospital Building complex (the 1959 Hospital Building complex is also referred to as the Stone Building complex), comprising 188 beds, in its entirety.	Y	–	–	same	same	same	–	same
- Meet SB 1953's 2013 non-structural criteria for all 66 intensive care beds at SHC, the Emergency Department (ED), and the 21 operating rooms at SHC in the most efficient manner.	Y	–	–	same	same	same	–	same
- Complete required non-structural renovations to critical areas at LPCH.	Y	same	same	same	same	same	same	same
- Provide sufficient space for patients and families during construction of required renovations or replacements.	Y	–	–	–[a]	–[a]	same	–	same
- Meet SB 1953's 2030 criteria in the most efficient manner.	Y	–	–	–[b]	–[b]	same	–	same
- Design new facilities to comply with applicable ventilation and structural requirements.	Y	–	–[c]	same	same	same	–	same

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Meet existing and projected future demand for patient care:								
- Relieve the existing shortages of beds at SHC and LPCH.	Y	–	–	–	–	same	same	same
- Provide additional patient rooms and facilities at SHC to meet the projected needs of an aging population.	Y	–	–	–	–	same	same	same
- Provide additional patient rooms and facilities at LPCH to meet projected growing demand for LPCH services.	Y	–	–	–	–	same	same	same
- Size the ED to provide adequate patient waiting and triage space, and trauma rooms consistent with contemporary facility standards.	Y	–	–	–[d]	–[d]	same	same	same
- Meet existing and projected demand for clinic and other outpatient services that are important to the core academic and translational discovery process, or that otherwise should remain co-located with inpatient services.	Y	–	–	–	–	same	–	same
- Provide sufficient space to replace medical offices removed due to demolition, and to accommodate increased space for both medical offices and support services due to existing and projected future growth in need for patient services.	Y	–	–	–	–	same	–	same

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Provide modern, state-of-the-art facilities, designed to deliver high quality healthcare services and related teaching and research:								
- Size facilities to accommodate advanced medical services, state-of-the-art imaging, modern diagnostic and other medical equipment, and to provide sufficient space for high quality patient care and associated support services.	Y	–	–	–	–	same	–	same
- Design facilities to enhance the comfort and healing of patients and the productive care-giving and general welfare of staff and visitors.	Y	–	–	–[e]	–[e]	same	–[f]	same
- Meet current hospital planning guidelines by providing space to accommodate patients in single-bed rooms as appropriate, including adequate space for treatment by healthcare providers, equipment and support by family members;	Y	–	–	–[e]	–[e]	same	same	same
- Minimize the distance of travel from procedure room to patient room.	Y	–	–	same	same	same	-[g]	same
- Provide a safe, secure, and efficient route from operating rooms or the ED to patient rooms.	Y	–	–	same	same	+[h]	+[h]	same
- Minimize patients' risk of infection.	Y	–	–	–	–	+[h]	+[h]	same

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Meet regional needs for emergency and disaster preparedness:								
- Design facilities to take into account needs identified in the region's Disaster Preparedness Program, such as the ability to quickly add or convert beds and procedure rooms to manage critically injured patients for mass population events such as earthquakes, pandemics (influenza), or man-made biological/chemical exposure (bioterrorism, etc).	Y	–	–	–	–	same	–[i]	same
- Design facilities to maintain and further SUMC's role as a Level 1 Trauma Center for daily and extreme-disaster healthcare delivery.	Y	–	–	–	–	same	–[i]	same
Maintain relationships with community physicians:								
- Identify replacement space for community physicians who must relocate their medical offices to accommodate demolition of facilities due to the SUMC Project.	Y	–	–	–	–	same	same	same
Provide responsible and sustainable design for the hospitals' operational systems, water systems, and use of physical materials, while meeting applicable requirements and hospital planning principles, including those applicable to infection control and patient safety.	Y	–	–	–	–	same	–	same
Allow sufficient design and entitlement flexibility to be able to adapt to changes in healthcare needs, changes in technology, and changes in delivery practices.	Y	–	–	–	–	same	–	same

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
SoM Objectives								
Optimize the SoM's ability to translate medical research discoveries into treatments and cures.	Y	–	–	same	same	same	–	same
Replace outmoded research buildings with state-of-the-art research facilities to support contemporary translational research:								
- Design facilities to comply with code requirements for strong and reliable fire separations.	Y	–	–	same	same	same	–	same
- Design research facilities to efficiently meet current building requirements, including those pertaining to: seismic safety; heating, ventilation, and air conditioning; mechanical, electrical, and plumbing (MEP) systems; and provision of emergency power.	Y	–	–	same	same	same	–	same
- Design circulation and access to laboratories and offices to enhance handicapped accessibility, and to allow for safe and efficient access to a diverse array of laboratory and support function.	Y	–	–	same	same	same	–	same
- Employ best available design techniques to provide for efficient, high quality facilities.	Y	–	–	same	same	same	–	same
Provide sufficient faculty offices, research laboratories, and administrative support space to meet the SoM's projected needs.	Y	–	–	same	same	same	–	same
Provide responsible and sustainable design for the SoM's operational systems, water systems, and use of physical materials, consistent with Stanford University's existing sustainability practices.	Y	–	–	same	same	same	–	same

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Allow sufficient design and entitlement flexibility to be able to adapt to changes in medical research needs and changes in technology.	Y	–	–	same	same	same	–	same
Siting Objectives								
Site facilities to maximize highest and best use of SUMC and Stanford University lands.	Y	–	–	–	–	+	–-	–[j]
Site SHC and LPCH facilities to efficiently use a single, shared ED.	Y	–	–	–[e]	–[e]	same	same	same
Locate patient beds, ED, and SoM facilities in close proximity to each other to maintain and enhance program synergies and connections.	Y	–	–	–	–	same	–[k]	same
Locate outpatient healthcare facilities that are important to the core academic and translational discovery process in close proximity to inpatient facilities.	Y	–	–	–[e]	–[e]	same	–[g]	same
Site parking facilities for patients and visitors to provide clear, safe, and convenient access to SUMC facilities, with sensitivity to the needs of elderly, limited mobility, and ill patients.	Y	same	same	–[a]	–[a]	same	–[l]	same
Site parking facilities for staff with consideration of safe paths of travel after dark.	Y	same	same	-[a]	-[a]	same	–[l]	same
Locate new clinical, medical office, and support facilities for hospital staff and community physicians within reasonably close proximity to SHC and LPCH facilities.	Y	–	–	–	–	same	same	same

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Optimize department adjacencies that ensure the healthcare facilities are clinically safe environments, promote safe and efficient patient flow, and provide access to state-of-the-art technology.	Y	–	–	–	–	+[h]	–[g]	same
Use the existing SUMC Sites in Palo Alto for all components of the SUMC Project.	Y	same	same	same	same	same	same	–[m]
Arrange the buildings, open space areas, and infrastructure within the SUMC Project boundaries to create a highly functional medical center environment.	Y	–	–	–	–	+	–	same
Circulation and Parking Objectives								
Provide clear, safe, and convenient access to SUMC facilities for patients and visitors.	Y	–	–	–	–	same	–[l]	+[n]
Provide efficient access to SUMC for healthcare providers and staff.	Y	–	–	–	–	same	–[l]	+[n]
Provide sufficient convenient parking for patients, visitors, healthcare providers and staff, with sensitivity to the needs of elderly, limited mobility, and ill patients.	Y	same	–[a]	–[a]	–[a]	same	–[l]	same
Enhance the bicycle and pedestrian connections within and between the SUMC, the Stanford Shopping Center, PAITS, and nearby open space areas.	Y	–	–	same	same	same	same	+[n]
Provide improved way finding to minimize unnecessary circulation.	Y	–	–	–	–	same	–	same

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Cost Objective								
Select methods of construction to minimize the initial cost to the greatest extent feasible while producing facilities that are cost effective to operate over the long term.	Y	–	–	–	–	+	–	–[o]
City Objectives								
Provide high quality employment districts, each with its own distinctive character and each contributing to the character of the City as a whole.	Y	–	–	–	–	same	–	same
Employ state-of-the-art urban design principles and ensure adequate design review of the SUMC Project.	Y	–	–	–	–	same	–	same
Create a more walkable, bikeable, mixed-use, transit-oriented, and well-connected urban environment that captures the potential travel behavior, air quality, and greenhouse gas reduction benefits associated with the performance of well-designed urban villages.	Y	–	–	–	–	same	–	same[p]
Create walkable and bikeable connections that link together Stanford University Medical Center, Stanford University, PAITS, downtown, Stanford Shopping Center, and surrounding residential neighborhoods.	Y	–	–	–	–	same	same	+[p]

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Promote sustainable development and green building design principles through thoughtful urban planning and site design, building design and construction, energy production and conservation, and utility and transportation infrastructure design and construction, in a manner that improves the City's economic health, and improves the quality of life in the City.	Y	–	–	–	–	same	–	same
Promote development that contributes to the design and implementation of comprehensive solutions to traffic problems near Stanford Medical Center and key connections.	Y	–[q]	–[q]	–[q]	–[q]	same	–[q]	+[p]
Encourage employment districts to develop in a way that encourages transit, bicycle and pedestrian travel and reduces the number of auto trips for daily errands.	Y	–[q]	–[q]	–[q]	–[q]	same	–[q]	+[p]
In conjunction with new development proposals, create new park, open space, recreation, plaza, or other public gathering spaces.	Y	–	–	–	–	same	–	same
Provide for long-term utility and public infrastructure demands generated by the SUMC Project.	Y	same	same	same	same	same	same	same
Address project-induced school impacts not mitigated by school impact fees.	Y	same	same	same	same	same	same	same
Minimize environmental, financial, and municipal infrastructure impacts of the SUMC Project on the City.	Y	+[r]	+[r]	+[r]	+[r]	same	same	same

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Assist Stanford University Medical Center in responding to changes in the delivery of healthcare services. Work with the SUMC to plan for changing facility needs, but within the context of City of Palo Alto planning goals and policies, as well as the goals and policies of other relevant jurisdictions.	Y	–	–	–	–	same	–	same
Support Stanford University's historic campus identity as "a place apart" with a "sense of higher purpose" as well as Stanford's commitment to innovative, high quality of design through their "interpretive approach to contextual design" in the architecture of campus buildings and the landscape.	Y	same	same	same	same	same	same	same
Identify and implement strategies for accomplishing housing with a focus on below-market-rate residential units that would be available to help accommodate employment generated by the SUMC Project.	Y	–[s]	–[s]	–[s]	–[s]	same	–[s]	+
Locate work force housing close to SUMC Sites and train station in order to reduce traffic trips of both employees and employee household members.	N	same	same	same	same	same	same	+
Encourage public and private upkeep and preservation of resources that have historic merit.	Y	+	same	same	same	same	+	same
Optimize delivery of healthcare and services to patients and meet regional needs for emergency and disaster preparedness.	Y	–	–	–	–	same	–	same

Table 5-6
Attainment of Project Objectives

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative

Source: PBS&J, 2010.

Notes:

a. Parking structure at Hoover Pavilion site, needed to replace existing Parking Structure 3 during replacement hospital construction, would not be provided.

b. Construction of new facilities without providing sufficient space to accommodate demand could lead to inefficiencies due to potential future need to construct additional facilities later or elsewhere, leading to inefficiency in building design.

c. This alternative would not include new clinic facilities.

d. ED would not include space to fully accommodate expected growth in demand.

e. Facilities would not be designed to fully accommodate expected growth in patient demand.

f. Outpatient facilities at the Stone Building complex would not provide as comfortable and efficient patient space as the proposed new clinic space.

g. Existing Stone Building complex presents difficulties in patient travel to new hospital buildings due to differences in access points and the heights of floors.

h. Building configuration proposed under the Tree Preservation Alternative provides programmatic benefits regarding patient transport. Efficient patient transport reduces the potential for exposure to infection during transport.

i. Outdated space at Stone Building complex could not be as readily adapted for use in a disaster.

j. Housing component accomplishes this objective less fully than SUMC Project.

k. Design of proposed project provides benefits regarding relationship of hospital buildings to SoM.

l. Location of clinic parking is unknown.

m. CP/GUP housing sites are not located in Palo Alto.

n. Linkage components improve access.

o. Housing component would increase project costs.

p. Linkages component improves connections. Nonetheless, the housing component increases vehicle miles traveled (VMT) compared to proposed SUMC Project.

q. The SUMC Project sponsors have not offered to provide Caltrain GO Passes to existing or future employees under these alternatives, making the feasibility of this measure less certain.

r. These alternatives would decrease City costs associated with provision of services, but would provide fewer new jobs to City residents and fewer customers for City businesses.

s. The SUMC Project sponsors have not offered to provide housing fees in association with these alternatives.

PTC6.10 *The commentor questions the role of the Historic Review Board (HRB) in the SUMC Project review*. Please refer to Master Response 11 for a detailed description of the City's review process and HRB's involvement in the SUMC Project approval process.

In addition, the commentor asks if the HRB favored the Historic Preservation Alternative. As included in hearing transcript HRB1 of this document, the majority of HRB members were in support of the Historic Preservation Alternative as the preferred alternative for the SUMC Project. However, most members also acknowledged that the retention of the Stone Building complex may be infeasible and would not meet the SUMC Project sponsors' objectives.

The commentor also notes that landscape architect Lawrence Halprin was a significant landscape architect of the Stone Building complex. The Architectural Resources Group (ARG), a historic consultant for the City, prepared a historic resource evaluation and peer review for the buildings at the SUMC Sites (included as Appendix I of the Draft EIR). As explained in ARG's report, landscape architect Thomas Church collaborated with E.D. Stone to develop the landscaping at the Stone Building complex at the Main SUMC Site. However, as also described in this report, the grounds at 1101 Welch Road were designed by Lawrence Halprin. The Medical Plaza at 1101 Welch Road consists of three one-story buildings surrounded by parking lots, screening fences, landscaping, and a small courtyard between two of the buildings. As concluded by ARG, the landscaping is not a well-developed representation of the designs of Lawrence Halprin, and therefore, not considered a significant historic resource for the purposes of CEQA.[2] Please refer to Appendix I of the Draft EIR for more information regarding the landscape architects of the SUMC Sites.

PTC6.11 *The commentor requests a table that compares the significant and unavoidable impacts of the SUMC Project to the same impacts under the alternatives*. This information is provided in Table 5-8 of the Draft EIR, on pages 5-51 through 5-55. However, Table 5-7 is provided below in order to easily compare just the significant and unavoidable impacts of the SUMC Project, as listed on page 5-2 of the Draft EIR, with the alternatives. In addition, Table 5-7 updates the significant and unavoidable impact list provided in the Draft EIR, as explained in more detail in Section 1 of this document, Introduction, and listed in Section 6, Revisions to the Draft EIR.

[2] Architectural Resources Group, Inc., Stanford University Medical Center Historic Resource Evaluation and Peer Review, 2009.

Table 5-7
Significant and Unavoidable Impacts of SUMC Project Compared to SUMC Project Alternatives

Impact[a,b, c]	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Transportation								
Increased average daily traffic on four Menlo Park roadway segments: Marsh Road, Sand Hill Road, Willow Road, and Alpine Road.	S/SU	NI	NI	NI	S/LTS	S/SU	S/SU	S/SU
Air Quality								
Emission of criteria air pollutants (NOx) during construction, on both a project level and cumulative level.	S/SU	S/LTS	S/SU[d]	S/SU[e]	S/SU[f]	S/LTS	S/SU	S/SU
Emission of criteria air pollutants (ROG, NOx, PM_{10}) during operation, on both a project level and cumulative level.	S/SU	NI	NI	LTS	S/SU	S/SU	S/SU	S/SU
Noise								
Temporary but substantial noise during construction, on both a project level and cumulative level.	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU
Emission of ambulance noise along Sand Hill Road into the proposed Durand Way extension, so that noise levels at roadside residences would increase by a level exceeding the threshold established by City's Comprehensive Plan.	S/SU	NI	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU
Cultural Resources								
Demolition or alteration of the Stone Building complex, which is a historical resource.	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU	S/LTS	S/SU
Biological Resources								
Removal of up to 74[g] Protected Trees, as defined in the City of Palo Alto's Tree Protection and Management Regulations, which is a significant and unavoidable impact on both a project level and a cumulative level.	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU

Table 5-7
Significant and Unavoidable Impacts of SUMC Project Compared to SUMC Project Alternatives

Impact[a,b, c]	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative

Source: PBS&J, 2010.

Notes:

a. Note that the significant and unavoidable Climate Change impacts identified in the Draft EIR have since been determined to be less than significant with mitigation. As such, the Climate Change impacts are not included in this table. Please see Staff-Initiated Change 4 for more details and Section 6 of this document for revisions to the Draft EIR.

b. Note that the significant and unavoidable cumulative emissions of toxic air contaminant (TACs) impacts identified in the Draft EIR have since been determined to be less than significant. As such, the cumulative TAC impacts are not included in this table. Please see Staff-Initiated Change 3 for more details and Section 6 of this document for revisions to the Draft EIR.

c. After receiving input from the City of Menlo Park, the City of Palo Alto has now determined that the previously identified impacts on Menlo Park intersections would now be mitigated to less-than-significant levels. As such, the LOS impacts are not included in this table. See Staff-Initiated Changes 2 and 8.

d. Page 5-75 of the Draft EIR discusses why No Project Alternative B would have significant and unavoidable construction criteria air pollutant emissions. Although the impact conclusion remains the same, the following is an expanded analysis: Under No Project Alternative B, there would be construction emissions associated with the replacement of SB 1953 noncompliant structures. The amount of construction and duration of construction activities could be less than that of the SUMC Project; however, the intensity of construction in the first year of No Project Alternative B could be similar to the SUMC Project and still result in a significant daily emission of NOx. This alternative would emit significant construction dust and would require the implementation of standard Bay Area Air Quality Management District (BAAQMD) control measures for fugitive dust and diesel emissions, similar to the SUMC Project, resulting in a significant and unavoidable impact.

e. Page 5-94 of the Draft EIR discusses why Reduced Intensity Alternative A would have significant and unavoidable construction criteria air pollutant emissions. Although the impact conclusion remains the same, the following is an expanded analysis: Similar to the SUMC Project, Reduced Intensity Alternative A could result in significant construction air emissions. The amount of construction and duration of construction activities could be less than that of the SUMC Project; however, depending on how the construction activities are phased and the intensity of construction in the first year of Reduced Intensity Alternative A could be similar to the SUMC Project and still result in a significant daily emission of NOx. This alternative would require the implementation of standard BAAQMD control measures for fugitive dust and diesel emissions, similar to the SUMC Project, resulting in a significant and unavoidable impact.

f. Page 5-117 of the Draft EIR discusses why Reduced Intensity Alternative B would have significant and unavoidable construction criteria air pollutant emissions. Although the impact conclusion remains the same, the following is an expanded analysis: Under Reduced Intensity Alternative B, there would be construction emissions associated with the new structures. The amount of construction and duration of construction activities could be less than that of the SUMC Project; however, depending on how the construction activities are phased and the intensity of construction in the first year, Reduced Intensity Alternative B could be similar to the SUMC Project and still result in a significant daily emission of NOx. This alternative would emit significant construction dust and would require the implementation of standard BAAQMD control measures for fugitive dust and diesel emissions, similar to the SUMC Project, resulting in a significant and unavoidable impact.

f. The Draft EIR states that 71 Protected Trees would be removed under the SUMC Project. However, this number has been reevaluated and it has been determined that a total of 74 Protected Trees potentially would be removed under the SUMC Project. Up to 59 Protected Trees potentially would be removed under the Tree Preservation Alternative. Please refer to Staff-Initiated Change 6 in Section 3 of this document for updated tree numbers to be removed under the SUMC Project and the Tree Preservation Alternative.

PTC6.12 *The commentor questions why the Hoover Pavilion and the Stone Building complex are not included on the City's Historic Inventory List.* The City of Palo Alto's Historic Inventory lists noteworthy examples of the work of important individual designers, architectural eras, and traditions as well as structures whose background is associated with important events in the history of the City, State, or nation.[3] However, none of the buildings at the SUMC Sites, including the Stone Building complex and the Hoover Pavilion, are listed on the Historic Inventory.

The Historic Building Inventory for Palo Alto was originally completed in 1979. The survey was confined to the area of Oregon Expressway to the south, El Camino Real to the west, San Francisquito Creek to the north and east including the College Terrance neighborhood. This area does not include the Hoover Pavilion Site. The survey studied buildings built on or before 1940 and identified many of the most obvious landmarks in the City, including the shingled houses in what is now known as Professorville, commercial buildings in the Spanish Colonial Revival (or Early California) style, and the works of several major architects. The survey team emphasized architectural design over other aspects of historical importance. In 1997, an update to the 1979 survey was completed in order to add additional sites to the inventory. This survey area included the City limits and considered the Hoover Pavilion for listing. However, the City eventually decided not to add the sites identified in 1997 to the inventory. It is important to note that even though the City's Historic Inventory does not include the buildings at the SUMC Sites, the Draft EIR considers the Stone Building complex and the Hoover Pavilion as historic resources for the purpose of the CEQA analysis. The fact that the Historic Inventory does not include these buildings does not change the impact analysis and conclusions in the Draft EIR.

PTC6.13 *The commentor questions the role of the Commission in reviewing the alternatives as presented in the Draft EIR and recommending alternate alternatives.* Please see Response PTC6.8, above. In addition, please refer to Master Response 8, which addresses the variations to alternatives as proposed in the Draft EIR, and to Master Response 11 for a description of the SUMC Project review process and the next steps in the EIR review process.

The commentor also states that the Final EIR process is meant to conclude the evaluation of which alternative is superior and should be adopted. It is important to note that it is not the purpose of CEQA or the EIR to make recommendations regarding alternatives or the SUMC Project in general. The EIR serves to present information about the SUMC Project and alternatives to reduce the impacts identified in the Draft EIR. However, the EIR does

[3] City of Palo Alto, Department of Planning and Community Environment, "Historic Inventory Category Information," accessed on September 16, 2010 at: http://www.cityofpaloalto.org/depts/pln/news/details.asp?NewsID=539&TargetID=209

not make conclusions about the adoption of the SUMC Project or its alternatives. As explained above in Response PTC6.8, it is at the discretion of City Council whether to approve all or portions of the proposed alternatives that would mitigate or avoid significant environmental impacts, while rejecting the alternatives that are deemed to be infeasible. Please refer to PTC6.8, above, for more details.

PTC6.14 *The commentor seeks clarification on the number of net employees and the number of total employees under the SUMC Project*. As explained on pages S-22 though S-23 and page 2-48 of the Draft EIR, full buildout and occupancy of the SUMC Project would result in an increase of 2,242 new full-time equivalent employees,[4] or an approximately 23 percent increase over 2007 employment. In total, SUMC would include approximately 12,123 employees by 2025.[5] Table 2-9 of the Draft EIR shows projected on-site employment as a result of the SUMC Project, as well as the projected changes in employment without adjusting for part-time status. Without such an adjustment, employment is projected to increase by 2,417 employees.

PTC6.15 *The commentor questions the SUMC Project sponsors' objectives and whether the "bulleted" and "dashed" objectives contained in the Draft EIR were used when analyzing the SUMC Project alternatives*. As noted in the hearing, the bulleted and dashed objectives were considered for the Alternatives analysis. Please refer to pages 5-39 through 5-49 of the Draft EIR, Section 5, for an analysis that describes the extent to which these alternatives would meet or not meet the SUMC Project sponsors objectives as described in Section 2 of the Draft EIR. In addition, as requested, Table 5-6 is provided above to show a comparison between the SUMC Project and the seven alternatives. Please refer to Response PTC6.9 for more details.

Pages 2-4 through 2-8 of the Draft EIR, Project Description, list the SUMC Project sponsors' objectives as well as the City's objectives. The SUMC Project sponsors' objectives are divided into four categories: Program, Siting, Circulation, and Cost. The Program objectives are further sub-divided by entity (SCH, LPCH, and SoM). The objectives were designed to avoid specific details of the SUMC Project in order to allow for an evaluation of different ways to fully or partially accomplish the objectives.

PTC6.16 *The commentor questions the conclusions regarding traffic and vehicle miles traveled (VMT) under the analysis of the Village Concept Alternative*. Please refer to Staff-Initiated Change 8 for a revised traffic analysis of the Village Concept Alternative and the traffic impacts created by the recommended employee housing. Please also refer to Staff-Initiated Change 4 for a revised discussion of the greenhouse gas effects of the Village Concept Alternative.

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[4] Adjusted for part-time employment.

[5] Keyser Marston Associates, Final Proposed Stanford University Medical Center Expansion Housing Needs Analysis, September 2009.

PTC6.17 *The commentor questions the role of the HRB in the SUMC Project review*. Please refer to Master Response 11 for a detailed description of the City's review process and HRB's involvement in the SUMC Project.

The commentor also asks which entity would review the historical significance of the Stone Building complex since it is eligible for the California Register of Historic Resources (CRHR). The CEQA Guidelines (Section 15064.5) specify that a historical resource for purposes of CEQA is (1) a resource listed in, or determined eligible by the State Historical Resources Commission, for listing in the CRHR; or (2) a resource listed in a local register; or (3) a resource that a lead agency determines to be historically significant. Generally a resource shall be considered by the lead agency to be historically significant if it meets the criteria for listing on the CRHR. Criterion 3 applies to the SUMC Project. The State Historical Resources Commission has not made, and need not make, a determination regarding eligibility of any of the resources on the SUMC Sites. However, through the EIR, the lead agency (the City of Palo Alto) has made the applicable determinations.

PTC6.18 *The commentor questions the contribution of affordable housing fees from the SUMC Project sponsors*. As part of the SUMC Project, a Development Agreement would be approved if such an agreement could be mutually agreed upon. One component of the Development Agreement between the City and the SUMC Project sponsors would be the payment of a housing in-lieu fee in the amount of $23.1 million, which is equivalent to what a commercial project would pay (see page 2-27 of the Draft EIR). However, the Development Agreement terms have not been settled between the City and the SUMC Project sponsors.

As proposed by the SUMC Project sponsors, the money identified in the Development Agreement would be set aside and used for community projects. The City Council would need to decide whether to make a counter-proposal which would allow for alternative use of these funds, or whether to instead accept the proposal of the SUMC Project sponsors. Such funds could be used either for the direct construction of housing units, or as leverage to encourage private developers to construct even more affordable units; however, the exact number of housing units that could be constructed is currently unknown. Whatever number of units is ultimately constructed within the City would count towards the City's affordable housing targets.

Provision of funding in and of itself would not result in an environmental impact. Therefore, no further response is necessary. Please refer to Master Response 10 for a discussion of non-CEQA issues and Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption.

PTC6.19 *The commentor questions whether the Village Concept Alternative would swap housing occupancy rather than increase occupancy*. As discussed on pages 5-33 to 5-34 of the Draft EIR, the previously approved housing units at the Quarry Road/Arboretum Drive and

Quarry Road/El Camino Real sites were approved for occupancy by post graduates and/or hospital residents (see Response 22.84, which clarifies that the housing units were specifically approved for occupancy by postdoctoral fellows and medical residents). Under the Village Concept Alternative, the City would recommend that those housing units be instead dedicated for occupancy by SUMC employees.

The commentor also asks if the SUMC Project sponsors have other projects involving housing. As discussed on pages 3.1-4 and 5-33 of the Draft EIR, the CP/GUP, approved by Santa Clara County, allows 3,018 net new housing units on Stanford University lands. Staff-Initiated Change 8 evaluates the traffic effects of housing SUMC employees, and the displacement of the University population.

PTC6.20 *The commentor indicates that criteria need to be developed to evaluate the impact of the Development Agreement affordable housing funding on the City's ability to meet ABAG requirements*. Please see Response PTC6.18, above.

PTC6.21 *The commentor states that the housing proposed under the Village Concept Alternative along Quarry Road would displace housing included under the CP/GUP and asks if the Draft EIR considers this impact*. The CP/GUP allows up to 3,018 units, but only requires that 2,420 of those units be constructed as a condition to full academic build out. As there is no regulatory requirement to build 598 units, up to 598 CP/GUP units have been identified by the City as excess units that could be the subject of a housing agreement if mutually agreed upon. Stanford asserts that the units have been "programmed" for other uses, but the CP/GUP does permit the units to be used for postdoctoral fellows and medical residents.

While the CP/GUP provides strict limits on non-residential development, including a specific development cap, it provides greater latitude for residential development. The Framework section of the CP/GUP clarifies that additional housing is exempt from the development cap. The Housing section of the CP/GUP also expressly provides that upon approval of the Santa Clara County Planning Commission and subject to further environmental assessment, additional housing beyond 3,018 units may be constructed. Read together, if the parties mutually agree, the housing can be used for hospital housing.

As stated on pages 5-34 through 5-35 of the Draft EIR, recommendations to dedicate the housing to SUMC employees would have some implications on the analysis in the CP/GUP EIR. Specifically, the CP/GUP EIR transportation analysis applied trip generation rates specific to campus residents, including graduate students and post doctoral fellows. However, the trip rate of SUMC employee occupants of the housing, as proposed under the Village Concept Alternative, would differ from the trip generation rate for graduate students and post doctoral follows. The change in the trip rate and the corresponding VMT, air quality, climate change, and noise emissions are also analyzed on pages 5-198 through 5-210 of the Draft EIR.

In light of Stanford's assertion that the units have been "programmed" for other uses, the trip generation and LOS analysis of the Village Concept Alternative has been revised since the publication of the Draft EIR. For the revisions to the analysis, refer to Staff-Initiated Change 8, which assumes displacement of the campus population could occur if CP/GUP housing were allocated to SUMC employees. In addition, the associated changes to the climate change analysis due to adjustments of VMT have also been applied to this EIR under Staff-Initiated Change 4.

PTC6.22 *The commentor questions if there would be a difference between hospital employee spousal trips and student spousal trips, as analyzed under the CP/GUP EIR.* Please refer to Staff-Initiated Change 8 for the changes to trip generation and LOS analysis under the Village Concept Alternative. It should be noted that housing for hospital employees has a slightly higher trip generation rate than the housing in the CP/GUP analysis.

PTC6.23 *The commentor questions whether the housing in the CP/GUP has an allocated purpose in Stanford's plans.* As specified by the General Use Permit, the housing units proposed under the CP/GUP have an allocated purpose.

PTC6.24 *The commentor states that the $23.1 million dollars in housing in-lieu fees, as included in the Development Agreement proposal, could be used to accommodate more units than originally planned.* Please see response PTC 6.18, above, and Master Response 12 for a description of the Development Agreement terms.

PTC6.25 *The commentor asks if the City's affordable housing requirement can be transferred to other communities.* According to the San Francisco Bay Area Housing Needs Plan for 2007-2014, after the initial allocation (of the Regional Housing Needs Allocation [RHNA]), each local jurisdiction may request that it be allowed to transfer units. The transfer must take place in a way that maintains the total need allocation amongst all transfer parties, maintains income distribution of both retained and transferred units, and includes a package of incentives to facilities production of housing units.[6]

PTC6.26 *The commentor expresses opposition to No Project Alternative A.* Per CEQA Guidelines Section 15126.6, an EIR must include a range of feasible alternatives that obtain most of the project objectives and reduce the significant and unavoidable impacts of the proposed project. In addition, CEQA Guidelines Section 15126.6(e) requires the inclusion of a "no project" alternative in order to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, the SUMC Project Draft EIR analyzes seven alternatives, including two No Project Alternatives. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

[6] ABAG, *San Francisco Bay Area Housing Needs Plan 2007-2014*, p. 37, June 2008.

PTC6.27 *The commentor states that it is difficult to understand whether the alternatives presented in Section 5 of the Draft EIR would meet the SUMC Project objectives*. In response to this comment, Table 5-6 has been prepared, as outlined above. Please refer to Response PTC6.9 for a comparison between the SUMC Project and the seven alternatives.

PTC6.28 *The commentor asks how the 60 percent reduction of Reduced Intensity Alternative B was derived*. Refer to Master Response 8 for a description of the alternatives included in the Draft EIR and the methodology for selection.

The commentor also states that other reduced intensity alternatives should be considered, including the removal of the top floor of the SHC Hospital building. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

PTC6.29 *The commentor questions the methodology for selecting the alternatives as presented in the Draft EIR*. Refer to Master Response 8 for a description of the alternatives included in the Draft EIR and the methodology for selection.

PTC6.30 *The commentor asks how the 60 percent reduction of Reduced Intensity Alternative B was derived*. Refer to Master Response 8 for a description of the alternatives included in the Draft EIR and the methodology for selection.

PTC6.31 *The commentors state that other reduced intensity alternatives should be considered, including the removal of the top floor of the SHC Hospital building and an alternative that would address the height issues*. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

PTC6.32 *The commentor asks why the parking garage would be above-ground under the Tree Preservation Alternative*. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the parking structure at Pasteur Drive and Welch Road, as explained by the SUMC Project sponsors at the public hearing. Under the SUMC Project, the parking garage would be below-grade; however, this would require the removal of two Protected Trees. In order to reduce the footprint of the parking structure to avoid the Protected Trees, the parking structure would need to be partially above-grade. Therefore, the Tree Preservation Alternative would avoid the removal of the Protected Trees at the corner of Pasteur Drive and Welch Road by constructing the parking structure three stories above-grade.[7] Also, please see Draft EIR page 5-20 for a discussion of how the change to the parking structure would improve overall SUMC Project design and function, while reducing construction costs.

[7] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, July 7, 2010.

PTC6.33 *The commentor asks why some of the SHC Hospital buildings would be taller to make up for the loss of the hospital module in Kaplan Lawn, but the School of Medicine (SoM) FIM buildings would not increase in height to reduce the building footprints*. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is an explanation of the FIM building heights, as provided by the SUMC Project sponsors at the public hearing. The SUMC Project sponsors were able to accommodate the SoM FIM buildings on the proposed site without needing to increase the height of the buildings. Although the FIM buildings would be smaller in height than the SHC buildings to the east, the FIM buildings were designed to match the height of the existing buildings immediately to the west of the proposed FIM buildings. The FIM buildings would be 50 to 65 feet in height, while the existing buildings to the west, which are in the County of Santa Clara, are 44 to 85 feet in height. Increasing the height of the FIM buildings under the SUMC Project or the Tree Preservation Alternative would not be conducive with the surroundings. As such, it would not be feasible to increase the height of the FIM buildings in order to reduce footprint impacts.[8]

PTC6.34 *The commentor questions if the building footprints at the Main SUMC Site could be further reduced in order to avoid the removal of additional Protected Trees*. Please refer to Master Response 8 for a description of the Tree Preservation Alternative and variations to the alternative as proposed in the Draft EIR.

PTC6.35 *The commentor questions the number of Protected Trees to be retained under the Tree Preservation Alternative*. Since the publication of the Draft EIR, the number of Protected Trees to be removed and retained has been corrected. Refer to Staff-Initiated Change 6 for the revised Protected Tree numbers.

The commentor also asks for clarification of the biological and aesthetic tree resource definitions. The designations of "biological tree resources" and "aesthetic tree resources" do not currently exist under the City's regulations, but these designations are proposed for inclusion in the new Hospital District zoning ordinance. Under the proposed Hospital District zoning, all Protected Trees would be biological tree resources. A "Biological Tree Resource" is a protected category oak or redwood of a certain size as defined in the Palo Alto Municipal Code, Chapter 8.10.

Under the proposed Hospital District zoning, the definition of an "Aesthetic Tree Resource" is as identified on page 3.9-12 of the Draft EIR. An aesthetic tree resource is a tree that is deemed important relative to the SUMC Sites because it has one or more of the following characteristics: functions as an important or prominent visual features relating to the existing area, proposed conditions, or pedestrian or vehicular thoroughfare; contributes

[8] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, July 7, 2010.

to a larger grove, shared canopy, or landscape theme or provides a visual balance to existing buildings, trees, or streetscapes; and/or possesses unique character as defined in the designation of Heritage Trees (per Municipal Code Section 8.10.090) such that if the tree is an outstanding specimen of a desirable species, distinctive in form, size, age, location, or has some other historical significance. In general, categorizing trees under this designation would be performed by the Director of Planning and Community Environment, in consultation with the City Arborist.

In order to determine the Protected Trees that qualify as both biological and aesthetic tree resources, the City's arborist, the Department of Planning and Community Environment, and the SUMC Project sponsors surveyed the SUMC Sites and evaluated the existing trees. Although several trees qualified as biological resources, which are Protected Trees pursuant to Chapter 8.10 of the Municipal Code, not all of these trees were deemed to be aesthetic tree resources, as defined above. The Draft EIR includes an analysis of the Protected Trees potentially to be removed and also focuses on the biological and aesthetic tree resources.

PTC6.36 *The commentor questions what would stop the SUMC Project sponsors from just removing a Protected Tree and paying the tree removal fee.* The SUMC Project sponsors would be required to adhere to all mitigation measures outlined in the Draft EIR and would not be permitted to remove trees without prior authorization from the City. Mitigation Measures regarding tree removal are presented on pages 3.9-26 through 3.9-28 of the Draft EIR. Since the publication of the Draft EIR, the mitigation measures have been revised and further enhanced. As such, please refer to Staff-Initiated Change 6 for revisions to the mitigation measures as included in the Draft EIR.

PTC6.37 *The commentor questions if tree removal at the SUMC Sites would be similar to the tree removal at UC Berkeley and whether the SUMC Project would create comparable controversy.* It is anticipated that the SUMC Project would not create controversy regarding Protected Tree removal. The City is taking preemptive actions by assessing the characteristics and values of the Protected Trees and requiring the SUMC Project sponsors to implement mitigation measures to reduce impacts. The City has evaluated all the trees at the SUMC Sites and would oversee the tree removal process during the construction of the SUMC Project. The City would ensure that the mitigation measures are implemented as described in Staff-Initiated Change 6, which would reduce any potential controversy.

PTC6.38 *The commentor asks if the footprint of the SoM FIM 1 building could be further reduced under the Tree Preservation Alternative in order to retain additional Protected Trees.* Please refer to Master Response 8 for a description of the Tree Preservation Alternative and variations to the alternative.

PTC6.39 *The commentor requests that the Final EIR include a map with the Protected Trees to be retained and removed.* A site plan that depicts the Protected Trees under the Tree Preservation Alternative is included as Figure 5-1 in the Draft EIR, page 5-19. However, the Protected Tree numbers were corrected since the publication of the Draft EIR, Figure 5-1 has been replaced with new figures (Figures 5-1a through 5-1d), as presented in Staff-Initiated Change 6. This figure depicts the Protected Trees, including biological and aesthetic tree resources, that potentially would be removed, retained, and relocated. Unlike Figure 5-1 in the Draft EIR, Figures 5-1a through 5-1d in Staff-Initiated Change 6 compare tree removal, retention, and relocation under the Tree Preservation Alternative with the SUMC Project. Please refer to Staff-Initiated Change 6 and Section 6 of this document for the updated figures depicting the Tree Preservation Alternative and the SUMC Project.

In addition, the commentor requests additional information regarding the tunnel under the proposed FIM 2 and FIM 3 buildings. See Master Response 8 for information regarding the existing utilities corridor.

PTC6.40 *The commentor asks if the functions of the FIM 1 building could be incorporated into the FIM 2 and FIM 3 buildings in order to preserve more trees.* In order to allow for the SoM to continue to operate during construction of the SUMC Project (or the alternatives), the FIM 1 building would be constructed while the Stone Building complex is still in use. SoM functions in the Edwards building would then move from the Stone Building complex to the FIM 1 building, and the Edwards building would be demolished. The FIM 2 and FIM 3 buildings would then be constructed in a portion of the demolished Stone Building complex footprint. As such, it is not feasible to incorporate the FIM 1 building floor area into the FIM 2 and FIM 3 buildings, while still continuing SoM operations during construction. Also, please see Master Response 8.

PTC6.41 *The commentor requests a well-publicized communication plan before tree removal during construction of the SUMC Project. The commentor requests advanced notification for the removal of the trees at the SUMC Sites during construction.* Tree removal is likely to occur over various stages of the construction process, rather than all at one time. The City of Palo Alto Tree Ordinance and the City's Tree Technical Manual do not include policies or regulations that mandate the notification to surrounding communities of tree removal. The requirements for noticing the public about tree removal could be determined upon the issuance of a tree removal permit.

PTC6.42 *The commentor states that trees that would be removed under the SUMC Project should be replaced.* Mitigation Measures regarding tree removal are presented on pages 3.9-26 through 3.9-28 of the Draft EIR. Since the publication of the Draft EIR, the mitigation measures regarding tree removal have been revised and further enhanced. As a result of these revisions, tree replacement for privately-owned trees is required under Mitigation

Measure BR-4.4B. In addition, as included in the Draft EIR, tree replacement for loss of publicly-owned street trees is included in Mitigation Measure BR-4.5. For the new Mitigation Measure BR-4.4B, please refer to Staff-Initiated Change 6 for revisions to the mitigation measures as included in the Draft EIR.

PTC6.43 *The commentor questions the cost of the Tree Preservation Alternative in comparison to the SUMC Project*. Please refer to Master Response 10 for a discussion of non-CEQA issues.

The following is a description of the Tree Preservation Alternative cost, as explained by the SUMC Project sponsors at the hearing. The building costs of the Tree Preservation Alternative would be comparable to the SUMC Project because of the amount of square footage proposed under both projects. SUMC Project costs would mainly be from the amount of square footage constructed, the medical equipment, and the information technology that would need to be purchased. Since the Tree Preservation Alternative would have the general building program during construction and operation, the costs of this alternative would be equivalent to the SUMC Project.[9]

PTC6.44 *The commentor expresses general support for the Tree Preservation Alternative*. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

PTC6.45 *The commentor states that the importance of the Stone Building complex is not necessarily the building itself, but the events that took place there*. The historic significance of the Stone Building complex was determined using a variety of criteria. As explained on page 3.8-15 of the Draft EIR, ARG evaluated the Stone Building complex in relation to the eligibility criteria of the CRHR and the seven aspects of integrity defined in the National Register Bulletin 15. ARG noted, among other observations, that E.D. Stone designed the building during a pivotal phase of his career and that the original features and feeling or the building are largely intact. In addition, ARG noted that the Stone Building complex is associated with an important historic event: the first heart transplant in the United States. As such, the historic evaluation of the Stone Building complex in Draft EIR considers the events that occurred there.

Additionally, the commentor states that the real importance of the SUMC Sites is to enable the continuation of research and ground-breaking procedures. Please refer to Master Response 9 for a discussion of project and alternative merit in the CEQA process.

PTC6.46 *The commentor questions the reasoning for demolishing the Stone Building complex because it does not meet building codes, but not demolishing other non-compliant buildings on the Stanford campus*. The Stone Building complex would not be demolished under the SUMC Project solely because it does not meet OSHPD standards. The Stone Building

[9] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, July 7, 2010.

complex would be demolished because it no longer meets the functional needs of the SUMC Project sponsors and the cost of retrofitting would be high. The physical restructuring of the Stone Building complex to accommodate earthquake forces, even for non-hospital uses, would require intense reconstruction. In addition, the existing uses of the Stone Building complex would need to be relocated during the entire retrofit process. However, there is no existing space on the Stanford campus to house the SUMC clinics and medical offices and/or the SoM medical research labs. If the SUMC Project sponsors were to undertake a retrofitting of the Stone Building complex, the existing uses would have to be decommissioned over the lengthy Stone Building complex retrofit process. Further, at the end of the retrofit process, the buildings still would be less functional than the new SoM and clinic buildings. Please see pages 5-45 to 5-48 of the Draft EIR for additional information regarding the feasibility of retrofitting and reusing the Stone Building complex.

The commentor also suggests that the Stone Building complex be used for something other than a hospital. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

In addition, the commentor asks if the other non-compliant buildings on the Stanford campus are planned for demolition. Demolition of other buildings on the Stanford campus is not part of the SUMC Project. Please refer to Master Response 10 regarding non-CEQA issues.

PTC6.47 *The commentor requests clarification about the process for determining the significance of historical resources in the Draft EIR.* Under CEQA, there are several ways in which the historical significance of a building can be determined. One method is to use the local jurisdiction's list of historical buildings. As explained in Response PTC6.12, above, the City of Palo Alto's Historic Inventory lists noteworthy examples of the work of important individual designers, architectural eras, and traditions as well as structures whose background is associated with important events in the history of the City, State, or nation.[10] However, the Stone Building complex and the Hoover Pavilion are not listed on the City's Historic Inventory, and therefore are not considered as historic resources under the inventory. See Response PTC6.12, above, for more details.

Another method for determining historic significance under CEQA is to determine whether the resource is eligible for listing under the CRHR or the National Register of Historic Places (NRHP). As described on pages 3.8-11 through 3.8-15 of the Cultural Resources section, two studies were performed to evaluate the historical significance of the Stone Building complex and the Hoover Pavilion. One study was conducted in 2007 by Stanford University's Director of Heritage Services and the University Archaeologist who concluded

[10] City of Palo Alto, Department of Planning and Community Environment, "Historic Inventory Category Information," accessed on September 16, 2010 at: http://www.cityofpaloalto.org/depts/pln/news/details.asp?NewsID=539&TargetID=209

that the Stone Building complex is not one of E.D. Stone's major achievements but would be potentially eligible for listing due to the building's connection with the first heart transplant; however the University report concluded the buildings lacked integrity and therefore probably are not eligible for listing on the CRHR. However, the study also concluded that the Hoover Pavilion is eligible for listing on the CRHR under criterion 3 as an important example of pre-World War II hospital design.[11]

In 2008, the City hired ARG to perform a separate study, which included a peer review of Stanford University's evaluation. As explained on page 3.8-15 of the Draft EIR, ARG evaluated the Stone Building complex in relation to the eligibility criteria of the CRHR and the seven aspects of integrity defined in National Register Bulletin 15. ARG noted that E.D. Stone designed the Stanford University Medical Center/Palo Alto Hospital during a pivotal and innovative phase of his career, the building remains in its original location with its essential physical features intact, the setting has not been significantly diminished, the character-defining materials and workmanship are largely intact, and the original feeling of the building is intact. In addition, both Stanford University and ARG noted that the complex is associated with an important historic event: the first heart transplant in the U.S. As a result, ARG concluded that the Stone Building complex appears eligible for listing on the CRHR and should be considered an historical resource for the purposes of the CEQA review. In addition, ARG concurred with Stanford's findings that the Hoover Pavilion is eligible for listing on the CRHR under criterion 3.[12] Based on the findings by ARG, and the consensus of the City's Historic Preservation Planner,[13] the Draft EIR considers the Stone Building complex and Hoover Pavilion as significant historic resources. ARG's complete peer review is included as Appendix I in the Draft EIR. As noted in the comment, if the SUMC Project is approved, the City would need to adopt a Statement of Overriding Considerations for significant and unavoidable impacts on the Stone Building complex.

The commentor also questions the HRB's role in the review process. Please refer to Master Response 11 for a detailed description of the City's review process and HRB's involvement in the SUMC Project.

PTC6.48 *The commentor acknowledges the siting and retrofitting challenges of retaining the Stone Building complex*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process

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[11] Jones, L., *Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project*, 2007.

[12] Architectural Resources Group, Inc., Stanford University Medical Center Historic Resource Evaluation and Peer Review, 2009.

[13] Dennis Backlund, Historic Preservation Planner, City of Palo Alto, *Staff Comments on the Stanford Shopping Center and University Medical Center: Historic Resource Evaluation and Peer Review*, prepared by Architectural Resources Group, Inc., memorandum to Julie Caporgno, Chief Planning and Transportation Official, and Steven Turner, Advance Planning Manager, May 15, 2008.

In addition, the commentor offers suggestions on how to reflect the Stone Building complex into the design of the SUMC Project, including tile motifs and scale models of the complex. At this time, the SUMC Project sponsors do not anticipate using portions of the Stone Building complex in the design of the new buildings. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

To address the building modification and demolition, Mitigation Measures CR-1.2 through CR-1.4, as presented on pages 3.8-22 through 3.8-23 of the Draft EIR, would be required as part of the SUMC Project. Mitigation Measure CR-1.2 would require Historic American Buildings Survey (HABS) documentation with site-specific history, accurate mapping of all buildings, architecture descriptions, and photographic documentation. As included in Mitigation Measure CR-1.3, all written and photographic documentation regarding the Stone Building complex would be submitted to applicable agencies. In addition, Mitigation Measure CR-1.4 requires the SUMC Project sponsors to install interpretive displays within the SUMC Sites that provide information to visitors and residents regarding the history of the Stone Building complex. The displays, signs, and/or plaques would be installed in highly visible areas. Therefore, although the SUMC Project would require the demolition of the Stone Building complex, these mitigation measures would reduce the significant and unavoidable impacts associated with the loss of this historic structure, but not to a less-than-significant level.

In addition, the decorative pattern on the exterior façade of the Stone Building complex has been recently utilized to create a textile pattern. The SHC has used this fabric at the recently completed Vision Center and other Outpatient Clinics projects.[14]

PTC6.49 *The commentor questions whether reducing SHC Hospital beds by 25 percent of what is proposed under the SUMC Project, but not reducing beds at the LPCH Hospital, would meet the SUMC Project sponsors' objectives.* Although this reduction of beds would partially meet the SUMC Project sponsors' objectives, this scenario would not include a large enough reduction in construction and operation activities to substantially reduce the significant and unavoidable impacts identified in the Draft EIR. Please refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

PTC6.50 *The commentor discusses his opinions of the Stone Building complex, and concludes that the objectives of the SUMC Project outweigh the importance of preservation.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

PTC6.51 *The commentor asks if portions of the Stone Building complex façade could be retained and incorporated into the architecture of the proposed SHC clinic/medical office building.* At this time, the SUMC Project sponsors do not anticipate using portions of the Stone Building

[14] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

complex façade in the design of the new buildings. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description as to why it is infeasible to reuse portions of the Stone Building complex in the design of the proposed SHC clinic/medical office building. If any part of the Stone Building complex were retained, it would have to be physically separated from the remaining hospital buildings in order to comply with the requirements of OSHPD. This would necessitate demolition of the 1973 Core Expansion Building and separation of utility systems. In addition, any portion of the Stone Building complex that would remain in place would need to undergo substantial seismic retrofit work. The buildings in the Stone Building complex do not meet current standards for fire separations, air exchange, and ventilation. Upgrading these systems would require duct work that would reduce available interior space, diminishing the functionality of the interior space.[15]

In addition to the functional obstacles, preservation of a portion of the Stone Building complex would not substantially reduce the effect on historic resources caused by demolishing the rest of the building complex. CEQA Guidelines Section 15064.5(b)(2)(A) states that the significance of a historical resources is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify it inclusion in, or eligibility for, inclusion in the CRHR. The primary façade of the Stone Building complex faces the main entry and its fountain plaza on Pasteur Drive. Three sections of the Stone Building Complex are visible from the Pasteur entry: the Boswell, Edwards, and West Pavilion buildings. This represents about 1,050 linear feet of façade and the complex as a whole has approximately 3,000 linear feet of unobstructed façade. Even if one of the buildings facing the front entry, the West Pavilion, were preserved and re-used, the Stone Building complex would no longer retain sufficient physical characteristics to justify its eligibility for the CRHR.

Re-use of the West Pavilion would preserve approximately 560 linear feet (18.6 percent) of the total façade for the Stone Building complex façade, only 325 feet (10.8 percent) of which would be visible from Pasteur Drive. While retaining the West Pavilion would preserve some of the architectural features of the building, the scale and proportion would be severely compromised and, at less than 20 percent of the original complex and less than a third of the front façade, the surviving element would not retain enough integrity to qualify as a historic resource. In addition, the West Pavilion displays some incompatible rooftop additions and lacks the interior courtyard that is one of the essential features of the Stone Building complex.[16] Accordingly, preservation of the West Pavilion would not avoid

[15] Barbara Schussman, Bingham McCutchen LLP, Memorandum: "Historic Preservation Alternative," November 12, 2008.

[16] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

or substantially lessen the significant effects of the SUMC Project and therefore is not required by CEQA.

PTC6.52 *The commentor states that the Draft EIR does not analyze a historic preservation alternative that both preserves the Stone Building complex and meets the SUMC Project sponsors' objectives.* As explained in more detail in Master Response 8, the SUMC Project sponsors and the City developed a list of potential alternatives to the SUMC Project that would reduce the identified significant and unavoidable impacts while also meeting the majority of SUMC Project objectives. The Historic Preservation Alternative, as included in the Draft EIR, was developed by the SUMC Project sponsors and the City in order to evaluate the environmental benefits of retaining the existing Stone Building complex, which would be demolished under the SUMC Project.

Three factors were considered during the development of the Historic Preservation Alternative: retaining the historic integrity of the Stone Building complex, meeting the SUMC Project sponsors' objectives, and designing the alternative to be as feasible as possible. Due to the complexity of hospital designs and the need for the appropriate functional adjacencies, the SUMC Project sponsors designed the Historic Preservation Alternative and the City conducted an extensive review of the proposed alternative. It was determined by the City that the Historic Preservation Alternative as included in the Draft EIR is the most potentially feasible alternative that would focus on the retention of the Stone Building complex, although it would not meet all of the SUMC Project objectives. As such, the Historic Preservation Alternative presented in the Draft EIR meets the majority of the requirements under CEQA for an alternative to be evaluated in the EIR.

PTC6.53 *The commentors request clarification regarding the features included in Figures 5-4 and 5-5.* Figure 5-4 on page 5-36 of the Draft EIR depicts the Village Concept Alternative and its proposed public spaces. The solid red lines in the figure denote the pedestrian and bicycle connections that would be included under the Village Concept Alternative. However, towards the bottom of the figure are semi-transparent red lines to the west of the SoM. These lines represent the bicycle and pedestrian connections that are not included in the SUMC Project application, or the Village Concept Alternative, but exist today and would connect the SUMC Sites with the rest of the Stanford campus.

Figure 5-5 on page 5-37 of the Draft EIR depicts the urban design characteristics under the Village Concept Alternative. The red solid lines in this figure represent urban streets and building frontages along Quarry Road and El Camino Real. These lines show that Quarry Road and El Camino Real are arterial streets that currently have the traffic volume, width, and location that can support a more urban street frontage. Therefore, the intention along these streets is to orient buildings and building entrances towards Quarry Road and El Camino Real. The specifications for building setbacks, heights, and other design

characteristics would occur later in the application process for the buildings proposed under the Village Concept Alternative.[17]

PTC6.54 *The commentor notes that portions of the Village Concept Alternative Study Area are located in unincorporated areas of Santa Clara County*. As explained on page 5-30 of the Draft EIR, two of the three housing sites under the Village Concept Alternative, the Quarry Road/Arboretum Drive Site and the Quarry Road/El Camino Site, are located in Santa Clara County. As such, if the Village Concept Alternative would be adopted, any changes to the previously approved housing sites would require County approval.

PTC6.55 *The commentor questions how the boundaries of the Study Area for the Village Concept Alternative were determined*. Originally, the Village Concept Study Area was developed to encompass two projects: the SUMC Project and the Stanford Shopping Center Project. Although the Stanford Shopping Center Project is no longer included as a foreseeable project in the City of Palo Alto, the Study Area boundaries were not changed. The Village Concept Alternative would work to connect all adjacent uses, including the existing Stanford Shopping Center, with the SUMC Project, the recommended housing units, and the Palo Alto Intermodal Transit Station (PAITS).[18] As described on page 5-28 of the Draft EIR, the Village Concept Study Area defines the focus area for consideration of urban design principles that can shape a village concept and link the SUMC Project and the surrounding context together.

PTC6.56 *The commentor questions the uses on the proposed Village Concept Alternative housing sites and whether they could be used as mixed-use development*. The three housing sites under the Village Concept Alternative would be used solely for residential units. In particular, the units would be dedicated to SUMC Project employees. Although the SUMC Project would result in less-than-significant population increases, the housing units would serve to alleviate some of the minor housing constraints caused by the SUMC Project.

In addition, the Village Concept Alternative includes housing units at the three housing sites because these sites have already been environmentally cleared under the CP/GUP EIR and the Sand Hill Road Corridor Projects EIR. As explained on page 5-33 of the Draft EIR, housing at the three sites have undergone CEQA review and have been approved by their respective lead agencies. The housing as approved could thus be constructed currently under the previous analysis and approval. However, mixed-use development at these sites has not been environmentally cleared by previous documents. Therefore, if the Village Concept Alternative includes mixed-use development and it is approved as the final SUMC Project, then additional environmental review and a change to the Stanford CP/GUP would be needed prior to that approval. Since the SUMC Project would not impact existing commercial and retail facilities, and since mixed-use development would

[17] Bruce Fukuji, Fukuji Planning & Design, Planning and Transportation Commission Hearing, July 7, 2010.
[18] Bruce Fukuji, Fukuji Planning & Design, Planning and Transportation Commission Hearing, July 7, 2010.

require further environmental studies, the addition of mixed-use development under the Village Concept Alternative is not proposed.

PTC6.57 *The commentor seeks clarification on the traffic congestion and greenhouse gas implications of considering spousal trips from the employee housing, under the Village Concept Alternative.* The analyses of traffic generation, VMT, and greenhouse gas emissions from the Village Concept Alternative have been revised. Please see Staff-Initiated Change 4 for a revised calculation of greenhouse gas emissions and revised climate change conclusions for the Village Concept Alternative. Please see Staff-Initiated Change 8 for a revised transportation analysis of the Village Concept Alternative.

PTC6.58 *The commentor asks several questions regarding housing occupancy under the Village Concept Alternative and the analysis of the Village Concept Alternative.* Please see Response PTC6.21, above. In addition, please refer to Staff-Initiated Change 4 and Staff-Initiated Change 8.

PTC6.59 *The commentor questions the use of Mitigation Measure VQ-2.1 to reduce land use impacts for the alternatives and questions the role of ARB in mitigating impacts.* As stated on page 3.3-38 of the Draft EIR, the ARB would conduct Architectural Review of the building mass and layout, landscaping, and exterior building treatment. The ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The City Council would then review the recommendations and make findings, as appropriate, that the design is compatible with the existing character. Therefore, as described in the Draft EIR, City Council would have the final approval regarding the building mass, site layout, landscaping, and exterior building treatments. For other issues, such as the Comprehensive Plan and the Zoning Ordinance, the City Council and the Commission would review the SUMC Project for compliance with existing policies, regulations, and general compatibility.

Mitigation Measure VQ-2.1 would ensure a less-than-significant impact pertaining to on-site character and views, which is described under Impact LU-5, page 3.2-32, of the Land Use section of the Draft EIR. As explained under this impact, the SUMC Project (and its alternatives) would not change the overall existing or planned land use patterns in the area surrounding the SUMC Sites. However, the increase in building intensity and massing at the SUMC Sites would result in a significant impact on on-site character and views. Therefore, implementation of Mitigation Measure VQ-2.1, which requires the SUMC Project sponsors to go through the City's Architectural Review process, would reduce the impacts from increased intensity under the SUMC Project and its alternatives.

As explained in Impact LU-1, on page 3.2-8 of the Draft EIR, the SUMC Project would also result in conflicts with adopted land use plans and policies. However, mitigation measures presented throughout the Draft EIR would avoid these conflicts. In order to avoid these conflicts, the following mitigation measures would be implemented, as listed on

page 3.2-29 of the Draft EIR: VQ-2.1, TR-6.1, AQ-1.1, AQ-1.2, NO-1.1, NO-4.1, BR-4.1 through BR-4.5, CR-1.1 through CR-1.5, and HW-3.1. These mitigation measures would also be implemented to reduce land use conflicts for No Project Alternative B, Reduced Intensity Alternatives A and B, the Tree Preservation Alternative, the Historic Preservation Alternative, and the Village Concept Alternative. As such, the Architectural Review process would not be the only mitigation measure to address the SUMC Project's conflicts with plans and policies.

PTC6.60 *The commentor asks if it is possible to approve the Village Concept Alternative with the pedestrian linkages, but without the revised housing occupancy*. The City has the ability to approve either the SUMC Project, or one of its alternatives, or a combination of components of the SUMC Project and its alternatives. Please see Master Response 8 for this discussion.

PTC6.61 *The commentor suggests intensifying the outboard portion of Welch Road and moving some (or all) of the medical office square footage proposed at the Hoover Pavilion Site to this site instead*. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations on the alternatives suggested by the commentors.

PTC6.62 *The commentor suggests a three-way agreement between the City, Stanford University, and Santa Clara County be made to dedicate the 490 CP/GUP housing units to medical residents and interns of the SHC and LPCH Hospitals*. The Village Concept Alternative includes a recommendation by the City that the units at the Quarry Road sites be dedicated to SUMC employees. It is speculative at this point to assume that such an agreement can and will be made between the City, County, and ABAG.

PTC6.63 *The commentor states that the Village Concept Alternative does not satisfy the traffic issue*. Please see Master Response 9 for a discussion of the merit of the SUMC Project and its alternatives.

PTC6.64 *The commentor states that the Village Concept Alternative does not result in a substantial difference compared to SUMC Project impacts on air quality and climate change*. Please see Master Response 9 for a discussion of the merit of the SUMC Project and its alternatives. Also, please see Staff-Initiated Change 4, which provides a revised analysis of impacts related to greenhouse gas emissions. Per Staff-Initiated Change 4, the SUMC Project and the Village Concept Alternative would no longer have a significant and unavoidable impact related to greenhouse gas emissions.

PTC6.65 *The commentor questions how annexing the Stanford land into the City would affect the CP/GUP numbers*. Annexation of Stanford university land for housing into Palo Alto has not been proposed by the SUMC Project sponsors and would be subject to Local Agency Formation Commission (LAFCO), City, and County approvals. Such an annexation is

speculative and is thus not addressed further. Please see Master Response 7 for an additional discussion of the feasibility of requiring housing outside of Palo Alto.

PTC6.66 *The commentor suggests increased density, smaller units, or senior housing as alternatives to the Village Concept Alternative as proposed.* Under CEQA, alternatives to a project must (1) meet the basic project objectives and (2) reduce or eliminate significant impacts of the project. Also, the alternatives must be feasible. Increasing density of the Quarry Road sites compared to the density in the CP/GUP would be subject to County approval. Changing the housing type to senior housing would also be subject to County approval. It should be noted that the Village Concept Alternative includes a recommendation, not a requirement, by the City to dedicate CP/GUP units to SUMC employees. Also, it is unlikely that the suggested increased density, smaller units, or senior housing would alleviate the significant and unavoidable traffic impacts of the SUMC Project, given that the current Village Concept Alternative would exacerbate the SUMC Project's traffic impacts. See Staff-Initiated Change 2 for a discussion of updated intersection LOS impacts, and Staff-Initiated Change 8 for a discussion of updated traffic analysis of the Village Concept Alternative.

PTC6.67 *The commentors question the feasibility and adequacy of the GO Pass program and question whether the GO Pass program would be included in the Development Agreement or in the CEQA process.* As stated by the City Attorney, there are a variety of ways to pursue the implementation of the GO Pass. One is the Development Agreement and one would be a condition of approval through the entitlement process. Ultimately, the City Council would need to make a finding on whether that particular mitigation is in fact feasible. Please see Master Response 1 for the effectiveness of the GO Pass mitigation measure and steps to be taken in the event mode split requirements were not achieved.

PTC6.68 *The commentor requests a mitigation monitoring process.* As explained in the Introduction Section on page 1-5 of the Draft EIR, if the SUMC Project is approved, then the City of Palo Alto must adopt a Mitigation Monitoring and Reporting Program (MMRP), which would ensure that the mitigation measures presented in the Draft EIR are being implemented. Please see Master Response 11 for a description of an MMRP and the SUMC Project review and approval process.

The commentor also requests a process to determine whether the proposed mitigation measures are adequate and actually reduce the impacts. Should this EIR be certified and should the SUMC Project or an alternative be approved, then the feasible mitigation measures identified in this document would be incorporated into Conditions of Project Approval, to be implemented and monitored as described above. This analysis has analyzed the efficacy of the various mitigation measures and has identified which measures would reduce impacts to less than significant, and which measures would not be sufficient to reduce impacts to less than significant.

PTC6.69 *The commentor suggests striking Mitigation Measure PH-3.1 to the extent that it the pending Housing Element update would accomplish measures therein.* As discussed in Master Response 7, City staff agrees that the City is already in the process of updating its Housing Element and, as part of that process, it is already identifying potential housing sites within the City. To the extent that Mitigation Measure PH 3.1 calls upon the City to identify additional sites not already being identified as part of the City's current efforts, staff agrees that the measure is not feasible and should be rejected.

PTC6.70 *The commentor questions Mitigation Measure TR-7.2 on pages 3.4-80 through 3.4-81 of the Draft EIR and questions the dollar amount of the cross-town shuttle.* Expanding the Palo Alto shuttles is included in the payment of Traffic Impact Fees in Palo Alto. This is a one-time payment and the dollar amount is estimated at $2.1 million. Expanding transit service for the Santa Clara Valley Transit Authority (VTA) Community Bus is an annual payment estimated at $150,000 per year. However, contributions to this service by the SUMC Project have been determined to not be warranted (see Staff-Initiated Change 1). Expanding transit service for Menlo Park shuttles is also an annual payment estimated at $46,430 per year. Although this measure is no longer included in Mitigation Measure TR-7.2, the SUMC Project sponsors have offered to contribute to the Menlo Park shuttles as part of a Development Agreement. Please see Master Response 6 for more information regarding the cost of mitigation. The traffic impact thresholds in San Mateo County as part of the City/County Association of Governments (C/CAG) and the thresholds adopted by Menlo Park are different than those for Palo Alto and Santa Clara County, as shown on Draft EIR pages 3.4-30 through 3.4-32.

In addition, the commentor suggests that the Comprehensive Plan Amendment analysis incorporate the City of Menlo Park's and/or the County of San Mateo's thresholds into the Palo Alto significance thresholds. Changing the City's standards of significance for traffic impacts and analyzing impact of the Comprehensive Plan Amendment are beyond the scope of this EIR. As discussed in Section 3.4 of the Draft EIR, Transportation, the standards of significance in which roadways are located were applied to roadways in the traffic analysis. Please see Master Response 11 for a discussion about the City's Comprehensive Plan Amendment.

PTC6.71 *The commentor suggests that a 911 dispatch center be included in the OSHPD certified complex.* The existing Palo Alto/Stanford emergency dispatch center is adequate and there are no current plans for expansion and/or construction of new facilities. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

PTC6.72 *The commentor indicates that Stanford University and the City should collaborate on additional mitigation measures that would benefit both the City's reduction goals as well as provide mitigation for the SUMC Project.* While there is certainly potential for future collaboration between Stanford and the City that could enhance existing or provide new

emission reduction measures to further the City's reduction goals, that is beyond the scope of the Draft EIR. With implementation of Mitigation Measures CC-1.1 through CC-1.4, and Mitigation Measure TR-2.3, the SUMC Project would not result in significant climate change impacts. Please refer to Master Response 11, which explains that conditions must have a nexus to SUMC Project impacts, and Master Response 12, which describes that both sides must to agree to Development Agreement terms.

PTC6.73 *The commentor requests a qualification of Palo Alto's Green Ordinance to help mitigate City emissions and assign the responsibilities between Stanford and the City*. Palo Alto's Green Ordinance is a way to increase the energy efficiency and reduce greenhouse gas emissions from typical residential and commercial land uses. However, most of the energy efficiency and conservation requirements within the Green Ordinance are not applicable to the more unusual land uses, such as hospitals. The Draft EIR analyzes the SUMC Project in relation to the energy requirements of a typical hospital. The SUMC Project as proposed would provide an energy efficient hospital facility. The SUMC Project would provide innovative engineering solutions to air circulation, energy efficient improvements to the existing chillers, and an overall efficient design of the buildings. These proposed features would result in greater energy efficiency than would have been achieved by applying the few elements of the Green Ordinance that would potentially be applicable to the hospital. Please see Staff-Initiated Change 4 for more information about the SUMC Project's energy efficiency.

The Draft EIR suggests a threshold of the SUMC Project tiering from a qualified Climate Action Plan. However, the City of Palo Alto currently does not have a qualified Climate Action Plan. The process of qualifying a Climate Action Plan involves not only determining the emissions inventories for the existing and future years, but also providing a list of the reduction measures that would be implemented under projects in the City in order to reduce emissions to the acknowledged thresholds (typically reduction emissions to 1990 levels by 2020). The plan must also quantify the expected reductions and be adopted following completion of the CEQA process.

PTC6.74 *The commentor asks which alternatives would meet the City's objective of addressing project-induced school impacts that are not mitigated by school impact fees*. As stated on page 3.14-17 of the Draft EIR, the SUMC Project would pay non-residential development fees subject to SB 50 School Impact Fees. According to Section 65996 of the State Government Code, payment of school impact fees is deemed to constitute full and complete mitigation. As such, no other mitigation is required.

As explained in the Draft EIR, the SUMC Project would not directly impact enrollment and school capacity. Instead, the actual generation of new students would be a tertiary impact. The SUMC Project would increase employment, which could induce more housing, a secondary impact. Construction of more housing units would generate more

students, a tertiary impact. The new residential development that may indirectly result from the increase in employment under the SUMC Project would be subject to separate CEQA review and would be required to pay separate residential school impact fees.

PTC6.75 *The commentor asks if the Draft EIR analyzes the impacts to the Palo Alto Unified School District (PAUSD) regarding the construction of 490 additional housing units under the Village Concept Alternative.* The analysis of public service impacts under the Village Concept Alternative is included on pages 5-224 through 5-225 of the Draft EIR. As stated, the Village Concept Alternative would not involve the construction of new residential units within the City that have not previously been environmentally cleared. As explained on page 5-33 of the Draft EIR, the 490 housing units included in the Village Concept Alternative have already undergone environmental review in the CP/GUP EIR and the Sand Hill Road Corridor Projects EIR and have been approved by their respective lead agencies. The housing as approved could thus be constructed currently under the previous analysis and approval. In addition, these housing units would be subject to the development fees and the school impact fees, as outlined in the respective EIRs. As such, the additional school impacts from the 490 housing units are not analyzed further in the Draft EIR.

In addition, the Draft EIR concludes on page 5-224 that dedicating the housing at the three sites to SUMC employees, and constructing the housing within the City's recommended timeline, would have no implications on the analysis in the CP/GUP EIR and the Sand Hill Road EIR. As with the SUMC Project, the impacts from the Village Concept Alternative would be mitigated by payment of the school impact fees established by SB 50, resulting in less-than-significant impacts.

PTC6.76 *The commentor suggests an alternative that combines the Tree Preservation Alternative with the pedestrian linkages included under the Village Concept Alternative.* The Palo Alto City Council must ultimately certify that it has reviewed and considered the information in the EIR and that the EIR has been completed in conformity with CEQA. During the SUMC Project approval process, the Commission could make recommendations regarding the SUMC Project and its alternatives. After consideration of the Commission's recommendations, it is at the discretion of City Council whether to approve portions of the proposed alternatives that would mitigate or avoid significant environmental impacts, while rejecting the alternatives that are deemed to be infeasible. As such, the Final SUMC Project could be the SUMC Project as proposed in the Draft EIR, an alternative to the SUMC Project, or a combination of the SUMC Project and different alternatives.

In addition, the commentor suggests the inclusion of mixed use development, including condominiums and hotels, in lieu of the housing units proposed under the Village Concept Alternative. As explained in more detail in Response PTC6.56, above, mixed-use development has not been environmentally cleared by previous documents; therefore,

inclusion of mixed-use development would require additional environmental review. Please refer to Response PTC6.56, above, for more explanation as to why mixed-use development would not be included under the Village Concept Alternative.

PTC6.77 *The commentor states that other reduced intensity alternatives should be considered, including the removal of the top floor of the SHC Hospital building*. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

PTC6.78 *The commentor asks if there are any alternatives that were not considered that could mitigate most of the significant and unavoidable impacts of the SUMC Project*. As explained in more detail in Master Response 8, the SUMC Project sponsors and the City developed a list of potential alternatives to the SUMC Project that would reduce the identified significant and unavoidable impacts while also meeting the majority of SUMC Project objectives. In addition, the alternatives were developed to be potentially feasible and reflect the appropriate functionality of a hospital project. Therefore, the list of seven alternatives that were created by the City and the SUMC Project sponsors attempted to alleviate the significant and unavoidable impacts of the SUMC Project, meet the objectives, and reflect a potentially feasible site plan. No alternative would avoid all of the significant effects of the SUMC Project, but several would lessen the effects.

PTC6.79 *The commentors question the process for selecting the alternatives as presented in the Draft EIR, especially Reduced Intensity Alternative B*. Please refer to Master Response 8 for the process of selecting and analyzing the alternatives presented in the Draft EIR.

PTC6.80 *The commentor questions if there would be another Reduced Intensity Alternative between those already identified that would satisfy most of the SUMC Project objectives and reduce the significant and unavoidable transportation impacts to less than significant*. Per Section 15126.6 of the CEQA Guidelines, "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not evaluate every conceivable alternative to a project." The Draft EIR identifies seven alternatives to the SUMC Project. The range of alternatives analyzed and evaluated in this EIR is robust, and is reasonable and adequate of the purposes of CEQA. Additionally, see Staff-Initiated Change 2, which provides a revised LOS analysis for the SUMC Project and which indicates that all significant intersection impacts would be reduced to less than significant with implementation of identified mitigation measures. See also Staff-Initiated Change 8, which provides a revised analysis of the transportation impacts of the various alternatives. Lastly, see Master Response 8, which discusses some variations to the Reduced Intensity Alternative that have been specifically identified by commentors on the Draft EIR.

PTC6.81 *The commentor feels that the Draft EIR does not analyze a historic preservation alternative that both preserves the Stone Building complex and meets the SUMC Project sponsors' objectives*. Please refer to Response PTC6.52, above and Master Response 8.

PTC6.82 *The commentor asks if the Tree Preservation Alternative could be revised further in order to retain more Protected Trees*. Please refer to Master Response 8 for a description of the Tree Preservation Alternative and variations to the alternative..

PTC6.83 *The commentor states that Reduced Intensity Alternative B is worth further consideration since this alternative would have less-than-significant climate change impacts, while the SUMC Project would be significant and unavoidable*. Although Reduced Intensity Alternative B would avoid the climate change impacts, this alternative would not be able to meet all of the goals and objectives of the SUMC Project as proposed. Further, with the revisions to the climate change analysis as presented in Staff-Initiated Change 4, the SUMC Project as proposed would result in a less-than-significant impact with respect to climate change, with mitigation.

PTC6.84 *The commentor expresses concern that review time for City Council and the Commission will be limited due to the desire for certification by the end of 2010*. The City Council and the Commission will have adequate time to give recommendations regarding the SUMC Project and its alternatives and to formulate findings. Please refer to Master Response 11 for a detailed description of the City's review process and the next steps in the EIR review.

The commentor also asks if City Council can decide to adopt an SUMC Project alternative (or a variation of an alternative) at the last minute. As explained in the hearing transcript, the Draft EIR provides adequate environmental coverage for the maximum amount of build-out under the SUMC Project. Therefore, the City Council can decide to approve a project that is less than what is analyzed in the Draft EIR since it would be environmentally cleared.

PTC6.85 *The commentor states that the Commission should consider the alternatives, or variations to the alternatives*. Please refer to Master Response 11 for a detailed description of the City's review process and the next steps in the EIR review and Master Response 8 for a discussion of alternatives.

PTC6.86 *The commentor summarizes the main SUMC Project sponsors and City objectives for the SUMC Project and states that it is imperative that these objectives be addressed*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process. Also, please see Response PTC6.8, above, and Table 5-6 for a comparison of the SUMC Project and the alternatives' ability to achieve project objectives.

PTC6.87 *The commentor states that the major impact of the SUMC Project is traffic and it should be mitigated*. Please see Staff-Initiated Change 2, which provides a revised LOS analysis for

the SUMC Project and which indicates that all significant intersection impacts would be reduced to less than significant through identified mitigation measures.

PTC6.88 *The commentor states that the City wants a vital, economic, jobs based, employment based, tax base and the SUMC Project is vital to meeting this goal.* Please refer to Master Response 9 for a discussion of project merit.

PTC6.89 *The commentor states that the City's Climate Protection Plan is a guiding document for the SUMC Project that should be adhered to.* The Draft EIR, page 3.6-25, cites compliance with the City of Palo Alto's Climate Protection Plan as one significance criterion for the analysis of greenhouse gas emissions. As such, the Draft EIR evaluates the SUMC Project's adherence to the goals and policies set forth in the Climate Protection Plan. Table 3.6-5, on pages 3.6-31 through 3.6-49 of the Draft EIR, presents the Climate Protection Plan goals that are relevant to the SUMC Project and determines whether the SUMC Project would be compliant with the policies. Please see Staff-Initiated Change 4 for a revised discussion of the SUMC Project's consistency with the goals of the City's Climate Protection Plan.

PTC6.90 *The commentor requests an "intermediate" alternative between Reduced Intensity Alternative B and the SUMC Project.* Although a specific alternative is not suggested by the commentor in this comment, other "intermediate" alternatives were suggested at this hearing, including the reduction of the SHC Hospital by removing the top floor and a reduction of the SHC hospital by 25 percent. Please Refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the alternatives.

PTC6.91 *The commentor expresses concern that the Comprehensive Plan is being changed for the SUMC Project, which "defines away the problem."* The proposed Comprehensive Plan changes are being proposed as part of the SUMC Project, not as mitigation to address the impacts from the SUMC Project. The various impacts from the SUMC Project are addressed throughout this EIR and are mitigated to the extent feasible.

PTC6.92 *The commentor notes that the SUMC Project, the Tree Preservation Alternative, the Historic Preservation Alternative, and the Village Concept Alternative meet the objectives of the SUMC Project, but do not fully reduce the significant and unavoidable impacts identified in the Draft EIR.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

PTC6.93 *The commentor requests confirmation regarding the Draft EIR's conclusions regarding the Village Concept Alternative.* Please refer to Response PTC6.11, above.

The commentor also seeks stronger mitigation measures for the Village Concept Alternative. As described in more detail in Response PTC6.56, the Village Concept Alternative includes housing units at three housing sites that have already been

environmentally cleared under the CP/GUP EIR and the Sand Hill Road Corridor Projects EIR and have been approved by their respective lead agencies. Therefore, as explained on page 5-33 of the Draft EIR, the housing as approved could be constructed currently under the previous analysis and approval. On the basis that the housing at the three sites has been environmentally cleared, the analysis in the Draft EIR does not provide a further analysis and additional mitigation measures to reduce impacts at the housing sites.

However, under the Village Concept Alternative, the housing would be constructed under recommended modification to the terms as previously approved, including dedication of housing to SUMC Project employees and an accelerated construction schedule. These recommendations would have some implications on the analysis in the CP/GUP EIR, including trip generation rates and associated VMT, air quality, climate change, and noise impacts. The additional impacts are discussed 5-198 through 5-210 of the Draft EIR. However, much of this analysis has been revised. Please refer to Staff-Initiated Changes 4 and 8 for revisions to the Village Concept Alternative impacts.

In addition, as described on page 5-35 of the Draft EIR, the modified terms of the housing sites would have no implications on the conclusions in the Sand Hill Road EIR. The Sand Hill Road EIR did not include assumptions on the type of residential occupants at the site and the housing density (70 units) would remain the same. As such, the housing units at the Sand Hill Road/Pasteur Drive site would not create additional impacts under the Village Concept Alternative and additional mitigation measures are not included to reduce impacts at this housing site.

PTC6.94 *The commentor asks if applying the eight percent Palo Alto housing demand to the school analysis is appropriate, and suggests applying ABAG's requirement for the City's jobs/housing balance*. The school demand that would be generated by ABAG's required RHNA for Palo Alto would not result from the SUMC Project. The City's RHNA is determined by ABAG based on broader considerations such as water and sewer capacity, suitable land, housing growth and market demand, housing cost, employment, and proximity to transit.[19] This EIR addresses environmental impacts resulting from the SUMC Project, and determining school demand based on the City's RHNA determined by ABAG would not be appropriate here. The eight percent distribution of housing demand within the City is based on historical evidence, comprised of SUMC's data on the residential distribution of their employees. As indicated on page 3.13-11 of the Draft EIR, the distribution of where SUMC Project employees would live is based on existing SUMC employee zip code data provided by the SUMC Project sponsors (see Appendix L of the Draft EIR).[20] Therefore, it is appropriate to assume in this analysis that eight percent of new SUMC employees would seek to live in Palo Alto, and base indirect housing demand

[19] ABAG, San Francisco Bay Area Housing Needs Plan 2007-2014, June 2008.

[20] Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.

on this distribution. Further, as indicated on page 3.14-24 of the Draft EIR, "Section 65996 of the State Government Code explains that payment of school impact fees established by the Leroy F. Greene School Facilities Act of 1998 is deemed to constitute full and complete mitigation for school impacts. PAUSD has enacted development fees in accordance with the Leroy F. Greene School Facilities Act and levies these fees on development projects within its service area." Housing development in Palo Alto would be required to pay the school impact fees.

PTC6.95 *The commentor contests the application of 1.72 workers per worker household, based on U.S. Census 2000 data for Santa Clara County, into the analysis of impacts on the City's jobs to employed residents ratio.* Please see Master Response 7 for a discussion of the methodology applied in analyzing the SUMC Project's impact on the City's jobs to employed residents ratio. The calculations for the analysis of the jobs to employed residents ratio is provided and in the table notes for Table 3.13-10 and 3.13-11 of the Draft EIR. As indicated, the 1.72 workers per worker household is based on U.S. Census 2000 data for Santa Clara County. If the 2,242 workers were multiplied by 8 percent directly, then the resulting number would only yield the number of new employees who may chose to live in Palo Alto. This number of employees still needs to be translated into household demand, which is why the 2,242 new employees is multiplied by 1.72 workers per worker household.

PTC6.96 *The commentor questions why the Lapkoff & Gobalet Report was not used in the analysis of SUMC Project impacts to PAUSD enrollment and capacity.* The Lapkoff & Gobalet Report, as cited by the commentor, addresses district-wide enrollment projections for the PAUSD. The forecasts incorporate fall 2009 enrollments, 2008 birth data, and updates on new housing developments.[21] The Draft EIR analysis is based on existing enrollment and capacity data. Therefore, the forecast information provided in the Lapkoff & Gobalet Report is not included in the Draft EIR.

In addition, it is important to note that the PAUSD submitted comments on the Draft EIR and did not contest the PAUSD capacity and enrollment numbers used in the Draft EIR. The PAUSD also did not request that the Lapkoff & Gobalet Report be incorporated into the Draft EIR findings. Please see Letter 10, in Section 4, Responses to Comments, for a list of the PAUSD concerns.

The commentor also questions the yield projections used in the Draft EIR. The Draft EIR uses a student generation factor of 0.7 students per household, which are based on Statewide statistics. However, the Lapkoff & Gobalet Report includes local generation rates. As included on page 11 of the Lapkoff & Gobalet Report, student yields were distributed by the type of housing unit, as follows: 0.9 for single family units, 0.5 for

[21] Lapkoff & Gobalet Demographic Research, Inc., *District-Wide Enrollment Forecasts: Palo Alto Unified School District*, December 2, 2009.

townhouse or townhouse-style units, 0.25 for condominium-style units, 0.15 for apartment units, and 0.7 for below-market rate units.[22]

At this time, the type of housing units that the SUMC Project employees would occupy is unknown. Therefore, assuming that the SUMC Project employees would be equally distributed among the different types of housing units, the average student generation rate would be 0.5 students per household. At this rate, the SUMC Project would indirectly generate approximately 52 students. As stated on page 3.14-16 of the Draft EIR, the SUMC Project would generate approximately 73 students with the Statewide average generation factor of 0.7. Therefore, the student yield used in the Draft EIR is higher than the generation rates included in the Lapkoff & Gobalet Report. As such, the Draft EIR includes a conservative estimate and does not need to be updated to reflect the yields in the Lapkoff & Gobalet Report.

Given that the SUMC Project sponsors would pay school impact fees, which are considered adequate mitigation under CEQA, the SUMC Project would result in less-than-significant school impacts, regardless of which PAUSD statistics are used. Please refer to Response PTC1.18 for more details.

[22] Lapkoff & Gobalet Demographic Research, Inc., *District-Wide Enrollment Forecasts: Palo Alto Unified School District,* December 2, 2009.

CC1

Special Meeting
June 7, 2010

CLOSED SESSION 264

1. CONFERENCE WITH LABOR NEGOTIATORS 265

STUDY SESSION 265

2. Public Safety Building Feasibility Study of Facility Alternatives. 265

CITY MANAGER COMMENTS 266

ORAL COMMUNICATIONS 266

APPROVAL OF MINUTES 266

CONSENT CALENDAR 266

3. Ordinance 5082 entitled "Ordinance of the Council of the City of Palo Alto to Amend the Contract Between the Board of Administration of the California Public Employees Retirement System (CALPERS) and the City of Palo Alto" to Implement California Government Code Section 20475 (2.0% @ 60 Full Formula) Providing a Second Tier of Different Level of Benefits for New Miscellaneous Employees. 267

4. Adoption of an Ordinance Repealing Chapter 16.09 of the Palo Alto Municipal Code and Amending Title 16 to Adopt a New Chapter 16.09 (Sewer Use Ordinance) Establishing Regulations to Reduce Discharges of Pollutants to the Sanitary Sewer and Storm Drainage Systems. 267

5. Approval of a Letter Opposing the Amendment to the Joint Powers Agreement for the Administration of the Santa Clara County Congestion Management Program related to Governance of the Santa Clara Valley Transportation Authority 267

6. Approval of Amendment No. 1 to the Option Agreement Between the City of Palo Alto and the Palo Alto History Museum for the Roth Building, 300 Homer Avenue, Providing for a One-Year Extension of the Option Term. 267

7. Approval of a Contract With Spencon Construction, Inc. in the Amount of $297,825 for the 2010 Street Maintenance Program Alma Street Concrete Restoration Capital Improvement Program Project (CIP) PE-86070. 267

8. Park Improvement Ordinance 5083 for a New Greenhouse and Shed Located in the Baylands at 2500 Embarcadero Road. *(First reading May 10, 2010 – Passed 9-0).* 267

ACTION ITEMS 268

9. Public Hearing: Stanford University Medical Center Facilities Renewal and Replacement Project-Meeting to Receive Comments on the Stanford University Medical Center Facilities Renewal and Replacement Project Draft Environmental Impact Report (DEIR), Including Comments Focused on the Project Description, Land Use, Population & Housing, and Public Services Chapters of the DEIR. 268

10. Approval of Recommendation From the High Speed Rail Committee to Endorse Peninsula Cities Consortium Revised Core Message and to Approve City Manager's Proposed High Speed Rail Staffing and Appropriating $90,000 from the Council's 2010 Contingency Fund 300

COUNCIL MEMBER QUESTIONS, COMMENTS, AND ANNOUNCEMENTS. 302

ADJOURNMENT: The meeting adjourned at 12:18 a.m. 302

The City Council of the City of Palo Alto met on this date in the Council Chambers at 6:00 p.m.

Present: Burt, Espinosa, Holman, Klein, Price arrived at 6:12 p.m., Scharff, Schmid, Shepherd, Yeh arrived at 6:20 p.m.

Absent:

ACTION ITEMS

By Council direction the Stanford University DEIR is typed verbatim.

9. Public Hearing: Stanford University Medical Center Facilities Renewal and Replacement Project-Meeting to Receive Comments on the Stanford University Medical Center Facilities Renewal and Replacement Project Draft Environmental Impact Report (DEIR), Including Comments Focused on the Project Description, Land Use, Population & Housing, and Public Services Chapters of the DEIR.

Mr. Curtis Williams, Director of Planning and Community Environment: Thank you Mayor and Council Members. I am Curtis William, the Director of Planning and Community Environment. I would like to make a few remarks before I turnover the presentation to Rod Jeung, our environmental consultant from PBS&J. Then also Cara Silver from the City Attorney's Office would like to make some comments. Eduardo Martinez from our Planning and Transportation Commission is here to report on the Commission's meeting last week.

The recommendation for tonight's item is that you accept any public comments and provide your own Council comments regarding the adequacy of the environmental review document, being the Draft Environmental Impact Report for the Stanford University Medical Center Renewal and Replacement Project. All the comments and questions provided tonight will be responded to in the Final EIR, which the Council must feel is satisfactory prior to entertaining any actions on the entitlements for the project that are scheduled to occur near the end of the year.

The discussion about the merits of the project, what public benefits are appropriate to request, how the Comprehensive Plan or the zoning are changed or amended are not the subject of this hearing, but will be discussed as outlined at a later date. We have provided you with a flowchart last time, and I think we have given you a larger size one that you might be able to read better this time. It is 11 by 17 I think. It shows generally the relationship of the Environmental Impact Report to the other project reviews and actions. We will be having a series of meetings, not just through the environmental review process and the

06/07/10 106-268

architecture review, but the Development Agreement discussions, and then the final entitlement discussions later in the year.

So there have been some questions asked about the process that I would like to address briefly. One of the questions that have come up has to do with the Council's discussions particularly of the community benefits, and the fact that there is a number of menu kind of options that you are looking at now, mitigation measures, benefits, conditions of approval perhaps, zoning, etc. These are key policy decisions obviously the Council is going to need to deal with and there are concerns. I know that the EIR might box you in or not allow the kind of flexibility that you need to look at those items as well. We don't think that should be a concern for several reasons. One is that the mitigation measures that we do provide in the document in some cases themselves are a menu of options for the Council to choose from.

Secondly, we have provided Alternatives in the document that allow for a number of the issues that you have discussed in terms of Development Agreement and other requirements, alternative mitigation measures to be implemented such as housing being considered with the Village Concept Alternative, or preservation of the Stone Building as part of the Preservation Alternative in the EIR. So there are a number of ways to address these issues.

There are other potential benefits and conditions that you have been talking about that don't really have a physical environmental impact such as funding for healthcare programs, for instance. So there are some things that we don't really have to address as part of the EIR that are sort of out of that scope.

So in summary, the EIR itself is basically the disclosure of the potential physical impacts of the project and of these Alternatives. It is not in any way an acquiescence or approval by the Council of the project as it is proposed.

We have scheduled, as you know, a series of meetings for the Council and Planning and Transportation Commission to consider this Environmental Impact Report. We have focused those meetings on the various topics and chapters in the Environmental Impact Report, given the scope of it that seems to be a much more manageable way to address the document. So overall we have a lengthy 69-day review period. We have meetings scheduled with the Planning Commission, one of them has occurred already. Again, broken down by topic and chapter, so last week we had the Project Description, Land Use, Housing, and Public Services Chapters. Those are the ones that are before you tonight.

This Wednesday we will be talking about Visual Quality, Biological Resources, and Cultural Resources with the Commission, and you will be looking at that next week, and so forth with Transportation, Climate Change, and Air Quality. All those subjects are addressed in a series of six meetings with the Commission and then subsequently with the Council as well in a series of five meetings. We have combined two of the subject categories into one for the Council. So there will be many opportunities to comment on these things. We would just encourage that tonight we focus on those chapters that are outlined for you, and that Rod will briefly touch on. Then these other ones will come along in their sequence.

There have also been questions at the Commission last week, and I know the Council had these questions a couple of weeks ago about the possibility of having additional meetings, or an additional meeting to try to coalesce the topics that have come up, the discussions that have been made over the period of several meetings. We don't have something like that scheduled at this point in time. We can either entertain doing that, which would mean that we would have to compress our schedule and get a meeting setup quickly, or we can as you move along through the series of meetings, you may gauge better later on whether that is necessary or beneficial, or else we would need to extend the comment period.

One issue that came up at the Planning Commission last week was the discussion of the relationship to the Comprehensive Plan, and concerns that things were out of sequence. That we are looking at a project that involves Comprehensive Plan changes, and at the same time we are doing our Comprehensive Plan Update. We certainly understand that dilemma. That really, to us, is not an EIR issue as much as it is a project issue, and sequencing the project with the Comprehensive Plan. However the environmental impacts such as traffic, and visual impacts, and that of that Comprehensive Plan change are addressed as part of the EIR. Project consistency with the Comprehensive Plan will ultimately be one of your gauges as to whether or not to approve the various entitlements associated with this project, which community benefits are appropriate, etc. I don't know the extent to which Commissioner Martinez will be discussing this. Then lastly, just frankly, the consideration of delaying in some way while the Comprehensive Plan Update moves along would be highly detrimental to the schedule for this project.

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Council Member Holman provided some questions today, and we distributed at places some responses. I just want to touch on a couple of those in particular. One was a concern about the lack of visual aids

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in the Environmental Impact Report. We acknowledge there are not detailed plans as you might receive on other projects. However, there are visuals in the EIR site plans and simulations, and shadow studies that relate specifically to addressing the significant impact criteria in the EIR, such as view obstruction, scenic qualities, shadow studies, etc. So we will be discussing the Visual Resources section of the EIR next week with you, this week with the Commission. I can address those in more detail. The applicant is also presenting a fly-through model of the site to the Commission this week and to you next week. We are hoping that will help address that concern.

CC1.2

Secondly, there was a question about whether Council comments would be provided or could be provided at after the close of the comment period. If I didn't understand this, Council Member Holman, let me know. Generally, the answer is no, comments are not provided after the comment period but you could certainly extend the comment period if you had a meeting scheduled to provide additional comments at a follow up meeting. If the concern was specifically about like tonight or next week's meeting being busy and you might not be able to get completely through those items, certainly those comments can continue to be made either at subsequent meetings, or even offline as individuals to Staff and the consultants, and they will be passed along before the timeframe is up on July 27.

Then finally questions about the review process, specifically the ARB review and the HRB review process, and the lack of HRB review. We do acknowledge the need for an HRB review and we are trying to schedule an HRB review of the Cultural Resources section prior to the July 27 deadline. We will move on that. The ARB's reviews continue to be preliminary in nature and we think they provide a useful forum for initiating some of the design discussions. We do also plan that the Commission and Council will have opportunities to look at those designs in the fall after we get through this Draft EIR comment period.

So with that I think first we want to go to the City Attorney, and then maybe Commissioner Martinez, and then come back to Rod Jeung. Thank you.

Cara Silver, Senior Assistant City Attorney: Thank you Curtis, Mr. Mayor and members of the Council, Cara Silver, Senior Assistant City Attorney. I want to provide you some framework for your decision tonight and moving forward through the entitlement process.

As we have discussed in the past there are three major aspects of the entitlement process. The first major aspect that we are dealing with of course is the environmental review under the California Environmental

Quality Act. The review process itself has several different phases. The first phase is the preparation of the Draft EIR by the consultant, which has now been prepared. The second phase that we are currently in the process of completing is receiving comments by members of the public, by the City Council, and by Boards and Commissions. Then the third phase will be that those comments will be assembled and the consultant will provide written responses to all of those comments. Fourth, once the Response to Comments document is finalized there may be some additional revisions to the Draft EIR that will need to be compiled. Then the Draft EIR, the Response to Comments, and the Final EIR, which contains some textual changes, are all compiled and that creates the Final EIR, which is then certified by the Council.

In conjunction with certifying the EIR the Council will need to make certain findings regarding the EIR. Those findings basically require the Council to decide whether there are any feasible mitigation measures that would reduce impacts identified in the EIR. The Council must also make a finding as to whether there are feasible alternatives that would reduce impact. Third, the Council must adopt a Mitigation Monitoring Plan. Finally, if the Council were to approve the project it must adopt a Statement of Overriding Considerations. This part of the EIR process is typically done at the tail end after all the Response to Comments are compiled of course.

As Curtis mentioned there are some mitigation measures that are listed in the Alternatives sort of as a menu. During the tail end of the EIR process is the time for you to make the policy decisions about whether one or several of these mitigation measures should be adopted and are in fact feasible.

The second major aspect of the Stanford Project is the zoning and entitlement process. This involves the zoning amendments, the Comprehensive Plan Amendments, and then also the discretionary entitlements. Of course, as we discussed in the past, the discretionary entitlements will involve some Conditions of Approval. Again, there are some overlap between mitigation measures and Conditions of Approval and we will sort that out as we go through the development process.

Finally, the final aspect of the entitlement process is the Development Agreement, which as we have discussed in the past locks in the zoning entitlements as of the date of the execution of the Agreement. In return for the City's locking in the zoning regulations the applicant typically grants the City a package of community benefits. Again, there is some overlap between community benefits and the Conditions of Approval, but the intent of the community benefits is that they are supplemental to the existing Conditions of Approval in the entitlement

process. So with that I will turn it over to Commissioner Martinez, who can report on the Planning and Transportation Commission comments on the three chapters that we are discussing tonight.

Eduardo Martinez, Planning and Transportation Commissioner: Good evening Council Members and Mayor. Curtis touched on one of the most significant aspects of our discussion last Wednesday. That is really the appropriateness of amending the Comprehensive Plan for this project when we are in a state of early review, and suggestions on what the Comprehensive Plan should be over the next ten years. We are unfortunately at the end of a Comprehensive Plan that was probably begun in the early 1990s. There are some things in it that really don't fit any more. It sort of reflected as we reviewed the DEIR and tried to make sense of some of the suggested mitigations.

CC1.3

We saw two types, and we discussed this at length. One is if the Comprehensive Plan didn't fit specifically Land Use Policy L-8 then you change it. There was some consternation about specifically that Comprehensive Plan Policy. The second was to suggest or describe the way in which the mitigation would be solved would be to utilize the ARB to make sure that the land use correct. I think we had some issue with that because the ARB, I think it was put fairly succinctly, reviews the use of land but not the land use. So there were some suggestions about mixed uses, and other items that could be considered to limit trips for example that would not be an appropriate discussion by ARB.

The second major issue was really the environmental impacts discussion itself, and the sort of marginal mitigations that were suggested. Specifically the school impact, it was suggested for example the school has over 600 spaces to increase capacity where other studies suggested that there is going to be an increase in the school population of over 1,100. So several members of the Commission really questioned things like that and felt that the DEIR could be a little more stringent in really reviewing sort of a tougher line for what these impacts are.

CC1.4

I raised a similar kind of thing in the Housing impacts and really suggested there might be greater impacts if, in the new Comprehensive Plan, we are trying to reduce trips, and use of cars, and such like that. When the DEIR would suggest for example that only eight percent of the people who work at Stanford live in Palo Alto, therefore housing isn't such a big deal. Well, when we are trying to reduce the carbon footprint it is a big deal. So we had issues like that that we raised in our discussions. Staff offered to really come back with some useful suggestions on how we go forth on that.

CC1.5

If you have any questions during your discussion I would be happy to try to answer them.

Mayor Burt: Thank you. Now we are ready for additional Staff Report. Consultant.

Rod Jeung, Project Director, PBS&J: Good evening Mr. Mayor, members of the Council, and members of the public. May name is Rod Jeung. As Curtis said earlier I am with PBS&J, serve as the Project Director. I am pleased to have Trixie Martelino with me tonight who served as the Project Manager.

Tonight I am going to give a very high-level overview to the four topics that were mentioned by Curtis and are shown on the slide. That is to go over the Project Description and to highlight three of the first topical impact assessments regarding Land Use, Population & Housing, and Public Services.

Regarding the Project Description it is fundamental to the Environmental Impact Report because it simply describes what is being proposed by the applicant. It describes the location, the physical envelope, the intensity, activities, and reasons for pursuing the project. These characteristics are intended to enable a determination of potential environmental effects of implementing the project.

In order to give you a context for how that proposed project is going to change things you do have to have some appreciation for what is on the ground today, what is the existing development. Well, there are two development sites the main Stanford University Medical Center site and a smaller Hoover Pavilion site as you can see on the slide, it is in the upper right corner. Combined, these two sites house about 2.37 million square feet of hospital, clinic, and research space. It is spread among buildings that reach 50 feet on the main site, and 65 feet at the Hoover Pavilion. The main SUMC site contains the Stanford Hospital and Clinics, the Lucile Packard Children's Hospital, the School of Medicine, and clinic and medical office space along Welch Road. The other key features that exist at the site now include, as shown on the slide, a heliport, an existing emergency department that accommodates about 9,900 employees and over 710 beds.

So what is proposed? First off that there is major expansion at both sites, both the SUMC and the Hoover Pavilion sites. They result in a net increase of 1.3 million square feet mostly on the main SUMC site. Two-thirds of that increase is for expansion. It is for new additional facilities. One-third is for right sizing, a term you heard earlier that refers to modifying the facilities to conform to modern healthcare

standards. The maximum building height would increase from 50 to 65 feet on the two sites to 130 feet on the main site. The tallest proposed structures would be the seven-story Stanford Hospital and Clinics hospital modules. In addition to those main building components there would be an additional helipad that will be constructed, as well as a replacement and expanded emergency department.

In order to accommodate the growth and the expansion that is projected there are a number of additional circulation changes that are envisioned. One of these includes a new connection to the Stanford University Medical Center from Sand Hill Road. These plans would result in nearly 250 more beds, an additional 2,240 employees, and about 3,000 more parking spaces at the site.

With that as an overview of the project why don't we go ahead and turn to the first of the topical impact assessments. That is Land Use. So this is a table that you might recall from your earlier workshop. The significance criteria that addressed land use considerations are shown on the far left column. Then as you subsequently move to the right it identifies those issues that are considered to have no impacts, less than significant impacts, significant impacts but can be reduced to less than significant with the recommended mitigation measures, and then those impacts that are considered significant and unavoidable even with the adoption of the recommended mitigation measures. As seen in this chart most of the impacts related to Land Use are considered to be those having no impact. There is one with less than significant.

The ones I want to focus on tonight because of our short time in the overview are the two impacts that were identified as significant. The first is, as mentioned earlier by the Commissioner, the project would conflict with the Comprehensive Plan policies and the Zoning Ordinance regulations regarding floor area ratio and height limits. Because of the size and scale of the project there would be a significant impact on the onsite character and the development pattern of the Stanford Medical Center.

There are mitigation measures as required, and they are detailed in the Environmental Impact Report and in the Staff Report. These mitigation measures are believed to reduce the effects to less than significant. In particular, there are a number of mitigation measures that are recommended to address very specific environmental issues as noted on the slide, and collectively would result in project modifications that would enable the project to be consistent with the Comprehensive Plan policies that are adopted to reduce environmental effects.

In addition, there is compliance as mentioned earlier, with the City's ARB review process. Recommendations from that body would reduce the project's effects on the character of the proposed improvements to less than significant.

With respect to Population and Housing the SUMC Project would not induce substantial population growth that exceeds projected levels for the City that are projected by the Association of Bay Area Governments. It would not displace housing or residents such that replacement housing would be needed.

However, for informational purposed the Environmental Impact Report does look at another issue, and that is how the project would change the ratio of jobs to employed residences within the community. This ratio is an indicator of a community's balance between employment opportunities or job and employees. A high ratio would suggest a job surplus or a housing shortage, and as a result commuters coming in from other areas. Those commuters would then trigger air emissions, greenhouse gas emissions, etc. So the actual change in the ratio in and of itself is not the environmental impact but it is kind of a spin-off effect. It is the effect of the additional travel. The analysis shows that the Stanford University Medical Center would increase the employees but not the housing and result in a ratio that goes from 2.61 in 2025 without the project to 2.66 with the project.

Mitigation measures that have been proposed in the Environmental Impact Report would be to reduce the impact on the jobs to employed residents ratio by looking a range or a menu of different options to increase the number of housing units to help offset that growth in jobs.

With regard to Public Services, which is our last topic, the criteria here show that Public Services considers a range of different issues ranging from police, fire, recreational, and school facilities. The project would result in increased demand for all of these services. However there would not be an increased demand such that the facilities that house those different types of services would result in expanded facilities that would result in significant impacts. So as a result, in summary, the Public Services result in less than significant impacts. That concludes our overview for tonight. Thank you.

Mayor Burt: Thank you. Before hearing from the applicant I just wanted to speak to the fact that we have 15 comment cards and we are nearing eleven o'clock. This is one of nine remaining meetings on just the Draft Environmental Impact Report between five that are coming forward before the Planning Commission and four more before the Council. So the public will have additional opportunities to speak to it.

In addition, the appropriate comments tonight are on the Draft Environmental Impact Report not one whether you are in favor or against the project in general. So we would like everyone to focus on that. Finally, because of the late hour, and the number of comments, and the nine additional opportunities we are going to need to limit each speaker to two minutes tonight, but it does not limit you from speaking in the future at either the Planning Commission or the City Council as we go through.

Now we have these three topic areas of Land Use, Population and Housing, and Public Service. That is the primary focus tonight but the public is not limited to speak on those areas of the Draft Environmental Impact Report. You can speak to other aspects of the Draft Environmental Impact Report either tonight or in the subsequent meetings. Of course would like to ask you to in future meetings to only comment once on a given aspect.

The way the process works is that all comments on the Draft Environmental Impact Report are recorded and it is the obligation of the CEQA process to respond to all of those comments. So you won't get neglected. I just want everybody to know that so they can kind of prepare for after the applicant speaks.

I would like to welcome the applicant forward. You have up to ten minutes at the beginning of the comment period, and five minutes at the end. Welcome.

Mike Peterson, Vice President Special Projects, Stanford University Hospital & Clinics: Thank you Mayor Burt and members of the Council. It is a real pleasure to be here. This has been a long road to get to this point. We know we have a ways to go but certainly the release of the Draft EIR is really an important milestone on this very important project.

I am Mike Peterson. I am Vice President of Stanford Hospital and Clinics. My role is to represent both Stanford Hospital and Clinics and Lucile Packard Children's Hospital in terms of the work with the City on this project. I will be followed by Bill Philips from the University who will add a few comments after mine.

What I would want to do tonight is just highlight this project in terms of what we are trying to do and some of the major features of it. We are going to be getting into a lot of detail about the project but I would like to just step back from it and talk about some of the general issues of it. From a Project Objective standpoint first and foremost what we are doing here is providing modern, state-of-the-art facilities to deliver high

quality healthcare and related teaching and research. There are two components to this. One is to delivering healthcare as any community hospital does. The second is as a teaching and research facility. That has been the role that we have assumed since 1959 when the medical school moved from San Francisco to Palo Alto.

Second, as I think you all know, in the State of California there is legislation and regulations requiring all hospitals to comply with seismic requirements for public safety both from a structural standpoint and from a nonstructural standpoint. Lucile Packard opened in 1990 and for the most part is fine with the structural but they do have nonstructural areas to address. Stanford Hospital and Clinics was built from 1959 through 1989 and has buildings, which will need replacing. We are currently proceeding with following a course of action under SB 1661 to replace our facilities and meet the standards. So we do have a time issue here. We do have a state law issue that we are dealing with regarding particularly Stanford Hospital and Clinics.

Third is to meet existing and projected future demand for patient care. We have had the unfortunate situation of turning people away at both hospitals because we have not had adequate facilities to respond to all the requests for transfer or admission of patients.

Next is to meet emergencies and disaster preparedness. You were spending a lot of time talking about an emergency operations center just now. There are three issues here. One is the size of the emergency department. It is very, very undersized to meet the current demand and what is going to be expected over time. Two is the lack of surge space. That is when you have a disaster the influx of patients and the ability to meet those needs is very difficult for us to respond to handle an influx during a disaster. Then third is really the basic structure of the buildings themselves. If we can't stand a shake and continue operations we can't take care of anyone. So those three conditions are really important for those two points.

Then finally is meeting the needs of the community physicians. We do have a large number of community physicians on the medical staff and we serve their inpatient requirements as well. Then we have a sustainable design in our facility.

Next slide. This has been commented on already but the project is broken into these components. The adult hospital, SHC, is looking at an 824,000 square foot net addition adding 144 beds. The Packard Children's Hospital 141,000 square feet, adding 101 beds. The School of Medicine is really staying the same in terms of the square footage. For the research at the Hoover Pavilion there is a net increase of 46,000

square feet for community physicians as well as faculty clinics. There is a net of 2,000 parking places. I think the total is 3,000 as previously mentioned. Again the right sizing issue here is about one-third of the project as you have heard already, to basically provide the adequate space for certain services without necessarily any increase in either staff or patients. The examples are private rooms, an appropriately sized emergency department, and appropriately sized operating rooms.

Next slide. There are a couple of other hospital projects in the Bay Area of comparable size such as UCSF, Mission Bay is looking at about 1.8 million square feet, and Cal Pacific a little under a million square feet. I will just move along in the interest of time.

The City engaged Marlene Burkhoff as a peer reviewer on the project. She reported her findings in November of 2007. A couple of points under single patient rooms, what she identified as pretty much all hospital projects today, not only in California but in the United States, are looking at private rooms. The size of the private rooms is pretty close in size to what we are seeing with Kaiser and other facilities in the State of California. Then finally, the overall space being considered for other services is pretty much on the line as you see in other facilities.

Height is an important issue. You can see the two hospitals are going up to 85 and 130 feet. We are looking at several features here. One is the floor to ceiling height of an existing hospital building has increased significantly over the past decade. We have a lot more infrastructure built into the building than we ever had before. It requires more height just for even a single floor. Second is from an efficiency of operations standpoint hospitals work better on a vertical rather than a horizontal design. Third is just the amount of land we have available to us tends to drive to a higher rather than a broader base. Then there are some comparisons to other building in the City of Palo Alto. That is not a comprehensive list just a selective list of building heights that currently exist in the city.

Next slide. Okay, Bill.

Mr. Bill Philips, Stanford University: Mayor Burt and Council Members, just quickly I will sum this up. Important factual information results. We have 9,800 current employees, eight percent, which you have heard before live in Palo Alto currently. We expect the demographics to be about the same for the additional employees of 2,200, a number you heard earlier. This net new employment results in a net regional demand for 1,300 housing units. Using the eight percent equates to a demand for 140 housing units in Palo Alto that is both affordable and

market housing. As Rod mentioned earlier, the DEIR shows that the housing demand would be less than significant.

Next slide. The average daily trips from the project are a little of 10,000, a number that the media has caught. With the Go Pass, which is a program of Caltrain Go Pass for all employees,\ not just the project employees, you would have about 8,000 net new daily trips. Just by way of comparison to a recent project in Menlo Park of about 900,000 square feet at the Menlo Gateway project has an ADT of a little over 11,000.

The peak hour trips, which are the ones that are susceptible to producing congestion, the maximum number there is the 766 AM peak hour trips. With the Go Pass that comes down to 261 AM trips, and basically eliminates all the employee trips from the new project as a result of the Go Pass for all employees. Again, by way of comparison Menlo Gateway, similarly sized, was 1,146 AM and a little over 1,200 PM. Thank you.

Public Hearing opened at 10:49 p.m.

Mayor Burt: Thank you. So at this time we will open the public hearing for members of the public to speak. Each member will have two minutes to speak. Our first speaker is Larry Taylor, followed by Dr. Bruce Baker, followed by Crystal Gamage. Welcome.

CC1.6 Larry Taylor, Palo Alto: Good evening Mayor and Council Members. While reviewing the Draft EIR I became a little bit alarmed at how many alternatives were in it. One alternative, the Historic Preservation Alternative, seems to be a bit unrealistic and doesn't really address or meet the Project Objectives. It is on page 5-45 and 47, and it clearly shows where the EIR clearly shows that in the School of Medicine research labs could not be updated properly under this alternative. Another, Reduced Intensity Alternative, right sizes the hospitals without adding any new beds. The current demand and future demand of hospitals shows that there is a need for more patient beds.

I have lived here for 60 years and consider the Medical Center as the crown jewel of our area. The Draft EIR identifies many, many mitigation measures that will address environmental impacts. So our focus should be on improving the project as proposed, and not all of these other alternatives. Thank you.

Mayor Burt: Thank you. Dr. Bruce Baker followed by Crystal Gamage followed by Tom Jordan. I don't see Bruce Baker here. Welcome Ms. Gamage.

CC1.7 Crystal Gamage, Palo Alto: Good evening. It was so refreshing to hear Mr. Peterson say patient care. That is what this project is all about. I think the objectives of the Stanford Medical Center Project are admirable and I do think what they have done with their land use and the kinds of buildings they are going to build for patient care is what we should be concentrating on. I like the design. I like the layout. I like the open space. I have no qualms at all about the height of the towers. I think visually it is going to be attractive. It is dynamic. It is going to brighten up Welch Road that has a lot of uninteresting monolithic buildings over there. I would like to refer to what John Northway said, form follows function. The function of the project and the buildings is patient care. I hope you will keep that in mind.

Palo Alto has been so fortunate in having very good hospital care. I don't know whether you know that the first hospital was open in 1895 followed by one in 1920, which Palo Alto acquired, followed by one in 1931, followed by the one that is currently being in 1959. This is nothing new for a Council to approach. So remember two-thirds of the people in Palo Alto need good hospital care. We want continuous hospital care. Please keep in mind that I think this land use and the objectives are very well meshed, and people in Palo Alto are looking forward to your support. So keep on schedule and get this project underway. Thank you.

Mayor Burt: Thank you. Tom Jordan followed by Stephen Player followed by Stephanie Munoz. I don't see Mr. Jordan. Welcome Mr. Player, you have not been ceded his time.

CC1.8 Stephen W. Player, Palo Alto: Thank you very much. I don't want his time but thank you. I am an employee of Stanford but they don't pay me to stay up as late as you are asking to stay up. I just would like to say a few brief words about this.

I have not read the EIR word for word, but what I have read about it seems to make a lot of sense and gives a good framework to develop this project. I was particularly intrigued by some of the issues that were raised by the Planning Commission. Then seeing how I felt that within the EIR itself and within the proposals, especially the hospital zone, which would be very specific to this particular site, is a very good way to deal with the kind of issues that have to be dealt with in order to really make this the kind of project we want to make to make it a showplace for Palo Alto. A place we can all be proud of. So I think the hospital zone, as you get into discussions, is going to address a lot of the issues that were raised by the Planning Commission.

CC1.8 Con't I also like the idea of the ARB's review as being one who is looking at the mitigation issues to tie together the Comprehensive Plan and the particular uses of this particular space. Ultimately the buck is going to stop with you all. I think within the framework of the City and within the framework of the plan there are good, good criteria, good reasons for why this should go forward. I urge you to go forward on a timely schedule so that we can comply with state law. So at the end of this whole thing we can all say this is a benefit to this community, a medical center that is going to be there for us, for our children, and our grandchildren for the years to come. Thank you.

Mayor Burt: Thank you. Stephanie Munoz followed by Mark Lawrence followed by Diane Churchill.

CC1.9 Stephanie Munoz, Palo Alto: Good evening again. Council, Mayor you can make a lot of changes to what you thought was optimum with no harm done. You can get a lot of community benefits in exchange, but if you let Stanford build a million new feet of workspace without commensurate low-income housing you are going to be sorry.

Stanford's Industrial Park used to be in the County, and when it was it was planned residential with the industrial down by the bay accessed from 101. When the industrial park was built Palo Alto annexed it and it was a huge addition to the tax base. As time went by and ownership never changed the proportion of property tax paid by the commercial vis-à-vis residential shank from 50-50 to 25-75.

However, meanwhile San Jose annexed a lot of land and developed it as residential, and the inequality this produced in school funding led to the state's seemingly absurd demand that every town allow for low-income housing, and the unbearable impact on Palo Alto's neighbors of the commuter traffic. You couldn't get out of your driveway in Los Altos. Now, the new development is not going to be to the south of the campus impacting the neighbors to the south. It is going to be spang in the middle of Palo Alto. It is Palo Altoans who are not going to be able to get out of their driveways. You are not going to like it.

Furthermore, the County's solution when Stanford built this destination was to take away the branch line. We lost the branch line access to Los Gatos, Saratoga, Los Altos, and west San Jose, but there isn't any branch line next time. I don't think you can in good conscience allow the largest landowner in the County to build all commercial and no worker housing. Thank you.

Mayor Burt: Thank you. Mark Lawrence followed by Diane Churchill followed by Brian Steen.

CC1.10 Mark Lawrence, Palo Alto: Good evening. I wrote a bunch of stuff up here and now it seems to mostly be irrelevant so I am going to try to condense it a lot for you. I have heard a lot of talk over the last few meetings about the community benefits that Stanford needs to be contributing to somehow make up for the impacts of this project. Never quite as strongly stated as the last speaker, I guess. I would just like to point out that the hospital is the community benefit that we are all looking for, and that many communities go out of their way to try and get a hospital built there. So I hope we don't run this one out of town.

CC1.11 I actually kind of focused on the Transportation part of the environmental impact statement. I guess I am here the wrong week to really cover that. I would like to comment on some suggestions I heard recently that Stanford instead of buying Go Passes for people should be subsidizing bus lines. The Go Pass is of course a mitigation of documented environmental impact. Specifically it is for trip reduction. If you take that away then you are taking away a mitigation for one of the environmental impacts.

CC1.12 I do hope we can keep this thing moving forward. I know the state's deadline is only a few years off but we don't know when nature's deadline is because we are after all worried about what happens when the earthquake hits. Thank you.

Mayor Burt: Thank you. Diane Churchill followed by Brian Steen followed by Joseph Hopkins. I don't see Diane Churchill. So Brian Steen followed by Joseph Hopkins followed by Jim Rebosio. Welcome.

CC1.13 Brian Steen, Palo Alto: Mayor Burt, Council Members, and Staff I am a land use consultant. I was very pleased to see your consultant put up his conclusions about the various different aspects of the Draft EIR, and basically all the different impacts can be mitigated. To me that is a very important turning point in terms of seeing that the various different things that are being proposed by Stanford can be dealt with within our community on a reasonable basis. That was my feeling from reading the plan from the start and I was glad to see a professional assessment that came to the same conclusion.

Because of that I really want to urge the Council and the City to move forward as quickly as possible to adopt the Draft EIR. I was glad to see the procedural process that was presented tonight. It seems to be very logical and hopefully one that the community will support.

I would like to present an idea that just occurred to me tonight, and maybe it is not entirely practical, but it seems appropriate given the

discussion for the Emergency Operation Center for the City of Palo Alto Police Department and the need for one with hospital. It seems there might be a good discussion there in terms of whether there could be a joint EOC. I have no idea if that is practical or not, but I would like to bring that up as a suggestion.

CC1.13 Con't I have no problem with the height being proposed by Stanford with the new hospital. After all City Hall apparently now is within three feet of the same height. So both buildings I think would be public service buildings at the same height. Overall I think rebuilding SUMC right now is an important thing that needs to happen. It is a regional hospital that will really establish a regional level of healthcare that I think is very important for Palo Alto and our region here in the Bay Area. Thank you.

Mayor Burt: Thank you. Joseph Hopkins followed by Jim Rebosio followed by Allison Cormack.

CC1.14 Joseph Hopkins, 3264 Murray Way, Palo Alto: My thanks to the Council for the opportunity to speak briefly with you. I am a physician at Stanford. I am the Senior Medical Director for Quality there so I worry about quality of care, patient safety, effectiveness of care along with a lot of other people. I am mostly a family physician and geriatrician and an over 40-year resident of Palo Alto, and have had the honor to provide medical care for hundreds of Palo Alto citizens in my career.

I just want to use some time to keep I hope top in your mind the needs of patients and the strong need the physicians are experiencing for the improvements that are part of this plan. I came to Stanford first as a medical student in 1969 when the practice of medicine was dramatically different than it is today, and the needs of the facility have changed accordingly. The size of rooms, and single rooms, is not just a nice thing but it has to do with the number of things that have to be around patients now to care for them. EKG machine, EEG machines, dialysis machines and so forth. Because the hospital is so full all the time patients cannot always be in the areas of the hospital where the nurse is most skilled in providing their care are available. We have the CCU at one extreme end of the hospital and the coronary thoracic ICU at the other end of the hospital. We have the need for controlling infections, which didn't exist, some of which are untreatable today. We have the need to provide for the care of the elderly which is an over-represented demographic in Palo Alto, as you know, who are particularly at risk for infections, are at risk for sleep disturbance which add to delirium which in combination with pain medications can cause falls, aspiration, pneumonia, and other things which actually have fatal outcomes. So I

CC1.14 Con't want to urge you to be as expeditious as you possibly can so that we can bring better care to our citizens. Thank you.

Mayor Burt: Thank you. Jim Rebosio followed by Alison Cormack followed by Craig Thom. Welcome.

Jim Rebosio, San Carlos: Good evening, thank you. I am the General Manager of the Sheraton Hotel here in Palo Alto. Our company also owns the Westin Hotel in Palo Alto. While I appreciate all the concerns about the added employees to Palo Alto I also think that we are in a time right now where our local economy has seen a lot of our companies' right here contract. So a lot of what we currently have is actually getting smaller. We have companies such as Sun Microsystems quickly going away, HP getting smaller, Roche, and so forth.

CC1.15 Last year was really a difficult time for our hotels. What I think we do see in hotels is kind of the vibe of the local economy. Of our biggest groups that we deal with Stanford Hospital was the only one that didn't actually go backwards. They were the only one that actually provided us with more hotel rooms and more business than the previous year. All of our corporate clients, all the corporate business in the area actually went backwards. They have been a great partner, not just somebody that we work with. It has been a great relationship with them over the years, and it is not one of just pure business. It is something that we see every day what they bring to the area. We see every day where people come from to come to this hospital. We always have people here from Hawaii because they don't have the medical facilities there in Hawaii. It has been an outstanding relationship and I see it every day. We see it every day with people around the hotel with children, with adults it has been a terrific relationship. So thank you for the time. Good night.

Mayor Burt: Thank you. Alison Cormack followed by Craig Thom followed by Susie Thom. Welcome.

Ms. Alison Cormack, Palo Alto: Good evening. I have been coming here for five years without addressing Council on any subject except the library, but I have made an exception tonight because this project is too important to may family not to come and ask for your approval.

CC1.16 The 2007 peer review study that was mentioned tonight is basically incontrovertible. It is very clear and reasonable that the size of the project is appropriate for all the reasons that have been outlined before, and the need in my mind is incontrovertible. I have been in that emergency room with a patient who was literally waiting in a closet. I have shared a room after having a C-section with a baby. I have

CC1.16 Con't waited for an operating room because my husband needed emergency brain surgery.

I don't want our community to have these substandard facilities any longer. They were designed and built before technology changed medicine. I am really pleased to see the Draft EIR identifies very few significant impacts in the three areas you are discussing this evening. I do feel compelled to mention that some of the City's requests on pages 12 and 13 I consider unreasonable.

Finally, it is clear that the Draft EIR suggests that both the zoning change and a Statement of Overriding Considerations will be necessary for approval. I ask that when the time comes you support these so this essential project can proceed. Staff looking for pages 12 and 13, it is in the Staff one, the City one that says Draft May 2010. Thank you.

Mayor Burt: Thank you. Craig Thom followed by Susie Thom followed our final speaker, Bob Moss. Welcome.

CC1.17 Craig Thom, 753 Maplewood Place, Palo Alto: Apologize for the late hour. I am here to lend my voice to the support of this project. I was very pleased to see in the schedule that came out that the Draft EIR came out with very few issues. I want to urge that you maintain focus on this project to meet the schedule that was proposed this evening, and pause when you see the loud voices come up to try to change course late in the game. Thank you.

Mayor Burt: Thank you. Susie Thom followed by Bob Moss.

CC1.18 Susie Thom, 753 Maplewood Place, Palo Alto: In 1990 the median age in the city was 35. In 2000 the median age in the city was 40. In 2010 those numbers will be coming to us soon, but the important point is that our demographics are changing. The community's population is aging and with that comes a critical need for current and up-to-date medical care.

The Draft EIR has been a long time coming and is very complete. It meets the needs of the City's Comprehensive Plan. I am concerned about the Planning Commission's recent discussions to delay the hospital project while the Comprehensive Plan is under review. I would like to encourage you to keep these facilities moving along for completion by the end of the year. I want to thank you for your consideration of this critical project and your leadership in keeping it on schedule.

Mayor Burt: Thank you. Bob Moss.

Robert Moss, Palo Alto: Thank you Mayor Burt and Council Members. I have a different viewpoint than almost all the other speakers. I would like to remind you this is the biggest project that has ever been proposed for Palo Alto in the 116 years we have been a city. The EIR is full of errors, omissions, and incorrect assumptions and statements. The Planning Commission in just a few hours did an excellent job of starting to tear it apart and show the errors and the problems. I think that in a couple of more weeks, after they have had more time to go into it in detail, they will examine and identify even more problems with the EIR. Basically it is garbage.

CC1.19 I also was kind of appalled that the ARB is being identified as the body to oversee compliance with the process, the project, the Comprehensive Plan, and the Zoning Ordinance. That is not what the ARB is in business for, but I guess Stanford figured if they asked to have the park rangers handle it that they wouldn't be able to get that approved, so they went with the ARB. That was their second choice.

This project is going to have very significant impacts, very significant negative impacts, on the City of Palo Alto and the City of Menlo Park. The mitigations that have been proposed so far are inadequate, and the ongoing oversight is totally inadequate. So before the project is approved it needs to be corrected. I thought for an example saying it doesn't comply with the Zoning Ordinance, Comprehensive Plan, and City policies therefore change the City policies and everything is going to be wonderful. No. Make Stanford comply with what we need in our community. This is a regional facility and we are being asked to make major sacrifices. So let's try to trim things down so that it fits in our community and works right for all of us.

Public Hearing closed at 11:11 p.m.

Mayor Burt: Thank you. Now we can return to the Council. Council Member Schmid, did you mean to have your light on? No? Okay. Who has first comments or it can be questions. Council Member Holman.

CC1.20 Council Member Holman: Yes, to follow up on the questions that I had submitted earlier regarding the visuals. I guess my concern still remains that when I am looking through the Index for some visuals that are going to inform me about visual effects for instance I just don't find enough visuals there to inform me of it. I used the Hoover Pavilion as an example because it is kind of an obvious one. So there are visuals in here, and we don't need a whole plan set, but I do recall that prior to the DEIR preparation when we were just looking at the scoping of the EIR that we had visuals that told a much better story than what we

CC1.20 Con't have provided now. Those drawings are inadequate at this point in time, and many people up here don't have them anyway, including Planning Commissioners, but the project has changed since then. So I am really concerned about how analysis is going to be made and comments are going to be made without adequate imagery, same with the scale model.

The response at the ARB has been getting images at the meetings is also a little troubling because are they making decisions, having to respond in real time to what they are being presented with. It takes often times a little time to digest these sorts of things. So I don't know if Staff can comment on that any further but I am troubled by that.

Mr. Williams: Yes, thank you Council Member Holman. I think we have some concern about that too, and we are trying to move forward. The ARB is starting to see actual plan sets in front of them too. Again, there are site plans in here. There are simulations that do accurately portray at least the massing and scale of buildings as they are required to for the purposes of the EIR, which are primarily what are the scenic views that are impacted, what are some of the other values that are specifically impacted. It doesn't require the level of a detailed site plan, or detailed architecture to make those determinations other than there are some criteria that relate to Visual Quality.

I think there has been some confusion about the reference to ARB that some folks have mentioned. One primarily that the comment that appears in several locations here is that the ARB will recommend as part of the architectural review process to the Council, and the Commission on the way, relative to design issues. That process is what is in place to try to address what the specific design components are. It doesn't affect the land use per se. It is not changing land uses. It is the visual quality and character issues that are addressed through that process. So there is nothing in here that says ARB will subsequently be making the decisions on what that design is. That is not the intent and it sounds like we may need to go back in and reword that so that is clear.

We will carry that back, as far as the plans go, to the applicant and see if we can't get more. Obviously we are scheduled next week to talk to you about Visual Quality but it is something we could also revisit later if we can get more information for you.

Council Member Holman: Thank you, I would appreciate that. The schedule, just quickly, I raised a question about next week's meeting. We started this meeting tonight I think it was a little bit after ten o'clock and we lost some speakers. Now I know we are going to have several

opportunities at this, but the next meeting I know there is no way we are going to start the next meeting on this before 10:30. I just can't imagine that we would. So I just want us all to keep in mind that we are really precluding opportunities for people to participate and not providing ourselves our own best opportunity to be our sharpest when we are looking that this. So that is another thing.

CC1.21 The other question I had asked was about the Hoover Pavilion site. I had been in the Chambers for a meeting late last Thursday when I picked up the Staff Report, because an ARB meeting had been held that day. I guess the response to my question didn't make me feel confident that there was a clear understanding of what the requirements of CEQA were in regards to review of historic standards, the Secretary of the Interior's Standards because the Staff Report that went to the ARB didn't mention the Secretary of the Interior's Standards, didn't mention context, both of which are required as a part of CEQA. So I guess it didn't instill confidence in me that there was a good understanding of what was required to satisfy CEQA.

The response came back that yes, this is going to go to the HRB. Is there clear understanding of, I know there is in City Hall a clear understanding of what is required, but the Staff Report did not convey that to me whatsoever.

Mr. Williams: Yes, thank you Council Member Holman. I don't know if we just didn't get down to that level of detail in the Staff Report, and Rod may be looking at it. I believe that the EIR itself does and will require that determination to be made. I recall seeing language in there to that effect. It is there, and I do think it is appropriate for us on that score to get HRB's input as to whether they believe this is addressing it adequately or not relative to the Secretary's Standards.

CC1.22 Council Member Holman: Just a last question about that and then I will pass to others. Will HRB be having a regular review of this? Typically their role is to be recommending to the ARB, but because the Secretary of the Interior's Standards are a requirement for satisfaction of CEQA what is HRB's role going to be in this process?

Mr. Williams: HRB will be commenting on the Cultural Resource section I would anticipate, and those will go to basically the consultant who will respond in the Final EIR to those comments. Then we will share them also with ARB, and with the Commission, and the Council. That would be the appropriate response. I think they should also be looking at the Preservation Alternative as part of that consideration.

Council Member Holman: Thank you very much.

Mayor Burt: Council Member Shepherd, do you want to go next?

CC1.23 Council Member Shepherd: Thanks. This is a big document. I have some numbers here that are large and I wanted to just ask if I am interpreting them correctly. In the Summary it talks about Policy L-8 limit of 3,257,000 square feet of new nonresidential development of which there is 1,944,000 square feet remaining under the Comprehensive Plan that can be developed. Yet in the Medical Center area it has already exceeded its square footage. So this new hospital zone is going to intensify that exceeding of square footage. My question is does that mean that some of the other square footage that could be built will not get built? Did I ask that correctly? Thanks.

Mr. Williams: Yes, Council Member Shepherd, thank you. I don't know if the City Attorney wants to maybe comment that, but I think the short answer is no.

Ms. Silver: Yes, Council Member Shepherd. The EIR as a mitigation does propose a clarification to the Comprehensive Plan. Currently the Comprehensive Plan designates the different planning areas and has specific caps in those specific planning areas. There is a recognition in the Comprehensive Plan that Public Facilities are exempt from the overall cap. Because of the specific drawings and mapping contained in the Comprehensive Plan there is some ambiguity about whether the entire Stanford Project as built out would be exempt as a Public Facility. So the recommendation in the EIR is to clarify that so that it is clear that the entire hospital project with the exception of the clinics would be exempt from the cap. So it would not affect overall development in the city.

Council Member Shepherd: So does that mean then that they are exempt from the cap in the hospital zone, the eventual use of the hospital zone? So that means that the remaining 1.9 million square feet is allowed to be built elsewhere in the other zones? Is that how I am supposed to understand that?

Ms. Silver: That is correct.

CC1.24 Council Member Shepherd: Okay. Then I have another question. In the 2000 GUP there is an allowable a little over 3,000 new housing units that can go onto the academic campus and another about 2.0 million square feet of academic building. I am assuming the 3,000 net new housing units is their allocation on their County campus zoning and would be in addition to the amount that ABAG is asking us to do. So in

our particular region we have a potential of about 6,000 units that could get put into play. Okay.

Then in addition to this there is another 2.0 million of academic building that can get built. Am I reading this right? Okay.

Mr. Williams: It is actually down. I think it is 1.0 million or so now because they have already built a lot of that.

Council Member Shepherd: Okay. Right. I am just going by what is in here.

Mr. Williams: All that was incorporated into the cumulative impact type of analysis.

CC1.24 Con't

Council Member Shepherd: I guess I am just kind of intrigued by the cumulative effect of all of this because looking at the net trips, and I know we are not on Transportation tonight of 10,000 per day. Already I am just curious as to what kind of the plan is because I know there are a number of bottlenecks. I also know that in a corridor study that we are going to be doing we are going to be answering some questions about whether or not some of the streets might get closed down going across the tracks if the train stays at grade. At least, that is the way I understand it. So there is a lot going on right now.

Raised concerns regarding the 10,000 net trips per day and the numerous bottlenecks noted in the High Speed Rail (HSR) corridor study with possibilities of street closure interfering with the tracks. She asked whether additional firefighters would be needed to staff the new 100-foot ladder fire truck.

James Keene, City Manager: That would be the corridor study related to High-Speed Rail.

Council Member Shepherd: Yes, exactly. I am sorry I don't mean to confuse anybody. It is just there is a lot in play and we don't know how it is going to end up.

CC1.25

Then I have one very simple question. The new 100-foot ladder truck, will we have to have like four firefighters on that? Does that increase our staffing at all or do we know?

Mr. Keene: I don't know the answer. We will get you the answer.

Council Member Shepherd: I was just curious. Okay, thank you.

Mayor Burt: Council Member Schmid.

Council Member Schmid: Thanks for all the information and the very rich sources of material. I guess my role tonight is just to play the role of a representative of Palo Alto and try and understand the information in front of us. We are going to be making important decisions over the next month and it is important that we have data that helps us make that decision.

CC1.26

I am struck by the numbers in the housing population and Housing Chapter, one in particular when it tries to answer the question stated on the first page. Will this project foster population growth that exceeds the City's and ABAG's regional forecast? The answer is no, it will have an impact less than two percent. That number struck me because last year when we talked about traffic we also said or the report also concluded that oh yes, it would be less than two percent impact on traffic. This is startling because, as someone mentioned already, this is the largest project in the history of Palo Alto. So how can the largest in the history of Palo Alto have a trivial effect on housing and traffic?

I think there is a fundamental misunderstanding of the jobs and housing models that ABAG, the City, and the VTA uses. Their models are derived from ABAG. ABAG's model in turn is derived from the demographic research unit of the State of California, the Department of Finance, and the Department of Finance does an extrapolative projection of population in California. Those numbers are passed to the Department of Housing and Community Development who translates them into housing. Since the model is a long-term model they say California has grown between 1950 and 2010 by this amount. The next 30 years it is grow by the same amount. We are going to have all these people. They distribute all those new people to the various regions, to ABAG. It is ABAG's job to distribute the burden of that growth within the Bay Area. It is not growth that comes anywhere except under the assumption that future population growth is going to be more or less like it has been in the past.

Those are the numbers that the VTA uses for their traffic analysis and the City uses for their projections already imbed extrapolated growth, which is likely much higher than will actually take place. Now when ABAG gets the number they look around and say let's distribute this on the basis of what we know, existing relationships, and we will treat Palo Alto and Stanford as a single sphere of influence. As it turns out the imbalance, the jobs/housing imbalance, 90 percent of it is caused by Stanford-owned lands. So in essence Stanford creates the jobs and Palo Alto gets the housing. The ABAG allocation projects that into the future.

So of course, when you have a mode that already has included all the jobs and housing and population growth that takes place within this region both historically now and probably in the future what it shows is this tremendous imbalance. So ABAG says they can have a larger regional allocation than anywhere else in the Bay Area. Palo Alto ends up having a faster rate of population than the Bay Area as a whole, than California as a whole. It is not surprising under this model that when you look at it and you say does this project cause more growth than is already imbedded in ABAG of course the answer is no, because your growth is already there.

CC1.26 Con't

It is unfair and inequitable that Palo Alto be told by the State of California that you have to remediate the jobs/housing imbalance generated by Stanford/Stanford owned lands through a high housing allocation now and in the future. I think it is incumbent on Staff to cover in the base report that we get the material that we analyze and get, and get a clear and acceptable statement or roles and responsibilities for population, and job growth, and their impact on the future of housing and traffic in Palo Alto. I think until we have that statement it is very, very difficult to asses the key issue of population and housing, and two weeks from now to sit down and talk about traffic impacts. We need to have an agreed upon base of information that we can work from.

Mayor Burt: Council Member Scharff.

Council Member Scharff: Thank you. When I was looking at this a couple of things struck me. The first was that on Housing it says the DEIR found impact on population housing to be less than significant. However for informational purposes the DEIR also included a discussion of the secondary environmental impacts relating to increasing the City's jobs/housing imbalance.

CC1.27

I have probably looked at 50 EIRs and it is really unusual I think to see something where we say 'for informational purposes' we are going to look at that. Usually, and my belief is what CEQA requires is once you decide that there is no significant impact you stop. You say, there is no significant impact, and we move on. So I guess my question is why do we have all this in here?

Ms. Silver: I think in providing the most legally defensible document it is important that all potential impacts are identified, and similarly all potential mitigation measures are identified. It actually is fairly common to see informational only analyses. They are typically in the appendixes.

Council Member Scharff: Maybe that is why I have not seen them. I don't get to appendixes usually.

Ms. Silver: Could be. They are not imbedded in the document itself. In this case, there was a decision to put this analysis up front because the issue has been very prevalent in the public discussions. Also, of course it is an alternative analysis in looking at ways to mitigate Transportation, Climate Change, and ….

Council Member Scharff: I guess that is what seemed inappropriate to me. Then it should be in the Climate Change and the Transportation sections, not here. I hate to take issue with our City Attorney, but I did look at the case law on this. The case law clearly said the opposite. It said you don't have to have mitigations. You don't have to have discussions of every possible mitigation. I think you agree with me, right? You don't have to have every possible mitigation in an EIR? There is a case tomorrow, I looked at it.

Ms. Silver: No, you should focus on feasible mitigations.

CC1.27 Con't

Council Member Scharff: But also you don't need to have mitigations at all, the case law says if it is less than significant. You just go look at the CUB book. I will send it to you tomorrow. It is black and white right there. So if you disagree with me I am willing to listen but I looked it up, read the case, and it seemed pretty straightforward that when it says there is less than a significant impact it doesn't need to be there. So that was my first part.

The second part is we have a bunch of possible mitigation measures here. If there is no significant impact and you impose that aren't you violating your nexus requirements? If you say there is no impact this project has and then you go ahead and put in a bunch of mitigations based on no impact, aren't you violating the law? Aren't' you saying there is no nexus and here you are imposing costs on the applicant?

Ms. Silver: Council Member Scharff, this was an issue that was well discussed, and we did consult with out outside CEQA attorney on this issue, Rick Jarvis, who actually is in the audience. I think it would be helpful for him to come to the podium and discuss that issue. It is an important one.

Mr. Jeung: Rick, just before you speak could I just offer something too? I am not going to argue with you.

Council Member Scharff: If I am wrong I am happy to be.

Mr. Jeung: I only wanted to mention that historically when we have done Environmental Impact Reports one of the conventional sort of land use related issues, population related issues, is the balance of your land use pattern. We have often looked at the jobs/housing as a surrogate measure for getting an indication of what the balance is and then by interpellation what the commute patterns are going to be like. So in a lot of the previous EIRs that we have done for other jurisdictions we do look at Population and Housing. As we say in this document it isn't in and of itself the significant impact, it is really sort of the indirect affects associated with having an imbalance. That is where the nexus comes in because with an imbalance comes additional commute patterns, additional travel, additional vehicle miles traveled, which results in the air quality and the greenhouse gas emissions.

CC1.27 Con't

So you are absolutely right that a lot of times this information is provided in another section. That is kind of why we explained in the document that the nexus occurs not so much because of a ratio and whether it is balanced or imbalanced. It is because it has some connection to the Air Quality and to the greenhouse gas emissions.

Council Member Scharff: So I am correct that it should be in the other sections then.

Mr. Jeung: Yes and what we do say here is that it provides further information that supports the significant conclusions that are reached in those other topics.

Council Member Scharff: Okay.

Mr. Jeung: Sorry, Rick.

Rick Jarvis, CEQA Consultant Partner, Jarvis, Fay & Doporto: I don't really have much more to add other than echo those points. There are significant and unavoidable impacts that the EIR identifies with respect to for example Air Quality and Climate Change impacts. Those impacts from the Air Quality perspective are analyzed in those other chapters of the EIR. This chapter looks at another way of both analyzing those impacts and different possible, conceptual approaches towards mitigating those impacts. This analysis that is here in the Population and Housing Chapter could have been put in Air Quality and/or it could have been put in the Climate Change Chapter. As a judgment call, since it related to population and housing issues it was included as part of the Population and Housing discussion with a cross-reference to those other issues. Really, it was a judgment call as to where to put it.

Council Member Scharff: Okay. I guess the other concern I had then is similar but it comes down to the Fire under Public Safety. We say a similar thing. We say there is no significant impact per the City's significance criteria. Again we suggest imposing costs on the project, buying a fire truck. Again, I ask, why is that there? What kind of a nexus is there if there is no significant impact? Shouldn't that belong in a Development Agreement if we are going to say to Stanford that is what we want from you then isn't that where that goes rather than in the EIR? Aren't we mixing these up?

Trixie Martelino, Project Manager, PBS&J Consultant: Good evening. I just want to address that question. The EIR does identify a provision of fire equipment as an improvement measure. That is distinguished from a mitigation measure. On page 3.14-14 the text acknowledges that the project would have a less than significant impact related to fire protection and emergency service, however there are measures the City could encourage the project sponsors to implement or consider imposing as Conditions of Approval. These are different from mitigation measures, which are required under CEQA to mitigate significant impacts.

CC1.28

Council Member Scharff: What does it mean and why do we put it in an EIR that we could encourage them? I guess I need a little understanding of why that is in there as opposed to a mitigation. It is clear to me there are a lot of significant impacts to this project. I think people have hit them right on the head. You have traffic issues, you have climate change issues, and you have air quality issues. That is what the significant impacts of this project are. That is why when I look at this and we are talking tonight about housing and public fire and police when there are no significant impacts, and there are no significant impacts and we have a whole bunch of proposed mitigations it sort of strikes me that we are on the wrong track, and those shouldn't be in here. Explain to me also how a Condition of Approval meshes into this and how that is different than a mitigation, and what right you have to put Conditions of Approval on a property when there are no significant impacts.

Ms. Silver: Council Member Scharff, I will start with that and perhaps the consultant can fill in the gaps. The EIR certainly can just be limited to discussing impacts and environmental mitigations. This is a large project and we thought that it would be most beneficial to the public, and to the Council, and Boards and Commissions where if we see particular types of improvement measures that can be imposed as Conditions of Approval that logically relate to some of the topics that those be itemized. We very clearly delineated those additional

measures as improvement measures, which is a standard nomenclature that is used in EIRs to distinguish from mitigation measures. It is possible to impose Conditions of Approval that don't have a nexus an environmental impact but do have a nexus to the other types of impacts such as social impacts, or other types of impacts that are not grounded in environmental consequences that you do typically do see issued as Conditions of Approval.

Council Member Scharff: So there legally would be a nexus between providing a 70-foot ladder truck on this?

Ms. Silver: It would be possible to require that as a Condition of Approval not through the environmental review process but through the entitlement process.

CC1.28 Con't

Council Member Scharff: Okay, but we are supposed to be discussing that in the EIR as opposed to do we have a separate discussion when we discuss Conditions of Approval?

Ms. Silver: The improvement measures that we have identified in the EIR do not legally need to be discussed in the EIR rubric. We have included them here to supplement the conversation.

Council Member Scharff: I guess since we are doing comments, my concern with going through and coming up with as many possible I guess I will call them 'exactions' that you can put in the EIR as possible is that all dollars in this project that we ask Stanford to pay for come out of patient care and come out of health care. I think that at some point you burden the project too much. I think that we have to be very careful on this because by identifying each of these when they are not environmental impacts I think we run a risk of doing that.

CC1.29

I also am a little concerned that when we have 12 percent unemployment in Santa Clara County, at least last time I checked that was the number, that there is sort of an anti-jobs bias in this. In that the way it is written is that it makes jobs a negative thing. To provide good jobs when you have 12 percent unemployment seems like a positive thing that we should be doing, and something that we should be supporting.

We talk about how we would like to have an economic recovery, and how this is important to the City's future. Well, there is no recovery without jobs, and I think that is something we have to be cognizant of. It is something that concerns me a lot. We talk about having a great recession and we all want economic recovery. We have the person from the hotel come and speak about how Stanford supports out hotels,

CC1.29 Con't

the hospitals do. Yet we talk about jobs as if they are a bad thing. I think that is something we have to be very careful about when we think about that and the future of California if that is the direction we are going to go as a community and as a state. Thanks.

Mayor Burt: Vice Mayor Espinosa.

Vice Mayor Espinosa: Well, I have spoken many times in favor of this project. I find myself needing to say that I think that we are not talking about exactions here, and that there is quite definitely an appropriateness to getting comprehensive information about the different aspects of what is on the table here even if they are not directly tied to the EIR process, other than what we are talking about right now, or that may come up in the future.

CC1.30

What I wanted to go back to was the Comprehensive Plan. Really when we look at this section and we look at significant impacts I think the Planning and Transportation Commission did a great job of diving right into those two areas where obviously we have problems. One is compliance with policy and the other is really impact there locally, and some discussion about height.

What I am hoping to get a better idea from Staff on is really the issue of timing. If this is really a significant impact that we are looking at in this section, and we are seeing some noncompliance, and sort of the broader conversation and the timeline that we have for that around the Comprehensive Plan, or what caused that conflict. Is this realistically something that we think we can resolve? Or is there an understanding here that exceptions may need to be made in this case? Or we need to go through a very different kind of process because we are not going to be able to have that broader conversation if we are going to stick to the timeline that we are on for Stanford? I am just hoping to get a better sense from Staff on how you think those can fit together. Obviously some of that was answered at the Planning and Transportation Commission discussion, but I don't think really getting to the heart of what we need to have answered to be able to make sure we can move this forward and understand the context that it falls within.

Mr. Keene: Let me say something, Mr. Vice Mayor, and then let Curtis speak to this. In one sense this issue is not unusual particularly in a dynamic environment, which we are in, and we ought to be glad we are in a dynamic environment. We ought to be glad we have things happening I think. Yet the process for a lot of visioning and planning can be on a different timeframe. Part of the Council's job ultimately is to reconcile the fact that you want to review and make changes or amendments to our Comprehensive Plan. Yet at the same time you

need to balance that with the fact that you have a major project that does have a schedule of its own in order to be really ultimately beneficial both to the project and to the community itself.

So I just know in my own career there have been many times when we have been in a big planning process and a project comes along that has a slightly different timeframe and dimension to it. In a lot of ways, typically you have to make an accommodation to the larger process through its own way of reconciling those things. I think that one of the things that the Council has laid out pretty clearly that we have tried to adhere to, and I think quite successfully so far this year, is really defining a schedule that could move towards action by the end of this year by the Council. I think that is a schedule that obviously at some places is going to move faster than where we are on all the aspects of the Comprehensive Plan. So I think it is ultimately going to be your job to help reconcile that.

Curtis, maybe you can speak to any of the specific pieces of that. Again, while I can appreciate the concern I just would restate we also ought to remember it is a good situation to be sort of faced with this dilemma too.

Mr. Williams: I would just add from a more specific standpoint that the guidance that you do have elsewhere in the Comprehensive Plan in terms of some of our policies and that are important components of that evaluation. You have Alternatives in front of you. You have mitigation measures that can help to address those policies that help mitigate a change in the Comprehensive Plan. So there are tools within this document and then there will be tools within our Community Benefits Package, and Conditions of Approval that will provide that opportunity.

Mayor Burt: Let me jump in here on a time check. We have a good number of additional questions and comments, but we are already closing in on midnight, and we have our High-Speed Rail item to go.

Our next week's meeting, Finance Committee runs until almost 7:30, so the general meeting starts at 7:30. We have a Study Session on San Francisquito Creek, and then two land use action items neither of which look to be really large, and then coming back to the Stanford EIR Project with focus on Design, Biological Resources, and Cultural Resources.

Mr. Williams: Was one of those the Open Space?

Mayor Burt: No, I deleted that or skipped over that.

Mr. Williams: Okay, because that has been postponed until October.

Mayor Burt: One of them is the California Avenue Parking project and the other is 420 Cambridge.

Mr. Williams: The parking project is a Public Works assessment issue.

Mayor Burt: Right, and probably not going to involve a lot of public input and a long hearing. So I wanted to frame that in that actually it looks to me that next week's meeting is not as heavy as this one. It is not light but it is not as heavy as this one. So the question I have is should we forego the balance of our discussion on these elements of the DEIR tonight, carry them over and combine them next week with Item 15? Otherwise it is looking like one o'clock before we get out of here.

Mr. Keene: I would also argue that there are some meetings starting at 8:30 tomorrow morning that are important to the Mayor and the Vice Mayor at least. So keep that in mind also.

Mayor Burt: Okay, so if that is okay why don't we do that? Alright? So we will continue the balance of this item and combine it with taking up the other elements of the DEIR on Visual Quality, Architectural Design, Biological Resources, and Cultural Resources next week. So thank you to everyone who is here on the Stanford Hospital Projects. We will see you again next week.

10. Approval of Recommendation From the High Speed Rail Committee to Endorse Peninsula Cities Consortium Revised Core Message and to Approve City Manager's Proposed High Speed Rail Staffing and Appropriating $90,000 from the Council's 2010 Contingency Fund.

MOTION: Vice Mayor Espinosa moved, seconded by Council Member Scharff to endorse the Peninsula Cities Consortium Draft Revised Core Message.

Council Member Yeh needed Staff's clarification regarding the deletion of filling all positions on the Peer Review Committee noted in the Peninsula Cities Consortium Principles edits of June 4, 2010.

Deputy City Manager, Steve Emslie said it was a reorganizational issue and was moved to the legislative list at the end of the Principles.

MOTION PASSED: 8-0 Klein absent

MOTION: Vice Mayor Espinosa moved, seconded by Council Member Shepherd to approve the City Manager's proposed High Speed Rail staffing and appropriating $55,000 from the City Council's 2010 Contingency Fund and $35,000 from the City Council's 2011 Contingency Fund, with funds to be expended in the 2011 Fiscal Year.

AMENDMENT: Council Member Schmid moved, seconded by Council Member XXXX that one-half of the $90,000 be spent on economic and financial analysis of impacts on Palo Alto.

AMENDMENT FAILED FOR LACK OF A SECOND

City Manager, James Keene said there was not enough staffing to support the emergent demands to engage the community in sharing and distributing of information.

Council Member Schmid said his perception was that in order to engage people you would need to have discussions in terms they would understand. He felt the economic financial property value impact on Palo Alto was where the engagement would come.

Mayor Burt said the High Speed Rail (HSR) Subcommittee is submitting a follow up letter to the Rail Authority regarding documents we have not received. Another letter expressed concerns that the City Council had with the adequacy of the Alternatives Analysis. The Rail Authority provided the City with inadequate information that raised the question of, do we need to engage professionals to help support the City's initiatives on generating the information.

Council Member Price said she was in favor of the proposal and looked forward to upcoming discussions on the corridor study.

MOTION PASSED: 8-0 Klein absent

MOTION: Mayor Burt moved, seconded by Council Member Scharff that Staff come to the HSR Committee with a preliminary proposal on the financial impacts as they relate to private property valuation through eminent domain and property value diminishment or potential increases.

Council Member Price raised concerns on the appropriateness to have Staff come back to the Council and ask how these issues would be achieved. She discouraged adding a new set of studies. She said some of these items were part of the economic development land use implications. She asked if one of the issues in the study was phasing so

that critical pieces could be dealt with early. She asked if June 30 was the deadline for the Alternatives Analysis.

Mr. Keene said June 30 was the deadline for the Alternative Analysis but it was not feasible in obtaining all the information on the Comp Plan and the project by that date.

Mayor Burt said there was a letter sent requesting to extend the time for submitting the Alternatives Analysis. Caltrain was receptive but did not have it in writing.

Council Member Scharff said he had concerns regarding the corridor study having impacts on the Alternative Analysis. He said the fiscal and financial analysis should come back to the Council as soon as possible once it was obtained.

Mayor Burt said there was a proposal to the Cities of Mountain View and Menlo Park to have two separate meetings in the next two weeks regarding transitions.

Council Member Yeh supported the corridor study. He raised concerns regarding phasing and was curious to see if a followup was going to occur for HSR Committee to discuss the corridor study and the timeframe.

Mr. Keene said the target was to comeback to the HSR Committee next week on the corridor study and to have a portion of the economic piece.

Council Member Shepherd raised concerns regarding eminent domain on homes along the corridor and whether Alma Street would be taken. She asked what the least impact would be on the economic viability of homeowners along the corridor.

Mayor Burt said those concerns would begin meaningful discussions.

MOTION PASSED: 8-0 Klein absent

COUNCIL MEMBER QUESTIONS, COMMENTS, AND ANNOUNCEMENTS

Mayor Burt spoke regarding Congresswomen Eshoo and Speier both taking strong positions regarding High Speed Rail that are aligned with the City's position.

ADJOURNMENT: The meeting adjourned at 12:18 a.m.

ATTEST: APPROVED:

City Clerk Mayor

NOTE: Sense minutes (synopsis) are prepared in accordance with Palo Alto Municipal Code Sections 2.04.180(a) and (b). The City Council and Standing Committee meeting tapes are made solely for the purpose of facilitating the preparation of the minutes of the meetings. City Council and Standing Committee meeting tapes are recycled 90 days from the date of the meeting. The tapes are available for members of the public to listen to during regular office hours.

06/07/10 106-303

CC1. City Council Hearing, June 7, 2010

CC1.1 *The commentor expresses concerns about the visual aids provided in the Draft EIR and at the public hearings.* Throughout the Draft EIR, figures and visual simulations are included to help visualize the buildings, site plans, design features, and linkages as proposed under the SUMC Project. The figures address potential impacts with the general proposed layout as provided in Section 2, Project Description; view obstruction, scenic qualities, compatibility with existing surroundings, and shadow impacts as provided in Section 3.3, Visual Quality; bicycle and pedestrian facilities, transit routes, truck routes, and trip distribution as provided in Section 3.4, Transportation; sound contours, ambulance routes, and mechanical equipment locations as provided in Section 3.7, Noise; geology maps as provided in Section 3.10, Geology; locations of Underground Storage Tanks as provided in Section 3.12, Hazardous Materials; and alternatives as provided in Section 5, Alternatives. In total, 63 figures are included in the Draft EIR to demonstrate existing and future conditions under the SUMC Project. Additional figures showing the Hoover Pavilion Site and renovation are provided in Appendix DD of this document.

Additional figures, diagrams, and simulations were presented during the public hearings for the City Council and the Planning and Transportation Commission (Commission). In addition, preliminary project plans are available to download at the City's website.[1]

CC1.2 *The commentor questions whether City Council comments could be provided after the close of the comment period.* There was no formal request from either the public or the City Council to extend the comment period; therefore, comments were not accepted after July 27, 2010.

The commentor also questions the review process with regards to Historic Resources Board (HRB) and Architectural Resources Group (ARG) involvement. Please refer to Master Response 11 for a detailed description of the City's review process and the next steps in the EIR review.

CC1.3 *This comment is a summary of comments made during the Commission hearing on June 2, 2010.* Please refer to PTC1 for responses regarding amendments to the Comprehensive Plan.

CC1.4 *This comment is a summary of comments made during the Commission hearing on June 2, 2010.* Please refer to PTC1 for responses regarding Palo Alto Unified School District (PAUSD) impacts.

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[1] City of Palo Alto, Planning and Community Environment Department, "SUMC Project - Development Simulation & Architectural Design," accessed on September 23, 2010 at: http://www.cityofpaloalto.org/depts/pln/news/details.asp?NewsID=1596&TargetID=85.

CC1.5 *This comment is a summary of comments made during the Commission hearing on June 2, 2010.* Please refer to PTC1 for responses regarding housing and associated impact due to increased employees at the SUMC Sites.

In addition, it is important to note that the Comprehensive Plan Amendment is on a separate schedule than the SUMC Project. Please refer to Master Response 11 for the review process of the SUMC Project in relation to the City's Comprehensive Plan Amendment.

CC1.6 *The commentor expresses support for the SUMC Project and feels that the range of alternatives provided in the Draft EIR is unnecessary.* Per CEQA Guidelines 15126.6, an EIR must include a range of feasible alternatives that obtain most of the project objectives and reduce the impacts of the proposed project. Since significant and unavoidable impacts on a historic structure would occur under the SUMC Project, the Draft EIR analyzes the Historic Preservation Alternative. In total, the Draft EIR includes seven alternatives that seek to reduce the significant and unavoidable impacts of the SUMC Project. However, as stated by the commentor and addressed on pages 5-39 through 5-49, several alternatives would not meet all of the objectives of the City and/or the SUMC Project sponsors. Nonetheless, under CEQA, the Draft EIR must consider potentially feasible alternatives that would reduce significant and unavoidable impact and meet the majority of objectives. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

CC1.7 *The commentor expresses support for the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC1.8 *The commentor expresses support for the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC1.9 *The commentor advocates worker housing and indicates a concern about traffic congestion in Palo Alto.* As indicated on page 3.13-14 of the Draft EIR, housing affordability is considered to be a socioeconomic issue. Neither a shortfall of affordable units, increased demand for affordable housing, nor socioeconomic impacts due to increased demand for affordable housing is considered to be a physical environmental impact. Please see Master Response 7 for a discussion of the SUMC Project's indirect demand for affordable housing in Palo Alto. For a description and analysis of the Village Concept Alternative, refer to Section 5 of the Draft EIR, Alternatives and the revised traffic analysis in Staff-Initiated Change 8.

In addition, as part of the SUMC Project, a Development Agreement would be approved if such an agreement could be mutually agreed upon. One component of the Development Agreement between the City and the SUMC Project sponsors would be the payment of a housing in-lieu fee in the amount of $23.1 million, which is equivalent to what a

commercial project would pay. Refer to page 2-27 in the Project Description of the Draft EIR for a full list of the potential Development Agreement terms. Please refer to Master Response 12 for a further discussion of the Development Agreement.

Lastly, please see Staff-Initiated Change 2 for an updated discussion of traffic congestion impacts.

CC1.10 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC1.11 *The commentor suggests that rather than purchasing GO Passes for employees, the SUMC Project sponsors should subsidize the bus lines*. Please see Master Response 1 for the effectiveness of the GO Pass and steps that would be taken in the event mode splits were not achieved.

CC1.12 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC1.13 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

In addition, the commentor suggests a joint Emergency Operation Center (EOC) for the Palo Alto Police Department (PAPD) and the SUMC. This is an arrangement that would be determined between the PAPD and the SUMC Project sponsors after the approval of the SUMC Project. As such, this comment does not pertain to the adequacy of the Draft EIR and no further response is warranted.

CC1.14 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC1.15 *The commentor expresses support for the SUMC Project in regards to its support of the hotel industry in the City of Palo Alto*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC1.16 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

In addition, the commentor believes that some of the City's requests to allow for approval of the SUMC Project are unreasonable. Please refer to Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption.

CC1.17 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC1.18 *The commentor expresses support for the SUMC Project and worries that approval will be delayed due to the Comprehensive Plan update process.* The City of Palo Alto is currently undertaking a Comprehensive Plan Amendment that will cover the period through 2020. The purpose of the Amendment is to extend the horizon year of the existing Comprehensive Plan adopted in 1998 from 2010 to 2020, revise base conditions and growth projections, modify policies and programs, update the land use map, and revise the Housing Element. City Council is working with the Commission and staff to develop the Comprehensive Plan Amendment.

The SUMC Project would require amendments to the Comprehensive Plan; however, this would occur separately from the Comprehensive Plan Amendment process that the City is undertaking. It is important to note that the Comprehensive Plan Amendment is on a separate schedule than the SUMC Project. Please refer to Master Response 11 for the review process of the SUMC Project in relation to the City's Comprehensive Plan Amendment schedule.

CC1.19 *The commentor states that the Draft EIR is flawed in that it assigns Architectural Review Board (ARB) to oversee compliance with the mitigation measures.* As stated on page 3.3-38 of the Draft EIR, ARB would conduct Architectural Review of the mass and layout, landscaping, and exterior building treatment. ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The City Council would then review the recommendations and make findings, as appropriate, that the design is compatible with the existing character. Therefore, as described in the Draft EIR, City Council would have the final approval regarding the building mass, site layout, landscaping, and exterior building treatments.

For other issues, such as the Comprehensive Plan and the Zoning Ordinance, the City Council and the Commission would review the SUMC Project for compliance with existing policies, regulations, and general compatibility.

CC1.20 *The commentor requests additional visuals, especially at the Hoover Pavilion Site.* Supplementary figures for the Hoover Pavilion Site are provided in Appendix DD of this document.

In addition, the commentor states that the SUMC Project has changed since the release of the Draft EIR and therefore, the figures provided in the Draft EIR are inadequate. As stated in Section 1 of this document, the SUMC Project as proposed in the SUMC Project application and described in the Draft EIR is the project that is analyzed in this Final EIR. The Tree Preservation Alternative, which is the SUMC Project sponsors' preferred alternative, is still considered an alternative for the purposes of this CEQA review. Nonetheless, the majority of the visual simulations included in Section 3.3 of the Draft EIR (Figures 3.3-8, 3.3-10, and 3.3-11) would pertain to the SUMC Project as well as the Tree Preservation Alternative. These visual simulations depict the Hoover Pavilion Site and the

proposed LPCH building, which would have the same building program as the SUMC Project. The only visual simulation that would be different, Figure 3.3-9, was regenerated to show the Tree Preservation Alternative and is included in Section 5, Alternatives, as Figure 5-6 on page 5-139 of the Draft EIR. Figure 5-6 depicts the SHC Hospital building under the Tree Preservation Alternative, which would differ from the SHC Hospital building program under the SUMC Project, with views looking south from Sand Hill Road and Pasteur Drive.

Although additional site plans for the Tree Preservation Alternative are not included in the Draft EIR, an analysis of the visual impacts and other site-layout impacts is provided in Section 5 of the Draft EIR. If City Council would like to see additional figures for the Tree Preservation Alternative, the SUMC Project sponsors can provide the most recent site plans and design figures upon request. In addition, preliminary project plans are available to download at the City's website.[2]

CC1.21 *The commentor questions the Staff Report and the review of historic standards that are required by CEQA.* Staff Reports were prepared by the City for the Commissioners, the ARB, and the City Council members in order to summarize the findings in the Draft EIR. See the Draft EIR for complete information regarding topics addressed in the Staff Reports.

As explained in Section 3.8 of the Draft EIR, Cultural Resources, potential historical resources at the SUMC Sites were evaluated. Based on findings by the Architectural Resources Group (ARG), and supported by the City's Historic Preservation Planner, the Hoover Pavilion and the Stone Building complex are considered historical resources for the purposes of the CEQA review. Although these two buildings are not currently listed on the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), or the City of Palo Alto Historic Inventory, ARG and the City's Historic Preservation Planner determined that they are eligible for listing. Therefore, the analysis provided in the Draft EIR regarded the Hoover Pavilion and the Stone Building complex as historical resources pursuant to CEQA.

The Secretary of Interior's Standards provide a standard guide to recommended treatments of historic properties and are also intended for use in developing documentation to be included in the Historic American Building Survey (HABS). Since the Stone Building complex would be demolished under the SUMC Project, Mitigation Measure CR-1.2 would require the preparation of HABS documentation for the Stone Building complex.

As stated in Section 15064.5(b)(3) of the CEQA Guidelines, "a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings

[2] City of Palo Alto, Planning and Community Environment Department, "SUMC Project - Development Simulation & Architectural Design," accessed on September 23, 2010 at: http://www.cityofpaloalto.org/depts/pln/news/details.asp?NewsID=1596&TargetID=85.

or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings... shall be considered as mitigated to a level of less than a significant impact on the historical resource." ARG has prepared a report (included as Appendix Y of this document) that concludes that the construction of the new medical office building and parking structure would not significantly alter the physical characteristics that convey Hoover Pavilion's historical significance such that it would no longer be eligible for inclusion in the NRHP and CRHR. Therefore, the SUMC Project would not result in a substantial adverse change in the significance of this historical resource and the impact under CEQA would be less than significant. Refer to Staff-Initiated Change 5 for a more detailed analysis of the potential impacts to Hoover Pavilion.

CC1.22 *This comment pertains to the role of the HRB in reviewing the EIR and the SUMC Project in general.* Please refer to Master Response 11 for a detailed description of the City's review process and the next steps in the EIR review process.

CC1.23 *The commentor asks if some of the development not related to the SUMC Project would not be constructed since the SUMC Project would exceed square footage limits under the Comprehensive Plan.* As explained in the hearing, the City has proposed to modify Policy L-8 to recognize that development at the SUMC Project Sites does not count against the square footage caps in Policy L-8. As outlined on page 3.2-29 of the Draft EIR, Land Use, and modified in Response 22.5, the policy would be amended to state that the SUMC hospital clinic and medical research uses would not be treated as "non-residential development." As such, additional growth in areas zoned "Hospital District" would be exempt from Policy L-8. It should be noted that the EIR analyzes the effects of the square footage proposed under the SUMC Project. Therefore, the change to Policy L-8 would not result in impacts beyond that identified in the EIR.

CC1.24 *The commentor questions the cumulative effect of traffic in relation to the Stanford University 2000 Community Plan and General Use Permit (CP/GUP) and the California High Speed Train (HST) project.* As discussed on page 3.1-5 of the Draft EIR, this analysis assumes that the HST project would not include a HST station in Palo Alto. The SUMC Project would generate approximately 10,000 additional vehicle trips per day, prior to mitigation to reduce single occupant vehicle trips. It is not expected at this point that the HST project would close any of the four streets that currently cross the tracks at grade; however, the train tracks would no longer be at the same grade as the streets, as the HST project would grade-separate the crossings for these streets. As such, the HST project would not create cumulatively considerable impacts in combination with the SUMC Project. Please refer to Master Response 3 for further discussion on the background growth and cumulative traffic impacts pertaining to the CP/GUP.

The commentor also asks whether additional firefighters would be needed to staff the new 100-foot ladder truck. The Draft EIR on page 3.14-14 identifies an improvement measure

to provide a 100-foot ladder truck. As an improvement measure, the 100-foot ladder truck would not be a mitigation measure that would is required under CEQA. The City could encourage the SUMC Project sponsors to implement improvement measures or consider imposing them as Conditions of Approval. Consideration over whether to include the improvement measures as Conditions of Approval would occur during the entitlement process rather than the environmental review process. Therefore, for the purposes of CEQA review in the Draft EIR, the improvement measures are provided as supplemental information and are not mandated, but encouraged. Please also see Response 22.74. The PAFD has indicated that they would need the 100-foot truck and three full time Medical unit staff to adequately serve the SUMC Project, and did not identify need to additional staff other than the three full time Medical unit staff.[3]

CC1.25 *The commentor questions how many Palo Alto Fire Department (PAFD) personnel would be required to man a 100-foot ladder truck and if this would require additional staff.* The PAFD currently owns a 75-foot ladder truck, which requires one captain, one apparatus operator, and one firefighter to operate. Under the SUMC Project, a 100-foot ladder truck would be necessary to provide adequate reach and access for the increased height of the buildings. According to the PAFD, the same amount of PAFD personnel would be needed to serve a 100-foot ladder truck.[4] Therefore, since the larger ladder truck would not require additional PAFD staff, the SUMC Project would not trigger the need for new PAFD facilities.

CC1.26 *The commentor questions the impact conclusions in Section 3.13 of the Draft EIR, Population and Housing, and the projections numbers used to determine the impact.* It is important to note that there is a distinction between the Association of Bay Area Governments (ABAG) Projections and the Regional Housing Needs Allocation (RHNA) that ABAG assigns to each jurisdiction. As explained on page 3.13-1 of the Draft EIR, ABAG is the San Francisco Bay Area's regional council of governments. ABAG forecasts a certain amount of population growth through its projections, and subsequently coordinates with various agencies and municipalities the required housing stock and infrastructure to support the projected growth. ABAG also prepares the RHNA, which is a State-mandated process used for determining how many housing units, including affordable units, that each community must plan to accommodate.

Comparison of SUMC Project's Resulting Population Growth to ABAG Projections. The SUMC Project's impact on population growth is addressed in Impact PH-1 of the Draft EIR, which identifies the new residential population that would result from the SUMC Project. As indicated in the Draft EIR, the SUMC Project would not include the development of new housing units and would thus not directly increase the residential

[3] Dan Firth, Fire Marshal, Palo Alto Fire Department, electronic communication with PBS&J, May 9, 2008.

[4] Gordon Simpkinson, Acting Fire Marshall, electronic communication with Kirsten Chapman, PBS&J, on September 21, 2010.

population within the region. The SUMC Project would increase employment, and those new employees would demand housing. This demand for housing would be an indirect impact of the SUMC Project. The Housing Needs Analysis (Appendix K of the Draft EIR) converts the number of new employees to the number of employee households. Table 3.13-8 of the Draft EIR distributes this number of employee households (or the housing demand for new SUMC employees) among the various jurisdictions within commuting distance. As indicated in Table 3.13-8, while the SUMC Project's total indirect housing demand would be 1,303 units, eight percent or 104 units of the overall housing demand would occur in Palo Alto. The distribution in Table 3.13-8 is an appropriate assumption because it is based on historical evidence, comprised of SUMC's data on the residential distribution of their employees (see Appendix L of the Draft EIR).[5] Overall, the resulting housing demand within each jurisdiction would comprise a small percentage of the projected household growth in each jurisdiction, when compared to growth projections by ABAG. As such, the SUMC Project's housing demand in Palo Alto and other jurisdictions would be less than significant and would not require mitigation.

There is a distinction between the SUMC Project's impact on population growth (Impact PH-1 in the Draft EIR) and the SUMC Project's impact on the City's jobs to employed residents ratio (Impact PH-3 in the Draft EIR). The former pertains to new residential population that would result from the SUMC Project, and how this growth compares to overall growth within each jurisdiction and the region. The latter is a metric for examining the trip generation and length and associated mobile source air emissions that is caused by increasing employment in the City without providing housing to support the employment.

Applicability of RHNA to SUMC Project. *The commentor indicates that the SUMC Project would be one of the largest in Palo Alto and would generate a large amount of jobs; the City would then be required by ABAG to provide housing to support these jobs, to improve the jobs housing balance in its jurisdiction.* As explained above, this required housing by ABAG is the RHNA. The City of Palo Alto's RHNA is not based solely on employment from SUMC facilities. The City's RHNA is determined by ABAG based on broader considerations such as water and sewer capacity, available suitable land, distribution of household growth and market demand for housing, housing costs, employment, and proximity to transit.[6]

The RHNA requirements for the City of Palo Alto are included in Table 3.13-3 on page 3.13-5 of the Draft EIR. As shown in this table, the City has already issued building permits for 741 housing units and therefore has an unmet need of 2,119. This unmet need will be addressed in the Housing Element, as part of the Comprehensive Plan update. As

[5] Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.

[6] Association of Bay Area Governments, San Francisco Bay Area Housing Needs Plan 2007-2014, pp. 21 – 23, June 2008. http://www.abag.ca.gov/planning/pdfs/SFHousingNeedsPlan.pdf, accessed October 4, 2010.

discussed above, the SUMC Project would result in an indirect housing demand in the City of Palo Alto of 104 units. See also Master Response 7.

CC1.27 *The commentor asks why the Draft EIR provides an analysis of the SUMC Project's impact on the City's jobs to employed residents ratio for informational purposes*. This EIR is a disclosure document that provides the SUMC Project's decision makers with information that would help inform their decision on the SUMC Project. The supplementary analysis was included for the benefit of the City's decision makers. It should be noted that analysis in the Draft EIR does not provide a CEQA conclusion (i.e., significant, less than significant) regarding the impact on the jobs to employed residents ratio. Also, please see Master Response 7 for a further discussion of the SUMC Project's impacts on the City's jobs to employed residents ratio. Master Response 7 also discusses the feasibility of Mitigation Measure PH-3.1.

CC1.28 *The commentor questions the impact conclusion for fire services and why measures are required if the impacts are less than significant*. Under CEQA, the need for additional equipment and/or staff to support a public service is not considered a significant impact unless new facilities would need to be constructed to house them, resulting in physical impacts. For example, if a project would require an increase in the level of staffing at the fire department, and the existing fire house was not large enough to support this increase, a new, larger fire facility would have to be constructed. This new construction would result in potentially significant environmental impacts. However, the SUMC Project would not increase the need for fire services to the extent that new fire facilities would need to be constructed, thereby resulting in a less-than-significant impact.

Nonetheless, the SUMC Project would require additional fire services, just not to the degree that would result in the construction of new buildings. These additional services would have an impact on the PAFD itself; however, under CEQA, this is not considered a physical environmental impact. As stated on page 3.14-13, the impacts to the PAFD include the need for a new ladder to serve the increased building heights at the SUMC Sites and the need for three additional full time employees.

Improvement measures are proposed in the Draft EIR to reduce the impacts on the PAFD, as presented on page 3.14-14. Since the impacts are not large enough to trigger the construction of new facilities, which would result in a significant impact, mitigation measures are not required through the environmental review process. Consideration over whether to include the improvement measures as Conditions of Approval would occur during the entitlement process rather than the environmental review process. Therefore, for the purposes of CEQA review in the Draft EIR, the improvement measures are provided as supplemental information and are not mandated.

CC1.29 *The commentor expresses support for the direct and indirect jobs created by the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC1.30 *The commentor requests a timeline of the SUMC Project with respect to the Comprehensive Plan Amendment process*. It is important to note that the Comprehensive Plan Amendment is on a separate schedule from the SUMC Project. Please refer to Master Response 11 for the review process of the SUMC Project in relation to the City's Comprehensive Plan Amendment schedule. In addition, refer to Response CC1.18, above.

CC2

Special Meeting
June 14, 2010

SPECIAL ORDERS OF THE DAY 307

1. Resolution 9060 entitled "Resolution of the Council of the City of Palo Alto Expressing Appreciation to Mark S. Herrera Upon His Retirement." 307

2. Resolution 9061 entitled "Resolution of the Council of the City of Palo Alto Expressing Appreciation to Gary R. Brooks Upon His Retirement." 307

3. Resolution 9062 entitled "Resolution of the Council of the City of Palo Alto Expressing Appreciation to Steve Baca Upon His Retirement." 307

4. Resolution 9063 entitled "Resolution of the Council of the City of Palo Alto Expressing Appreciation to Audrey Bates Upon Her Retirement." 308

5. Resolution 9064 entitled "Resolution of the Council of the City of Palo Alto Expressing Appreciation to Police Canine Lukas Z Kyjoskeho Udoli Upon His Retirement." 308

STUDY SESSION 308

6. San Francisquito Creek Joint Powers Authority's (SFCJPA) Capital Flood Protection Project Studies and Design Work. 308

CITY MANAGER COMMENTS 310

ORAL COMMUNICATIONS 310

APPROVAL OF MINUTES 310

CONSENT CALENDAR 311

7. Approval of a Conditional Use Permit and a Record of Land Use Action to Allow a Pediatric Dental Office on the Second Floor of an Existing Office Building at 2345 Yale Street. 311

8. Finance Committee Recommendation to Accept the Auditor's Office Quarterly Report as of March 31, 2010. 311

9. Finance Committee Recommendation to Accept the Auditor's Office Audit of Fleet Utilization and Replacement 311

10. Approval of a Wastewater Treatment Enterprise Fund Contract with Carollo Engineers, P.C. in an Amount of $389,715 for Design of Facility Repair and Retrofit Projects at the Regional Water Quality Control Plant - Capital Improvement Program Project WQ-04011. 311

AGENDA CHANGES, ADDITIONS, AND DELETIONS 311

ACTION ITEMS 311

11. Public Hearing: Approval of a Levy of Assessment for California Avenue Area Parking Bonds - Plan G: Fiscal Year 2010-2011 and Adoption of Resolution 9065 entitled "Resolution of the Council of the City of Palo Alto Confirming Engineer's Report and Assessment Roll, California Avenue Parking Project No. 92-13 (For Fiscal Year 2010-2011)." 311

12. Public Hearing: Adoption of an Ordinance of the Council of the City of Palo Alto Amending Section 18.28.050 (Site Development Standards) to Chapter 18.28 Special Purpose Districts (PF, OS, AC) of Title 18 (Zoning) of the Palo Alto Municipal Code to add a Maximum House Size Limit to the Open Space Zone District. *(Staff requests item to be continued by Council Motion to 10/04/10).* 312

13. Public Hearing: To Consider Approval of a Vesting Tentative Map and a Record of Land Use Action to Subdivide the Existing Parcel into Five Separate Condominium Parcels for Four Residential Units and One Commercial Unit at 420 Cambridge Avenue 312

14. Public Hearing: Stanford University Medical Center Facilities Renewal and Replacement Project Meeting to Receive Comments on the Stanford University Medical Center Facilities Renewal and Replacement Project Draft Environmental Impact Report (Draft EIR), Including Comments Focused on: A) the Project Description, Land Use, Population & Housing, and Public Services Chapters of the Draft EIR *(continued from June 7, 2010);* and B) Visual

Quality, Biological Resources and Cultural Resources Chapters of the Draft EIR. 313

COUNCIL MEMBER QUESTIONS, COMMENTS, AND ANNOUNCEMENTS..... 348

The City Council of the City of Palo Alto met on this date in the Council Chambers at 7:38 p.m.

Present: Burt, Espinosa, Holman, Klein, Price, Scharff, Schmid, Shepherd,
Yeh arrived @ 7:49 p.m.

Absent:

MOTION PASSED: 9-0

14. Public Hearing: Stanford University Medical Center Facilities Renewal and Replacement Project Meeting to Receive Comments on the Stanford University Medical Center Facilities Renewal and Replacement Project Draft Environmental Impact Report (Draft EIR), Including Comments Focused on: A) the Project Description, Land Use, Population & Housing, and Public Services Chapters of the Draft EIR *(continued from June 7, 2010);* and B) Visual Quality, Biological Resources and Cultural Resources Chapters of the Draft EIR.

Council Member Klein advised he would not be participating in this Agenda Item as his wife was on faculty at Stanford University. He left the meeting at 9:29 p.m.

Curtis Williams, Director of Planning and Community Environment: Yes, thank you Mayor Burt and Council Members. I am Curtis Williams, Director of Planning and Community Environment. As the Mayor

mentioned this is both a holdover from last week's meeting and also discussion of three additional chapter of the Draft EIR.

At last week's meeting the Council did go through a series and answers and was in the midst of making its comments, and did not have time to get through that. So we are looking forward to any additional comments tonight that you have on the Project Description, Land Use, Population and Housing, and Public Services. Those were last week's items. This week we are specifically looking that the Visual Quality, Biological Resources, and Cultural Resources Chapters of the DEIR. Rod Jeung of PBS&J has a brief presentation on those. Then Stanford Medical Center has a presentation on the visual portion including a flythrough of the site that they would like to make before you proceed. Mayor, is it okay to go through those presentations before you go back to last weeks items? The alternative is to have you discuss last week's items and then come to the presentation.

Mayor Burt: Let me get a sense of Council. So our options are to pick up right where we left off last week on the first item, or to have the Staff presentation on the second item, and then pick up where we left off. Then thirdly we could have the Staff presentation, go through these aspects, and then at the end return to where we left off last week. Three options, don't want to give you too many choices or spend too much time on this. Council Member Schmid.

Council Member Schmid: Why don't we finish where we were last week and then have a fresh view on these?

Mayor Burt: How does that sound to the rest? Is that how folks want to do it? Council Member Holman.

Council Member Holman: I would like to suggest, if I could, that it is 9:30 already and perhaps there are people here who want to speak on this item tonight. Perhaps before we continue our comments we allow the public to speak. Last week we lost some speakers.

Mayor Burt: I am seeing some nodding. Does that seem like the preferred way to go? Okay. Alright, so what we will do is have Staff presentation on the Biological Resources, and depending on whether we have significant questions on that we will make a determination whether to immediately hear from the public or allow questions from the Council before hearing from the public. What we want to do is make sure that the public has a chance to speak before it gets too late tonight.

Mr. Williams: I would like to introduce Rod Jeung from PBS&J. It looks like we may or may not have this presentation ready.

Rod Jeung, Project Director, PBS&J: Good evening Mr. Mayor, Members of the Council, and members of the public. Tonight we are presenting the next set of environmental topics. As Curtis Williams mentioned we will be covering Visual Quality, Biological Resources, and Cultural Resources from the Draft Environmental Impact Report. How are we doing with the slides?

Well, considering the hour and the desire to receive comments and to hear form the public our remarks tonight will be even briefer than usual. Speaking about Visual Quality, you have before you, I hope, the same table, the same format that we have used in the past. The table in this case identifies and summarizes the Visual Quality impacts. As explained previously at the other hearings the column on the left identifies the criteria for evaluating the impacts and the significance are rated across the top in the column headings ranging from No Impact or NI to Significant Unavoidable, SU. The table shows that with implementation of the recommended implementation measures the potentially significant impacts of visual character, changes to public views, and new light and glare would be reduced to less than significant.

These visual impacts would occur both during the construction and the post-construction periods. There are two mitigation measures that have been identified to address the impacts in both phases. So during the first impact, during the construction period, the visual character on the site would be significantly impacted by the construction staging and activities. The Draft EIR calls for a Visual Improvements Plan during construction to conceal the staging areas, to remove construction debris on a regular basis, and to landscape disturbed areas as soon as possible.

During the operation period, or post-construction, the Draft EIR recommends that the City's architectural review process be conducted. That the recommendations from that process be followed to ensure that the appropriate design of the proposed structures, and this would include consideration of their effects on the visual character, public views, and light and glare are all taken into account. The intent of this mitigation measure is that adherence to the architectural review process and requiring the implementation of those recommendations as forwarded to the Planning and Transportation Commission and the Council would reduce the visual impacts to less than significant.

With respect to Biology, again as shown in the table, the SUMC project would have significant impacts on special status species and wildlife movement. Specifically the construction could disturb special status bats that may roost in trees, and structures onsite, and the Cooper's

hawk, which may rest in onsite oak trees. The project could also disturb wildlife movement by disturbing birds that use onsite and nearby trees for nesting. The disturbance of these nesting birds constitutes a violation of the California Department of Fish and Game Code and is a significant impact.

Finally, in terms of the Biological impacts the project would have a significant impact on protected trees, as defined by the City's Municipal Code. Of the 176 trees onsite 76 would be removed due to the project. Mitigation measures cannot guarantee that impacts to these protected trees would be reduced to less than significant. Thus the Draft EIR reports that this impact would remain significant and unavoidable for both the project and cumulative impacts.

So summarize the mitigation measures, the mitigation measures for special status bats and birds are essentially the same and include three basic steps. The first is to conduct surveys before construction occurs to determine if the species are present. Second, it is taking steps to avoid those particular species if they are present. Then third it is working with a qualified biologist to protect the species if they are detected.

In order to mitigate for the loss of the 71 protected trees the Draft EIR identifies six mitigation measures starting with a Tree Preservation Report all the way through identifying and planning for the relocation of the targeted trees that are going to be preserved, to making deposits to the City to ensure the successful relocation of those trees. However, it is recognized that even with these measures the loss of protected trees would remain a significant and unavoidable impact.

In terms of the last topic for tonight Cultural Resources, Cultural Resources includes the historic architecture and archeological resources that may occur on the site. As shown in the table, the same format as we have seen previously, the project would have significant impacts on Cultural Resources. Some of which can be mitigated to less than significant and some that cannot be avoided. Specifically the project could disturb previously undiscovered archeological resources, paleontological resources, and human remains. Although with mitigation these impacts would be reduced to less than significant levels.

However, the project would demolish the Edward Durell Stone Building complex, also known as the 1959 hospital building, which the City has determined to be eligible for the California Register of Historic Resources. While mitigation has been identified to reduce the impacts to this resource the building would still be removed so the impacts would remain significant and unavoidable. In addition, the Hoover

Pavilion is considered an important example of pre-World War II hospital design and is also thus eligible for the California Register. While demolition of smaller surrounding buildings and construction of the clinic and garage as part of the proposed project could damage the Hoover Pavilion with mitigation the impact would be reduced to less than significant.

This slide shows the range of mitigation measures that are proposed in the Draft Environmental Impact Report. They essentially cover five different mitigation measures to reduce the potential impacts to Hoover Pavilion. These measures call for a protective buffer around the building during construction, prohibition on the use of vibration causing equipment, and implementation of specific protective measures that are contained in a separately prepared Pavilion Protection document. The measures for the Stone Building complex would include documentation, although as I mentioned earlier, these measures would not avoid the loss of this historic resource.

Finally, there are measures that are recommended in the event that there are archeological, paleontological, or human resources discovered. These measures, which are pretty standard, would effectively reduce the potential effects to less than significant. That concludes tonight' presentation.

Mayor Burt: Thank you. Next I should say we have Commissioner Martinez here. Did you have anything that you wished to add? Has the Planning Commission already gone through a preliminary review of this segment? Yes. Is there anything that you wish to add beyond the minute copies that we received today?

Eduardo Martinez, Planning and Transportation Commissioner: Thank you. The Commission spent about almost three hours on Visual Quality, Cultural Resources, and not much on Biological Resources. I think our discussion felt that there were great impacts visually on the Hoover Pavilion that the placement of the new building just seemed contrary. We felt that the radical change of the hospital campus really had both a cultural impact on our Cultural Resources, and a visual impact. Culturally there was a loss of continuity we felt. Not just in the demolition of the hospital, but just in the sense of the fact that this was a campus that has been in operation for 50 years or more. Visually we felt that there was a visual impact to the towers, a suggestion that maybe the height of the towers could be reduced. There was a suggestion that the medical office buildings could potentially be housed in the old hospital building, the Stone Building, as a way of preserving it. Then on Quarry Road there has been some discussion I think with the Council and the Planning Commission that there should be a plan for that as a significant entrance, gateway, to Stanford. We felt that

CC2.1 CC2.2 CC2.3

CC2.3 Con't should be considered in the mitigations for the Visual Quality aspect of the DEIR.

CC2.4 There were other suggestions moving the medical office building closer to the other office buildings on Welch Road so it would be more a part of a cluster of buildings and similar uses, and continuing the visual impact down Pasteur Drive through the gardens that are being preserved all the way to where the entrance to the hospital was as a way of mitigating the visual impact of the project. Thank you.

Mayor Burt: Thank you. Do colleagues have questions of either Staff or Commissioner Martinez before hearing from the applicant and then members of the public? Vice Mayor Espinosa.

Vice Mayor Espinosa: Just quickly for Commissioner Martinez. One of the things that was interesting to me was trying to find any sort of consensus on this resolution in the historic nature of the Hoover building and what is proposed around it beyond sort of moving some of the structures or decreasing height, etc. I just couldn't find that there was a consensus around that but sometimes it is hard to get that from just the minutes. So I was wondering if you thought that there was a clear direction that the Commission wanted to see the project go in order to resolve that.

CC2.5 Commissioner Martinez: I agree with you there was not a unanimous consensus but there was a majority opinion that the historic value of the Hoover Pavilion would be better served if there were a different location for the new building, and that we would really do more to restore some of the original qualities of the Palo Alto hospital, and that had to do with the landscaping of the entrance and really trying to restore it as it looked in 1939. There were a lot of ideas about moving buildings, not having the building there, and one felt that it was okay like it was. I think there was a strong consensus that really the Cultural Resource of the Pavilion was being compromised in the new plan.

Mayor Burt: Thank you. I don't see any other questions at this time. So would the applicant like to up to ten minutes to speak? Welcome.

Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children's Hospital: Thank you. Good evening Mayor Burt, Members of the Council. We have a presentation that we structured for about 15 minutes so hopefully that will be acceptable to you. We have a photorealistic visual flythrough and then a few slides that we showed to the Planning Commission.

Mayor Burt: By our rules you are allowed ten minutes at the beginning and five at the end. If you wish to take all 15 at this time that would be fine as well.

Mr. Tortorich: Well, we will talk as fast as we can.

Mayor Burt: Okay.

Mr. Tortorich: What we wanted to show you, if Zach can get video fired up, is a photorealistic simulation of moving through the project starting at the Quarry and El Camino intersection and then moving through the various projects on Welch Road up to Pasteur Mall. Zach, we can skip that and go right to the slides if that would be okay.

So I think one point I did want to address is that at the Hoover site there was an awful lot of dialogue and discussion about the Pavilion building which we are renovating to house some of our community physicians, about a 20,000 square foot requirement, as well as the proposed medical office building that is about 60,000 square feet on the site. Again, we proposed that building to give long-term security to community physicians who want to stay in the immediate vicinity of the Medical Center, as well as a parking structure on the Hoover site. We don't currently have occupants of that building right now. I think we have added a few additional slides to give what we would consider to be the existing context of the Hoover site.

There had been a suggestion at Planning Commission of using the old 1959 hospital for community physicians. The 1959 hospital and School of Medicine building is about 850,000 square feet. We don't currently have a requirement that is unmet in our plan for community physicians. So that didn't seem like a practical fit for us. There isn't 850,000 square feet of need for community physicians. There is about 20,000 square feet and we are housing them in the existing Pavilion that will be renovated as part of this project.

So here is the photorealistic video. It comes with music but I can narrate. This is at the transit center and then crossing El Camino coming up Quarry Road. PF Chang's is there on the right. Then on the left is the existing Hoover Pavilion that will be renovated. You will see medical office building here on Quarry Road. Then you will see the utility substation that is here at the corner, and the parking structure in the background. There will be an ensemble of buildings between the parking structure, new medical office building, and Pavilion.

This is moving up Quarry Road toward the Lucile Packard Children's Hospital expansion, which you can see in the background behind the Stanford Barn. This depiction will turn you right onto Welch Road and

you will see a grove of trees here at the corner of Quarry and Welch. We had changed the design for the Children's Hospital to preserve that grove of trees at the corner. We have created really a very large open space at the corner. These are the patient rooms with landscaping right outside of the patient rooms as you can see.

You are moving past the entrance to the existing Children's Hospital on Welch Road. You will see the new median strip and landscaping that is also proposed as part of the Welch Road improvements. We are ready to turn into the Pasteur Mall, which is the traditional entrance to the Stanford Medical Center. School of Medicine research buildings, specifically the Foundation in Medicine 1, 2, and 3 can be seen there on the right. On the left in the immediate foreground is the Parking Structure 4 that won an award from Palo Alto, as well as the hospital and clinic buildings in the foreground. This is the FIM building and one of the trees that we have preserved by redesigning that FIM 1. These are our future clinic buildings adjacent to the Thomas Church Fountains that exist at the entrance to the current hospital. This is the new five-pavilion 1.1 million square foot Stanford Hospital, with the entrance here to the immediate right. You can see the glass towers above the diagnostic and treatment platform looking back towards the clinics building and courtyard that is created there at the entry. Then you will see the parking structure in the foreground to the lower left. So that is the photorealistic simulation.

Now we will move onto the slide show and I will speak very fast. So I want to mention to you the four different aspects of the project Hoover Pavilion, Lucile Packard Children's Hospital, Stanford Hospital and Clinics, and the School of Medicine.

Next. The slide to the left is our existing conditions slide. The slide to the right is our proposal studied under the EIR, our base proposal.

Next. As part of our design process, we have developed a set of design guidelines that represent the things in between the buildings that connect developments, landscaping, paving, and such.

Next. Now we will talk about the Hoover Pavilion.

Next. You can see the upper left is the historic viewshed. That is the characteristic we consider to be the most significant about the view to the Hoover Pavilion at Palo Road and Quarry Road with the medical office building and parking structure adjacent.

Next. We really studied the language of the existing Hoover Pavilion, tried to match heights, tried to match base conditions, and then the vertical nature of the architectural expression. So that as our architect,

WR&S characterizes it this is really an ensemble of buildings on that campus.

Next. This is a view from the shopping center parking structure looking across Quarry Road at Hoover Pavilion. The Pavilion really is behind all those trees.

Next. Again a view from Quarry looking past the power station at the Hoover Pavilion. So Hoover Pavilion is not well seen except from the corner of Palo Road and Quarry Road by our analysis.

Next. These are some still of the photorealistic simulation that you saw.

Next. Then a point that we just wanted to make that the Environmental Impact Report does not suggest that there is any degradation of the visual quality of the Hoover Pavilion structure.

Next. Lucile Packard Children's Hospital. We have combined both inpatient facilities and clinics into one structure.

Next. We have made a very significant effort to connect with nature. As I mentioned in the photorealistic simulation, we actually changed the design of the building to accommodate the grove of trees at the corner.

Next. Through our site planning we are creating gardens. The garden that you see to the upper right is on grade. The garden that you see to the lower left is on top of our surgery platform. By doing this we have really created about three and a half acres of open space and green space that didn't exist on this site before. It is predominantly buildings and asphalt paved parking lots.

Next. This shows you what is underneath that discovery garden, and that is going to be our operating perioperative service area, and prep and recovery, and then our lobby, which has a nice glass wall that opens up to the gardens at the corner of Quarry and Welch.

Next. Our patient spaces up in the upper floors, which will have overlooks to the gardens, as well as landscaping right outside of the patient windows.

Next. Again, some still photographs from the photorealistic simulation.

Next. Stanford Hospital and Clinics, this is the 1.1 million square foot replacement hospital for our seismically deficient facilities. Then clinic buildings for about 429,000 square feet, these are for predominantly Stanford practices.

Next. This is a render site plan, which was our original proposal. You can see outlined the sixth pavilion that sat on the Pasteur Mall. We have actually removed that pavilion to preserve a grove of trees on what is called the Kaplan Lawn. We have also redesigned our parking structure from being a below grade structure to a structure that is partially below grade and above grade to accommodate trees in that location.

Next. This is a diagram that will show you overlaid with our original proposal the trees that we now have preserved by redesigning the building.

Next. Here you can see some views and the updated site plan, which is part of the Tree Preservation Alternative, which is our preferred Alternative for the project.

Next. This gives you a view of the site plan with the drop-off, with the new hospital connecting to the existing facility.

Next. Our architect, Rafael Vinoly, and Lee, Burkhart, Liu really have discussed this building as a garden interface between humanity and technology. The humanity being the patient bedrooms, and the technology being our emergency department and our interventional platform on the second floor.

Next. The ground floor plane shows the big volumes of space we are working with, our emergency department, which is nearly 40,000 square feet, as well as our imaging space. Those two spaces need to be immediately adjacent to each other. That really drives a lot of our planning of the building.

Next. Again, our patient floors with access from each of the single rooms out to natural daylight and good orientation to our internal atrium.

Next. Then stills from the photorealistic rendering.

Next. So I would ask David Lennox, our Campus Architect to talk about the School of Medicine.

Dave Lennox, Stanford Campus Architect: So the three School of Medicine buildings FIM 1, FIM 2, and FIM 3 will replace square foot for square foot the square footage in the Stone complex that they are currently occupying.

Next. The three buildings will actually provide a face for the School of Medicine to the Medical Center whereas the new buildings that have just recently been completed are the face to the main campus.

Next. We will be using the kit of parts, and the massing, and the scale, the limestone, the red lids, the rhythm of windows will all be incorporated in the new FIM designs.

Next. These are the views from Pasteur and Welch. You can see it will maintain the scale of the existing School of Medicine.

Next. One of the challenges of trying to do cutting-edge research space in the Stone complex is a floor-to-floor as it shows on the left. Currently how we are trying to make those work but it is really a challenge. We can't do a hospital in the Stone complex but we certainly have as much challenge doing cutting-edge research space. They are about three to four feet difference in floor-to-floor depth.

Next. So what we end up doing to meet the energy codes, to meet the HVAC requirements we end up needing to put equipment on the outside of the building, and run it up the outside walls and up in the roof.

Next. Thank you.

Mr. Tortorich: So we went quickly through that presentation. I know that some members of the Council maybe have seen the architectural expression of this project develop over the years, and some may be new to the project. So we would certainly offer to provide any further updates individually if you need them at your convenience. We certainly would be happy to do that. I think I have made it within our time limit. Thank you.

Mayor Burt: Thank you.

Public hearing opened at 9:56 p.m.

CC2.6 Stanley Mayerson, Palo Alto: I have gone through this. I just want to say one thing and that is all. A statement of – look you ally yourself with Stanford. It is genius to put stuff together. You not only get medical, you get all the other stuff along with it from anthropology. You are allying yourself with a world-class university. The chance is an incredible opportunity at this point. It depends on, well Palo Alto is I could say small but as a scientific community, medical, or whatever it provides an alliance. The sky is the limit. That's all.

Mayor Burt: Thank you. That was Dr. Stanley Mayerson. So we have cards from two members of the public at this time. Brian Schmidt followed by Bob Moss. Welcome.

CC2.7 Brian Schmidt, Committee for Green Foothills: Thank you. Good evening. We will be submitting most of our in writing. We barely, to be honest, had a chance to look at some of these things. I have just a couple brief comments. On some of the landscaping issues there might be some opportunities to work cooperatively. There are some interesting things there being done elsewhere. For example, in Morgan Hill they are doing tree plantings in the medians with oaks. They have done some interesting methods of reducing water demand and providing some habitat possibilities. I was interested to hear about the whole idea of connection to nature and some open space. I think those should be examined closely when you have some trees in parks with mowed grass beneath. That is not exactly what I would call nature. Maybe there is some opportunity to do that with that open space they have discussed up above the buildings. Usually private open space where the public doesn't get at access to doesn't compensate for the losses that the public has elsewhere.

CC2.8 We did have some concerns about visual impacts, especially considering the height and the density that might occur from this. So we are not sure that could be reduce to less than significant impact, and there might be some possibility for mitigation through open space protection elsewhere. We will submit other comments later. Thank you.

Mayor Burt: Thank you. Our next speaker is Bob Moss. Welcome.

CC2.9 Bob Moss, Palo Alto: Thank you Mayor Burt and Council Members. I found the review of the Visuals completely inadequate. The impact is significant. If you look at the video I notice that one of the things there was an area of the Hoover Tower you can't see because of all the trees. I can't tell you how many projects I have seen proposed where they very carefully have selected a location to look at that says, oh, this is not going to have an impact, and they picked the only place on the planet where it wouldn't have an impact. If you move ten feet to the right or the left you see it. Two examples, Campus for Jewish Life where when they showed how it was going to look they were standing behind the trees on San Antonio, but if you moved ten feet to the right you would see this massive building. A lot of people have complained about it. More recently the VA hospital where the only places they looked at the new building where in an area where there were a lot of trees. If you moved 50 feet to the left you could see the building. This one is the same thing.

CC2.10 It is not necessary to have a hospital 130 feet tall. We have two hospitals that have been built in Santa Clara County within the last two years that are between 60 and 70 feet tall, Kaiser in Santa Clara and El Camino Hospital in Mountain View. If they can do it Stanford can do it. The bulk and the scale are excessive.

CC2.11 Another thing that is fundamentally wrong is asking the ARB to have oversight on the project and the design. The ARB doesn't do issues relating to compliance with the zoning, land use, and other significant issues like biology for example. They look at things like the color and the types of window frames that you have. That is inadequate. The ARB should not be the arbiter of whether or not the buildings are correct. It should go back to the Planning Commission and if necessary to the Council. So the mitigations are inadequate and it will create significant problems if the actions, which are proposed, are what are adopted. We have to do some corrections and make things work properly.

CC2.12 Trees for example, I saw very little about transplanting some of those significant trees and preserving them. A lot of those could be but they are just saying we are going to look at it, we are going to try. There should be a requirement that they do it. So I think the mitigations that are proposed are inadequate. They need to be looked at again and corrected.

Mayor Burt: Thank you. Stephanie Munoz followed by A. Gladys Stavn.

CC2.13 Stephanie Munoz, Palo Alto: Good evening Mayor Burt and Council Members. Stanford is the largest college campus in the country. I suppose that makes it the larges college campus in the world. You cannot permit them to develop the entire 8,000 acres as commercial. They have to have some residential. You have to insist that Stanford provide housing for the workers with which it earns its millions.

CC2.14 The state is telling Palo Alto it must provide low-income housing for those workers and there is no place in Palo Alto to put them except on Stanford land. No place. You have to pass the buck back to Stanford.

Palo Alto was for many years a bedroom community. People took the train to San Francisco. I took the train to high school in San Francisco. The Stanford Industrial Park changed that and the Serrano Decision forced the state to equalize school funding. The demand that every town supply low-income housing is the direct result of the Stanford Industrial Park.

San Jose, unaware of Proposition 13 to come, annexed open land like crazy and developers built little three bedroom houses, selling for an

CC2.14 Con't average of $15,000. The impact on Palo Alto's neighbors of the commuter traffic was intolerable. Barron Park, which had resisted annexation to Palo Alto for years, was dragooned into the City by jury-rigging a district to include the cemetery so that Arastradero Road, to the consternation of the residents, could be widened by cutting their front yards in half.

Los Altoans living on Cuesta and Covington, the only two through streets in town simply couldn't get out of their driveways. Stanford's solution was to join with the Southern Pacific Railroad to get Santa Clara County to build Foothill Expressway. The County put a $6.0 million bond issue on the ballot to approve the transportation. After the measure passed they revealed the routes. Does that sound familiar? Telling us that by voting for the bond measure we voted for the routes too, surprise. They bought the section of the Southern Pacific branch line, which the railroad was delighted to get rid of, which served Los Altos, Saratoga, Campbell, Los Gatos, and West San Jose. Bob Debsinflint berated Palo Alto until they were blue in the face but to no avail. This time there isn't any railroad to destroy. Palo Altoans are in exactly the same position Los Altoans were in some years ago. They are not going to like it, and they are going to remember you did it, if you let Stanford get away without the low-income housing. It has to go someplace. You cannot have robots doing this work in the hospital. You have to have people that make ten dollars an hour, and they have to live someplace. Please, we lost a railroad. Thank you.

Mayor Burt: Thank you. Our final speaker is A. Gladys Stavn hopefully I am pronouncing that correctly.

A. Gladys Stavn, Palo Alto: Good evening Council Members. Yes, you are pronouncing that correctly. I am referring to the Stanford University Medical Center Visual Quality and Architectural Design pamphlet, which was also presented on the video. I have a quick question in this direction, mostly to the people who spoke who showed the video.

Mayor Burt: Our A/V person will get angry at us if we – it is fragile. That should work fine. Perfect, thank you.

CC2.15 Ms. Stavn: It is on page 11, there is a little red pathway and a little bridge. It is very appealing to me and I am wondering where this will be located especially since it leads into some trees. Could the members of the Stanford community answer that question for me?

Mayor Burt: They can't directly from your question but we may be able to have them answer that subsequently.

Ms. Stavn: Okay, thank you.

Public hearing closed at 10:07 p.m.

Mayor Burt: Thank you. So would the applicant like to use their remaining minutes to either respond to members of the public or add additional information that you didn't have an opportunity to do at the outset?

Mr. Tortorich: I would be happy to answer the question. I am not sure I understand it. The bridge here that is shown is an illustration of the attempt to connect with nature. This bridge doesn't exist on the Children's Hospital site.

The photograph to the right is a photograph of another place. The drawing on the left is the connection of our open spaces at the Children's Hospital. There are three significant open space and we hope to visually connect them. The right is somewhat of a metaphorical photograph.

As to the rest of the time I am happy to answer any questions you all may have about the rather rapid presentation if points are not clear, or if there are areas that you would like me to emphasize.

Mayor Burt: We weren't sure if we should give you a speeding ticket as you were racing through those streets. Colleagues, any questions for the applicant? Council Member Price.

CC2.16 Council Member Price: Yes, thank you. I appreciated the presentation even if it went by very quickly. Just a couple of things. In terms of the design of the significant main buildings, the hospital buildings, can you just give a couple of clarifying points why the decisions were made to make it reach a height of 130 feet? It is not clear to me, because there is a huge volume of material, how much of the building is below grade, and what are the functions of the activities below grade? If you could just clarify for me from your perspective the need to reach a height of 130 feet per proposed here.

Mr. Tortorich: I will happy to. Zach, can you go first to the diagrammatic section? So this idea of the garden as the interface between technology and humanity, the first two floors are really the highly technological spaces, our emergency department, and our imaging department. The floor-to-floor height there is about 18 to 20 feet. The floor above that is the surgical platform, which again is about a 20-foot, in fact it is even taller floor-to-floor height. The reason is because of not only the functions that occur with in the spaces but all of

the mechanical distribution ductwork and bracing of medical equipment that has to occur in the ceilings.

The third floor houses large mechanical units to provide the air exchanges necessary on those first two floors. Those first two floors have nearly three acres of space on each floor. So we have cleverly disguised those mechanical spaces with a garden. That will be a very public space. The floors above that are patient bedrooms, our single occupant patient rooms. There are four floors of those spaces.

The reason for 130 feet is just the mathematical addition of the floors below for technology, the large floor-to-floor height necessary for the mechanical equipment, which is about 24 feet in that third floor, as well as the 16 feet in floor-to-floor height for each of the patient bedrooms. The reason we like to organize a hospital vertically is because of patient care. So somebody coming into the emergency department in trauma, who needs to have surgery and is in a condition where we are right at the edge of saving their life, can be transported vertically to an operating room and cared for immediately in trauma surgery. Once recovered and stable enough to move into a patient bedroom we will move them vertically up into a patient room.

Zach, if you can go to the first-floor floor plan, what you will see here is we have the emergency department in this location, our ambulance bay, and our drop-off, and our imaging department here. So many cases that come into the emergency department there is a complaint of pain, something has happened. To properly diagnose the patient there needs to be an MRI, a CT scan or some other interventional study of what is going on inside. So that requires this immediate adjacency. Once stabilized in the emergency department there are elevators that can bring you immediately upstairs to surgery and moving on with the procedure.

You will see that there are banks of elevators within each of these patient units. So there is one set here. There is one set here, here, and here. That is what we call our offstage vertical circulation so patients don't have to move through public corridors as they have to do in the existing hospital between the operating room, recovery spaces, and patient rooms. Then we have the public elevators here and here that take you all the way vertically from the basement all the way through to the seventh floor.

As to your question of what is in the below grade structure there is one floor below grade. Zach, if you could go to the entry level plan. So we are entering the building from the drop-off into our internal atrium here, those public elevators. The perimeter of the building underground takes up this space. So in this region is our kitchen. The kitchen is

regulated by the State of California. It has to be in an OSHPD inpatient building because we have to be able to serve meals to patients in the event of a major earthquake that incapacitates other services. We will have mechanical equipment, electrical service, and other such appurtenances below the emergency department. We will have our central sterile supply, so the sterilization of all the instruments necessary for the operating room located in this region. Then we will have other material management and lab services located in this department below. So these spaces at the ground floor are the heavy support that don't need to be visible to the public for the operations of the hospital vertically.

So the 130 feet again is really to allow us to organize patient movement privately and safely in the most efficient way possible, and that is through vertical transportation. Not what we have today taking a patient hundreds of feet down public corridors from one space to another.

CC2.17 Council Member Price: Thank you. I am assuming that another reason that there was not more activity below grade is the costs. Is that correct or are there geological issues, etc. that would preclude?

Mr. Tortorich: Geologic issues. We are having a really, really difficult time with the State of California and the quality of the soil that is here on the site to accommodate a hospital building. In fact, there was a debate that occurred last week about whether the maximum credible quake we have to design to is 7.8, which was the 1906 earthquake for San Francisco, or whether that actually goes up higher than 8.0. The criteria is the building has to withstand that kind of a shake and immediately maintain operations. So that is a level of design that no other structure in California has to go through, say for nuclear power plant. So one level below is all we could do.

We have also designed the building to accommodate base isolation. So these are about 250 shock absorbers that will separate the foundation from the structure of the building. So the ground may move like this, and the building won't feel that same level of force. It allows us to design with a lighter weight of steel and also provides a greater insurance of operations after a major seismic event.

Council Member Price: Thank you. So the issues of seismic safety and all of the regulations around that really have a major impact on some of your design decisions related to the creation of these structures. Is that correct?

Mr. Tortorich: Absolutely. They affect all of our design decisions.

Council Member Price: Okay. I very much appreciate the attention to various designs and some modifications that have taken place. I think the sensitivity to the landscaping, the connectivity, all of the linking of the different parts of the campus I think makes a lot of sense.

CC2.18 The issue of the substations, my question is if there is sufficient buffering of those. It is sort of hard to tell we moved through this very quickly. Those are by nature quite ugly. Has there been enough attention regarding mitigation or buffering of the substations?

Mr. Tortorich: There are a couple of issues there. One is the substation, which is Palo Alto Utility Substation is here. There are power lines that move overhead in this direction. We will have to move those power lines and actually underground them in this location. We have not addressed the power station. I think it is really a Palo Alto utility station. There are existing trees around the station, which we will preserve obviously, but it is an element of the site.

CC2.19 Council Member Price: The Tree Preservation Alternative, I appreciate the discussion of that here during the presentation. I think it has some real merit. Could you very, very quickly talk about what you perceive to be gateway features? There were some comments made by the Planning and Transportation Commission in terms of unifying elements and gateway features that bring you into the site. Is there something specific or are you still evolving some of those thoughts?

Mr. Tortorich: I am not exactly sure of the reference to the gateway features, but if we go to the site plan what we do see is that the parking structure here to the shopping center is really immediately adjacent to the street and the sidewalk. The location of the medical office building really provides an open gesture we believe to the corner. There will also be transit stops right here to allow you to make access to the site. There will also sort of be a plaza that connects the entry to the medical office building with the Pavilion and the parking structure. So that is one element.

As you approach the Medical Center campus, and sort of moving through the retail, we did think very hard about how the Children's Hospital is one entry to the Medical Center campus. So we worked quite significantly on the design to create that tower element that you saw, what we call the Lucie Wall because of the graphic that represents the Children's Hospital. Then also the movement of the towers to preserve that grove of trees at the corner of Welch and Quarry.

The real gateway to the Medical Center has traditionally been Pasteur Mall. I think we had a good dialogue with the Planning Commission about the fact that when this building was built in 1959 it was the

termination of that Pasteur Mall. It was the main feature. No longer do we want the Clinic's building to be the main feature of the termination of that Pasteur Mall. It really will be in this location as the entry to the new hospital building, and the entry to the remaining 1989 patient pavilions. We also wanted to reinforce, and we have done a great amount of study, to reinforce this outdoor promenade, which we believe connects the School of Medicine research and faculty position with the Stanford adult hospital and the Lucile Packard Children's Hospital. It is a wonderful outdoor lane. Right now it is a fire lane that is used by pedestrians and bicyclists but it is used that way by accident. We hope to make it more of a designed event.

So Zach, could you go to the ground floor of the adult hospital? This is a good shot of it. So this building won't exist any more, right? So we don't want that to be the termination of this event, because this really is the entrance to the hospital, and this will be a real center of energy.

So Zach if you can go to the next diagram. This really will be the center of activity. So that promenade will be enlivened by a café at the ground floor, not a traditional part of a hospital program at the ground floor, but we thought a very important element to make this a vital place. We have also allocated a component of space from our imaging department, which doesn't make our Chief of Radiology happy, for retail space, again, to create a designed event along that promenade. We want to encourage the movement of medial students and faculty through that open space, and frankly encourage the movement of the citizens of Palo Alto through that open space to go from our Children's Hospital, the adult hospital, and the School of Medicine.

Mayor Burt: Any other questions or comments? What I would like to suggest is we will go through on the Visual Quality, Biological Resources, and Cultural Resources and let everybody go with their comments or questions at this time. Then we will return to the other half of the item. Council Member Holman.

CC2.20 Council Member Holman: I found as I went through the Biological Resources that I was continually confused as to what the mitigations were and how many trees were being protected. Thank you for the response to the questions that I did submit. One of the questions that I had still, I don't see which question it was, but I had asked about the mitigation measure for the publicly owned trees, the City owned trees. The response was that there were mitigation measure and these applied to both the City own and the private trees, but I just didn't find that when I was reading the mitigations. So why the focus on the City owned trees and why not equal focus on all of the trees? I am not being facetious about that, of course we want the City owned trees to be focal points, but I just didn't find the same mitigations for the

CC2.20 Con't others. For the trees that are being removed what is the mitigation? The language seemed to be kind of loose in terms of like feasible and those sorts of things.

CC2.21 While you are thinking about that there also seemed to me when I was reading through it to be some conflicting numbers. Like one of the mitigations talked about 48 trees I think or 58 trees being removed, but really there are more than that being removed. That was where it was referencing the hospital zone. So I want to make sure I am clearly understanding this. The Tree Preservation Alternative retains 13 of the 71 protected trees. Is that correct?

Mr. Williams: Council Member Holman, thank you. My understanding is that it retains 13 more of the protected trees. There are actually 176 protected trees on the site. So under the proposed project initially there were 71 of those that were being removed. Under the Tree Preservation Alternative there are 58 to be removed, and that is still considered significant, but it does preserve some of the nicer remaining trees that are on the site. So it is not 71 total protected trees it is 176 or something like that protected trees overall. There is just that difference.

I understand what you are saying as far as the public versus private and it sounds like we have some work to do to try to clean that up and break it up. I don't know, and if Rod knows now fine, but I don't know that there were different mitigation measures for public versus private trees.

Mr. Jeung: I can at least give it a shot to provide Council Member Holman with an initial idea. I apologize for it being confusing. We had a very, very specific mitigation measure that we had worked out with the City Arborist to specifically deal with the replacement of any public street trees that might be affected. So the mitigation measure associated with that was specifically captured within Mitigation Measure BR-4.5, which is on page 3.9-28.

All the other protected trees are those that are governed by the City Municipal Code that are found on the Stanford property. That is where I will make sure that we make sure that the numbers are consistently presented. There were 71 trees that were identified as protected trees. Then I think what you were referring to is that the hospital district that the Stanford University Medical Center team is proposing has a hospital district that would preserve 13 of those trees. So there were recommended mitigation measures and a Tree Preservation Alternative that would come up with different numbers, but we will clarify all that.

Council Member Holman: That would be great. Then going to Cultural Resources if I might. By the way I think it is important to maybe remind us all, and the City Attorney will weigh in here if I misspeak, what we are doing now is just evaluating impacts, or potential impacts, or no impacts. So that we know what we are looking at when we are looking at approving and what do approve. So this isn't approval or disapproval of anything. It is just actually knowing what we are looking at in terms of a project.

CC2.22 In looking through the Planning Commission minutes, on page 35 of 70, starting on line 13 it is talking about while Hoover Pavilion is a visually distinctive structure in the project vicinity, and we have heard about it tonight, it is not a visually protected resource under the Comprehensive Plan. The obstruction of this building would not comprise a significant visual impact, but it is something that is discussed in the Cultural Resources section. So again, we are looking to the Comprehensive Plan, we are looking to local sensibilities in order to identify what the scenic resources that need to be protected are and whose views are important.

That was confusing to me. A DEIR a CEQA document so I don't know what Comprehensive Plan has to do with how we evaluate viewsheds. I don't know if you want to answer this now or if I just bring up the issues now, but that was confusing to me and I think may have given some misinformation to some folks, unless I am misinterpreting that.

Mr. Williams: Thank you. I will just say that it is confusing. I think the Hoover Pavilion is addressed or it is an issue in both in Visual and in Cultural. So our thought is that these issues that the Commission brought up will be address one way or the other. I think they brought up some very good points about the visual aspect of it, which I think we need to reevaluate based on some of those comments they made. The Comprehensive Plan sometimes is used as our threshold for significance. That is where it sometimes enters in. Clearly the Hoover Pavilion is identified as a culturally significant/historically significant building in the Cultural Resources section, and we need to consider it and look at it that way and then be consistent in the Visual section.

CC2.23 Council Member Holman: If I might too, there was also I think some confusion or lack of understanding. I see the Preservation Planner is here so if I misspeak I would invite him to correct me. There was some question about somewhat the importance of Hoover Pavilion and the Stone Building and that they were not on the Inventory. If I am remembering correctly the Hoover Pavilion is not on the Inventory because when we were doing the Inventory back in the 1970s they didn't go to the other side of El Camino. That I think is the only reason why and that was not made clear at the Planning Commission meeting.

The Stone Building, when that inventory was done hadn't reached the threshold of 50 years. So those are the reasons why. It isn't because they are less significant. As a matter of fact, I think the Hoover Pavilion as part of the Dames & Moore survey that was done more recently I think determined it was eligible for the National Register. So just so it is on the record so we know what we are dealing with and why some things are and some things are not.

CC2.23 Con't Having to do with Cultural Resources as well, I agree with many of the comments the Planning Commission made. There is one other aspect of the Secretary's Standards actually which is a requirement of CEQA when it refers to cultural resources and that is that the historic resource, any built additions or context that those structures are subordinate to the historic resource. I think that is kind of what the Planning Commission was getting at when they were talking about the impacts of these other buildings on that same site. for those of you who have not been looking at this project so long, these comments that the Planning Commission made with several new Planning Commissioners, these are all suggestions that are years old. They are very consistent with comments that have been made for two and half or three years, something like that.

I can either pass or if somebody else has a light on?

Mayor Burt: Well before you do, Rod I think your associate had something she wanted to add at a certain point in Council Member Holman's questions or comments.

Trixie Martelino, Project Manager, PBS&J: I would like to clarify for the visual analysis there was a comment on the Hoover Pavilion not being treated as a visual resource. One of the considerations we took in identifying which resources were considered visual resources were policies from the Comprehensive Plan. There are specific policies in the Comprehensive Plan that protect say views of the hillsides to the west, or views of the bay to the east. Also, there are specific policies that protect views from scenic roads such as Sand Hill Road. There was no particular policy that protected the visual integrity or the appearance of the Hoover Pavilion. That is where the statement in the Visual Quality section came from.

Also, to address your comment on treating the Hoover Pavilion as a cultural resource, the Hoover Pavilion despite it not being listed in the City's Inventory is treated as a historically significant resource, and there are mitigation measures in the Cultural Resources section that protect the Hoover Pavilion from damage during construction.

Council Member Holman: Thank you.

Mr. Williams: Excuse me if I could just introduce Trixie Martelino, the Project Manager from PBS&J.

Mayor Burt: I will let Council Member Scharff and then we can go around if need be.

Council Member Scharff: Thank you. I just had a few questions about the Stone Building. I gather that originally Stanford's consultant found the complex not to be one of Stone's major achievements and probably not eligible for listing on the CRHR. Then we did a peer review of that. One of the things we looked at was the Stone Building design was designed during a pivotal and innovate phase of his career, and it has remained in its original location. I guess my question was is the Stone Building considered innovative or was it just designed during an innovative phase of his career? In other words, does the Stone Building reflect that innovation that we are talking about?

Charles Chase, Director of Planning for Architectural Resources Group, Inc.: Members of Council, my name is Charles Chase. I was responsible with Jodi Stock, who is with me here tonight, for that peer review. The Stone Building designed by Edward Durell Stone would be and does embody the innovative process of that period of his work.

CC2.24 Council Member Scharff: Could you elaborate, and tell me what exactly that means?

Mr. Chase: Well the body of Stone's work, without going into a history lesson, he moved into a phase of his work that architectural features on this building represent. The screen work, a series of columns around the base of the building is a very formalistic style that is embodied or is present in the building that stands today.

Council Member Scharff: Okay, and I guess while you are up here, my belief is that this building, the City Hall is a Stone building.

Mr. Chase: That is correct.

Council Member Scharff: I notice that somewhere in here it says only one other Stone building in Palo Alto, the Palo Alto Main Library, retains sufficient integrity. What have we done to this building? It looks fairly similar.

Mr. Chase: At some point in the past the Paris style that wrapped the perimeter of this building was removed.

Council Member Scharff: So that is why it no longer retains the integrity.

Mr. Chase: That is correct.

Council Member Scharff: Got it. I guess the other question I had was the first heart transplant took place in the Stone Building.

Mr. Chase: In the United States.

Council Member Scharff: In the United States, yes. So I guess my question with that is on the interior spaces they have been all remodeled, is that correct?

Mr. Chase: Yes, we commented in our report that because of the changes over time, which is natural for any facility, but probably more importantly for a hospital building where technologies change constantly and functions change and actual use of interior spaces may change on a fairly regular basis that you would not find the original or what would have been present at the time when that heart transplant took place is present.

CC2.24 Council Member Scharff: What I gathered from the applicant, if the applicant could confirm, is that building is not really appropriate to do research or cutting-edge anything anymore given it is basically functionally obsolescent in the interior, given the heights of the ceilings. Did I pick that out correctly out of the presentation, or was I incorrect?

Mr. Tortorich: So the Stone building has a few deficiencies. One is that by law it cannot be used as a hospital beyond 2030 and possibly beyond 2013. Two, even is the State of California OSHPD was not involved, even by the Palo Alto City code it is significantly deficient in many areas seismically, and would have to undergo a very significant seismic retrofit which would most likely alter significantly the architectural character of the building.

Separately the intense mechanical systems that are required to do medical research, do clinics work, or to be a hospital building, which it can't be, would require extensive renovation of the building. It was designed to be more naturally ventilated than it was mechanically ventilated, but the codes now in healthcare and in research require that you mechanically ventilate the spaces significantly. So to install that mechanical work both the equipment and to distribute the air would dramatically alter the character of that building beyond recognition.

Council Member Scharff: We are obviously planning on having a plaque somewhere that commemorates the heart transplant?

Mr. Tortorich: Absolutely for the heart transplant, and probably do something else to commemorate the work that had gone on in that building over time and the architecture that was done.

CC2.25

Council Member Scharff: Now, what is exactly going on that site? What kind of new activities would be done on that space?

Mr. Tortorich: Outpatient clinics and medical offices. Outpatient clinics don't have to be permitted by the State of California but they have specific requirements administered by the State of California. They are very similar to hospitals in all features except for the structural aspects. The structural aspects are more in keeping with the City of Palo Alto's codes.

Council Member Scharff: After the building is torn down and the new space is there you said the activities that will be there are still outpatient clinics?

Mr. Tortorich: Yes, outpatient clinics, and faculty offices.

Council Member Scharff: Alright. Thank you very much.

CC2.26

Mayor Burt: Other questions or comments? Then I will take a moment. I want to return to an issue that Council Member Price brought up but I want to ask for a clarification from Staff. The substation is on City property but the treatment of Quarry and having that Village Concept and the pedestrian elements, those are part of mitigations under the Transportation, is that correct? How does that tie-in?

Mr. Williams: Well, there are a couple of ways. One is they are part of the Village Concept so that Alternative does embody the interconnectivity from the transit station down to the hospital.

Mayor Burt: The Village Concept is tied in with both the Land Use and the Transportation mitigations?

Mr. Williams: Yes, those components are part of both. I don't know that all of the Village connectors are considered mitigations under Transportation. We might ask Cara to respond.

Cara Silver, Senior Assistant City Attorney: There are aspects of the Quarry connection that are mitigations. There are aspects that are project components suggested by applicant, and there are aspects that are portions of the Village Concept.

CC2.26 Con't

Mayor Burt: Okay, so that helps me. The reason I bring it up is I wanted to make sure that we are on sound footing of looking toward the entire treatment of Quarry as part of the mitigation. Even though I think it is a very small economic impact to do something more along the lines of what Council Member Price was suggesting, I do think that when I saw that video that substation stood out like a sore thumb. If we are looking at the entire treatment of Quarry as how it really makes this a Village Concept and one that will be much more pedestrian used I think that even though that is a City owned substation, doing more treatment to that could help that whole thoroughfare there that is an important part of our Transportation mitigation.

CC2.27

I also wanted to speak briefly on the height issues and the impacts because this is a comment period from us on the environmental impacts. We have elsewhere in the City our height limitations but I think there are really two aspects to it. One is what is spoken of in the report and whether it impacts the viewscape. The other is really an urban design element. Within the urban design element that has to do, in my recollection of the pretty detailed discussions around the Comprehensive Plan adoption and subsequent to that, is that it really has to do with the urban feel in our downtown areas more than it has to do with an area that is more isolated like this. I just am less sensitive to the height impact in this area than I would be in our core urban development areas near our downtowns, and those aspects. We still have to look at those impacts on the viewscape and that is a legitimate concern.

CC2.28

On the historic part, we may not have had the first human heart transplant here, but I believe we did have the first dog heart transplant there. I remember that dog very well. I got a tour in high school and he still barked.

On a very quick side note, we have to make sure that we have our other historic elements. There is a well forgotten that I insist is true that Charles de Gaulle did come to see the Stone Building in I believe early 1960. Ty Cobb did escape from the ground floor of the Stone Building to never be allowed inside again. So those little sidebars I just couldn't pass up, I am sorry.

CC2.29

Council Member Holman: Yes, thank you. I will leave the viewscape for the Hoover Pavilion alone other than to say I think there is still an impact there.

CC2.30

The role of the HRB, in reading the Planning Commission minutes, and seeing the description from the Director there of their role, I guess it is not clear to me how the ARB, Planning Commission, and Council is going to get clear comments from them if they are not giving direction

and they are just commenting. So the question that just came up earlier this evening of Planning Commission is like was there a consensus? So if we don't have consensus comments from the HRB how are we going to know what their direction is? That is the body in the City that knows the Secretary's Standards. So I am not quite sure how it works that when we are doing CEQA review that we are binding ourselves to the Ordinance. Maybe City Attorney could answer that for me. How is that we are binding ourselves to our City Ordinance when we are doing CEQA review and we are trying to utilize the body that has the expertise, but we are tying their hands because these buildings are not on the Inventory? It seems like a rat in a maze kind of situation.

Ms. Silver: We have had several conversations about the role of HRB internally. There is a possibility that the Council can make a referral to the HRB for further review as opposed to just reviewing the CEQA documentation. So you may want to make a very limited referral and then the HRB will make a recommendation to either Planning Commission or directly to the City Council. We are still exploring that piece of it.

CC2.30 Con't

We have determined that the HRB, because the property currently, both Stone and Hoover, are not on the Inventory the HRB does not need to review this application formally. So those are our preliminary thoughts. Perhaps Dennis Backlund would like to offer further comments on this.

Council Member Holman: Yes, if the Preservation Planner would come to the podium.

Dennis Backlund, City Planner: Regarding the HRB, one factor about the Board that is unusual in Palo Alto and not common to all cities in California is that it is a certified local government. This means that there is a special contract between the Board the State Preservation Office that monitors the Board, checks their resumes, requires special training, and therefore the HRB is the City's only State Certified Board focusing on a particular specialty that is pertinent to this environmental review. Therefore it can be regarded as a valuable resource.

The buildings are not on the Inventory, which means that there is not a formal requirement through the Municipal Code for them to do a review where they would take a formal motion. So of course we leave this to the Council and the City Attorney to work out how they should review this, but their special expertise is not in question.

Council Member Holman: Thank you very much. So is Staff going to get back to us about what our options are about that, or when we should make such a direction? What is your advice?

Mr. Williams: I think we will get to you. I think we need to find a way to incorporate the HRB's comments to you. I think the dilemma was more one of as you started out with whether they are voting on a consensus or majority recommendation to you or whether they are making a group of comments to you. Certainly on the EIR that is all they are doing is the comments. We take all the comments and respond to them. On the project itself we will come back to you and try to let you know where we think the best way to inject that is and look for ways to get a consensus recommendation or a majority recommendation to you.

Council Member Holman: Thank you. I appreciate in the long run it is going to save time and provide clarity. So I appreciate that.

CC2.31

A couple of comments about Visual Quality. Building height, if the video flythrough could be put back up I think it would be helpful. I would concur somewhat with the comments of the Mayor that height in itself isn't so much a concern. I was struck by something though in seeing the video. In comment there were examples given of heights of other buildings in Palo Alto and on the Stanford campus that are of significant height. I think a comparison of footprints is important. That is one place here. One of the things I was struck by is because of the height and the mass combined there is a barrenness aspect to the background there. I think there were a couple of other places where that was obvious too, where I was just struck about there is no greenery, there is no foliage, and it is just building. So I think there is a relationship between height and open space that needs to be considered in terms of mitigating the visual impacts. I think that is my only other comment for this section.

Mayor Burt: Okay. I don't see any other lights on this section. So in that case we can return to Item 14 A, which is the Project Description, Land Use, Population and Housing, and Public Service Chapters and pick up where we left off a week ago. Is there anyone who would like to either ask questions or provide comments? Council Member Yeh.

CC2.32

Council Member Yeh: Thank you. I did want to just have a chance to ask about the methodology used for the housing, and just understand the preparation for the EIR. I know that the basis for what appears in the EIR is the current percentage of employees that work for the hospitals and live in Palo Alto. If someone could walk me through that methodology it would be helpful. Was that the only one looked at or were alternatives looked at?

David Doezema, Kaiser Marsden Associates: Just to summarize we prepared the Housing Needs Analysis, which is Appendix K to the DEIR. To get to your question, we in looking at the different types of

adjustments that could be made to reflect commute and where the workers at this hospital could live we looked at also the Census 2000. It also provides a ratio of workers who both work and live in Palo Alto. That is a 14.3 approximately that both live and work in Palo Alto according to the 2000 Census, whereas the Stanford data, which was applied in the DEIR, indicates about eight percent.

Council Member Yeh: How does that compare with for example a calculation of the housing impact fee? If this were a for profit developer for example, using the City's methodology for calculating, what would be the equivalent versus just looking at the existing percentage of residents.

Mr. Doezema: I think the impact fee wasn't set directly based on that Census relationship. I am not sure of the exact methodology that was used to set the existing impact fee. I don't believe it was a specific commute relationship that was used like this.

Council Member Yeh: I can turn to Staff to see if they know.

CC2.32 Con't

Mr. Williams: I am not aware of what the specific percentage was. I know the resultant fees that I think we reported before cover approximately 16 or 17 percent of what the estimated cost would be to create those units. I would have to go back and see what the basis was.

I think the dilemma here was being in an Environmental Impact Report situation and we need to have something factual to kind of base what that estimate comes from, and the eight percent equates to what the current percentage is. It could be more than that but we don't necessarily have a basis.

Now from a policy standpoint the Council can certainly look at, as you get to review the project, where you would like to set a policy target for percentage of housing. That is not what the EIR necessarily has to look at, but as a policy matter if the Council wanted to have a higher percentage then eight percent accounted for in some ways then that can be done through Conditions of Approval, Development Agreement, or the various methods that have been outlined in the document as possible approaches to the housing.

That is what makes this housing no nebulous in this is, we had that discussion, we have that menu that I think Council Member Schmid referred to a couple meetings ago of there are several ways to try to address this. In terms of trying to address it in the DEIR based on some factual number that we can hang our hat on, the eight percent is the most obvious one.

CC2.32 Con't

Council Member Yeh: So I guess it gets to because there is on the Land Use side a request for new zone then I think Council Member Scharff had discussed what appears in the EIR I think then directly relates to mitigations. Then we have the Development Agreement, which is separate. I know that is a different discussion. I think for me just understanding, I don't know how frequently this kind of request has come before the City in terms of land use to create the zone. So given that there is not much historical context for then kind of seeing this analysis, knowing what is going to be really relevant to the mitigation side, and what is going to fall outside of mitigation that is relevant to environment impacts I think it is just so important to have that clarity. Once it is pulled out of mitigation context and then it becomes more subject to I think negotiations, having that clear factual basis, knowing the methodology, getting agreements on that methodology I think is really what will drive that particular issue for me forward with all the parties involved.

Mr. Williams: We will go back and look at our housing nexus study too and see if that gives us any guidance for this.

CC2.33

Council Member Yeh: Otherwise I know since the last session was focused on this new proposed zone it is just something that I as an individual Council Member I did want to express my openness to. I did think that there are a lot of important services provided by the hospital that I think Stanford has always been seen as a leader within the health field. That even within the context of other hospitals going through their rebuilding the position of Stanford as one of the preeminent academic hospitals I think is something that factors into my decision process and seeing this request for a new zone. So I just wanted to go on the record with that. Thank you.

CC2.34

Mayor Burt: Other Council Members? I will just add one item. There was concern at the Planning Commission over the sequencing of this process given that we are looking at significant changes to our Comprehensive Plan kind of in response to a project proposal rather than deliberately setting up this hospital zone in advance. I would just say that while I agree with them in the abstract, we have had this project in the works for four years or so, and I think that we have had ample opportunity to look at those impacts. It might be ideal to have gone in the sequence that they were advocating. I think from a practical standpoint that we have an obligation to take it in the sequence that we are, and that we have had ample opportunity to really look at it in the context of the Comprehensive Plan, even though our Update will formally follow approval of this project in all likelihood. I don't see that as a barrier to proceeding with the hospital zones for instance. Council Member Schmid.

CC2.35 Council Member Schmid: I guess I just have a question on procedure for Staff. We have been engaged in this process for awhile and we are now in a formal process of reviewing. I guess from my perspective the parts that are going to have the biggest and longest lasting impacts on Palo Alto are housing and traffic. In both of those the mitigations or the nexus we keep talking about are based upon models that seem to me to be biased or flawed. I raised this issue a year ago on the traffic model. I raised it the other night on the housing model, which is based on the same thing. I did read in the interim the new traffic model, which is the same as it used to be. So I guess I am just wondering what our role is. We can raise these issues and say we are representing the public in some way. I would think one of the responses would be here is a simply couple page statement that addresses the issues you raised, and it doesn't seem to happen. We end up in the same place, and now we are getting close to decision points and we are still there. So what is the process we are going through and what emerges from this process? I would think one of the outcomes should be a simple and straightforward answer to fundamental issues on housing and traffic. What can we look forward to?

Mr. Williams: Thank you, Council Member Schmid. I am not sure I am understanding exactly what you are getting at as far as what you are looking to. I will say that the models we have to use are somewhat ones that we need to be able to point to and say that there is some consistency or commonality to them with common practice out there used by other cities, etc., etc. The traffic model you mentioned is essentially the same. I think there have been very significant changes in the last year in the traffic model that we will talk about in a few weeks when we talk about Transportation. So we did do I think quite a bit of work to try to modify that to be more Palo Alto specific. The housing, you are right, we are basically using what we have. Although we used the ABAG year that we felt was sort of most closely related to the current circumstances.

Our hope is that ultimately we do get to a point where the housing determination is made, how much housing is necessary, what is the technique, probably through to some extent the mitigations, but also through the Development Agreement too. Incorporate that and then on the traffic side what are the key mitigation measures that we outline to try to address those traffic impacts. Yes, it is all based on some models that certainly could be challenged and have been challenged in the past. I think Rod would like to add to that.

Mr. Jeung: I do want to add to that because it is a very fundamental point. It is something that you raised at the last Council meeting that had to do with the voracity or the use of the ABAG forecasts. I think

because it is a concern and probably to others in the City it is incumbent upon us in our Responses to Comments to go ahead and develop a response that will help the public and yourselves understand the use of those different models, including the derivation, the methodologies inherent in them, how they are used for traffic forecasting, how they are used for population and housing forecasts, so that everyone has a common understanding of how they are used. It, of course, may not satisfy you because I know you have some very legitimate concerns about how the ABAG forecasts are used. Again, the environmental document is a public information document and to the extent that we can provide a better explanation of how those models are used, and how those forecasts are developed it can be beneficial.

Council Member Schmid: Good thank you.

Mayor Burt: Council Member Holman.

Council Member Holman: Yes, just one. I guess you would say it is a procedural question. Having to do with Comprehensive Plan compliance or conformance, the approach that is being indicated in the DEIR is a change of the Comprehensive Plan, and that is indicated as a mitigation. I am not understanding how that could be a mitigation because we don't change the standards for other things to provide mitigations. It would seem to me that that would later be a policy decision to be made, which well may be made. I am not understanding how we can change the Comprehensive Plan and say that is a mitigation. We don't change out air quality standards, we don't change our traffic standards, and we don't change any of our other standards. So procedurally I am wondering how that is a mitigation as opposed to a policy decision to be made at a later date.

CC2.36 Mr. Jeung: I am going to start off the response, and I am more than willing to be corrected as I go along with the response. There is always a tricky issue that comes up when you have any sort of a large-scale project, or even a small-scale project that as part of that project involves a general plan amendment, or in this case a new zoning district. You heard some other speakers talk about the Menlo Gateway project in Menlo Park that proposed a general plan amendment and a new zoning. We have done other hospital projects where they similarly have come up with new hospital districts as part of the entitlement process.

So while the proposed project is coming forward with a specific development application and inherent in that talks about a development program, circulation improvements, etc. it also identifies the required entitlements in order to accommodate that project. So I am parsing hairs a little bit here in the sense that I am describing or thinking of the

CC2.36 Con't

hospital zone and the Comprehensive Plan Amendment as part of the entitlement process, almost part of the proposed project rather than a mitigation measure. What we need to do, and what the City needs to understand in the Environmental Impact Report is that we are looking at the impacts associated with making those changes. So when we look at the physical changes that occur with the hospital and its height, and its mass, and its scale, and the resultant traffic, etc. we are looking at the implications of going forward with those entitlement requests that have been made by the applicant. So in essence you are looking at both the development application, the zoning district, the Comprehensive Plan Amendment all as part of a package, and we are describing the impacts of all of those within the Environmental Impact Report.

Council Member Holman: Appreciate the description but I am still not seeing why. We are not going to argue the point. I don't want to argue the point, but I don't understand why we couldn't just say that there is an impact, so be it, we will make a policy decision later, and the project will conform to the new proposed hospital zone. So just a comment.

Mayor Burt: Council Member Price.

CC2.37

Council Member Price: The comment was made earlier as it relates to the number of people who live within the City of Palo Alto and the environs that would be part of the commuting, etc. I know that is a separate issue related to Transportation. My basic question is the Census data from 2010 you mentioned earlier that we are utilizing 2000 data. Are we going to miss a window here to use the more current Census data? When is the 2010 data available? Is it going to be available in time to be utilized in this process?

Mr. Doezema: The 2010 Census actually is not going to include comparable data to the 2000 Census. That data set has been replaced by the American Communities Survey. Although I have not looked up to see what the number is, the 2008 American Community Survey would have comparable data, which is available now.

Mayor Burt: Any other questions or comments? Okay, I think that concludes item number 14 and we will just move onto Council Member Questions, Comments, and Announcements.

Council Member Price: Excuse me I did want to make a quick comment.

Mayor Burt: Okay, Council Member Price.

Council Member Price: This is sort of related to process in terms of ensuring that I recognize we have a lot of meetings coming up, Public Hearings, related to the environmental work here in front of us. I just wanted to make sure and just make the observation that if there are citizens that want to speak and we get to this very, very late in the evening is there anyway to really look at is it possible to say for example put the Proclamations later in the evening and start our kind of specific Public Hearing items a little bit earlier, so that citizens that do want to comment on this document have a real opportunity to do that.

The other thing I would like to observe is I think the schedule we have before us is great. It is very ambitious and I am all for keeping that. If we find in July or prior to the first or second week of July that there appears to be a need to add an additional meeting, I am reluctant to say this, to ensure that the community members have an opportunity to speak. I don't know if my colleagues would consider such a thing. At this moment it may be premature, but if there are people who want to speak, and by the time we get to this item it is very late in the evening. What are other people's observations about that?

Mayor Burt: Council Member Schmid.

Council Member Schmid: I would just like to second that. I think it is an important element and we often find ourselves doing as the last item on the Agenda. So the opportunities to discuss come after waiting three hours at 10:30 or eleven o'clock at night. So it might be good to have some targeted dates where we say we will do this by eight o'clock or first thing on the Agenda, and announce it so that people know that. As Council Member Price, maybe putting in a special meeting where we announce it would just be for a two hour public comment on the whole thing, the wrap up, the mitigations, or some important element of it. So that makes a lot of sense.

Council Member Price: Could I ask what the Staff's reaction to that would be? I know we don't meet often enough.

Mayor Burt: Before we go into that we may be able to partially answer this by looking at our Tentative Agendas. I think what I am hearing is a concern to make sure that the wrap up session has an ample public comment opportunity at a good hour, after we have had the input and the analysis that has gone on in the Planning Commission meetings and here. That is scheduled for Monday, July 26. We have at this point in time a fairly light Agenda. The only other item on Action Item is the College Terrace Residential Parking Permit Program. I don't even know if that is time sensitive.

Mr. Williams: We may be able to move that or it may actually end up as a Consent Item instead of an Action Item.

Mayor Burt: Right. At this point in time we do not have a Study Session or a Closed Session scheduled for that meeting. So as far as our visibility allows at this point in time it looks like we have that blocked out real well. That has been part of the effort to try to at least at that end of the schedule to really devote ourselves to this topic as we wrap it up in that meeting.

Council Member Yeh. I am sorry, before we do that, did Staff have any other comments in response to Council Member Price's concerns?

Mr. Keene: Well, Mr. Mayor the only thought is if we are going to get to that point to get to it sooner, to identify that extra date sooner rather than later, as opposed to the last minute. Since we do get into the summer schedule and people are coming and going and that sort of thing.

The other thing I would say is I know that late afternoon or early evenings are difficult but occasionally for something special I would suggest that you might think about that. Sometimes if the accommodation of the public is such that we don't just always think about starting at six o'clock or seven o'clock and trying to figure out how to get all the business done. Not that it would be a regular practice, but you go to a County Board meeting and they are meeting all day at times too.

Mayor Burt: Council Member Yeh.

Council Member Yeh: I just wanted to express appreciation for that consideration of tweaking. I think every time we meet there are big topics for the DEIR. I just want to express my openness to it where if there is a set of issues that will be discussed, and we see that the public comment stack is bigger than others that there might be consideration for bumping that Stanford item up earlier in the Agenda if there just happens to be a large number of comment cards submitted. I think that would reflect just – and I think we have been pretty sensitive to that.

Mayor Burt: I will just add so everybody is bearing in mind I believe that the other two scheduled meetings at the Council are on July 12 for the Transportation, Air Quality, Climate Change, and Sustainability, which could be very substantial. This morning we looked at pushing out the 7:30 Study Session on Council Priorities Work Plan to July 19 because the Stanford component on that night is Noise, Geology, Soils, Seismicity, Hydrology, and Hazardous Materials a less substantive issue

in all likelihood. So that change has just been made to try and balance out those two meetings. So I think the two big ones we have are on July 12 and we do have a Closed Session on labor at six o'clock scheduled. Then no Study Sessions after that and this is the only scheduled action item for that night.

Council Member Holman: Just to support and appreciate Council Member Price's raising this issue. Appreciate that it looks like there are some opportunities to forward. My anticipation is the further we get into this process and the longer the DEIR has been out there the more public comments that we are going to get. That kind of traditionally is what happens. So I appreciate we have some opportunities to hear from the public earlier and make more accommodation for that.

COUNCIL MEMBER QUESTIONS, COMMENTS, AND ANNOUNCEMENTS

Mayor Burt reported on a meeting held last week with the High Speed Rail (HSR) lobbyist who provided an update to the HSR Committee. On June 9, 2010, Chair of the High Speed Rail Authority, Curt Pringle met with the Mayors from Mountain View, Menlo Park, Atherton, and Palo Alto. He provided a tour of some of the right-of-ways and impacted areas of the future HSR. He reported that TheatreWorks received four Tony awards on June 13, 2010.

ADJOURNMENT: The meeting adjourned at 11:20 p.m.

ATTEST: APPROVED:

City Clerk Mayor

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CC2. City Council Hearing, June 14, 2010

CC2.1 *This comment is a reiteration of comments from the Planning and Transportation Commission (Commission) hearing on June 9, 2010.* Please refer to PTC2 for responses regarding the demolition of the Stone Building complex.

CC2.2 *This comment is a reiteration of comments from the Commission hearing on June 2, 2010.* Please refer to Response PTC1.1 regarding the height of the proposed SHC Hospital modules.

CC2.3 *The commentor requests that a significant entrance or gateway to the Main SUMC Site should be located at Quarry Road to mitigate some of the visual impacts identified in the Draft EIR.* This comment was not stated at a previous Commission hearing. As stated in the Draft EIR in Section 3.3, Visual Quality, the SUMC Project would have a less-than-significant visual quality impact with the incorporation of mitigation. As discussed on page 3.3-26, implementation of Mitigation Measure VQ-2.1 on page 3.3-39, which would require the SUMC Project to adhere to the City's Architectural Review process, would reduce the significant impacts on on-site character to less than significant. As such, no further mitigation, including gateway features, is required by CEQA.

In addition, gateway features are included in the SUMC Project site plans and considered in the landscaping discussion on pages 3.3-34 and 3.3-37 of the Draft EIR. As required by Municipal Code Sections 2.21 and 18.76.020(b), the SUMC Project has undergone preliminary Architectural Review and SUMC Project plans are being considered by the Architectural Resources Board (ARB). Included in the preliminary Design Guidelines for the SUMC Project, as submitted to the ARB, are designs for "Campus Gateways." These gateways would be shaped by the relationship of building density and formal open space to provide visual clarity, establish hierarchy between entrances, and present various circulation paths.[1] As such, the designs of the new SHC Hospital building, the LPCH Hospital building, and Hoover Pavilion Site would include prominent entrance features. However, it is important to note that the SUMC Project design is still in progress and could continue to be altered.

The following is a description of the existing and new gateway features under the SUMC Project, as currently proposed by the SUMC Project sponsors.

SHC Hospital. The existing SHC Hospital has several gateway features that would remain under the SUMC Project. The Pasteur Mall gateway currently has a monument sign that reads "Stanford University Medical Center." In addition, there is an existing fountain in front of the Stone Building complex. As part of the proposed SHC clinic/medical office

[1] Stanford University Medical Center, *Stanford University Medical Center Campus Design Guidelines,* June 24, 2010.

building, this fountain would either be retained or reinterpreted in a more environmentally appropriate landscape and hardscape expression. There is also an existing fountain at 1101 Welch Road that was designed by Lawrence Halprin. The design for the new SHC Hospital building would include a slight relocation of this fountain to an area near the Emergency Department (ED), along Pasteur Drive.[2]

The gateway to the SHC Hospital has traditionally been Pasteur Mall, which terminates with the Stone Building complex, the visually distinctive fountain, and other landscape features. However, as explained by the SUMC Project sponsors, the SUMC Project would not focus on the termination of Pasteur Mall. Although the existing fountain would be retained, as described above, the new gateway to the SHC portion of the SUMC Sites would be at the proposed SHC Hospital building entrance, which would be the center of activity. The ground floor of this area would include a promenade with a café and retail component and the surrounding open space would encourage the movement of medical students, faculty, employees, patients, and visitors to the various portions of the Main SUMC Site.[3] In addition, the new SHC Hospital design would include a circular entry court for patient drop-off. This entry court would be surrounded by native oak trees and would consist of distinctive landscaping, informal seating, and an information kiosk.[4]

LPCH Hospital. The proposed LPCH building would mark another entry to the Main SUMC Site. The building design for the LPCH Hospital building would feature a prominent vertical element, which would function as a way-finding tool for the new building. This patterned glass portion of the façade would feature the LPCH logo and would enclose a stair tower that will be used by LPCH Hospital staff. This element would be visible from Quarry Road, and would assist in directing patients and visitors to the LPCH Hospital's main entry court. A "Rain Garden" would also be adjacent to the entry, which would collect rainwater from the paved surfaces of the outdoor gardens.[5]

Hoover Pavilion Site. An existing fountain is located in the center of the original drop-off circle to the east of the Hoover Pavilion and would be retained as part of the SUMC Project development. In addition, the location of the medical office building at the Hoover Pavilion Site would provide an open gesture along Quarry Road. Located in this area would be transit stops that would allow access to the Hoover Pavilion Site. Along Quarry Road there would be a plaza that would connect the entry to the proposed medical office building with the Hoover Pavilion and the proposed parking structure.[6]

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[2] ARB Submittal for New Stanford Hospital Preliminary Review #2(09/02/10) Sheets ARB-101 & 106.

[3] Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children's Hospital, City Council Hearing, June 14, 2010.

[4] ARB Submittal for New Stanford Hospital Preliminary Review #2 (09/02/10) Sheets ARB-101 & 106.

[5] ARB Submittal LPCH Preliminary Review #1 (05/20/10) Sheets ARB-030, 035, 036.

[6] Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children's Hospital, City Council Hearing, June 14, 2010.

CC2.4 *This comment is a reiteration of comments from the Commission hearing on June 9, 2010.* Please refer to PTC2 for responses regarding the relocation of medical office buildings from the SUMC Sites to Welch Road. In addition, please refer to Master Response 8 for the range of alternatives analyzed in the Draft EIR and variations to the proposed alternatives.

CC2.5 *This comment is a reiteration of comments from the Commission hearing on June 9, 2010.* Please refer to PTC1 and PTC2 for responses regarding the impacts of the proposed medical office building at the Hoover Pavilion Site on the existing Hoover Pavilion structure. In addition, please refer and to Staff-Initiated Change 5 for further discussion regarding the impacts of the new buildings under the SUMC Project at the Hoover Pavilion Site.

CC2.6 *The commentor expresses support for the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC2.7 *The commentor suggests landscaping and open spaces at the SUMC Sites.* Proposed landscaping is generally described on pages 3.3-34 and 3.3-37 of the Draft EIR, Section 3.3, Visual Quality. The Draft EIR describes proposed open spaces, walkways, lighting, vegetation, and other decorative features, but does not list the specific species of plants to be installed. The Architectural Review process would consider whether the SUMC Project adequately incorporates landscaping. The ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The City Council would then review the recommendations and make findings, as to whether the amount and arrangement of open space are appropriate to the design and the function of the structures, and the planning and siting of the various functions and buildings provide a desirable environment for occupants, visitors, and the general community.

CC2.8 *The commentor suggests open space mitigation elsewhere to reduce the height and bulk impacts of the SUMC Project.* The impacts to visual character and quality would be mitigated by Mitigation Measure VQ-2.1. The Architectural Review process would consider, among other factors, whether the SUMC Project has a coherent composition and whether its bulk and mass are harmonious with surrounding development. City Council would then determine if the design promotes consistent transitions in scale and character and that the amount and arrangement of open space are appropriate to the design and function of the structures. Mitigation Measure VQ-2.1 would also address impacts on hillside views from local streets and other vantage points, as discussed on pages 3.3-40 through 3.3-42. Mitigation Measure VQ-2.1 would reduce visual quality impacts to less than significant. Additionally, open space protection in areas other than the SUMC Sites would not further mitigate the increased density impacts to the SUMC Sites. As such, further mitigation is not warranted. Protection or development of off-site open space

would not alter the visual character of the SUMC Sites and would, therefore, have no mitigating effect on the height of the buildings on the SUMC Sites.

In addition, as stated on page 3.14-9 of the Public Services Section, the SUMC Project proposes to expand the existing open space at the SUMC Sites. The open space at the SUMC Sites would include walkways, open plazas, and landscaped areas for employees, patients, and visitors. The SUMC Project would also incorporate new sections of open space and small grass fields, increasing pervious surfaces by 23 percent over existing conditions. Several of these proposed open spaces would be visible from public areas, such as the landscaped gateway at the corner of Welch Road/ Quarry Road, the Hoover Pavilion entry lawn, and the refurbished Pasteur Mall. In addition, the SUMC Project sponsors would provide access to Stanford University's fields for SUMC employees. Therefore, even though the SUMC Project would increase height and bulk at the SUMC Sites, additional open space would be included and access to other open space areas would be available.

CC2.9 *The commentor states that the visual analysis in the Draft EIR is inadequate because it chooses vantage points that would not have views of the SUMC Project buildings*. The Draft EIR includes visual simulations of the SUMC Project from five vantage points. These vantage points were selected based on identified viewer locations or roadways, and on vantage points that were identified during the scoping process as areas of concern. As described on pages 3.3-39, these locations represent views from which the SUMC Project would be most visible and as such represent the worst-case impacts on views. Therefore, the locations for the Hoover Pavilion visual simulations were selected because it was determined that these views would have the greatest visual impacts.

Figure 3.3-7 on page 3.3-25 of the Draft EIR provides a map of the five vantage points from which the visual simulations are depicted. Figures 3.3-8 through 3.3-10 in Section 3.3, Visual Quality, show views of the Main SUMC Site from visually sensitive locations. The alteration of public viewsheds and view corridors under the SUMC Project is analyzed under Impact VQ-3. As explained, a change in view is considered adverse if the resulting development pattern demonstrably conflicts with the Comprehensive Plan. Due to building massing and vegetation that would remain under the SUMC Project, direct and unobstructed views of the site or the proposed buildings from other locations are not anticipated. However, as shown in these figures, the SUMC Project buildings at the Main SUMC Site would be visible from Quarry Road/Vineyard Lane, Sand Hill Road/Pasteur Drive, and Sand Hill Road/Arboretum Road. Implementation of Mitigation Measure VQ-2.1, which is presented on page 3.3-39 and would require adherence to the City's Architectural Review process and recommendations, would ensure that the visual impacts would be less than significant.

Figures 3.3-11 and 3.3-12 on pages 3.3-35 and 3.3-36, respectively, of the Draft EIR show views of the Hoover Pavilion Site from visually sensitive locations. As shown in Figure 3.3-11, most of the Hoover Pavilion, including its frontage, would still be visible from Quarry Road even after construction of the proposed medical office building. As also shown, the medical office building and the parking structure at the Hoover Site would be visible and not entirely blocked by vegetation, as the commentor suggests. However, it is important to note that although Hoover Pavilion is a visually distinctive structure, it is not a visually protected resource under the Comprehensive Plan. Therefore, visual impacts to this structure would not be considered significant for the purposes of the Draft EIR. Nonetheless, additional visual simulations and design drawings for the Hoover Pavilion Site are included in Appendix DD of this document.

CC2.10 *The commentor states that the height of the SHC Hospital modules is not necessary for the hospital to function.* This comment pertains to the design of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the SHC Hospital module height, as explained by the SUMC Project sponsors. The Building Code itself does not specify the height or square footage of hospitals; these details are dictated by the hospital program envisioned by the SUMC Project sponsors in order to meet the future demands. The SHC Hospital building would need to be built vertically for efficiency purposes, thereby requiring the building heights as proposed. The upright alignment of the new SHC Hospital building would allow for vertical circulation in the form of elevators, rather than requiring patients to move through lengthy public corridors. The immediate adjacency between the floors would organize patient movement privately and safely in the most efficient way possible through vertical transportation.[7] In addition, Building Code ventilation and structural requirements result in a greater floor-to-floor height for a hospital than a commercial office building. The typical floor-to-floor height of an office building is 10-12 feet, while in a modern hospital it is 16-20 feet.[8] As such, the height of the SHC Hospital building is necessary for the functionality of the Hospital.

As outlined on page 3.3-39, Mitigation Measure VQ-2.1 would be implemented to reduce the impacts to visual character and quality. This mitigation measure would require the SUMC Project sponsors to adhere to the City's Architectural Review process and would reduce the impacts to less than significant.

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[7] Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children's Hospital, City Council Hearing, June 14, 2010.

[8] Stanford University Medical Center, "Guide to Key Community Issues for the Stanford University Medical Center Renewal Project," June 2010, accessed on October 14, 2010 at: http://www.stanfordpackard.org /sites/default/files/pdfs/report_0610.pdf.

The commentor also cites two examples of recent hospital buildings that were constructed to a height of less than 70 feet. It is important to note that the SUMC is not only a local or regional hospital, like the hospitals mentioned by the commentor. The SUMC serves patients mainly from Palo Alto and the San Francisco Bay Area; however, the hospital also provides medical services for patients nationally and internationally. As such, it is necessary for the SUMC to be larger and more expansive than regional hospitals in the area. As explained on page 2-22 in Section 2, Project Description of the Draft EIR, the SUMC Project requires additional floor area over what is currently at the SUMC Sites due to existing spatial constraints and the growing demand for outpatient services. Therefore, in order to meet the objectives of the SUMC Project, the hospitals at the Main SUMC Site would need to be expanded.

However, several alternatives are discussed and analyzed in Section 5 of the Draft EIR, Alternatives, that seek to reduce the building program of the SUMC Project. No Project Alternative A, No Project Alternative B, Reduced Intensity Alternative A, and Reduced Intensity Alternative B would reduce the floor area and construction of the SUMC Project. Please refer to Master Response 8 for an explanation of alternatives to the SUMC Project.

CC2.11 *The commentor states that Mitigation Measure VQ-2.1 is inadequate and that the City Council and/or the Commission should have the final say in the SUMC Project design, rather than ARB.* As stated on page 3.3-38 of the Draft EIR, ARB would conduct Architectural Review of the mass and layout, landscaping, and exterior building treatment. ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The City Council would then review the recommendations and make findings, as appropriate, that the design is compatible with the existing character. Therefore, as described in the Draft EIR, City Council would have the final approval regarding the building mass, site layout, landscaping, and exterior building treatments. Please refer to Master Response 11 for a detailed description of the City's review process and ARB's role in SUMC Project review.

For other issues, such as zoning, land use, and biology, the City Council and the Commission would review the SUMC Project for compliance with existing policies, regulations, and general compatibility.

CC2.12 *The commentor requests that trees at the SUMC Sites be transplanted and states that tree removal mitigation measures are inadequate.* Mitigation Measures regarding tree removal are presented on pages 3.9-26 through 3.9-28 of the Draft EIR. Since the publication of the Draft EIR, the mitigation measures regarding tree removal have been revised and further enhanced. As a result of these revisions, an additional mitigation measure has been added, Mitigation Measure BR-4.4B, which requires tree replacement for privately-owned trees. In addition, as included in the Draft EIR, tree replacement for loss of publicly-owned trees is included in Mitigation Measure BR-4.5. Mitigation Measure BR-4.3

addresses tree relocation. For the new Mitigation Measure BR-4.4B, please refer to Staff-Initiated Change 6 for revisions to the mitigation measures as included in the Draft EIR.

The Draft EIR also includes the Tree Preservation Alternative, which would seek to retain as many biological and aesthetic tree resources as feasible. This alternative would also include relocation of some biological and aesthetic tree resources to certain areas surrounding the SUMC Sites, called Tree Relocation Zones. Please refer to Section 5 of the Draft EIR, Alternatives, for a description and analysis of the Tree Preservation Alternative.

CC2.13 *The commentor asserts that the SUMC Project sponsors should provide housing for their workers*. Please see Master Response 7, which discusses the housing demand. Also, see Master Response 8 for a discussion of the Village Concept Alternative, which includes dedication of housing for SUMC employees. In addition, as part of the SUMC Project, a Development Agreement would be approved if such an agreement could be mutually agreed upon. One component of the Development Agreement between the City and the SUMC Project sponsors would be the payment of a housing in-lieu fee in the amount of $23.1 million, which is equivalent to what a commercial project would pay (see page 2-27 of the Draft EIR).

As proposed by the SUMC Project sponsors, the money identified in the Development Agreement would be set aside and used for community projects. City Council would need to decide whether to make a counter-proposal which would allow for alternative use of these funds, or whether to instead accept the proposal of the SUMC Project sponsors. Such funds could be used either for the direct construction of housing units, or as leverage to encourage private developers to construct even more affordable units; however, the exact number of housing units that could be constructed is currently unknown. Whatever number of units is ultimately constructed within the City would count towards the City's affordable housing targets. Please refer to Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption. Also, please refer to Master Response 10 for a discussion of non-CEQA issues.

CC2.14 *The commentor asserts that the SUMC Project sponsors should provide housing for SUMC workers, given that Palo Alto is required to construct low-income housing*. As indicated on page 3.13-14 of the Draft EIR, housing affordability is considered to be a socioeconomic issue. Neither a shortfall of affordable units, increased demand for affordable housing, nor socioeconomic impacts due increased demand for affordable housing, is considered to be a physical environmental impact. Please see Master Response 7, which nonetheless provides a discussion of the SUMC Project's indirect demand for affordable housing in Palo Alto and Section 5 of the Draft EIR regarding the Village Concept Alternative, which includes housing for SUMC employees. Also, as part of the SUMC Project, a Development Agreement would be approved if such an agreement could be mutually agreed upon. One

component of the Development Agreement between the City and the SUMC Project sponsors would be the payment of a housing in-lieu fee in the amount of $23.1 million, which is equivalent to what a commercial project would pay. Refer to page 2-27 through 2-28 in the Project Description of the Draft EIR for a full list of the Development Agreement terms. Also, please see Master Response 12 for a further discussion of the Development Agreement.

CC2.15 *The commentor questions the location of a specific pathway and bridge*. The commentor is referring to a graphic of a red pathway and small bridge that was included in the SUMC Project sponsors' presentation at the public hearing. This graphic was included in the presentation as a metaphor for the "Healing Journey" that was used as the design concept for the proposed LPCH Hospital expansion. As such, the image was not intended to represent a literal bridge that would be constructed as part of the SUMC Project.

CC2.16 *The commentor questions the thought process that went into determining the height of the SHC Hospital towers and requests information on what portion of the SUMC Project is located below grade*. Please refer to Response CC2.10 regarding the importance of the SHC Hospital height.

In addition, the commentor requests information on the functions of the proposed floors below grade. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the SHC Hospital building functions by floor, as explained by the SUMC Project sponsors at the public hearing. One level of the building is below-grade and would house the kitchen, mechanical equipment, electrical services, material management, and lab services. The first two above-ground levels would contain the ED and imaging. The next level above is the technology floor that would contain large mechanical equipment to serve the functional needs of the first two floors. In order to reduce the visual impact of the mechanical equipment, the third floor would feature a garden that would conceal these features. The upper four stories of the building would contain the patient bedrooms.[9]

CC2.17 *The commentor questions why more SHC Hospital activity cannot occur below-grade*. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is an explanation as to why more hospital functions cannot be located below-grade, as explained by the SUMC Project sponsors at the public hearing. The SHC Hospital cannot include a significant amount of the building program underground due to

[9] Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children's Hospital, City Council Hearing, June 14, 2010.

geologic issues. The quality of the soil at the SUMC Sites is not conducive to accommodate several floors of below-grade hospital uses. In addition, the SHC Hospital building would be designed to accommodate base isolation. Base isolation requires shock absorbers to separate the foundation from the structure of the building, to allow hospital operations to continue even after a major seismic event. Seismic safety and compliance with Office of Statewide Health Planning and Development (OSHPD) regulations are foremost in the design process; therefore, more than one underground level at the SHC Hospital building would not be feasible.

CC2.18 *The commentor is concerned with the amount of buffering around the substation at the Hoover Pavilion Site*. Since the substation is an existing condition and not a new feature proposed under the SUMC Project, mitigation to block the substation from view is not required by CEQA. Accordingly, the Draft EIR does not include a mitigation measure to improve existing visual quality at the Hoover Pavilion Site.

In addition, the substation is owned and operated by the City of Palo Alto. Therefore, beautification of this area is outside the control of the SUMC Project sponsors. It has been determined that planting trees at the edge of the substation, along Quarry Road, would be infeasible due to insufficient space between the sidewalk and the fence around the substation. Additionally, the Palo Alto Utilities Department has expressed concern regarding the risk of tree canopies touching the overhead power lines. The SUMC Project would retain the existing planting around the substation, which includes trees, shrubs, and ground cover planted along the Quarry Road side of the substation.[10] As such, since the City's substation is an existing condition, and the SUMC Project would not further degrade the visual character in this portion of the Hoover Pavilion Site, landscape buffering of the substation is not required under CEQA.

CC2.19 *The commentor questions what gateway features would be provided under the SUMC Project*. For existing and proposed gateway features, refer to Response CC2.3.

CC2.20 *The commentor expresses concern that Mitigation Measure BR-4.5 in Section 3.9, Biological Resources, only focuses on publicly-owned trees and not all Protected Trees at the SUMC Sites*. Since the publication of the Draft EIR, the mitigation measures regarding tree removal have been revised and further enhanced. As a result of these revisions, tree replacement for all privately-owned Protected Trees is required under Mitigation Measures BR-4.4B. In addition, as included in the Draft EIR, tree replacement for loss of publicly-owned trees is included in Mitigation Measure BR-4.5. For the new Mitigation Measure BR-4.4B, please refer to Staff-Initiated Change 6.

CC2.21 *The commentor questions the number of Protected Trees to be retained and/or removed as outlined in the Draft EIR*. Since the publication of the Draft EIR, the number of Protected

[10] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

Trees to be removed and retained has been corrected. Please refer to Staff-Initiated Change 6 for corrected Protected Tree numbers.

CC2.22 *The commentor asks why the Hoover Pavilion is considered a historically significant resource in the Cultural Resources Section of the Draft EIR, but is not considered a visually significant resource in the Visual Quality Section.* There is a distinction between a visually protected resource and a historically significant resource.

The City's Comprehensive Plan policies were used in the Draft EIR as a basis for determining visual resources that warrant protection. Since the Hoover Pavilion is not included in the Comprehensive Plan as a visual resource that should be protected, this building was not treated as a visual resource in the Draft EIR. Nonetheless, the Hoover Pavilion is described on page 3.3-37 of the Draft EIR as a "defining feature of the Hoover Pavilion Site and is a distinct element of the SUMC Sites' existing visual character." Section 3.3 of the Draft EIR concludes that since only interior renovations would occur, the Hoover Pavilion exterior visual appearance would not be significantly altered.

As explained in Section 3.8 of the Draft EIR, Cultural Resources, the Hoover Pavilion is considered to be a historical resource for the purposes of the CEQA analysis. Although the building is not protected under the Comprehensive Plan or included on the Palo Alto Historic Inventory, studies were conducted to determine its historical significance. Stanford University's Director of Heritage Services and University Archaeologist evaluated the Hoover Pavilion and recommended that the building is eligible for listing on the California Register of Historical Resources (CRHR) under criterion 3 as an important example of pre-World War II hospital design.[11] The Architectural Resources Group (ARG), a consultant for the City, concurred with Stanford's conclusion and stated that the building is also eligible for the National Register of Historic Places (NRHP) under criteria A and C.[12] As such, the Draft EIR impact analysis considered the Hoover Pavilion as a significant historic resource.

Impact CR-1, on pages 3.8-18 through 3.8-21, discusses the potential impacts of the SUMC Project on the Hoover Pavilion. The analysis examines the impacts to the building, as well as the visual impacts due to the proposed new development. The Draft EIR concludes that the proposed medical office building and the parking structure would be in close proximity to the Hoover Pavilion; however, significant views would be retained. In addition, several non-historic buildings already exist in the surrounding area; therefore, additional modern buildings would not further degrade the visual appearance of the Hoover Pavilion. Please refer to Staff-Initiated Change 5 for further discussion regarding the impacts of the new buildings under the SUMC Project at the Hoover Pavilion Site. As

[11] Jones, L., *Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project*, 2007.

[12] Architectural Resources Group, Inc., Stanford University Medical Center Historic Resource Evaluation and Peer Review, 2009.

discussed under Staff-Initiated Change 5 and Appendix Y of this document, the proposed site plan would not obstruct views of the Hoover Pavilion to the extent that the Hoover Pavilion would no longer be eligible for listing in the CRHR and NRHP.

CC2.23 *The commentor questions why the Hoover Pavilion is not on the City of Palo Alto Master List of Structures on the Historic Inventory*. The Historic Building Inventory for Palo Alto lists noteworthy examples of the work of important individual designers and architectural eras and traditions as well as structures whose background is associated with important events in the history of the City, State, or nation.[13] However, none of the buildings at the SUMC Sites, including the Stone Building complex and the Hoover Pavilion, are listed on the Historic Inventory.

The Historic Building Inventory for Palo Alto was originally completed in 1979. The survey was confined to the area of Oregon Expressway to the south, El Camino Real to the west, San Francisquito Creek to the north and east including the College Terrance neighborhood. This area does not include the Hoover Pavilion Site. The survey studied buildings built on or before 1940 and identified many of the most obvious landmarks in the City, including the shingled houses in what is now known as Professorville, commercial buildings in the Spanish Colonial Revival (or Early California) style, and the works of several major architects. The survey team emphasized architectural design over other aspects of historical importance. In 1997, an update to the 1979 survey was completed in order to add additional sites to the inventory. This survey area included the City limits and considered the Hoover Pavilion for listing. However, the City eventually decided not to add the sites identified in 1997 to the inventory.

It is important to note that even though the City's Historic Inventory does not include the buildings at the SUMC Sites, the Draft EIR considers the Stone Building complex and the Hoover Pavilion as historic resources for the purpose of the CEQA analysis. The fact that the Historic Inventory does not include these buildings does not change the impact analysis and conclusions in the Draft EIR.

CC2.24 *The commentor asks several questions about the integrity of the Stone Building complex. One of the questions pertains to whether the Stone Building complex itself is considered innovative or if it was designed during an innovative phase of E.D. Stone's career*. The Stone Building complex embodies the innovative process of the second phase of E.D. Stone's career. As explained in Appendix I of the Draft EIR,[14] E.D. Stone's work during the second phase of his career has been called both Formalism and New Romanticism. The Stone Building complex, which was completed in 1959, was designed during this pivotal

[13] City of Palo Alto, Department of Planning and Community Environment, "Historic Inventory Category Information," accessed on September 16, 2010 at: http://www.cityofpaloalto.org/depts/pln/news/details.asp?NewsID=539&TargetID=209

[14] Architectural Resources Group, Inc., Stanford University Medical Center Historic Resource Evaluation and Peer Review, 2009.

and innovative phase. The design of the complex was based on the American Embassy in New Delhi, which E.D. Stone created during this same design phase. The Stone Building Complex symbolizes his departure from the International style to a Formalistic approach. The design of the Stone Building complex shares many of the character-defining features that E.D. Stone used on buildings from this period including: concrete grillework, symmetrical façade, massive overhanging eaves, loggias with tall slender columns, reflecting pools, and incorporated landscape elements such as gardens and courtyards.

The commentor also asks whether the Palo Alto Main Library still retains its historic integrity. As explained on pages 3.8-26 through 3.8-27 of the Draft EIR, E.D. Stone built three other buildings in Palo Alto, in addition to the Stone Building complex. These buildings include the Palo Alto Civic Center, the Palo Alto Main Library, and Mitchell Park Library. Unlike the other two buildings, the Palo Alto Main Library retains sufficient integrity and has been determined eligible for the NRHP. As such, contrary to the statement at the public hearing, the Palo Alto Main Library retains its historical integrity.

In addition, the commentor questions whether the interior of the Stone Building complex has been remodeled since the first heart transplant in the United States took place. As described in the ARG Report (included as Appendix I of the Draft EIR), the interior of the Stone Building complex is the most compromised element of the building. Decades of interior remodeling have altered the interior finish to such an extent that the sense of being inside a historic hospital is compromised in many of the spaces: patient rooms have been converted to offices, and the remaining medical treatment areas are thoroughly modern in character. The lobby of the building has been infilled and the historic form is no longer evident. ARG concurs with the SUMC report that the interior designed by Maurice Sands has been compromised.[15]

In addition to the degradation of the interior historic integrity, the Stone Building complex is functionally insufficient. By law, the Stone Building complex cannot be used as a hospital beyond 2013 because the building is seismically deficient. In order to comply with OSHPD standards, the Stone Building complex would be required to undergo a significant seismic retrofit, which would potentially alter the architectural character of the building. Improvements to the mechanical systems would also require extensive renovation of the building. The Stone Building complex was originally designed to be naturally ventilated rather than mechanically ventilated; however, current healthcare and research building codes require mechanically ventilated systems. Therefore, the installation of a new mechanical system would significantly alter the character of the building.[16]

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[15] Architectural Resources Group, Inc., Stanford University Medical Center Historic Resource Evaluation and Peer Review, 2009.

[16] Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children's Hospital, City Council Hearing, June 14, 2010.

Finally, the commentor asks if a plaque would be installed under the SUMC Project that would commemorate the first heart transplant in the United States. The SUMC Project sponsors confirm that a plaque would be installed denoting the first heart transplant and additional features may be installed to commemorate other significant achievements that have occurred in the Stone Building complex.[17]

CC2.25 *The commentor asks what uses and building program would occur at the existing Stone Building complex site under the SUMC Project.* The Stone Building complex would be demolished under the SUMC Project and replaced by a clinic/medical office building and the FIM 2 and FIM 3 buildings. The clinics building would have four modules connected by a center platform and would not be required to be designed to such stringent standards as the hospital buildings at the Main SUMC Site. However, the structural aspects of the building would be required to meet the City of Palo Alto's building code. In addition, the clinics parking structure would be located below-grade at the existing Stone Building complex site.

CC2.26 *The commentor questions the similarities of the mitigation measures proposed for the bicycle and pedestrian impacts of the SUMC Project, presented as Mitigation Measure TR-6.1 on pages 3.4-76 through 3.4-77 of the Draft EIR, and the pedestrian linkages under the Village Concept Alternative.* There are aspects of the pedestrian linkages proposed under the Village Concept, as described on pages 5-35 and 5-38 of the Draft EIR, that are also mitigation measures for the SUMC Project. Additionally, there are aspects that are Development Agreement components proposed by the SUMC Project sponsors. Table 5-8, below, provides a comparison between the Mitigation Measure TR-6.1 proposed in the Draft EIR for the SUMC Project (as revised in this document in Master Response 6) and the pedestrian linkages included in the Village Concept Alternative (as revised in this document).

Additionally, the comment states that the substation along Quarry Road (at the Hoover Pavilion Site) is visually intrusive and that treatments of the substation should be included as transportation mitigation. Since the substation is an existing condition and not a new feature proposed under the SUMC Project, mitigation to block the substation from view is not required by CEQA. Additionally, the substation is owned and operated by the City of Palo Alto and therefore, beautification of this area is outside the control of the SUMC Project sponsors. Please refer to CC2.18, above, for more detail about the substation at the Hoover Pavilion Site.

[17] Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children's Hospital, City Council Hearing, June 14, 2010.

Table 5-8
Comparison of SUMC Project Mitigation Measure TR-6.1 and Village Concept Alternative Pedestrian Linkages

Bicycle and Pedestrian Connections	SUMC Project Mitigation?	Village Concept Alternative?
Enhanced pedestrian crossing at Quarry Road/El Camino Real (12 feet wide, visible markings).		✓
Consider new bike lane route markings through the Quarry Road/El Camino Real.		✓
Evaluate the adequacy of pedestrian/bicycle signal crossing times at Quarry Road/El Camino Real.		✓
New paving to connect Class I shared use path and other pedestrian paths to the east side of the Quarry Road/El Camino Real pedestrian crossing.		✓
Add new ADA accessible median pedestrian refuge at Quarry Road/El Camino Real.		✓
Consider new pedestrian and bicycle actuated signal crossing for off-peak hour crossings.		✓
Provide a connection from the planned Everett Avenue bicycle and pedestrian undercrossing to the El Camino/Quarry Road Intersection.	✓	✓
New impervious surface at this connection.		✓
New pedestrian-scaled lighting at this connection.		✓
New directional signage at this connection.		✓
Enhance all signalized intersections in the Project vicinity, particularly along Quarry Road, Vineyard Road, and Welch Road to include a 12-foot pedestrian crosswalk (signed, marked, and lighted).	✓	✓
Create a bicycle and pedestrian connection between the Stanford Shopping Center and SUMC, not on Quarry Road.	✓	
Incorporate into the Quarry Road corridor, from El Camino Real to Welch Road, improvements to and within the public right-of-way to enhance the pedestrian and bicycle connection, including urban design elements and way finding, wider bicycle lanes, as necessary, on Quarry Road, enhanced transit nodes for bus and/or shuttle stops, and prominent bicycle facilities.	✓	
Install the appropriate number of Class I and Class III bicycle parking spaces as required by the City's Zoning Ordinance.	✓	

Source: PBS&J, 2011; Fukuji Planning & Design, 2009.

CC2.27 *The commentor states that there is less sensitivity to the height impacts in the area of the SUMC Sites than in the downtown areas; however, there still needs to be an examination of the height impacts on the viewscapes in the area.* The alteration of public viewsheds and view corridors under the SUMC Project is analyzed under Impact VQ-3. As explained, a change in view is considered adverse if the resulting development pattern demonstrably contravenes the vision for the City that is expressed in the Comprehensive Plan. The Draft EIR examines views from Sand Hill Road, views from other public streets (including Quarry Road and Pasteur Drive), and views from other vantage points. Based on site reconnaissance and visual simulations developed for the SUMC Project, the Draft EIR concludes that the SUMC Project's potential to alter public viewsheds, view corridors, and views from the Sand Hill Road scenic route would be significant if the SUMC Project were not addressed properly through the City's Architectural Review process.

The Architectural Review of the SUMC Project would consider, among other factors, whether the SUMC Project has a coherent composition, and whether its bulk and mass are harmonious with surrounding development. The ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The Architectural Review of the proposed buildings under the SUMC Project would be required under Mitigation Measure VQ-2.1.

CC2.28 *The commentor notes other significant historical events that have occurred at the Stone Building complex.* In order to determine if the Stone Building complex is historically significant, ARG performed a Historic Resource Evaluation and Peer Review of the Stone Building complex. ARG evaluated the Stone Building complex in relation to the eligibility criteria of the CRHR and the seven aspects of integrity defined in National Register Bulletin 15. Criterion 2 of the CRHR considers a resource historically significant if it is associated with the lives or persons important to local, California, or national history. As stated by the commentor, and on page 20 of ARG's report, Dr. Norman Shumway and Dr. Richard Lower undertook a dog-to-dog heart transplant in December 1959. The dog recipient of the transplant lived more than a week, making it the first successful heart transplant in the world.

However, the visitation of significant historical figures, such as Charles de Gaulle and Ty Cobb, are not considered significant under the CRHR since they were brief and did not yield an important event that contributed to history.

CC2.29 *The commentor states that there would be an impact of the viewscape of the Hoover Pavilion under the SUMC Project.* Please refer to Response CC2.22, above.

CC2.30 *The commentor asks how the City's ARB, Commission, and City Council would get directions or comments from the City's Historic Resources Board (HRB).* The HRB has reviewed the proposed modifications to the Hoover Pavilion Site, specifically the Hoover Pavilion renovation portion of the SUMC Project and a review of the contextual and

historic relationships of the proposed medical office building and parking garage to Hoover Pavilion. Please refer to Master Response 11 for the review process of the HRB and the SUMC Project in general.

CC2.31 *The commentor requests a comparison of building footprints for the buildings in the vicinity of the SUMC Sites.* Outlines of the existing building footprints are provided in Figure 2-5 of the Draft EIR, on page 2-14. Outlines of the existing footprints for buildings to remain in relation to the proposed building footprints under the SUMC Project are provided in Figure 2-10. The figure depicts the footprints of the proposed buildings relative to the existing buildings.

In addition, the commentor states that landscaping and open spaces are necessary to mitigate visual impacts. As stated in the Draft EIR in Section 3.3, Visual Quality, the SUMC Project would have a less-than-significant visual quality impact with the incorporation of mitigation. As discussed on page 3.3-39, implementation of Mitigation Measure VQ-2.1, which would require the SUMC Project to adhere to the City's Architectural Review process, would reduce the significant impacts on on-site character to less than significant.

Proposed landscaping is generally described on pages 3.3-34 and 3.3-37 of the Draft EIR, Section 3.3, Visual Quality. The Draft EIR describes proposed open spaces, walkways, lighting, vegetation, and other decorative features, but does not list the specific species of plants to be installed. The Architectural Review process would consider whether the SUMC Project adequately incorporates landscaping. The ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The City Council would then review the recommendations and make findings, as to the amount and arrangement of open space appropriate to the design and the function of the structures as well as ensuring that the planning and siting of the various functions and buildings provide a desirable environment for occupants, visitors, and the general community.

CC2.32 *The commentor seeks clarification on the methodology applied in determining where SUMC employees would live, and asks if alternative methodologies were considered.* Table 5-5 of the application for the SUMC Project provides the cities and zip codes where existing LPCH and SHC staff live, and also provides the number of LPCH and SHC staff that live in each identified zip code.[18] Percentages of new SUMC employees who would seek to live in each zip code area (e.g., eight percent of new SUMC employees would seek to live in Palo Alto) were based on Table 5-5 of the application. As such, the distribution of where new SUMC employees would seek to live is based on historical evidence. Also, as indicated in the hearing transcript, the City considered a distribution based on the 2000

[18] Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 13, 2007, as amended on September 28, 2007, October 31, 2007, April 14, 2008, May 30, 2008, October 23, 2008, December 11, 2008, June 2, 2008, March 8, 2010, and March 25, 2010.

Census. However, staff determined that applying the historical data from the SUMC Project application would be more site- and land use-specific and more current, and thus more appropriate.

The commentor also asks how the housing distribution compares to the calculation of the City's housing impact fee (presumed here to be Section 16.47 of the City's Municipal Code). Since 1984, the City has imposed a fee on new employment-generating development to fund affordable housing. Applicants may either provide affordable housing to the City or pay a fee. The City then uses this money to fund affordable housing developments. These developments give preference to people who currently live or work in Palo Alto. Hospitals are exempt from the housing fee.

CC2.33 *The commentor expresses support for the proposed new zoning district under the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC2.34 *The commentor supports the sequencing of the process for the proposed Hospital District rezoning.* Please see Master Response 11 for further information regarding the City approval process.

CC2.35 *The commentor expresses concern that the models for the housing demand and transportation analyses are flawed, and asks how such models factor into the analysis and the process for evaluating such models.* The analysis of housing demand (see Impact PH-1 of the Draft EIR) applies Association of Bay Area Governments (ABAG) Projections 2005 of household growth, and the transportation analysis applies the City of Palo Alto Travel Demand Model, which is based on the Santa Clara Valley Transportation Authority (VTA) Regional Travel Demand Model. Both the ABAG Projections 2005 and the VTA Regional Travel Demand Model are reasonable data sources.

Housing Demand Analysis. The significance criteria for the housing demand analysis are provided on page 3.13-8 of the Draft EIR and indicate that a significant impact would occur if the SUMC Project would:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure), that exceeds ABAG projected levels; or

- Cumulatively exceed regional or local population projections.

Since the criterion being addressed is whether or not the SUMC Project would induce population growth that would exceed ABAG Projections, then it is appropriate to compare the SUMC Project's induced housing demand against ABAG Projections. As discussed under Impact PH-1 of the Draft EIR, the SUMC Project would not directly increase

housing demand (or residential population), and its indirect housing demand would comprise a small percentage of ABAG-projected housing demand in the various communities in the Bay Area region, including Palo Alto. As such, no mitigation would be required under CEQA related to housing demand. Also, please see Master Response 7 regarding the analysis of the SUMC Project's contribution to the City's jobs to employed residents ratio, and the feasibility of implementing Mitigation Measure PH-3.1.

Transportation Analysis. As stated above, the City of Palo Alto Travel Demand Model is based on the VTA Regional Travel Demand Model. The VTA Regional Travel Demand Model is a subset of the Metropolitan Transportation Commission's (MTC) nine-county model. Each of these models use ABAG population and employment forecasts. When the City of Palo Alto obtained the VTA Regional Travel Demand Model, the growth in employment associated with the SUMC Project was included in the land use forecasts. To assess the effect of the SUMC Project, the growth associated with the SUMC Project was removed from the model to arrive at the forecasts without the SUMC Project. The traffic projections without the SUMC Project are included in Appendix C of the Draft EIR in Figures 3-2 a, b, c, and d. The analysis then generated new traffic volumes that would be created by the SUMC Project and added these project trips to the 2025 Without Project volumes to determine the 2025 "With Project" traffic volumes. These traffic volumes are included in Appendix C of the Draft EIR in Figures 3-7 a, b, c, and d. Comparing the traffic operations of the "Without Project" traffic volumes to those of the "With Project" traffic volumes determines the effect of the SUMC Project on the Study Area intersections and roadway segments. Please refer to Master Response 3 for a comparison of SUMC Project traffic to Existing Conditions.

Process. In terms of process, it is the role of the decision-making body, the City Council, to review and consider the contents of this EIR in making a decision on the SUMC Project. In order to approve the Final EIR, the City of Palo Alto must certify that the EIR has been completed in compliance with CEQA and must certify that this EIR was presented to the decision-making body. As indicated above, the approaches for the housing demand and transportation analyses are appropriate based on the City's selected significance criteria. Should the City certify this EIR and approve the SUMC Project, it can be expected those feasible traffic-related mitigation measures would be adopted as Conditions of Approval and implemented under the City's enforcement. No mitigation measures would be required for the SUMC Project's resulting indirect housing demand.

CC2.36 *The commentor indicates concern about amending the Comprehensive Plan as a mitigation measure*. As indicated in the hearing transcript, the Comprehensive Plan changes that are identified in the Draft EIR (see page 2-23) are approvals that would be needed for the SUMC Project and are treated in this EIR as part of the proposed actions under the SUMC Project rather than mitigation measures being imposed on the SUMC Project. Please refer

to Master Response 11 regarding the Comprehensive Plan amendments and other approvals needed for the SUMC Project.

CC2.37 *The commentor asks if more recent data than the 2000 Census can be used in this process. Census data from 2010 are not available for this EIR.* American Community Survey (ACS) is not available until January 2011. As such, this EIR does not apply ACS data. However, ABAG 2005 Projections as well as 2007 employee data are applied to this analysis. As such, more recent data than the 2000 Census has been applied to this analysis.

CC3

City Council Meeting of July 12, 2010
Council Chambers, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

Mayor Burt: The next item is Approval of Minutes. We also have a memo at our places that is a Staff recommendation that the Minutes of June 7 and June 14 be pulled from the Agenda for approval in order to allow inclusion of verbatim minutes for the Agenda Items related to the Stanford Draft Environmental Impact Report. The City Manager's Office has stated that verbatim minutes are necessary to complete the Final Environmental Impact Report.

So do we have a motion?

Council Member Shepherd: I would like to move that the approval of the minutes for June 16 and June 21.

Vice Mayor Espinosa: Second.

Mayor Burt: Motion to approve by Council Member Shepherd. Seconded by Vice Mayor Espinosa. Any discussion? Please vote on the board. That passes unanimously.

So we now move onto Agenda Changes, Additions, and Deletions. Do we have any? I don't believe so.

So our next item is Item Number 4, which is a Public Hearing on Stanford University Medical Center Facilities Renewal and Replacement Projects. A meeting to accept

comments on the Draft Environmental Impact Report (Draft EIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an overview of the Transportation, Climate Change, and Air Quality Chapters of the Draft EIR. Mr. Williams, are you going to kick it off?

4. Public Hearing: Stanford University Medical Center Facilities Renewal and Replacement Project-Meeting to Accept Comments on the Draft Environmental Impact Report (Draft EIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, Including an Overview of the Transportation, Climate Change, and Air Quality Chapters of the Draft EIR.

Mr. Curtis Williams, Director of Planning and Community Environment: Yes I am thank you Mayor and Council Members. I am Curtis Williams, the Director of Planning and Community Environment. We are here tonight in the latest in our series of installments of the Draft EIR for the Stanford University Medical Center Projects.

We have had a number of meetings with you before and with the Planning and Transportation, and are here tonight to talk about the Transportation, Climate Change, and Air Quality Chapters. All of these comments will be compiled along with public comments in writing or email that are due by the 27th of this month. Then the Final EIR will be produced.

A reminder again that we are not talking about the merits of the project here but we are talking about the EIR. The entitlements will be coming to you later in the year.

So the agenda for tonight, we have again with us Rod Jeung from PBS&J, our primary environmental consultant. He is going to give an overview of the three chapters that are before us. Then we also have Dennis Struecker from AECom, the traffic consultant who

will present more details on the Transportation section. Gayle Likens, our Management Specialist, will also provide a brief overview of the background of the modeling for Transportation. Then we will move to the applicant/project sponsor, Stanford University Medical Center for their presentation. Then back to you and the public for questions and comments.

Then the next steps are that we will be back to you on July 19 and 26 with other chapters for your review. I also want to note that we have been having and will continue to have meetings with or attend meetings of other cities that are reviewing the EIR. In particular we met with Menlo Park Council and we have met several times with the staff, and we believe they are going to take a recommendation on a letter here shortly. East Palo Alto we are having a Study Session with them tomorrow night to go over some questions on the project. Then on Wednesday evening Portola Valley is going to be considering their comments on the EIR and we will be attendance at that as well. So again, the comment period runs through July 27 and then we will be preparing the Response to Comments for the Final EIR. With that I will turn it over to Rod Jeung. I do want to note that also before we go to the applicant that Dan Garber from our Planning and Transportation Commission is here to provide some input relative to the Commission's deliberations. Thank you.

Mr. Rod Jeung, PBS&J Project Director: Thank you very much Curtis. Mayor Burt, Members of the Council it is a pleasure to be here again tonight. I have the pleasure tonight of speaking and just talking about the highlights related to the Transportation, Climate Change, and Air Quality sections. I did want to take a quick moment to acknowledge a couple of other key members of our team who are here tonight to help respond to any questions or comments that you might have. So in addition to the

individuals that Curtis mentioned, we do have Trixie Martelino who served as our Project Manager, Michael Hendrix who prepared the Climate Change section, and Geoff Hornek who prepared the Air Quality Analysis. As Curtis mentioned, AECom who prepared the Transportation Analysis is here. Supporting Dennis Struecker is Nicole Sou. We also have with us tonight Elizabeth Measoner and Michael Keneth of ENVIRON who helped prepare the Environmental Health Risk Assessment. So with that let's get started.

The first topic is Transportation. What you will see on this first slide is a very familiar table. I am just going to briefly highlight the organization again. Along the left column are the various significance criteria. Then they rate across the top going from NI all the way through to SU as the various significance conclusions that were reached.

In terms of the significance conclusions, the impacts to freeways as seen in the next to the bottom row, impacts to freeways regarding US 101 and I-280 would be less than significant. In the next column to the right with implementation of various recommended mitigation measures, which we will talk about, there would be less than significant impacts for construction impacts, intersection congestion, and local circulation, as well as pedestrian and bicycle safety impacts. The column at the far right of this table shows that there would be significant and unavoidable impacts on various roadway segments all of which are in Menlo Park.

The remaining impacts considered in the Environmental Impact Report regarding Transportation those being for transit, parking, and emergency access would either be less than significant or with recommended mitigation measures they would be reduced to less than significant.

Stepping back quickly to the construction impacts, which were identified as significant there are nine different transportation mitigation measures that have been identified to handle the construction related period, or construction period impacts. These mitigation measures address a variety of different circulation concerns during the lengthy construction period, and include parking for construction crews, maintaining access for bicyclists, pedestrians, and transit vehicles, various restrictions on truck activities and haul routes, and special considerations when major events are held. Collectively all of these different mitigation measures would reduce the impacts to less than significant.

In terms of the operational impacts once the project is up and running there are five mitigation measures that have been identified to address the intersection congestion or level of service impacts. These mitigation measures include things like an enhanced Transportation Demand Management program, and traffic adaptive signal technology. These mitigation measures collectively would reduce the impact to less than significant. The same measures are recommended to reduce impacts to roadway segments including the enhanced TDM program and expanded transit service, but the streets in Menlo Park would continue to remain significant and unavoidable in terms of the traffic volumes.

There are a number of other operational impacts that were identified ranging from local circulation, pedestrian and bicycle safety, transit impacts, emergency access. The mitigation measures that have been identified for these impacts range from providing additional roadway improvements, funding bicycle, pedestrian and bus and shuttle improvements, and again traffic signal priority systems for emergency access. All of these collectively would reduce the impacts to less than significant.

Climate Change I am going to do a little bit different only because it is something relatively new to Environmental Impact Reports. So I want to give a few background pointers. As I said it is a fairly new topic that is being addressed in the EIRs. Global Climate Change refers to changes in the normal weather pattern of the Earth. These changes in weather have been shown to correlate with changes in sea level, water supply and quality, ecosystems or biodiversity, and human health specifically vector born infectious diseases.

A principle contributor to these changes in the weather patterns is the release of greenhouse gases from human activity. These greenhouse gases trap heat in the atmosphere and have been identified as a source for rising temperature levels throughout the world. Greenhouse gas includes water vapor, carbon dioxide, methane, nitric oxides, among others. Importantly, in terms of an Environmental Impact Analysis climate change is really a cumulative impact on a global scale. So any individual project in and of itself isn't likely to trigger that kind of an affect, but we do look at it from a cumulative perspective.

Again, by way of background, there are a number of recent plans and legislations that have been adopted to reduce greenhouse gases and greenhouse gas emissions, at all levels federal, state, and local. These regulations are described in the Draft Environmental Impact Report, and some of the key ones are highlighted on the slide above. Of the ones that are listed here I just wanted to draw your attention to AB 32, which is the California Global Warming Solutions Act. This law in particular requires that the California Air

Resources Board implement rules to reduce greenhouse gas emissions in the state to 1990 levels by 2020. These measures and regulations are expected to be in effect by 2012.

Now Palo Alto has been in the forefront in terms of climate change sustainability and so the City has already adopted its own Climate Protection Plan. The Plan identifies the current emissions in the city and sets goals for various interim years through 2020. Importantly, these goals are aligned with the reduction goal of 30 percent below business as usual emissions that have been articulated by the California Air Resources Board.

What this table shows is that while the Stanford University Medical Center Projects include many of the strategies that are contained in the City's Climate Protection Plan the net effect of those strategies is a six percent reduction from business as usual rather than the goal of 30 percent that has been established in the City's Climate Protection Plan. As a result both from a consistency perspective in terms of how well it supports the Palo Alto Climate Protection Plan as well as in terms of reducing the 30 percent of business as usual emissions the EIR finds that this impact would be significant and unavoidable.

There are however a number of mitigation measures that have been identified. This slide shows that those mitigation measures are wide ranging, many of them again supporting the ideas and goals that are contained in the City's Climate Protection Plan. They include commissioning or maintenance of new energy systems, participating in green energy programs, greenhouse gas monitoring, performing an annual waste reduction audit. Again, these measures would significantly increase the emissions reductions, and collectively these additional measures would reduce greenhouse gas emissions to about 25 percent, but still short of the City's 30 percent target.

The final topic for tonight in terms of our overview is Air Quality. As shown in this table there would be less than significant impacts with regard to localized carbon monoxide impacts from motor vehicle traffic, toxic air contaminants, and objectionable odors. However, there would be significant and unavoidable construction and operation impacts from the emissions of criteria air pollutants at both the project and the cumulative level. Specifically construction activities would emit significant amounts of nitrogen oxides associated with the construction exhaust from the equipment and trucks. Operation of the project would result in significant emissions of reactive organic gases, nitrogen oxides, and small diameter particulate matter.

As is typical, especially for the construction related impacts, there are a series of standard mitigation measures that are available. However, given the size and the scale of this project and its duration the construction related mitigation measures would be effective but not to the point where it would reduce the impact to less than significant. There would still be significant unavoidable levels of nitrogen oxides. In terms of the operational impacts, again it is the scale of the project, especially the number of trips that are anticipated that would be substantial. As a result the significant criteria air pollutant emissions would remain significant and unavoidable. That concludes our presentation for tonight. Thank you.

Gayle, did you want to come up now and talk a little bit about the traffic model?

Ms. Gayle Likens, Transportation Management Specialist: Good evening Mayor Burt and Members of the Council. I would like to give a brief overview of the City's Travel

Demand Forecasting Model and how it relates to this particular project and the Traffic Impact Analysis for the project.

The City's model was originally developed in about 2003, and it was for the Citywide Traffic Impact Fee Nexus Study and has been used in the ensuing years for the traffic impact studies that have been done for all of the development projects.

Starting in 2007 the model was updated to project traffic through 2015, and additionally 2025, which previously we had not had any traffic projections for that far into the future. Including the local traffic and the known projects using the Regional Land Use Data Projections from ABAG and the model was also updated to be consistent with the VTA's Congestion Management Program Travel Demand Model. So in 2007 originally this update was for both the combined projects, the Medical Center and Shopping Center Projects. Because we did have the future traffic growth numbers for the projects themselves, we backed out the ABAG projections for 2025 and 2015 from the background data.

Then in 2009, because the Shopping Center Project was withdrawn we had to readjust the model to put the ABAG projections for the Shopping Center back into the background growth projections for the City and in the model. At the same time the model also showed that we had some roadways that were over capacity so we did some adjustments to the model. We constrained some of our major roadways, there were 11 locations that were constrained, to bring the traffic on those roadways back to the capacity of the roadways and not exceed the capacity. Even so there were some adjustments that we had to make beyond that to fine-tune the model. That including looking at shifting some of the traffic

on these roadways that were showing greater than capacity in numbers to the freeways and also to do some modifications that included peak spreading to result in more accurate and realistic forecasts for the travel patterns.

We reviewed this approach to the traffic model with the VTA because we do need to have a model that is consistent with our regional planning agencies. They agreed that with our approach being a conservative approach to modeling, and they felt it was appropriate. So that is a brief background on the model itself, which was used in the development of the Traffic Impact Analysis. Thank you.

Mr. Dennis Struecker, AECom: Mr. Mayor, Members of the Council good evening. These are the study components of the Traffic Impact Analysis. Sixty-six intersections, most of them in Palo Alto and Menlo Park, some in East Palo Alto and the County. There are six freeway segments, three on 101, and three on 280. Eight residential roadway segments, and then eight roadways segments along major corridors in Menlo Park, which is a specific requirement of the City of Menlo Park.

The analysis year was 2025. It coincides with the approximate build out of the project, and it is consistent with the horizon year of the City's Travel Demand Model.

The analysis scenarios we looked at were existing traffic counts that were collected from 2006 through 2009. Although not included in the EIR itself, for information purposes we looked at existing plus project in the Traffic Impact Analysis. The future was 2025 and then the future with project added the project traffic to the 2025 volumes.

This is the magnitude of the project in terms of trips, 10,000 daily trips, approximately 650 in each the AM and PM peak hour. This shows you the 66 intersections spread throughout Palo Alto, Menlo Park, and East Palo Alto. These are the residential roadway segments that we looked at both in Palo Alto and Menlo Park. These are the specific ones, shown in green, the specific collector and arterial corridors that are required to be looked at in Menlo Park based on their criteria.

In 2025 if you add the hospital projects to No Build you end up with five intersections that are significantly impacted, closely around the project itself, around the project area itself. For the PM peak hour, as you can see we have the same project, the intersections around the project itself but we also expand impacts into the central part of Palo Alto, into Menlo Park, and onto the Bay Front Expressway.

We looked at four priorities of mitigations and we build each one on top of the other. So the first priority was to look at traffic adaptive signal technology. The second priority was to add new pedestrian and bicycle under-crossings to the first priority. The third one is to add TDM measures. The fourth is to add physical intersection improvements.

For the Priority 1, the traffic adaptive signal technology, we still have four AM impacts and nine PM impacts. They were five and 12 if you recall. So we reduced one in the AM and three in the PM. When we added Priority 2, the pedestrian and bicycle under-crossings we have three AM impacts and nine PM impacts. So we got rid of one more AM impact. When we add Priority 3, the Transportation Demand Management measures, we end up with zero AM impacts and we still have four PM impacts. Then when we look at

adding Priority 4, the intersection improvements, on top of that we end up with all the AM and PM impacts mitigated.

The four intersections that remained impacted on the last slide are Middlefield-Willow, which the EIR identified as infeasible, the mitigation is infeasible. Menlo Park has stated that they think there are feasible mitigation measures at that intersection. Arboretum-Galvez was identified as being feasible. The mitigation there is to signalize that intersection. Bay Front and Willow the EIR identified that to potentially feasible and again Menlo Park has said that the improvements at that location are feasible. Bay Front and University the EIR identified the mitigation to infeasible but again Menlo Park has stated that they believe mitigation measures are feasible at that location.

Mr. Williams: I believe that Dan Garber is here from the Commission.

Mayor Burt: Welcome.

Dan Garber, Chair, Planning and Transportation Commission: The Commissioners reviewed these various chapters with the Staff and the consultant, and had some broad-ranging discussions. I will try and rollup some of the broad comments here.

I will start first with a couple learnings specific to the Transportation Chapter. One of the learnings was that a large part of the transportation impacts come from patient trips as opposed to staff and/or construction along the way. Second is that the projected increase in the population of Santa Clara has interestingly a larger impact over our street than the

project will have at its conclusion, which isn't to state that mitigations shouldn't be pursued, because they should.

CC3.1 Relative to impacts in both the Transportation Chapter as well as the Air Quality Chapter there was significant conversation around the impacts that the construction has on our community, and the need for the DEIR to more fully understand what those impacts are. I will just name a couple of things. First of all, it needs to better consider the impacts of the transportation of the construction workers themselves to and from the site over the course of 12 years. It needs to take a closer look at the impacts and the opportunities on the mitigation side of the equation to coordinate the actual construction work that occurs over those 12 years relative to where the mitigations happen and what happens on the campus itself. Then finally, the other topic concerning construction was the truck routes to the site. they have been identified in the DEIR, but some additional work we believe the DEIR should do is looking at time of day, and which truck routes are used when, because

CC3.2 depending on the time of day and which ones they use they will have more or less impacts both on our business district of the University Avenue, and/or impacts on our high schools and transportation during early mornings and afternoons. Those things can be mitigated through proper planning.

CC3.3 One of the things that raised some concern on the Commission, there was quite a bit of discussion about it, is the reliance of many of the mitigations on the Caltrans GO Pass to achieve the less than significant ratings of a variety of the impacts that were identified. In particular that was a concern given the questions that have been raised about Caltrans recently and their future plans, and what happens if the GO Pass is no longer available at some future point? How do we then deal with those impacts if that goes away?

CC3.4 Relative to Climate Change again there is a broad-ranging kind of discussion about that. Let me just highlight two topics there. One is the recognition that most of the DEIR report addressed emissions, emissions during the construction phase and to a lesser degree emissions during the actual operation of the hospital itself. Although it is less in terms of the overall carbon footprint, the overall lifecycle assessment, what was not addressed were the embodied carbon footprint of the materials that were actually being created and brought to the site, which is potentially worth up to 15 to 20 percent of the overall carbon footprint in the overall lifecycle. That should be considered, and we suggested that the DEIR should include an evaluation of the embedded energy in addition to the operational emissions or the energy that is created through emissions, even though that is not an easy calculation to make.

CC3.5 Finally, I would just like to note that one of the City's consultants suggested at the end of this particular discussion on the Climate Change Chapter that the City consider taking its Climate Plan and turning it into a qualified to help the City better deal with the emission offsets and meet its own climate protection goals, as a way of separating the responsibilities of Stanford and Palo Alto and assigning responsibilities between those two. That's it.

Mayor Burt: Dan, could you explain that last aspect again?

Commissioner Garber: The City's consultants?

Mayor Burt: Yes, on the Climate Protection Plan and the bifurcation.

CC3.5 Con't

Commissioner Garber: It was a comment that was offered by the City's consultant I think in response to one of Commissioner Fineberg's questions or comments regarding the impact not just on Palo Alto but regionally. Although I am not familiar with the components of a qualified plan versus the plan that we already have in place, and I believe Staff will be looking into that as part of their response that they have to prepare for the entire DEIR. The suggestion was made that by creating a qualified plan the criteria could be parsed between Stanford and Palo Alto, and that would be a benefit to Palo Alto because it would have a more manageable set of criteria that would be applied to it as opposed to it and Stanford. I may entirely wrong and perhaps or one of the consultants can give you a better understanding of that particular issue.

Mayor Burt: Thank you. Curtis, does that conclude Staff presentation?

Mr. Williams: Yes it does, Mayor.

Mayor Burt: At this time the applicant has a presentation to make. Welcome.

Mr. Bill Philips, Senior Associate Vice President, Land, Buildings, and Real Estate, Stanford University: Good evening Mayor Burt and Council Members. Tonight we have a comprehensive but hopefully brief, even though it will be comprehensive, presentation on Transportation and Sustainability. On the Transportation section Brodie Hamilton, who is Director of Parking and Transportation Services will join me a little bit. What we want to focus on is the TDM portion, the GO Pass portion of this program. Brodie gives me

credibility, but he also is probably the foremost expert on how these things work and how they can be made most effective.

Next slide. The context of what we are talking about here is both the force of what we want to do at the City, and what we want to do at Stanford. That is use a multimodal approach to address traffic congestion. That means utilizing Transportation Demand Management, and some of the other priority features that Dennis mentioned as opposed to simply increasing roadway capacity. We know at Stanford that the importance of Transportation Demand Management, and this also applies to the SUMC, the hospitals, because they use all of the same TDM programs that Stanford uses, except for the GO Pass. The reason we do these is we want to achieve environmental sustainability, we have obligations that we acquired and that we welcomed under the General Use Permit with the County, and we do focus a lot of our University attention and a lot of hospital attention on employee well being.

Brodie is always emphasizing to me that the most successful TDM systems have to varied, there have to be a lot of choices, they have to be flexible, you have to be able to move between choices depending on the time and the nature of the surroundings, and they have to adapt to what people want to accept and are willing to embrace.

We think it has worked pretty well because the mode split when we did the data collection in 2006, which is most of what we used for the DEIR was that the University's drive alone mode was only 54 percent. The Caltrain mode split was 15.8 percent. For the hospital at the same time drive alone split was 77 percent, the Caltrain mode split should be 3.6 percent, I apologize for that being off one percentage.

So understanding the hospital employee population as you look at that above comparison to see whether something as good as what Stanford is able to do in these various areas is achievable. It is important to note that the hospital employees commute for the most part during the evening and on weekends. Eight-nine percent of them work on weekdays during typical daytime hours. In addition, of the approximately 9,000 hospital employees almost 70 percent are located on the peninsula, meaning in the prime Caltrain service counties. Of those 65 percent live in locations proximate to Caltrain, which means close to Caltrain cities, which is actually higher than the 52 percent relationship that we see at the University.

Next slide. Brodie is going to go through this little list.

Mr. Brodie Hamilton, Director of Parking and Transportation Services, Stanford University: Good evening Mayor and Members of the Council. I am going to fly through this very briefly to give you an overview of our program, which is one of the most comprehensive you will find in a University or jurisdictional setting. We have a Commute Club, which is made up of individuals that have committed to not driving alone. In 2002 there were roughly 3,400 members of that and today there are over 8,000 members in the Commute Club.

The Marguerite has grown significantly over the years. We now have 41 buses, provide over 1.4 million trips per year. We have 14 routes and about 160 stops around the area. VTA Eco Pass provides, I think as most of you know unlimited ridership on the VTA services in the area. We have been providing GO Pass for a number of years, actually

providing it before it was GO Pass. The University and Caltrain established the U Pass or University Pass back in 2003 and ran that for two years. They felt it was viable and created the GO Pass from that to extend to other employers in the area.

Line U was established to make connections with the East Bay, the ACE Train, and the BART system with regional Measure 2 monies. AC Transit was able to come up with some trans-bay buses as well as some operating monies so we partnered with AC Transit to establish the Express to the East Bay and we have about 350 people a day that are doing that.

I think most of you know we have a very extensive bicycle program both in terms of facilities available on the campus, as well as all the educational programs and outreach efforts that we have in order to encourage people to commute by bike. Right now if we look at all of our campus commuters, people actually coming from off campus about 22 percent of our commuters are via bike.

We have vehicle rental and car-sharing programs on campus. They are there primarily to provide options for individuals that have used alternative transportation to get to the University. We have the biggest car-sharing program at a University in the nation. Right now we have 34 cars. We are presently trying to get some located over near the train station to help out the City connection as well.

Charter bus service, we have about 1,200 charters a year. A lot of that is directed towards getting conference attendees from hotels to the campus so we don't have a lot of people driving on their own.

The other is flexible work hour options. We have a lot of people that have altered their commute so that they are coming in either before or after the peak commute times, which has helped us significantly.

I think most of you are familiar with the emergency ride home program, a very important part of any complex or comprehensive transportation program. Basically, if somebody has an emergency and needs to get home and they have used alternative transportation if they are within 20 miles we will give them a taxi ride home. If they are beyond that we will give them a rental car for free to get them home. Again, we have a variety of other programs but these are the big ones.

Next slide. This is how we measure the success of our program. The campus commute mode split is a biggie. If we look at commute mode split for University employees in 2002 it was 72 percent for drive alone, and this year we just achieved 48 percent for University employees. If we look at all of our commutes including graduate students and postdoctorals we are down to 43 percent. Annual cordon counts, each year we have been able to stay below the base count that was done in 2001. Actually the peak hour trips in the afternoon are the biggest ones and we are currently approximately 400 trips below the baseline there. I mentioned the Commute Club before. We have gone from a participation level of 3,400 in 2002 up to over 8,000 today. Parking permit sales, if we look at our commuter parking permits, if we look at all the commuter parking permits that we sell in our peak of 2004 we were selling just shy of 15,000 and this year, mid-February we were around 12,500. So we have dropped dramatically in the number of people that are buying commuter permits. I mentioned already the Marguerite ridership. Just four years ago the

ridership was a little over a million and we are up to a 1.4 million now. For vehicles miles traveled and carbon footprint from commuters, our estimates are that we are already down to the 1990 levels and getting lower. In terms of cars parked on campus, another measure again confirming the number of people that have jumped into alternative transportation. In 2004, our peak year, we had about 17,700 cars parked on campus. In 2009 we had about 15,000 cars parked on campus. This was looking at a snapshot during a mid-February so a considerable drop there. I think that is all I need to say. Thank you.

Mr. Philips: So focusing on the GO Pass, I would like to say that with Brodie here tonight and also Robert Eckles of Fehr & Peers, our traffic consultant here tonight, both of them have dealt a lot with Caltrain. I think if there are specific questions like the ones Dan raised about the future and viability of Caltrain I would encourage you to ask them and get their input and thoughts about that.

The DEIR for the TDM, which is the enhanced TDM that includes the GO Pass, for the hospital projects shows as being 21.1 percent. That is all the transit not just the GO Pass or Caltrain. The Caltrain portion is forecasted to be at 15.8, which was the University level in 2006.

One of the things that really make the Caltrain GO Pass work is the way the Stanford Shuttle Program adjusts to it to provide the connectivity that is required and the capacity demands that are needed. We do that primarily through route changes, and also by having additional vehicles. GO Pass applies to both the existing and the new hospital employment. That is something that sometimes gets lost but it is so important. All of these hospitals employees will now have a GO Pass and that will be the thing that causes

this dramatic reduction as forecasted in the DEIR of a little over 500 peak hour trips. When you combine it with the other Priorities that Dennis mentioned, adaptive signals and pedestrian improvements, the TDM and GO Pass that eliminates four AM and eight PM peak hour intersection impacts from that total of 17. The GO Pass along mitigates three intersections in the AM and five intersections in the PM. Obviously doing that decreases vehicle miles traveled by a significant amount. That 500, actually it is 505-peak hour trip reduction translates into a 65.9 percent reduction in the project's peak hour trips. Thank you.

The final point of the presentation is just to respond a little bit to what we heard Planning and Transportation Commission comment on. A particular concern they had was the capacity if so many people are going to be utilizing the GO Pass and switching to Caltrain is there going to be sufficient capacity at Caltrain to handle that increased ridership. So a few of the statistics that we put together show that based on the 2010 Caltrain Ridership Survey the northbound peak time capacity is 51.4 percent, southbound 41.1 percent. The evening peak period ridership survey also shows the northbound at 42.8 percent of capacity and southbound at 56.9. There are very few individual trains that ever reach the 85 to 95 percent of packed capacity at their maximum loading point. It is important to point out that the maximum loading point usually occurs north of Redwood City not in the Palo Alto area. The maximum seating capacity we are talking about for these trains is 650 passengers. So we believe there is sufficient capacity available within the system. Also the way the employees at the Medical Center tier their time around this peak period suggests that we will be able to smooth this capacity issue out even more because they don't concentrate themselves in the primary employee peak hour periods. That is my presentation. We will go to Sustainability with Mark Tortorich.

Mr. Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center and Lucile Packard Children's Hospital: Good evening Mayor, Members of the Council. We just wanted to review with you briefly a few sustainability features of our hospital Renewal and Replacement Program. We believe these sustainability features will help reduce greenhouse gas emissions and help our projects achieve the City's and the State's goals.

So first, designing hospital buildings has particular challenges. We obviously have very strict infection control requirements to meet. Air, water, and dirt are enemies of the infection control program. So those sometimes conflict with sustainability goals. We have very strict oversight by the State of California and OSHPD in everything that we design, and everything that we build. And, we are a 24-hour operation obviously being a medical center.

The traditional measurement in sustainability would be a LEED standard. LEED was designed as a standard more for office building type occupancies. There is a special standard being established for healthcare facilities, the Green Guide for Healthcare or LEED for Healthcare. Our LEED designer of the Children's Hospital, Robin Gunther, was one of the authors of the Green Guide for Healthcare and we are using that as our guidebook for this facility. Additionally our LEED engineer, Walt Vernon of Massetti Engineers was a co-author of the Green Guide for Healthcare, and he is the engineer responsible for both hospital projects.

1 Finally, the Draft EIR concludes that with mitigation the project will result in
2 approximately 25 percent fewer greenhouse gas emissions than business as usual. We
3 believe that there actually are maybe some technical adjustments that could be made in the
4 Draft EIR based upon our current data that we can provide the consultants that will
5 demonstrate that we are much closer to 30 percent reduction in greenhouse gases.
6 Primarily that is through the use of more energy efficient designs for our hospitals, which
7 will then allow us to use less chilled water or hot water from the Stanford Central Energy
8 Plant, and therefore reduce greenhouse gas emissions through the production of chilled
9 water and hot water.
10
11 Next slide, please. So we really looked at 15 big ideas of sustainability in the design of
12 these projects. I would like to focus on the top six. Next, Steve. Then spend a little bit of
13 time talking about each of these big six ideas.
14
15 Next. So first, as I mentioned Walt Vernon of Massetti Engineers has really challenged us
16 to achieve very ambitious energy conservation goals in the hospital design, and we have
17 accepted that challenge from the engineers. That is to achieve Energy Star scores of 90 to
18 95, which really means that we are designing these buildings to be better energy consumers
19 than 90 to 95 percent of similar hospitals. Now, again, many of these ambitions that we
20 have, and many of the design features we are submitting to the State of California for
21 approval will require either building code changes or approval by the State for deviations
22 of the building code to accommodate energy performance. We are designing the hospitals
23 to use 35 percent less energy than typical hospitals and 20 percent less than a hospital
24 designed to current energy standards. Again, I will explain some of those features. The
25 School of Medicine buildings that are also part of our Renewal and Replacement Program

1 are being designed to be 30 percent better than traditional buildings designed to current
2 standards. So obviously with these features and with our commitment to sustainability we
3 think we will really help reduce greenhouse gas emissions.
4
5 Next, please. So what are we doing? So for our HVAC systems, our mechanical systems
6 that ventilate these building, and remember these being hospital buildings the buildings are
7 entirely mechanically ventilated. They cannot be naturally ventilated through operable
8 windows because of infection control issues. We are using a new system, Displacement
9 Ventilation, which is something that will allow us to generate or to use less energy to
10 displace the air within the patient rooms and within the operating rooms, and the other
11 critical care spaces of the facility more efficiently. We are using variable air volume
12 systems. We are allowing occupants to control the temperature of the rooms. Obviously
13 when a room is not occupied we will be shutting off the systems there.
14
15 We are also connecting to Stanford's Central Energy Plant for chilled water and hot water
16 generation. That is tremendously efficient for us. That plant already exists we just need to
17 make utility connections in Welch Road, and we believe there will be significant
18 economies in doing that.
19
20 Next. So what is Displacement Ventilation? Basically, there is an airflow reduction
21 system. The typical dilution systems where you introduce fresh air from the ceiling and
22 you also extract air from the ceiling makes you pump a lot of air into the space to dilute the
23 existing air and then remove it. A displacement ventilation system actually introduces the
24 new air at the floor. By doing that, your natural convection will allow for distribution and

separation of air through the system. To accommodate a displacement ventilation system we will actually have to pay particular attention to the building façades.

Next slide. What we are doing for the building façades is we are actually employing two different systems. One for each hospital appropriate to the needs and the character of the design, but we are designing a very high-tech curtain wall system for both hospitals. Again, they have different architectural expressions. This is for the new Stanford Hospital building. We are investing a considerable amount of time and capital in designing a double curtain wall system. So there is a gap between the two layers of glass that will actually have horizontal sun control devices between those two layers of glass. Those horizontal shades will be controlled by an automation system to make sure that we don't have hot spots on the floor from the solar exposure.

Next slide. At the Children's Hospital we are designing a similar performing system, but again it is expressed very differently because of the very different nature of the pediatric environment. At the Children's Hospital the system is a much more passive system, and it is also one that is expressive on the outside of the buildings. So those horizontal sunshades are actually attached to the exterior of the building in a fixed position, and then we have also animated the façade by landscaping outside of each of the patient rooms to help provide the solar shading that is necessary to make the displacement ventilation system efficient.

Next. Obviously we are studying green practices and green materials. Just in the paving that we use and in the green roofs that you have seen at both hospital projects will obviously reduce heat island effects and make these much more energy efficient buildings.

Next. Our architects have developed a rather novel approach to staying up-to-date on new building materials. They have established a precautionary list. So those products and materials that they should actually stay away from that are non-sustainable materials in the design and specification of these features. Given the long period of time between design and construction and implementation of the buildings many of the finishes that we look at specifying today won't be in existence and they will be constantly updated. So this interactive website is a good way to stay up-to-date on what is available in the marketplace.

Next. As I mentioned, we are also looking extensively at how are we rejuvenating the spaces that we are taking over? This is for example at the Lucile Packard Children's Hospital where to the top of the slide you will have Welch Road as well as Quarry Road, but you can see that the site is predominantly asphalt parking and roofscape.

Steve, if you go to the next slide, you will see how we are transforming that into really a green space. We are creating about 3.5 acres of greenspace with the facility. Obviously, with our open Emerald Court here at the corner of Quarry and Welch, and then by putting a green roof on top of our surgical platform here between the hospital expansion and the existing facility.

Next slide. We are also very aggressive in our practices of sustainability and Christine Hansen from our General Services Department is here if you have any questions about how we maintain our sustainability beyond the construction practices for this project.

Next. Now, finally, water conservation, which I know is a very important topic here. First, obviously we are looking at the marketplace and using the best features available from the marketplace to conserve water, including low-flow fixtures, dual flush fixtures. Obviously going to an all-private model the use of water within the restrooms is a very important issue for us and making sure that we minimize the water use as much as possible.

Next. We are also looking at the landscape features, obviously those green roofs of being drought tolerant landscaping, and talking other sustainability practices on how we maintain the landscaping.

Next. One feature again subject to State approval is our ability to capture rainwater in cisterns for irrigation, but also our ability to capture condensate water from the mechanical equipment that will be cooling the building in the summer. If you look at graph at the bottom of this slide you will see that our peak production of condensate water matches quite well with our peak demand for water. The volume of condensate water that we can produce matches very closely with our irrigation demand at the Children's Hospital. So again, we will be proposing storage tanks for the condensate water that we can then recycle into irrigation.

Next. Our estimates of water use. We have estimated for the project that overall we will consume, again this for the total project, both hospitals and the future clinic buildings as they are built out, approximately 177,000 gallons per day but with conservation measures we can reduce our use to slightly below 100,000 gallons per day. We believe that, and the

EIR has concluded that, there is sufficient water supply within Palo Alto to support the projects.

Next. We have obviously benchmarked, as has been requested and as is appropriate, these facilities against other comparable modern facilities not only in the State of California but also around the country. It is a pretty consistent average that it is about .20 or .2013 in the case of Packard, of gallons per day per square foot of facilities. We have also estimated the use for our clinics buildings and for our School of Medicine. One of the things that is interesting about our two facilities is because of the high acuity of the patients that we see we do have a higher proportion of interventional and treatment spaces per bed. So our water use, you would typically expect it to be higher than a comparable facility but we are still falling within the ranges of other comparable centers around the state.

Next. So again, that concludes our presentation. We obviously have staff here to answer any questions that you might have.

Mayor Burt: Thank you. So this evening we have a big Agenda. We have quite a few members of the public who wish to speak. I should mention that because we actually have three different aspects to the Draft EIR that we are discussing tonight the applicant was allowed to aggregate their time on the three different elements. If members of the public wish to speak to more than one element, if they would like they may ask that of the Chair and we will extend their time to five minutes. I have a lot of cards, so I am not encouraging everybody to take five minutes. The standard time is going to be three, but if you wish to speak to more than one of the elements then please note that.

The other issue is right now we ordinarily go to Council Member questions before proceeding to the public. Out of courtesy to the many speakers who are going to be up late we can take some hopefully brief questions from the Council, as long as we can keep them to true direct questions and not rhetorical questions or statements of position. So if that is okay, we can go forward and take a few questions, then go to the public, and if we have some additional questions and comments we can do that after the public has spoken. Does that seem like a reasonable approach? Okay. Colleagues, questions of the Staff or applicant. Council Member Shepherd.

Council Member Shepherd: Thank you. I don't even know where to start on this particular segment of the Draft EIR. I just want to say first that I am very impressed by all of the strategies that are coming into play in such an important project, particularly when it comes to the Climate Change and Air Quality Chapters. My questions pertain tonight primarily to traffic.

CC3.6 One of the last questions I asked of Staff earlier today was we are being asked to compare between the employees for the hospital and the University employees, and how it will shift when it goes to the GO Pass, and the expectation of reducing peak periods of traffic by people riding Caltrain. When I asked this question, I was given an answer that there are 11,000 University employees today. Yet the report that I am looking at in Appendix C, Appendix H, which is double appendix, notes that the University employees there are 9,156. So I just wanted to know has there really been a 20 percent increase in University employees.

Mr. Struecker: No, the table you are looking at is just the peninsula employees. So if you look at the – it goes down to Gilroy and goes up to San Francisco but it does not include anybody from the East Bay. So it is just the peninsula ones.

Council Member Shepherd: Okay. That helps explain that then. Then I was trying to figure out how I was supposed to correlate this. The other question I have right now is the CC3.7 numbers that we are looking at are 2006. How significant of a change is there from 2006 to say 2009? I do worry about that a bit as well.

Mr. Struecker: What we are looking at is location of residences of the employees. So I think that is pretty minor. People don't change their location or where they live that frequently. It is not a volume it is a percentage or a location of percentage.

CC3.8 Council Member Shepherd: Right. One question of our Staff. When I was chatting with our Safe Trips to School Rep for PAUSD she explained there is a two percent creep in traffic every year. Is that true or can you give me any information on that? So every year we have a two percent increase in traffic on our city streets?

Mr. Williams: Thank you Council Member Shepherd. I believe that is kind of a maximum. We have looked at the trends over time and they tend to be less than two percent. They may have a wide range to them but they averaged, I think last time we were before you we talked about like 0.6 to 1.6 kind of a range typically. It has gone higher than that from time to time.

Mayor Burt: Vice Mayor Espinosa.

CC3.9

Vice Mayor Espinosa: Just a quick question about GO Pass. I have comments about it too. So much of the transportation creative thinking focuses on GO Passes and then inherently Caltrain. There has been a lot of discussion that we have seen in recent weeks and months about the viability of Caltrain and the possibility of it not being around in one to three years. I think it is a large enough agency and there is enough commitment that it will be, but I just wonder in our planning what considerations we gave for that, and what are the Plan B options? How does that exactly work when you look at these types of studies?

Mr. Struecker: Well, the way we wrote the mitigation measure was that we needed to get to the 21.1 percent from where the transit is today. So if Caltrain wouldn't be there there would need to be a lot of head scratching on what else we would do to get to that percentage. As long as we get to that percentage somehow in non-drive alone vehicles it essentially achieves the same result. One of the things we looked at for informational purposes was remote parking lots so you intercept the traffic before it gets to the local streets. There are a lot of issues with that but maybe we have to explore that avenue a little bit more. Maybe there is an expansion of the Marguerite Shuttle that it goes around into Menlo Park and northern Mountain View, and Palo Alto, and places like that. Yes, we would need to think about that. The idea is to get that percentage. As long as you get that percentage then you get the benefits of that.

Mayor Burt: Council Member Scharff.

CC3.10

Council Member Scharff: Thank you. I actually had some technical traffic questions as well. On page 3.4-65 it says there are three feasible intersection improvements in Table 3.4-18. I only noticed two, which were 16 and 37. I could not find the third. I guess I was wondering if that was 62 because I couldn't see why 62 would not be feasible as it says the exact same thing as 37.

Mr. Struecker: Yes, 37 is feasible, and 16 is feasible. I think at one point in time we said that Bay Front, 52 was feasible and it got changed to potentially feasible because it is outside of the jurisdiction of Palo Alto. We don't have control over that intersection even though the improvement is … So I think it is 52 that is the third feasible one.

Council Member Scharff: So 52 is feasible even though it says potentially feasible.

Mr. Struecker: Yes, we identified it as feasible in the traffic report but in the EIR, because it is in another jurisdiction they took a little bit more conservative approach.

Council Member Scharff: When you say it is in another jurisdiction you mean Menlo Park, because if it says jurisdiction – Caltrans we don't consider that to another jurisdiction, correct?

Mr. Struecker: No, because of Menlo Park.

Council Member Scharff: Then 37 that we thought was feasible was in Santa Clara County. So we are okay with that? That is not in Palo Alto.

Mr. Struecker: It is a traffic signal and pretty easy to do. So we listed that as feasible.

Council Member Scharff: So why is 62 only potentially feasible when it says the same thing as 37? I don't mean to be difficult I am just curious why it is.

Mr. Struecker: I guess because 37 is within the Stanford campus. This is part of their project. It is a good point.

Council Member Scharff: Okay. So when I see potentially feasible should I assume that there is a good likelihood these could be done, or does potentially feasible mean it is going to be difficult to do these?

CC3.10 Con't

Mr. Struecker: The potentially feasible ones are ones that in my opinion are highly likely. The ones that are infeasible are because of right-of-way and cost issues are much more difficult.

Council Member Scharff: What makes number 10 so difficult that it is not feasible?

Mr. Struecker: The cost and the impacts to right-of-way requirements in just creating those improvements.

Council Member Scharff: Isn't it on Stanford land? So wouldn't the right-of-way have to come from Stanford?

Mr. Struecker: Yes, it is probably mostly Stanford land, yes.

Council Member Scharff: So obtaining the right-of-way probably wouldn't be that difficult I would guess.

Mr. Struecker: Probably not. It also contradicts, as it says there in the last sentence, contradicts the City's general plan policy to do physical improvements. That is one of the reasons it is probably listed as not feasible.

CC3.10 Con't

Council Member Scharff: So would that be the primary reason then?

Mr. Struecker: Yes.

Council Member Scharff: Alright, thank you.

Mayor Burt: Council Member Yeh.

Council Member Yeh: Thank you for the presentation. I also just had some questions on Caltrain and GO Pass, and a follow up on Vice Mayor Espinosa's questions. I appreciated that the data that Stanford had shared in its presentation on understanding the SUMC employee population. I know that it carves out that 89 percent of SUMC employment base works on weekdays, but 11 percent of an increment of 2,000 still is about 220 new trips, and that is on weeknights and weekends. If I understand correctly the proposed Caltrain reduction in service kind of is concentrated within those timeframes. So I am just curious, you mentioned some head scratching that would be going on in the event that something were to happen to Caltrain service. I think we have an opportunity between the DEIR and

CC3.11

CC3.11 Con't

the Final Environmental Impact Report to do some of that head scratching. I saw charter buses listed as some of the TDM program solutions. I am curious if Stanford has looked at or why have some of our local companies gone to charter bus models for the employees in different cities?

Mr. Struecker: Off the top of my head I would say it is probably a cost issue.

Council Member Yeh: Has there been a cost analysis to compare charter buses versus GO Pass?

Mr. Struecker: We have not done that as part of this work, no.

Council Member Yeh: Given the concern with the with the level of service I know because there is upwards of $100 million dedicated to GO Pass whether or not that analysis would be merited at this stage of the Environmental Impact Report process as opposed to later on.

Mr. Struecker: Yes, we could do some more analysis to determine what charter bus have as opposed to GO Passes.

Council Member Yeh: The only reason is, I don't know for friends that work at Facebook or some of the other local companies, it sounds like it is a cool thing. So I don't know, aside from that factor I am trying to understand the economics of it and seeing if there is this opportunity to look at an alternative model. I know the intention is to get up to that percent to divert ride alone or just within car transportation is the goal. If that is the goal

CC3.11 Con't

then fully exploring all the alternatives at this point so that it is just a smooth transition to another model if that need ever arises.

CC3.12

The other question I did have was about the truck routes. The Planning and Transportation Commission had mentioned that and just discussed it as part of their questions. I just wanted to see if you had any preliminary responses to the 'during construction phase,' for truck routes.

Mr. Struecker: The DEIR identifies the existing City truck routes or the City truck routes that are adopted by ordinance now, and those are the truck routes that construction traffic would have to adhere to. So that is the information that is in the DEIR right now. I believe the comment also included looking at or determining the volumes. That has not been done as part of this work. If we had some information on construction duration and the type of activity that was going on at any one point in time it could be done.

Council Member Yeh: Thank you.

Mayor Burt: Council Member Price.

CC3.13

Council Member Price: Thank you very much. I appreciate your presentation. A question. In the development of the Draft EIR could someone define for me 'funded improvements?' What is the duration of that assessment? The second question I have is in

CC3.14

terms of feasibility of for instance if there were an intersection improvement, which is the lowest priority of various mitigation measures, the feasibility being engineering feasibility, funding feasibility, programmatic feasibility? There are two different types of questions.

CC3.14 Con't

The one is how are defining funded improvement, particularly because this project is over a significant time period.

Mr. Struecker: The feasibility is probably a combination of about anything you can think of. As I mentioned, the City does have a policy against expanding roadway capacity, so there is one. Political feasibility, funding, the availability of right-of-way, the removal of several mature trees is something that goes against City policy. So I think those are the things that went into the idea of whether the improvements are feasible or not.

In terms of funding, or in terms of funded improvements, the travel model uses funded improvements. For instance, the auxiliary lanes on 101 would go into the travel model to determine the capacity of the roadways to accommodate existing and future traffic. I don't know if that answered your question or not.

CC3.15

Council Member Price: Yes, partially. I guess the question is when we say funded improvements again the duration or potential implementation of this project it ten or 15 years. So I guess I am trying to get a clearer understanding of what does funded improvements mean. Some of these improvements may or may not be in CIP projects, the full assessment may not have been done yet. So that was my question in terms of how we are using that phraseology.

Mr. Struecker: The only improvements that I know of that are funded or partially funded are the ones that Menlo Park included as part of their traffic impact fee. They have identified, and as I mentioned they have identified improvements that they think are feasible that we think are not feasible.

Mayor Burt: I have a couple of TDM questions for the applicant. First is regarding bus service to East Palo Alto including off peak and night hours. What service is there currently and what is planned to enhance that service?

Mr. Hamilton: At this point the nighttime service that is available during the academic year is something we call the Shopping Express, which takes students down El Camino to the San Antonio Shopping Center. We have service that provides…..

CC3.16

Mayor Burt: For East Palo Alto you are referring?

Mr. Hamilton: No, we don't have anything that goes beyond the train station.

Mayor Burt: So my question wasn't just what Marguerite does. What is the bus service that is being supplied? I know that SamTrans expanded that service I think some time after the cancer center went in, and I want to get the current status. My understanding is that a lot of service employees for the hospital development are from East Palo Alto. You run three shifts. There were past issues on public transit to serve those employees at off hours, and I was trying to get an update on that, and what is the baseline and what is in the plan here.

Mr. Hamilton: I don't believe there is any expanded service in the plan at this point. I could not accurately respond to what is available right now.

CC3.17 Mayor Burt: The other question is out of your really comprehensive trip reduction measures one that is in use in a lot of cities, some in North America but certainly more and more in Europe is the bike rental programs, and the automated systems on that. Do you have any comments on that? That is the one that we have not seen Stanford do. You have done almost everything else.

Mr. Hamilton: Well, we do it in a little different way, which is often the University way. We have a lot of programs available on the campus that are characterized as bike sharing. Right now we have about 13,000 bikes on the campus every day. Often times you will find a bike-sharing situation where you don't have bikes readily available. We do have rentals available on campus through the bike shop. We have a lot of departments that have their own departmental bike fleets that allow staff to use that. The alumni visitors' center has about 30 bikes that are available for any individual alums.

CC3.18 Mayor Burt: Let me in the interest of time jump to what bike sharing programs if any are planned for the hospital and the hospital expansion?

Mr. Hamilton: From what I have seen I don't think there is anything formal.

CC3.19 Mayor Burt: Okay. Thank you. For our environmental consultant, was there any analysis on bus service to East Palo Alto, and what mitigation measures that might provide?

Mr. Struecker: No. There was no bus service expansion to East Palo Alto of the Marguerites. No.

Mayor Burt: Okay. Then my final question. When we look at the climate impacts we are looking at vehicular CO2 emissions as one of our largest sources. That is one of the impacts that was significant beyond what could be mitigated. What is the baseline that is being used in CO2 emissions per vehicle mile traveled? Are we using 2010 average vehicle emissions and vehicle types? We have a large transformation that is occurring in vehicular travel.

Mr. Michael Hendrix, PBS&J: Good evening. I am Michael Hendrix and I was the author of the Climate Change section. The vehicle fleet that we used we got out of M-FAC for year 2010, and then future years. The vehicle fleet within that M-FAC assumes a bell-shaped curve as far as older vehicles coming up to newer vehicles. That is based off of the CC3.20 smog certificates that people get for the older cars, and what they estimate the California average on the vehicle fleet is.

Mayor Burt: So that addresses the portion that has to do with the amount of emission for a vehicle that was created under older emission standards and getting those off the road and that is valuable. The thing I am focusing more on is the transformation that has been starting to happen and what is anticipated over the next ten or 20 years in significantly different emissions from vehicles. Is that factored in in any way?

Mr. Hendrix: The M-FAC model does factor in the renewing of the vehicle fleet as the years go by. So the 2025 analysis and the 2020 analysis show a newer vehicle fleet.

Mayor Burt: The new vehicle fleet, you are alluding to a newer vehicle fleet but I am trying to quickly get to the key aspect. What does that assume in a new vehicle fleet?

CC3.20 Con't

Mr. Hendrix: That assumes that as an example for 2020 that a certain percentage of those would be brand new vehicles. That a fairly large portion of those vehicles would be one to three years old, a significantly smaller proportion would be five years or older.

Mayor Burt: I am sorry, but that is all age. I am not getting to the point. Does it assume that among those newer vehicles that in 2025 a certain percentage are going to be hybrid, a certain percentage are going to be electric?

Mr. Hendrix: No, those are all gasoline driven vehicles. At this point it would be a little bit speculative to figure out what that ratio is. We are getting a little bit better handle on electric. Hydrogen has been slower than anticipated. We took a conservative analysis only using M-FAC, which looks at gasoline driven vehicles.

Mayor Burt: Quite conservative, thank you. Okay. I see no more questions so let's proceed to members of the public. Our first speaker is Walt Hays followed by Arden Anderson. Welcome.

CC3.21

Mr. Walt Hays, Palo Alto: Good evening. I am speaking as the Co-Chair of the Friends of Stanford Hospital and Clinics. I am speaking only on the issue of Sustainability. I looked back at my computer and I have been working on sustainability in Palo Alto since 1993. Back at that time June Flemming was our City Manager and she did not allow the Staff to use the word 'sustainability.'

CC3.21 Con't

Through some dedicated Staff people and getting the right people elected to the Council we have come a long way since that time. I worked on a lot of campaigns that helped that happen. I have also been either the Chair or a judge in Acterra's Business Environmental Awards program for many years. Corporations apply for awards in various categories including sustainability. So I can't say I am a professional on sustainability but I am certainly a dedicated volunteer.

CC3.22

Now with that background I would say looking at what Stanford is proposing here it is one of the strongest statements of sustainability on issues that I have ever seen. It goes far beyond legal requirements. Just to give one little example, I am also the Chair of the Sustainable Schools Committee. We were shocked when we were told, because we were starting to try to reduce energy there that Palo Alto High School uses one-third of all the electricity that is used by the entire district. We were trying to figure out why that was and it is because they have classes at night among other things. They also have a lot of old buildings that are poorly insulated, but it was the night classes that were the big factor.

Now a hospital has to operate 24 hours a day as was very briefly pointed out. So they do have some major challenges and I think they have taken incredible steps to deal with those challenges. So I hope you will recognize that in your deliberations. Thank you.

Mayor Burt: Thank you. Arden Anderson followed by Ray Bacchetti.

CC3.23

Mr. Arden Anderson, Palo Alto: Hello, my wife and I have resided and voted in Palo Alto for 36 years. This is my third time to address the Council urging the adoption of this project.

CC3.23 Con't

I want to first mention what a valuable resource this hospital is to our community. I have for the last five years been volunteering in the Intensive Care Units, the pediatric ICU, and the Cardiovascular ICU working with parents as their children are having heart transplants, liver transplants, and so forth. I can see the tremendous value that this institution is providing our community and our Bay Area at large and the state.

On a more personal note, 15 years ago our granddaughter was born with Biliary Atresia. Her bile ducts did not connect properly to her liver and she needed a liver transplant. I commend the Council years ago that allowed Packard Hospital to be built because we had a live-saving resource right in our backyard. We did not have to go to Pittsburg, Pennsylvania, which was the center of excellence for liver transplants at that time. Our granddaughter has now completed her freshman year in high school, and for that we are eternally grateful.

The last point I want to make is what seems to be lost in all of this is the seismic retrofit that is mandated by the state. As I say, this is my third time to come before the Council asking for passage of this plan. The first time was in 2007, three years ago. Most experts predict not if we have another earthquake, it is when we are going to have another earthquake. So over the three years the Earth has been moving and I would like to see the City Council move a little faster, and stay ahead of the Earth so we don't have a catastrophic earthquake that will take lives. Thank you.

Mayor Burt: Thank you. I should have clarified for speakers that this evening our comments are focused on the Draft Environmental Impact Report and the three areas

related to Transportation, Climate Change, and Air Quality. We will have a whole series of additional hearings including as we go to the Development Agreement where there will be additional opportunities to speak on the merits of the project as a whole. Just as an encouragement to the speakers to focus on those three aspects of the DEIR. Thank you. Mr. Bacchetti followed by Paula Sandas.

Mr. Ray Bacchetti, Palo Alto: Thank you for that clarification. I will come back another time.

Mayor Burt: You will be welcome. Paula Sandas followed by Harry Dennis.

Ms. Paula Sandas, CEO, Palo Alto Chamber of Commerce: I am following in Mr. Bacchetti's footsteps. Thanks.

Mayor Burt: You are inspirational. Harry Dennis followed by Hal Mickelson.

CC3.24

Mr. Harry Dennis, Palo Alto: Mayor Burt and Members of the Council, thank you for giving me this opportunity to comment on the proposed updating and expansion of the hospitals nearby. I don't take any credit for it, but I was born at Hoover Pavilion. I grew up in Palo Alto, and nearby. I have been practicing pediatrics at the Palo Alto Medical Foundation for just about 20 years now. Before going to medical school I worked for a rabble-rousing group up in San Francisco called Friends of the Earth. So issues of growth and the impact of development on our quality of live have always been important to me, and continue to be so.

I have reviewed a summary of the Draft EIR and I do see that we can expect some adverse impacts from the project not all of which can be fully mitigated. As I ride my bicycle around town, I bike to work, I see the Marguerite buses, and I know that they are doing what they can there. My daughter, who is currently an employee at Stanford, I could never get her to ride her bike to high school but she rides her bike to Stanford because it costs her too much to drive and she gets a little extra money if she rides her bike.

I do believe that environmental impacts need to be balanced against other community needs. Living next door to Stanford it is easy to become complacent about the quality of care to which we all have access. We all benefit from the proximity to the pioneering care they have. To have a child go home two days after repair of a ventricular septal defect, a congenital heart defect, would have been unthinkable 15 years ago, but it is routine now. The team there is excellent overall and in many cases second to none.

CC3.24 Con't

I have had many times when patient's surgeries have needed to be delayed because of lack of space in the operating rooms. We have patients who sit in the emergency room sometimes for 16 or 20 hours waiting for a space to open up in the hospital. Stanford has done what they can by opening space at El Camino Hospital to help out but if you are a Palo Alto parent with a very sick child you don't want the added stress of having to drive down to Mountain View when you go back and forth between your home and seeing your sick child. So I hope that we will be able to get approval of the expanded capacity that they need. It does serve a larger community than just Palo Alto but the only way that we are going to have the kind of quality that we get there is by having an institution, which draws from a larger area. Thank you.

Mayor Burt: Thank you. Hal Mickelson followed by Michael Griffin.

Mr. Hal Mickelson, Palo Alto: Thank you for the opportunity to comment this evening. Like many other residents I am impressed by the effort and thoughtfulness that has gone into these sections of the EIR. I believe the Council should be confident that the hospital and its advisors are dealing with the potential impacts and mitigations in these three areas very thoughtfully and very creatively.

CC3.25

To me it is worth noting that Stanford has earned a high degree of credibility with its very well established record of Transportation Demand Management, providing the Marguerite Shuttle, which is a great resource and notable in comparison with what other institutions are doing, and also, promoting the use of bicycles, Caltrain, and other forms of transit. In my view the credibility that the University has earned in these areas carries over to Stanford's commitments regarding high Energy Star scores, use of green and recycled materials, green roofing, rainwater harvesting, and all of the rest. So I believe the Council should have a high degree of confidence in this process. I believe that Stanford deserves the credibility that it has earned. Thank you.

Mayor Burt: Thank you. Michael Griffin followed by Traci Fallecker.

Mr. Michael Griffin, Palo Alto: Mayor and Council Members good evening. I have several questions concerning the adequacy of the Medical Center DEIR relating to traffic impacts. First, Stanford knows the home location of all its employees by zip code both on the peninsula as well as in the East Bay. There is no attempt to correlate the East Bay zip code data with the Traffic Demand Management scheme. The mitigation proposal as you

CC3.26

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1 know is Caltrain-centric only helping peninsula employees living in a city served by
2 Caltrain. Question: why is there not a similar solution for East Bay employees to
3 financially assist them in riding East Bay transit thus keeping cars off peninsula roads?
4

CC3.27

5 Secondly, why is there no analysis on whether Caltrain will have the financial ability to
6 deliver the required new capacity to make a go of the GO Pass? Why propose a Caltrain
7 mitigation that is beyond Stanford's ability to deliver it? Will there in fact even be a
8 Caltrain when we need it? Why then is there no discussion of a backup plan should
9 Caltrain for whatever reason be unable to perform?
10

CC3.28

11 Thirdly, the trip distribution map on page 48 shows that the majority of regional traffic
12 attempts to access Stanford from the east, basically, exiting off 101 and then sifting
13 westward through the neighborhoods until finally reaching Stanford. Why doesn't the
14 DEIR suggest incentivizing motorists to access Stanford off of Highway 280 in the west?
15 Why wouldn't offsite park and ride lots at SLAC and behind the berry farm for example be
16 of benefit in accomplishing this? Why was there no discussion of encouraging the use of
17 western access thereby avoiding traffic impacts throughout Menlo Park and Palo Alto?
18

CC3.29

19 Fourth, why is offsite parking classified as an alternative to the GO Pass rather than as an
20 adjunct to it? Especially considering the uncertainty of the Caltrain solution it seems this
21 would make an excellent plan B.
22

CC3.30

23 Lastly, why is there no discussion of the no net new trips? No net new trips are a
24 requirement of Stanford's General Use Permit. Why doesn't the DEIR discuss the

CC3.30 Con't

1 applicability of this requirement to the Medical Center? The Medical Center is Stanford, is
2 it not? Thank you.
3
4 Mayor Burt: Tracy Fallecker followed by Caren Chappell.
5

CC3.31

6 Ms. Traci Fallecker: Good evening. I am a nurse at Stanford. I was here two years ago in
7 support of our doctors and nurses to tell you how badly we needed a new hospital. I left
8 very confident that the leaders in this community knew how important it was and how it
9 was the sooner the better. Then when I caught up with my friends later on who are
10 business owners here in Palo Alto they pretty much laughed at me saying nothing moves
11 through the muck. I am here because I am still confident that we are going to be able to
12 move this through before, as the other gentlemen had mentioned, some catastrophic
13 earthquake decides to hit us.
14
15 So I have worked at 21 hospitals and healthcare facilities in this country as a travel nurse.
16 I have to tell you that Stanford delivers probably the best care in this country if not the
17 world. I find it incredibly shameful that the City has not quite embraced it and the need for
18 a new building. It is interesting we are asked what can you do for us besides possibly save
19 your life. I am trying to find a reasonable explanation for what the holdup is, and though I

CC3.32

20 very much appreciate all the information that the EIR has provided, I myself like to work, I
21 think the EIR is somewhere around 900 and some pages, took two and a half years to
22 formulate, and I realize we are talking about Sustainability and Transportation. I wasn't

CC3.33

23 here for the Housing piece and I do apologize, but what I could understand from it is the
24 EIR stated that there will be no adverse affects on housing. Yet we are still being asked to

CC3.33 Con't

pay money for that. I found out that the hospitals are actually offering $23.1 million despite the fact that we are exempt from doing so.

CC3.34

So I am a little confused as to why the hospital is continuing to be asked for things other than to provide excellent healthcare to you and your families. I am also curious to know in the EIR that there is graph to show how many more lives would actually be saved if we could keep the ED open. Because we have to close it several times because we are full. So I appreciate all your time and effort. I think making a decision and moving this through a little bit sooner rather than later is very important. Thank you.

Mayor Burt: Thank you. Caren Chappell followed by Alan Grundmann.

CC3.35

Ms. Caren Chappell, Palo Alto: I live in the south of Palo Alto. I do most of my local transporting of myself by bicycle. I don't go to Stanford very often. I have not been there since I was sick and that was now more than five years. I like to see the emphasis on bicycle transportation. Possibly not real helpful for acute care patients but certainly for families and for people who are just going for medical appointments. Thank you.

Mayor Burt: Thank you. Alan Grundmann followed by Michele Grundmann.

CC3.36

Mr. Alan Grundmann, Palo Alto: I too came here with the idea of speaking I guess off point. So I won't bore you with it, except to tell you that I was going to compliment the new Council on a professional, business-like interactive way of dealing with Stanford, instead of debating. We are all in this together. So keep it up.

Mayor Burt: Thank you. Michele Grundmann followed by Nancy Peterson.

CC3.37

Ms. Michele Grundmann, Palo Alto: Good evening. I will be a neighbor to come over time because next week I shall be in the hospital at Stanford to acquire a brand new knee. I just wanted to say that the Stanford Hospital has been wonderful. We have lived in Palo Alto for 49 years next month. The hospital was two years old and was a formidable asset at the time. I think really now a renovation and a replacement of some buildings is absolutely a must. I hope that it will be done well before I go to some other place. This is what I want to say. Also, I feel optimistic because what I heard tonight from these people who worked very, very hard and planning the construction of the new hospitals really I was dazzled by what goes on, and water conservation, the green space allocation, the GO Pass. I happen to be a great fan of Caltrain. I think that is great. Thank you.

Mayor Burt: Thank you. Nancy Peterson followed by Boyd Smith.

CC3.38

Ms. Nancy Peterson, Palo Alto: Good evening. Palo Alto has been my home for almost 20 years. I am strong supporter of the hospital renewal project and I wanted to be here this evening specifically because I am also an advocate for alternative transportation.

I have worked on the Stanford campus for the past four years. Like many people here this evening I ride my bike to work. For me it is unless the weather is really lousy, and when it is I take the Marguerite, which is just a great shuttle system. I was really glad to see the Draft EIR has such a thorough analysis on traffic impacts. I was really actually surprised that the mitigations can really neutralize the impacts for local intersections.

CC3.38 Con't

Of the many positive things in the Draft EIR and certainly as part of the Development Agreement the hospitals have offered a lot of improvements. I wanted to point out the ones that I think are important for cyclists and pedestrians. A couple of those are along Quarry Road and the Everett Undercrossing. These measures I think are really important because they are going to give those of us who bike and ride the confidence that we can do that safely.

On the subject of bicycle safety, I think some of you know that I suffered a pretty serious accident on my bike almost three years ago today. It was at a time that quite fortunately for me the Stanford emergency room had space for me and could admit me. We all know that I couldn't take it for granted then and we can't take it for granted now, the reason we are all here tonight is because the emergency department needs to be expanded. The bottom line is the hospital needs to be safe for the next earthquake. Thank you very much.

Mayor Burt: Thank you. Boyd Smith followed by Norman Beamer.

CC3.39

Mr. Boyd Smith, Palo Alto: I won't be here next week. I think my comments touch on the major subject but I perhaps will go a little bit off. I have lived in Palo Alto since 1956. I have been admitted to the Stanford Hospital three times, one very serious. Most of our children and many of grandchildren were born in Lucile Packard Children's Hospital. On two occasions there were serious complications. My parents were both treated at Stanford and I have been down to the emergency room with them and others many, many times.

Several weeks ago I made a visit to the Stanford Hospital to a very prominent member of this community who has made an enormous contribution to this City. He had been

CC3.39 Con't

admitted for serious medical reasons. He had been there for some time. As I left I thought, my goodness, how grateful I am to be close to the Stanford Hospital when something serious occurs.

I have heard and read that there are those in this community who would like a smaller hospital, one that doesn't have to be large and not so comprehensive in its medical capabilities. Such a smaller hospital would generate less traffic, less pollution, require less housing, employ fewer people, and therefore be more convenient and less disruptive to their lives. They believe it is a bother, an inconvenience to have such a preeminent medical center in their midst. When they talk about that I think about the definition between a major and minor operation. A minor operation is when it is on someone else. A major is when it is on you.

I submit that when complex medical issues confront you or those you love you will want to be very close to Stanford Hospital and Lucile Packard Hospital. Traffic and housing and pollution issues will fade into insignificance. You will want the best and the brightest and that is what Stanford offers.

One more thought. I am aware there are many among us who would look at Stanford as a cow to be milked. The hospital expansion is an opportunity to help Palo Alto deal with its own financial problems that are unrelated to this renovation and expansion. I hope you won't let those ideas creep into your decisions, and will resist the urge to take advantage as some would do to play Stanford's dependence upon Palo Alto for all it's worth. Thank you.

Mayor Burt: Thank you. Norman Beamer followed by Stephanie Munoz.

CC3.40

Mr. Norman Beamer, Palo Alto: Thank you. I am President of the Crescent Park Neighborhood Association. I am confident that most of the Crescent Park residents are very supportive of the expansion of Stanford and think very highly of it, much along the lines of some of the speakers here tonight.

CC3.41 Con't

On the other hand, the people in the neighborhood are concerned about traffic. So we want to make sure that the proper mitigation measures are taken. Given the uncertainty of Caltrans and the uncertainty of traffic predictions I would like to suggest a mitigation measure that might be considered. That is a technological solution, which has been tried for example in London. The EIR talks about traffic adaptive signal lights but I have in mind something like what the City of London does to manage traffic congestion. I would like to handout this brochure, if I may, which describes it. So if I run out of time at least you will know what I am talking about.

In London there is a congestion control area and any nonexempt car that enters must pay a daily fee. There are hundreds of TV cameras in the area that take pictures of the license plates, which are electronically scanned and identified. The owner of any car that is detected that hasn't paid the fee is charged extra. Apparently this system is very accurate.

This might be used in the hospital situation as follows. Hospital employees who drive from outside the city would be told to approach the hospital via routes or during time periods that minimize congestion. Stanford would provide the City with the license plates of the employees, the cameras would monitor for compliance, and noncompliance would

CC3.41 Con't

result in extra payments by Stanford to the City. That is one way I think that might ensure that the traffic is mitigated to the maximum extent possible.

It is true, Palo Alto enjoys the benefits of the hospital but so does the whole area, the whole state, the whole country, but we are bearing the costs and the detriment. So we ought to be entitled to get them mitigated to the maximum extent possible. Thank you.

Mayor Burt: Thank you. Stephanie Munoz followed by Tom Jordan.

CC3.42

Ms. Stephanie Munoz, Palo Alto: Good evening Mayor Burt and Council Members. In listening to previous speakers I was reinforced in my thought that we need a somewhat richer context and a somewhat more holistic acceptance of the problems and the possibilities of a wonderful new hospital in our midst. I don't think it will work to move them, to try to fragment the problems, which are interrelated.

CC3.43

Although, for Transportation specific, so I intend to speak about something else but I hope I won't take more than three minutes. Anyway, as for bicycles I am here to tell you that last summer my kids went up to a place called Sun River, which is their idea of recreation. I tried out bicycles for the first time in many years. I would like everybody to know it is not as easy to ride a bicycle as you might think. Many of the people who come to the hospital they are obviously not going to be able to ride bicycles, but nobody expects them to. It is the workers that a very rosy expectation that they will ride any bicycles. But furthermore, you have no way of knowing that the cities and the other entities are going to cooperate. With all praise that we give to those worthy's that ride the bicycles, Caltrain tells them after soliciting their business frequently that they can't get on the train with their

CC3.43 Con't

bicycles. These are people that are going to work. I really do not understand how Caltrain gets away with that. I don't understand how a person – however, Stanford could do one thing and should do one thing, and it is really very easy. They should run a jitney for the late, late hour people, the midnight people, and the seven in the morning people who will not be taken care of by any other kind of transportation, to East Palo Alto, which is the main part of their low-income employees. You may wonder sometimes when you hear the Democrats talking about the minimum wage and how they have made it seven dollars an hour. Who works for seven dollars or eight dollar an hour? It is hospital employees. They do not live in Burlingame. They do not live in San Mateo. As for people changing their residence to take these new jobs it is not going to be Google employees who ride bicycles actually, who make $60,000 or $80,000 a year and have been laid off. It is not going to be those people.

CC3.44

CC3.45

Second point. As to the other qualities faced by the EIR that Palo Alto is concerned with they are all related in that they all take money. Palo Alto has many good ideas about how to improve the quality of life and the quality of air in spite of increased density. They are not going to take place without any money. The simple fact is that Stanford, wonderful though it is, we have degrees in our family from Stanford, more than one. Wonderful thought it is Stanford is a moneymaking enterprise. It is a big money-making enterprise. They have managed to work the mixed up health system so that somebody is coming out on the top and it is Stanford. Well, okay.

CC3.46

When you allow Stanford to build a tall building, taller than this building, I thought that was sort of undiplomatic. When you do you are giving Stanford the square feet that for ordinary people would be spread out over a much, much wider area. A million square feet

CC3.46 Con't

approximates about half of the Downtown business area. That is millions of dollars a month in rents that Stanford can then collect from doctors, lawyers, pharmacies, Silicon Valley entrepreneurs because they don't have to use up their other space for that density. It is a practical way to do it. I want to remind you however that this very Council, well the Council once before, went that Jewish Community Center-living center opened they were not allowed to go another flight up. I stood here and said you know those elderly people will find it much more practical to go up and down in an elevator than to walk with their walkers long distances, and they were not allowed to go up over that amount, nor were the parking garages. I think Stanford ought to go up because it is more practical, but they also ought to give back to the community the open space that they are being able to add to their financial profit.

Mayor Burt: Thank you. Tom Jordan followed by Bob Moss.

CC3.47

Mr. Tom Jordan, Palo Alto: Mr. Mayor, Members of the Council. I want to address the Transportation section only. The Transportation section is 87 pages and there is not one word in the 87 pages about one of the most significant things that should have been mentioned and dealt with. That is Stanford's 2000 General Use Permit that it obtained from the County. Now why is that important? It is because it is a project that is even bigger, if you can imagine, than this hospital project before you. It is 2, 035,000 square feet of academic space, 3,018 living units, 2,000 for students, 350 for medical students and postdoctorals, and 668 for faculty. That equates to about 5,000 new people on campus. That is 5,000 new people more. What is in front of you is 2,242. So it is really much bigger. Now why is it important? Well, number one it is only about half built. So there is more to come. If it is only half built why isn't it discussed?

Secondly, there are quite a few things in the Permit from the County, 36 pages. There are quite a few things that Stanford is required to do. It would be nice to know that they have done them. Now on how much is built and have they done them I have inquiries myself on those points, but a single citizen shouldn't have to do that. It should be in the EIR and it isn't. I say its absence makes it inadequate.

Probably the most important thing being inadequate is the structure that the County Board of Supervisors imposed on Stanford at the time it gave them this General Use Permit. It is 36 pages and nine pages have to do with transportation. On page 13 there is a requirement of no net new trips. Now that is something that the Board of Supervisors imposed on Stanford even though they don't own many intersections, and they don't have urban populations near Stanford. You do. If the Board of Supervisors imposed it and imposed it with teeth, on page 16 it says if you don't comply you actually have to stop construction. So it is not only a requirement but it is one with teeth. So what I would suggest is that perhaps it is not an inadequacy of the EIR but you should have from your Staff why your requirement is not the same as the County's. There is an interrelation. For instance in 2005 Stanford was within just a few trips of violating that. We saw in the screen tonight 776 more commute hour trips. They were within 14 trips in 2005. There needs to be an interrelation of those two things and there isn't. Thank you.

CC3.48

Mayor Burt: Our final speaker is Bob Moss.

CC3.49

Mr. Robert Moss, Palo Alto: Thank you Mayor Burt and Council Members. I am concerned about the traffic and Transportation issues but they also spillover to Air Quality

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and Climate Control. The number of additional cars, over 10,000 a day, is going to have some significant impacts on generation of carbon dioxide, it is going to hurt the atmosphere, and it is going to also make it more difficult to achieve climate control.

So why do we have these problems and how do we resolve them? Well, the mitigations that Stanford is proposing for traffic I think in many cases are dubious. We have heard about the problems with Caltrain and the fact that the proposals may not actually be viable five years from now. Caltrain may not even be here but there are other issues. We talked about some of them like not having transportation to East Palo Alto, nothing to the East Bay. The distribution of employees they have today is not necessarily the distribution they are going to have five or ten years from now. Because somebody happens to live in Burlingame and go down to Stanford today doesn't mean that five years from now they aren't going to be someplace else. Let me give you an example. Years ago my secretary lived in Mountain View. They rented a house and worked in Palo Alto. They had an opportunity to buy a house in Tracy. So they moved out of Mountain View and moved to Tracy and commuted 45 minutes each way into Palo Alto. You may find people doing that in the future. Nobody knows where the new 2,000 to 2,500 employees they are going to hire are going to be living. So the projections for being able to mitigate traffic I think are very optimistic.

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When the Stanford project was proposed years ago, going on five years ago, things were different than they are in the hospital business today. Let me give you an example. *New York Times* had a very interesting article in yesterday's paper about how hospitals are using new techniques based on kaizen. It is called CPI or Continuous Performance Improvement. The automotive and aerospace industries have been this. The hospital they

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gave as an example is Seattle's Children's Hospital. Let me give you some of the things they have been able to do. By using this, and only in the last couple of years, they have been able to eliminate $180 million in capital improvements. They were able to increase the number of patients they saw each year from 27,000 a year to 38,000. They were able to reduce hospital stays from 20 days to ten. MRI examinations, which took as long as 25 days for non-emergencies are now one or two days. There were able to reduce the amount of transportation of patients along the hospital corridors to get from the beds to the operating rooms and care areas. These ways of improving performance have been proven. This is just one hospital that is doing it. They gave a number of others, Beth Israel Deaconess Medical Center in Boston, Park Nicollet Health Services in Minneapolis, Virginia Mason Medical Center in Seattle. All of these hospitals have successfully adopted CPI in just the last couple of years and found they have been much more efficient, and needed much smaller hospital facilities in order to operate. This is new.

Stanford should be looking at these new techniques and approaches and seeing if they really need to expand as much, to have as many additional rooms, to have the hospital configuration that they are proposing in light of these new technologies. In this article they talk about how literally hundreds of representatives of hospitals all over the country have come to Seattle to look at how well it is working. This is not theoretical. This is actual and this effective. So I think it is time for everybody, Stanford and the City, to step back and see if the scope of expansion is really necessary if something like CPI was adopted, and is as effective as some of these other hospitals have found it is. I will leave this with the City Clerk and she can pass it around for you to take a look at.

Mayor Burt: Thank you. So before we begin Council discussion and comments I should say it is after 10:30. We have several other items on our agenda. Mr. City Manager, you were suggesting to me a moment ago that we might have some alternatives on how we could arrange the schedule. Next week we have what appears to be a lighter schedule. The Stanford item is on Seismicity, Hydrology, Hazardous Materials, and Utilities, which are probably inherently much less contentious and complicated than the ones that we are addressing tonight. This is both first a question for you and then for colleagues whether we should rollover this segment wrapping it up next week on these three items, or alternately look at postponing any items that remain on the agenda for tonight. Does Staff have any comments before we hear from colleagues?

Mr. James Keene, City Manager: Mr. Mayor, I think you expressed it well. I guess you would know better how to asses how long you would continue to discuss the current item tonight, and you can see what else you have on your agenda. As it relates to next week separate from a Closed Session we really have just Consent items, the Stanford EIR item that the Mayor mentioned, Review of Project Safety Net Community Task Force Report, and then the Update on High-Speed Rail, essentially the extension to the Capital Advocates contract, which we don't think would be very complicated. So to the extent that that helps you sort of figure out how to apportion items between the remainder of tonight, and next Monday.

Mayor Burt: Council Member Scharff.

Council Member Scharff: I think we should finish this item up as it is somewhat technical. I know at least I forget things after week.

Mayor Burt: Okay, so if we go that route we have to face the reality of what remains in Items 5 and 6 really, 7 should be very brief, and the Consent should be brief.

Council Member Scharff: I would move 5 and 6 to the following week if it is light.

Mayor Burt: Do we have a second to that proposal? Do we have any other suggestions other than staying here past midnight? Council Member Schmid.

MOTION: Council Member Scharff moved, seconded by Council Member XXX to move Agenda Item Nos. 5 and 6 to July 19, 2010.

MOTION FAILED FOR LACK OF A SECOND

Council Member Schmid: What about setting a deadline of say 11:30 and at 11:15 we can decide where we are and complete what we can do.

Mayor Burt: Well, if this item continues until 11:30 then I would expect that we are going to be here after midnight. My question is what would we stop?

Council Member Schmid: My suggestion is we go to 11:15, stop at that point, and say do we want to continue this, do we want to complete it, and move everything else.

Mayor Burt: Okay. Are any of the other items time sensitive of Items 5, 6, or 7?

Mr. Keene: I am looking to see whether there is anything on Item 7. I am assuming the Consent Calendar could be passed given that there are some time sensitive items on that.

Mayor Burt: Council Member Shepherd.

Council Member Shepherd: Does this mean that if we don't get to the rest of the business by 11:15 then we will not? Because it is very important to me to see number 5 and number 6 addressed this evening?

Mayor Burt: That's right. We really have a choice as best I can estimate it between deferring the balance of this item or getting to Items 5 and 6.

Council Member Shepherd: Then I would like to see us get to Items 5 and 6.

Mayor Burt: Council Member Holman.

Council Member Holman: My concern about not finishing this item tonight, and I am understanding about the need and desire to hear a couple of other items, my concern about not finishing this item tonight is a balance between us being fresh enough to do a good job, but when we continued a Stanford item once before it got short shrift at the second meeting. So how do we best balance that? Do we have a notion of how long 5 and 6 would take this evening?

Mr. Keene: Mr. Mayor I can tell you that Item 7 we can just automatically carryover to next week.

Mayor Burt: Okay. I would say 5 and 6 would take a moderate amount of time. I think we need to be realistic. Maybe they will take less than we budget for. There are pros and cons to each. I know my mind is focused on this right now, but we have I think realistically that choice. If we want to proceed on this item we could go at 11:15 and look at where we go from there. I would estimate that we have 45 minutes in the other items if we move them along pretty quickly. Okay, so then let's go ahead. I think if everyone can try to be as succinct as possible.

This process, just to remind everyone and this goes for the Council Members as well it is not about commenting extensively on the merits of the project. If we can just focus on specific elements to the Draft EIR that we think should be addressed differently from what is already in there that is really the task before us. Council Member Price.

CC3.52

Council Member Price: Thank you. I wanted to follow up on comments made by several colleagues. Within the Draft EIR I do think there needs to be a more thorough and complete assessment of the issue of the future of Caltrain and how in fact that will impact the opportunity to expand the GO Pass option. Clearly the TDM measures are very critical to this whole project. It seems to me that there needs to be a section within the Draft that talks about some of the uncertainties around funding and operations of Caltrain. Related to that, I think there needs to be language in the Draft EIR and perhaps the Development Agreement that specifically defines the problem as that is emerging over the next few years, and clearly identifies the process that will be used to come up with alternatives, alternative transportation options that will be able to make up for and address the issue of capacity. What I am suggesting is that if in fact the Caltrain services are reduced or

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eliminated what will be the alternatives that are viable, that are feasible, and that are fundable to provide this option to reduce trips in single occupancy vehicles.

I think if the Draft EIR does not address this I think it is really woefully incomplete because this issue is not going to be determined in a year or two. It is something that we are going to have to have a plan that is clear in terms of addressing these problems if they emerge. So that would be my recommendation.

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The other thing is any reference to Palo Alto Shuttle I think we need to look at one of recent budget items and actions to make sure any language around Palo Alto Shuttle reflects current actions by the City Council, and to recognize that the evolution of that service we can't say with specific certainty which way we are going. I personally would like to see it expanded, absolutely, but we have to have the ability and the resources to do that.

So those are my two major points. I appreciate the work that has gone into the preparation of the Draft EIR and all the consultants and Staff, thank you.

Mayor Burt: Council Member Holman.

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Council Member Holman: This is quite a major undertaking and I appreciate all the additional effort that has gone into it. I have a question that may relate to the emission offsets that the Commission referred to. They relate to both traffic and to air quality. If there are intersections that don't reach the significant unavoidable impact because of the failing grade of those intersections, can we do I guess it would be an offset to that to

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1 require improvements at other intersections that would improve the air quality because of
2 the emissions put out by the traffic? I don't know if that is a CEQA directly related issue
3 or if that is something we would have to determine outside of CEQA.
4
5 Ms. Cara Silver, Senior Assistant City Attorney: The air quality impacts are not
6 necessarily linked to particular intersections. So that doesn't seem to be an appropriate
7 offset.
8
9 Council Member Holman: But there is an accumulation of them. So you don't see any
10 way though that we could address those in a cumulative way as part of the DEIR or EIR?
11
12 Mr. Jeung: Maybe I can try clarifying a little bit for Council Member Holman. The issues
13 that you are identifying at the local intersections where we have congestion and there are
14 air quality related emissions, those emissions are considered localized emissions related to
15 carbon monoxide. The emissions that are more related to the longer distances and the
16 traveling along major corridors are other types of criteria pollutants. So the mitigation
17 measures that would be effective for the intersections don't necessarily relate to those other
18 emissions that are being considered as part of the longer trips.
19
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20 Council Member Holman: Actually, that was a question I had too. On the analysis it talks
21 about how I think it was less than significant impact as a result of low speeds traveled and
22 congested areas. I think it is a comment you can address later. . I wasn't understanding
23 how it will be a much more congested area, how that could be a less than significant
24 impact when we are obviously going to have much more congested intersections. So a
25 comment on that.

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1
2 In the air quality impact was the removal of the trees that are a part of the current preferred
3 Tree Preservation Alternative, was the removal of those trees and the air quality impact of
4 those removals considered as part of the Air Quality Analysis? I don't believe it was.
5
6 Mr. Jeung: You are correct. It was not included.
7
8 Council Member Holman: It seems as though it should be since those large trees do
9 contribute quite a bit to purifying the air.
10
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11 Parking and counting trips. It has been perhaps generations long, but certainly a decade's
12 long issue of overflow parking in the College Terrace neighborhood. I am wondering if
13 Staff has any count on how much of that spillover parking that is Stanford related, how that
14 relates to the number of trips that actually occur going to Stanford. In other words, people
15 stop in the College Terrace neighborhood and then take a bicycle or bus onto the Stanford
16 campus. So those trips are not necessarily counted. Maybe Staff has some count of how
17 much of the parking in College Terrace neighborhood is Stanford related because those are
18 trips.
19
20 Something that is often overlooked and it seems to be overlooked now is the impacts of
21 mitigations. Several of the mitigations for Air Quality have to do with watering of
22 construction sites, and I will just use that one as an example. That construction is going to
23 go on for a good number of years so it is an awful lot of water that is going to be consumed
24 to keep construction dust down, again as an example. Is that water use considered as a part
25 of the water impacts? I will stop there for now.

Mayor Burt: Council Member Schmid.

CC3.58 Council Member Schmid: Good data makes good decisions. The assumptions in the traffic model seriously understate future traffic growth. According to the Palo Alto traffic model that is used in the DEIR almost 85 percent of the traffic increase between 2005 and 2025 in eight intersections surrounding the Medical Center project will come from "other baseline growth." At the extreme, the traffic model says that the intersection of Durand and Welch, an intersection that doesn't exist today and only will be built to help the Medical Center, only eight percent of future traffic will be accounted for by the new project. Yet this is a project that will be increasing parking places from today's 932 to 2,985.

The assumptions embedded in the model that produce such a hard to believe outcome are that baseline growth comes from ABAG, and is driven by the California Department of Finance's Population Forecast. This state cohort component model forecasts future growth on the basis of past statewide demographic patterns and then allocates that total among regions to regional councils such as ABAG.

ABAG is distributing the State's high population jobs and housing forecasts through a statewide allocation formula. Thus Palo Alto's traffic model "baseline forecast" already includes growth extrapolated from the existing jobs/housing ratios. That is most new ABAG extrapolated jobs in the Stanford core are baseline. The only other identified major cause of significant growth near the Medical Center project is the expansion of the main campus northward toward Sand Hill Road but they are under a no net new trip agreement.

CC3.58 Con't Please, come back to us with a traffic model that contains clear, understandable, and reasonable assumptions about traffic impacts, and that does not use ABAG extrapolations as their baseline assumption.

Mayor Burt: Council Member Scharff.

CC3.59 Council Member Scharff: Thank you. I had a couple of comments on the traffic again. I do think that traffic is the thing that most concerns me about this project in terms of affecting the quality of life in Palo Alto. So one of my concerns is when we look at the intersection improvement, which is that most of them were written as not feasible, and yet four of them are in Menlo Park and Menlo Park says they are feasible. If Menlo Park says they are feasible I think we should rethink that and think they are feasible.

CC3.60 Then I was also somewhat concerned that some of the ones in Palo Alto are considered unfeasible because of Policy T-27 in our general plan. There may be some good reasons to have that policy for a number of projects. However, the Stanford project is different. We have recognized that the Stanford project is different in that we are going to look closely at removing the 50-foot height limit just for this project. Just like that, we should probably not apply Policy T-27, which is increasing road capacity. Where can increase capacity, which is fixing the intersection is deemed increasing road capacity as far as I can tell on this, we should do that. We should make traffic flow as smoothly as possible. Not to do that in this opportunity seems to me to be a fairly silly thing to not do.

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So I am hopeful when we look back at this EIR and look at the Final EIR we can look at those and try and get those done and not say that they are infeasible just solely because we have a policy. If we are going to look at other policies we can look at this policy as well. I think that should be a Council decision at the end of the day.

The next concern I had on this was it talks about the fair share that Stanford would only have to pay the fair share. Now obviously I only think Stanford should have to pay their fair share in things, but on the other hand I want to make sure that these traffic improvements get done. Maybe you give a little explanation because I am not sure I understand what that means. Does that mean that none of these could be done if there is not money available? How are we going to determine what a fair share is? What this means? How do we ensure as Council that this happens so we don't have these unmitigated traffic impacts?

CC3.61

Ms. Silver: I am happy to answer it Council Member Scharff. There are two different ways to approach fair share allocation. One is to have the applicant fund 100 percent of the improvements, and then as other projects come online the future developers will reimburse the applicant. The other approach is to accumulate money from this applicant and future applicants and when it is fully funded then perform the improvements at that time.

Council Member Scharff: Would Council be making that decision then or how do we see that going? Is that a question that will come up and we will vote on that at some point?

Ms. Silver: Yes, that will be defined in the mitigation measures.

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Council Member Scharff: So when the EIR itself comes out will there be dollar amounts associated with this so we have a sense of what these improvements will cost Stanford, and how much we are voting? Obviously that plays some role in this.

Ms. Silver: To the extent financial feasibility is going to be an issue we will attempt to cost those out in the Final EIR. Not all mitigation measures are costed out in the EIR.

Council Member Scharff: I noticed there weren't other traffic improvements that may affect us, and one of them that came to mind was obviously when you drive down Embarcadero it narrows to three lanes under the bridge and then it goes back to four. If you ever are around on game day you clearly see it would be nicer to have four lanes there. So I guess the question is do we look at any of those kinds of traffic improvements or are they just cost prohibitive or we just didn't look at them because of our Council Policy T-27?

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Mr. Williams: Yes, Council Member Scharff, there in that one particular instance particularly with Embarcadero that was not looked at because there no significant impacts identified to address. So it may be something that again in a bigger sense is useful to address in some way, but as far as being a mitigation measure it wasn't really triggered by the significance criteria to go there.

Council Member Scharff: Right, fair enough. I just meant that as an example of the kind of thing. I was asking if there were roadway segments, because I think there were a few roadway segments here for instance that are unmitigable according to the EIR. My

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question was if Embarcadero was unmitigable that would be something we would look at. My question was, not having driven those roads every day, Embarcadero comes to mind, are there things in the City of Palo Alto that we didn't look at that we could have done or outside the City of Palo Alto on some of those segments that would fix those problems of those unmitigable roads that we could do?

Ms. Silver: Council Member Scharff, I don't believe we had any unmitigable impacts to roadway segments in Palo Alto. Certainly in Menlo Park.

Council Member Scharff: We had it in Menlo Park, right?

Ms. Silver: Right.

Council Member Scharff: I guess then my question is on those Menlo Park roadway segments are there things that could be done to increase capacity that would mitigate that area that we didn't look at for some reason, or is it just not possible to do it?

Ms. Silver: To my understanding, Menlo Park is taking up this issue at their next meeting and Menlo Park City Council will be reevaluating their existing policies and looking at that issue pretty closely.

CC3.63

Council Member Scharff: Alright. I also wanted to comment briefly on Mayor Burt's comments about electric cars and hybrids. I tend to agree that clearly we are going to make much more of a transition by 2025 to that. Was it just a matter of being more conservative or would it be inappropriate to do some sort of an analysis where you look at

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that, where it would basically show that as an impact? I know that when I drive around Palo Alto I see probably one out of ten cars is a Prius.

Mr. Hendrix: Currently we don't have good statistics on the growth of hybrids, or more particularly on the growth of electric vehicles or hydrogen vehicles. So it would be hard, without being speculative, to figure out what that growth would be. That would be something – a whole other study that would need to be done to augment the greenhouse gas analysis.

Mr. Jeung: Let me go ahead and interject that just as Council Member Scharff has suggested on other comments and Council Member Price, we can introduce information to acknowledge that there is a trend that is occurring, and that the analysis that is currently included in the environmental document is particularly conservative. To the extent that we can provide some information that suggests and indicates how the car fleet is changing we can certainly do that.

Council Member Scharff: Thank you.

Mayor Burt: Council Member Yeh.

CC3.64

Council Member Yeh: I think I just wanted to start off with my comments. I did want to echo some of the comments that were shared by members of the public just about the sustainability measures that have been proposed by Stanford. I think it is to be commended with some of the thoughtfulness that has been put into some of the measures.

CC3.65

I think from a height perspective there is a visual impact. But when you have the different viewing perspectives of the proposed hospitals and buildings you do see the intention for this holistic environment for healing. When you have living roofs or you have viewscapes for patients that objective is not lost on me, where the primary function of the hospital is for this healing environment. So I do want to commend Stanford for coming forward with those designs

CC3.66

My questions remain on the Transportation side. In terms of prioritizing I know we have talked about traffic adaptive signal technology, and new pedestrian and bike under-crossings, TDM measures, and intersection improvements. I am just curious as it comes forward how the cost analysis will relate to this prioritization and seeing the effects on mitigation the traffic impacts. If that level of detail will come back in the next round for the Final EIR, and I would be interested in seeing that. I think the reason being that just as all of the impacts are seen and the potential solutions have been identified, to start tying these particular solutions kind of going outwards from the project, those intersections immediately surrounding the project all the way out to where we have a kind of impact on our streets and under our authority within the City of Palo Alto, and those that are regional. Just tying really specific options and allowing for some policy input on those would be really beneficial. I think it is helpful where creating options really does allow for different perspectives to get onboard with different potential mixes of solutions. I think that will be really important as we get closer to our Development Agreement and a final decision on what the project mitigations are versus what we are determining are within our Development Agreement to see what – we need to maximize flexibility in a collaborative process.

Under Sustainability I do have one question. I just don't recall, I wonder if Staff can remind me who handles the hospital's garbage and solid waste. I just don't remember.

Ms. Silver: That is within Palo Alto's service area. So Green Waste picks up the solid waste.

Council Member Yeh: Is there going to be any additional analysis on that coming forward in a future session for us to discuss? With the expansion of the hospital my assumption is that there is going to be some impact on solid waste. I know that there is hazardous waste associated with some and just want to make sure we have an opportunity to understand some of those streams.

CC3.67

Ms. Silver: Yes, some of that analysis is already contained in the EIR. There certainly was landfill capacity analysis discussed in the EIR, and there is also some hazardous materials discussion in the EIR.

Council Member Yeh: That was the extent of our opportunity to discuss some of this, just making sure that we understand the level of proposed participation within some of the zero waste goals that Palo Alto in terms of its policy? I don't know if that is a future session that you envision? I see some nods.

Mr. Williams: Yes, Council Member Yeh we did discuss it and that is in Utilities. So that is next week's session.

Council Member Yeh: Thank you.

Mayor Burt: Okay, we have three more of us remaining, and I hope we don't get to 11:15 and you cut me off. Council Member Shepherd.

CC3.68 Council Member Shepherd: I will speed-talk then. First off I wanted to acknowledge, a couple of times Stanford has not only in the Draft EIR, but then even this evening talked about expanding the Marguerite service. That is something that I am pretty darn passionate about. Just looking at the location of how many people live in the vicinity, the Palo Alto, Mountain View, Menlo Park, Los Altos, Stanford, and East Palo Alto communities. It is not likely people, I don't know if people from Mountain View are jumping on the train or if they are just jumping in their car. I don't know. It is something that I think can be a real big win/win for this community. As a citizen of Palo Alto I have to protect the interests of the quality of life in this process, and I think that would be a major input for not only just the employees but the students on the campus to get back and forth between hopefully some hot spots in our community, and also patients going back and forth. So I would like to see that expanded and actually implemented.

This leads me to the next comment that I have, which is the fact that we have had to cutback on our own shuttle service, the Midtown Shuttle. This was a difficult decision to make during I think Finance Committee, but then also Council discussion a couple of weeks ago. It begged the question then, and I think even more now to actually do a study on the shuttle and where it can be most effective to collect people and deliver them where they need to get delivered so that we can get people efficiently over to the hospital.

CC3.69 The one thing that I am not completely convinced about is the expectation of those that will be transferring to GO Passes partially because the relationship between the GUP where there are no new net trips and yet this is outside the GUP. The no new net trips are probably more driven by the fact that there just isn't enough space to get everybody over there. Our arteries going into Stanford are old. They were decided to have three lanes I guess under Embarcadero Road subway at some point in time in our history. That right now might be choking a possibility of perhaps looking at relieving traffic that many, many people I know come up through Central Expressway into our Alma and can only transfer over to El Camino on Oregon Expressway or Churchill and they cannot do that on Embarcadero. Then the last one for Palo Alto is University, which has its own complexities. So at this point I would like our Staff to seriously take a look at working with Stanford to do a borderless type traffic study. I have noticed that Council Member Schmid has also wondered what we could do between Alma and El Camino on Embarcadero Road based on his questions. See if we can't really look at this strategically for the 21st Century basically. To not just look at an isolated project but to see if there is a way we can get this traffic really understood and unwound so that we can support the no net new trips but also support having good traffic flow through the local municipalities.

CC3.70 Finally, I was very impressed with looking at the park and ride locations both at Ardenwood in the East Bay to get people over on the Dumbarton Bridge, also up on Sand Hill Road. I know that those are possibilities. They are not written into the Draft EIR at this point so I would like to see them become a little more material as we move forward with this project. I think that this is possibly more of a style of a hospital employee. The only reason why I say the style might be different than the University campus that this is more of a nine to five type job. People do like to get in their car and relax on their way

CC3.70 Con't

home. So anything we can do to help them do that without impacting traffic in Palo Alto and the vicinity is really important to me. Thank you.

Mayor Burt: Vice Mayor Espinosa.

Vice Mayor Espinosa: Thank you for the presentations. Thank you for everybody staying so late this evening. I was very much looking forward to tonight's conversation for two

CC3.71

reasons. One is I think there is probably no other area where I have heard more from the public and from community members about the impact that Stanford will have the impact that this project will have on their quality of life than traffic. I think that people see that as a worry.

CC3.72

The second point though is that Stanford has been, as we have acknowledged tonight, a real leader in alternative transportation policy and projects. So I was very interested to see how the discussion would go and to really dive deep into this part of the DEIR. I think there was a lot of creative thinking that went into this, and it was exciting to see it all come together.

CC3.73

As we look at what we are going to flush out a little bit more before we come back with a Final report my concerns are I think we did an interesting study, Council Member Scharff looked into that, on intersections. Obviously that is a key component of understanding the traffic impacts.

CC3.74

The second though in really understanding ridership and looking at reducing trips is where my concerns lie. I think that obviously I raised the GO Pass in the questions part of these

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comments tonight. If you are looking either at really diving into where employees live and modeling out where we think employees will live over time, understanding who is on the corridor and not. If you are going to think about so much of your trip reduction, ridership reduction, traffic reduction programming based on Caltrain then you really need to think about how many of those employees realistically are going live along that corridor and are going to use that model. I am not sure that we end up with a deep enough understanding of whether or not those numbers will stand over time.

So I think that as we move forward having a better understanding of that both on the front end of really understanding where employees live, modeling where we think they will live over the next ten, 15, 20, 25 years. Then really thinking through Caltrain, its ridership numbers over time, its levels of service over time, its frequency over time, and whether or not this is really going to be a sustainable model for us.

CC3.75

In the big picture, I just want to acknowledge the great work that I think was done. Again, Stanford on so many different levels has been a leader across the country in transportation policies and programs. I think the concerns that have been raised tonight, from my perspective, are all ones that we can really work through and address. I just want to make the point that this was the area that was most important to me, the area that I think was most important to so many citizens. I think we end up at a place this evening where I can see us getting there. There isn't this huge delta in terms really being able to address those traffic impacts. I think it is really understanding though what programs are going to make the most sense, and making sure that we are dealing with data that is really going to hold true over time. So thank you everybody for their work.

CC3.76

Mayor Burt: I will make a couple of broad comments and then some more specific ones. First, I think that this project is radically better, a more sustainable project, than what we first saw four years ago in a whole variety of ways that colleagues and the Staff and the applicant have all laid out. If there is a lesson learned it is in this era, the 21st Century, lead with sustainability on a project. Don't wait until three or four years into it before putting your best foot forward. I know that some of this you didn't have your best foot at the time. It has taken a lot of work to get to the specifics of what you have. The first project that we had for the first year or two there was almost no discussion of sustainability, and a lot of community angst that has come about in opposition to the project that now has to be reconciled and we are in a positive track could have been mitigated if we had had the concepts of sustainability even before we put the meat on the bone on what that would be, and the design of the project.

CC3.77

Our task tonight is principally to help make this DEIR better, and more complete, and more accurate. I think frankly it is a good EIR. I have seen a lot of them over the years and I think this is a very solid one. I think it has done a thorough job in a lot of ways. So I will just cite a few aspects of specifics. One is that I think the offsite parking is not a very progressive measure. It should be a last resort. It may need to be a last resort to try to further mitigate the impacts that otherwise cannot be adequately mitigated.

CC3.78

I also think that we need to include a post-project environmental analysis. We had this on the Sand Hill Road Corridor. As is customary in EIRs it is important to err on the high side on impacts and be cautious on assumption on mitigations. That is the way we are supposed to do it. Apparently on the Sand Hill Road Corridor, which was supposed to have post-project analysis, the traffic impacts as I understand it were less than what the

CC3.78 Con't

EIR had projected. Either way it is one thing to go through this whole extensive process and then never look back and see how close we were. This is not a crystal ball process.

CC3.79

Next, I think that we should look at the bicycle rental program. One program may work effectively on campus and a different campus in the medical centers. I think that we should look at greater mitigations through public transit to East Palo Alto. That is a lot of the employee base, and it has been traditionally underserved by transit. We were not able to have much of an update here as far as what level of service there is, and what would be the cost effectiveness of additional service to mitigating trips. I think we also do need to look during construction at the hours of heaviest truck use. In the end, we are looking right now at a project with 2,000 additional parking spaces. Frankly, that is the bottom line on the additional impact on trips. You can measure it that way.

CC3.80

My final point on this issue that we have spoken about on the vehicle types, I think that the climate change impact from the vehicle trips is probably being significantly overstated. The car trip impact is a major portion of that. I think it is just silly in this era to not have a methodology that would look at the trends in vehicular trips. I think that is stale methodology and I am very surprised that professionals in this field have not adopted changes to that methodology that would reflect that range of impacts.

Now out among the experts in the field there is a range, anywhere from a high end to a low end. I have no problem with a conservative number being used, but not a non-number where we say that we are all going to be driving the same gas-guzzlers in 15 years that we are now. That just makes no sense to me, and it is not accurate. I am not expecting that

CC3.80 Con't

we can have something other than a conservative estimate within a reasonable range, but get it in the range. I think that is the most egregious error in the report.

So those are my comments. Council Member Holman, you have a couple of others?

CC3.81

Council Member Holman: Yes, and I will be pretty brief. I support the comments of other Council Members in regards to traffic and quality of life. I guess even more than that for me one of the biggest, biggest concerns is the air quality. While it is not specifically an environmental impact, the result of the environmental impacts here I am really interested in knowing how that translates to increased incidents of asthma, if there is any data that is readily available for that for instance. It is our job that we see that we do no harm. I have serious concerns about what the health impacts are of the air quality impacts.

Then just a couple of overall comments. The three dimensional model that was asked for by prior Councils, we are at now July 12 and the comment period ends July 27, and we still have not seen a three dimensional model. So I am really looking forward to seeing that.

I understand that there are better visuals, and more visuals that are available, but we have not seen them. They have not become public. So I am interested in seeing those. We do still have opportunity to see what the impacts are on the visual quality of Palo Alto post-project.

Then lastly, and unless I hear contradiction by other Council Members I just want to make sure that we are all clear that what we are doing here is not say yes or no to a project. We are not trying to impede a project. What we are trying to do is get informed about the

impacts of the project and the lack of impacts of the project. The reason I am saying this is because I just want to make sure that we are all clear that what we are asking of Staff and the consultants is to help us help the community understand what the impacts are, so that we don't end up at the end of the day with surprises. That is not to abdicate. The intension here and this comment is not to abdicate the Council's responsibility, it is just to say we need to all be partnering in making sure that we don't have any surprises at the end of the day. So if there are impacts that we need to be better informed about, or that need to be brought to our attention to a greater degree than we are catching or picking up on, then I am asking for that support by Staff to help educate and inform us and the community. Thank you.

Mayor Burt: Thank you. I think that completes this item. Thank you all for attending.

CC3. City Council Hearing, July 12, 2010

CC3.1 *The commentor calls for a better understanding of construction-period transportation and air quality impacts and opportunities for mitigation.* Please refer to Master Response 4 for a discussion of construction traffic. Also, Impacts AQ-1 and AQ-6 in Section 3.5 of the Draft EIR provide a quantified, year-by-year analysis of construction-period air pollutant emissions. As indicated, even with mitigation measures that are recommended by the Bay Area Air Quality Management District (BAAQMD), impacts would be significant and unavoidable. In terms of construction-period emissions of toxic air contaminants, per Impact AQ-4 and Staff-Initiated Change 3, impacts would be less than significant and would not warrant mitigation.

CC3.2 *The commentor states that the analysis of construction truck trips should analyze the time of day that trucks would travel along the identified truck routes.* Please refer to Master Response 4 for a complete discussion of construction traffic.

CC3.3 *The commentor expresses concern about the future of Caltrain and viability of the GO Pass.* Please refer to Master Response 1 for a discussion of the viability of the Caltrain GO Pass and additional steps that would be taken in the event the mode splits were not achieved.

CC3.4 *The commentor states that a life-cycle assessment should be provided for the SUMC Project.* A life-cycle analysis attempts to identify and quantify the greenhouse gas emissions associated with the energy and materials used at all stages of a project's life, from the gathering of raw materials, through fabrication, distribution, use, and the ultimate disposal at the end of the project's useful life. A realistic life-cycle analysis requires knowing exactly what type and quantity of materials are used, where all materials originated, and how the materials would be transported to the project site in order to calculate the embedded energy within the construction material.

At the time of preparation of the Draft EIR, the actual types of materials to be used, the origin of those materials, and the transportation routes for those materials were unknown. Since these facts are unidentified, it was impossible to correctly calculate the embedded energy within the building materials. Further, there is not a standardized agreement on the appropriate methodology for analyzing the life-cycle of projects. For these reasons, the Draft EIR analyzes the emissions resulting from the operation of construction vehicles, as well as the operation of the SUMC Project on an annual basis, which is consistent with the standard methodologies for conducting greenhouse gas emission inventories.

CC3.5 *The commentor is interested in qualifying Palo Alto's Climate Protection Plan to help mitigate City emissions and better assign the responsibilities between the SUMC Project sponsors and the City.* The City of Palo Alto Climate Protection Plan includes existing emissions inventories for the City as a whole, but does not distinguish between emission

sources within the SUMC Project sponsors' control and those within the City's control. The larger Stanford University is outside the jurisdiction of Palo Alto, accordingly, it is beyond the scope of this EIR to address this issue.

CC3.6 *The commentor asks if there has been a 20 percent increase in Stanford University employees, when comparing data from staff versus data in Appendix C and Appendix H of the Draft EIR.* There are 9,156 Stanford University employees who live on the Peninsula. Table 2 in Appendix H of the Draft EIR is titled Location on Peninsula of Hospital and University Employees by City. Based on this table, total employment within Stanford University is about 11,000 employees.

CC3.7 *The commentor asks for the change in Stanford employment from 2006 to 2009.* The Draft EIR provides employment and residence data from 2006; however, significant changes in location of residence do not occur over a short, three-year period.

CC3.8 *The commentor asks if Palo Alto experiences an annual two percent increase in traffic on City streets.* Two percent is the maximum annual increase in traffic, although the trends over time tend to be less than two percent. Typically, the increase in traffic ranges from about 0.6 to 1.6 percent.[1]

CC3.9 *The commentor expresses concern about the future of Caltrain and effectiveness of the GO Pass.* Please refer to Master Response 1 for discussion of viability of Caltrain and additional steps to be taken if the SUMC Project sponsors do not achieve the mode split requirements under Mitigation Measure TR-2.3.

CC3.10 *The commentor asks to verify feasibility of the various roadway improvements in Table 3.4-18 of the Draft EIR.* Please see Staff-Initiated Change 2 for a revised listing of feasible roadway improvements. Please see below for discussion of the feasibility of some of the intersection improvements.

- *Arboretum Road/Galvez Street (intersection #37).* The Draft EIR lists Arboretum Road/Galvez Street as feasible because this intersection is on Stanford lands, in Santa Clara County, and the improvement is the installation of a traffic signal, which is physically feasible. The roadway improvement at this intersection is included in Mitigation Measure TR-2.4.

- *I-280 NB Off-Ramp/Alpine Road (intersection #62).* Per Staff-Initiated Change 2, the roadway improvement at I-280 NB Off-Ramp/Alpine Road would not be warranted as the significant impact at this intersection would be mitigated to less than significant through Mitigation Measure TR-2.1, involving traffic-adaptive signal technology, Mitigation Measure TR-2.2, involving bicycle and

[1] Curtis Williams, Planning Director, City of Palo Alto, City Council Hearing, July 12, 2010.

pedestrian undercrossings, and Mitigation Measure TR-2.3, involving an enhanced TDM program.

- *El Camino Real/University Avenue/Palm Drive (intersection #10).* The intersection improvements at El Camino Real/University Avenue/Palm Drive would not be warranted as the significant impact at this intersection would be mitigated to less than significant through Mitigation Measure TR-2.1, involving traffic-adaptive signal technology, Mitigation Measure TR-2.2, involving bicycle and pedestrian undercrossings, and Mitigation Measure TR-2.3, involving an enhanced TDM program.

CC3.11 *The commentor suggests use of charter buses, as is done in some private companies in the area, as an alternative or back-up mitigation measure to the GO Pass.* Information has been collected regarding shuttle bus operations for several private companies. This information is presented in Master Response 1. The costs are included in that analysis.

CC3.12 *The commentor inquires about construction-period impacts related to truck routes.* Please refer to Master Response 4 for a complete discussion of construction traffic.

CC3.13 *The comment asks for the definition of "funded improvements" and the duration of that assessment.* Funded improvements refer to improvements that have 100 percent of the funding for construction in place. The duration of that assessment can vary. Improvements cannot be made until full funding is in place. Funding can be from traffic impact fees and other sources. The local jurisdiction can prioritize the improvements and once a sufficient amount of funding is in place, the highest priority improvement can be made. The duration for other improvements to be funded would be longer.

CC3.14 The commentor asks which, in terms of feasibility, is the lowest priority of various mitigation measures, considering engineering feasibility, funding feasibility, programmatic feasibility. Feasibility is a combination of factors. Political feasibility, funding, availability of right-of-way, the removal of mature trees, and the City policy against widening (T-27) are the major factors that determine whether an improvement is feasible. The roadway improvements are not ranked according to priority, but improvements at intersection # 37, 52, and 53 would be necessary to reduce significant LOS impacts to less than significant.

CC3.15 *The commentor asks what is meant by a funded improvement.* A funded improvement refers to an improvement that is completely funded for construction. As pointed out in the comment, because the development of the SUMC Project would take 10 to 15 years, improvements in the future may become funded at some point, but they are not currently included in the City of Palo Alto Travel Demand Forecasting Model.

CC3.16 *The commentor asks for an explanation of the current off-peak and night time transit service to East Palo Alto.* Stanford's Director of Parking and Transportation responded at

the hearing that at this point, the nighttime service that is available during the academic year is the Shopping Express, which takes students down El Camino to the San Antonio Shopping Center. No further expanded East Palo Alto service is planned. Please refer to Master Response 2 for more discussion on transit impacts. Also, a potential expanded bus plan has been explored in Master Response 1.

CC3.17 *The commentor inquires if there are plans for a bicycle rental program.* As indicated in the hearing transcript, there are programs available on the campus that are characterized as bike sharing. Please refer to Master Response 2 for further discussion on bicycle sharing programs.

CC3.18 *The commentor asks what bicycle sharing programs are planned for the SUMC.* Stanford's Director of Parking and Transportation responded that there are no bicycle sharing programs formally planned for the SUMC. Please refer to Master Response 2 for further discussion on bicycle sharing programs.

CC3.19 *The commentor asks if the analysis addresses bus service to East Palo Alto.* Please refer to Master Response 2 for a discussion of bus service to East Palo Alto.

CC3.20 *The commentor questions the baseline year that was used to calculate vehicle emissions in the Draft EIR as well as whether hybrid vehicles were accounted for in the future year analysis.* The vehicle fleet used in the analysis for existing and future years came from the Emission Factors model (EMFAC) for 2010 as well as the future years. EMFAC assumes a bell-shaped curve as far as older vehicles coming up to newer vehicles. This assumption is based on smog certificates that are obtained for older cars and the estimated average California vehicle fleet for the given years. EMFAC does factor in the upgrading/renewing of the vehicle fleet so the 2020 and 2025 analysis shows a newer vehicle fleet than the 2010 models. For example, in 2020, a certain percentage of vehicles are assumed to be new, a large percentage of vehicles are assumed to be between one to three years old, and a smaller proportion would be five years old or older.

The analysis used EMFAC assumptions for the emissions of greenhouse gases with respect to vehicle miles traveled. EMFAC only looks at gasoline driven vehicles and, as such, the use of hybrid vehicles was not accounted for, resulting in a conservative estimate. Currently, accurate statistics on the growth of hybrid, electric, or hydrogen vehicles is not available. Please see Staff-Initiated Change 4, which removes emission from patient and visitor trips from the climate change conclusions.

CC3.21 *The commentor notes his involvement with a sustainable environment.* Please refer to Master Response 10 for a discussion of non-CEQA issues.

CC3.22 *The commentor supports the sustainability methods proposed under the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.23 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.24 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.25 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.26 *The commentor indicates that the analysis does not correlate East Bay commuters with the enhanced transportation demand management (TDM) program*. As indicated in Master Response 1, Mitigation Measure TR-2 indicates that the SUMC Project sponsors shall use reasonable efforts to lease 75 parking spaces at the Ardenwood Park & Ride Lot, or an equivalent facility, to serve SUMC employees who commute from the East Bay. As such, consideration was given to SUMC commuters from the East Bay under Mitigation Measure TR-2.3.

CC3.27 *The commentor inquires about the future of Caltrain and alternative measures to the GO Pass*. Please refer to Master Response 1 for a discussion of the viability of Caltrain and effectiveness of the GO Pass.

CC3.28 *The commentor inquires about incentivizing motorists to access the SUMC Site from the west*. There is no effective means of dictating to employees what routes they can travel to reach their place of employment. Each employee will choose a travel path that minimizes their travel time, whether via US 101 or alternatively via I-280, taking into account necessary or desirable detours and additional destinations. Please also refer to Master Response 2 for a discussion of remote parking.

CC3.29 *The commentor inquires as to why remote parking is an alternative to the GO Pass rather than adjunct to it*. Please see Master Response 2 regarding remote parking. It should be noted that Mitigation Measure TR-2 indicates that the SUMC Project sponsors shall use reasonable efforts to lease 75 parking spaces at the Ardenwood Park & Ride Lot, or an equivalent facility, to serve SUMC employees who commute from the East Bay.

CC3.30 *The commentor asks why the analysis does not identify a No Net New Trips requirement*. Please refer to Master Response 2 for a discussion of imposing a No Net New Trips requirement. Also, per CEQA Guidelines Section 15126.4(4)(B), mitigation measures must be roughly proportional to the impacts of the project. The standards of significance applied to the transportation analysis are listed on pages 3.4-30 through 3.4-32 of this EIR. Based on these criteria, there could be some increase in traffic that would not result in a significant impact. As such, requiring no net new trips as a mitigation measure would be beyond the requirements of CEQA. See Staff-Initiated Change 2, which provides the

revised analysis of LOS impacts, and the updated mitigation measures for significant LOS impacts. The mitigation measures identified in Staff-Initiated Change 2 are appropriate.

CC3.31 *The commentor expresses support for the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.32 *This comment pertains to the review process of the EIR and the SUMC Project in general.* Please refer to Master Response 11 for a detailed description of the City's review process and the next steps in the EIR review.

CC3.33 *The commentor asks why the SUMC Project sponsors have been asked to pay a housing fee when the Draft EIR determined that housing impacts would be less than significant.* As part of the SUMC Project, a Development Agreement would be approved if such an agreement could be mutually agreed upon. One component of the Development Agreement between the City and the SUMC Project sponsors would be the payment of a housing in-lieu fee in the amount of $23.1 million, which is equivalent to what a commercial project would pay (see page 2-27 of the Draft EIR).

As proposed by the SUMC Project sponsors, the money identified in the Development Agreement would be set aside and used for community projects. The City Council would need to decide whether to make a counter-proposal which would allow for alternative use of these funds, or whether to instead accept the proposal of the SUMC Project sponsors. Such funds could be used either for the direct construction of housing units, or as leverage to encourage private developers to construct even more affordable units; however, the exact number of housing units that could be constructed is currently unknown. Whatever number of units is ultimately constructed within the City would count towards the City's affordable housing targets.

Please refer to Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption.

CC3.34 *The commentor asks why the SUMC Project sponsors are being asked to provide things other than healthcare.* The various mitigation measures identified in this EIR are required under CEQA to reduce the significant environmental impacts from the SUMC Project and its alternatives. Please see Master Response 7 regarding the feasibility of Mitigation Measure PH-3.1, which involves provisions for affordable housing.

CC3.35 *The commentor promotes emphasis on bicycle transportation.* The bicycle network in and around the SUMC Project area is extensive. Also, as part of the SUMC Project, bicycle improvements would be made. Mitigation Measure TR-2.2 requires the SUMC Project sponsors to contribute their fair share to two new bicycle and pedestrian undercrossings of the railroad tracks. Mitigation Measure TR-6.1 requires the SUMC Project sponsors to make other bicycle and pedestrian improvements. As part of the SUMC Project, the

SUMC Project sponsors would stripe a bicycle lane on Welch Road. Lastly, the Village Concept Alternative would enhance bicycle connections around the SUMC Sites.

CC3.36 *The commentor compliments the City Council's interactions with Stanford.* Please refer to Master Response 10 for a discussion of non-CEQA issues.

CC3.37 *The commentor expresses support for the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.38 *The commentor expresses support for bicycle and pedestrian mitigation measures in the Draft EIR and for the SUMC Project in general.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.39 *The commentor expresses support for the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

In addition, the commentor is concerned that the City could take economic advantage of the SUMC Project sponsors. A Fiscal Impact Analysis was prepared by CBRE Consulting, Inc. in February 2009 to determine potential tax and fee revenues that would be generated by the SUMC Project. These fees would be required to sufficiently fund the anticipated costs of providing municipal services to the SUMC Project. The analysis used a time horizon of thirty years (2010-2040) to be consistent with the proposed Development Agreement, which is outlined on pages 2-27 through 2-28 of the Draft EIR. For the monetary impacts of the SUMC Project and the required fees to be paid by the SUMC Project sponsors, refer to the Fiscal Impact Analysis, which is available at the City's website.[2] Please refer to Master Response 10 for a discussion of non-CEQA issues.

CC3.40 *The commentor expresses support for the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.41 *The commentor suggests implementation of a system called congestion pricing, which is a system of surcharging users of a transport network in periods of peak demand to reduce traffic congestion.* All significant intersection LOS impacts would be reduced to less than significant through the various mitigation measures identified in this analysis. As such, congestion pricing would not be warranted as an additional mitigation measure. In addition, such an approach would need to be applied to a larger area than just the area around SUMC Project.

CC3.42 *The commentor seeks a "richer context" and "more holistic acceptance of the problems."* Please see Master Response 9 for a discussion of project merit in the CEQA process.

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[2] City of Palo Alto, "City Manager's Report," Memo to City Council, May 24, 2010, accessed on September 3, 2010 at: http://www.cityofpaloalto.org/knowzone/news/details.asp?NewsID=1316&TargetID=219.

CC3.43 *The commentor raises concern about bicycle use*. The current modal split for bicycling to the SUMC Sites is 2.5 percent. The SUMC Project would include improvements in and around the SUMC Sites to increase bicycling as a mode of access. In addition, Mitigation Measure TR-2.2 requires the SUMC Project sponsors to contribute to the proposed undercrossings of the nearby Caltrain tracks. The SUMC Project sponsors do not have control over ridership policies of Caltrain.

CC3.44 *The commentor suggests use of a "jitney" for late-hour transit to East Palo Alto*. Please refer to Master Response 2 regarding expanded local transit service into East Palo Alto.

CC3.45 *This comment concerns financial issues and does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA*. Please refer to Master Response 10 for a discussion of non-CEQA issues.

CC3.46 *The commentor states that the building program proposed for the SUMC Project is large*. As explained on page 2-22 in Section 2, Project Description of the Draft EIR, the SUMC Project requires additional floor area over what is currently at the SUMC Sites due to existing spatial constraints and the growing demand for outpatient services. Current spatial constraints at the SHC and LPCH restrict the SUMC's ability to serve new patients and expansions are needed to provide the optimal level of care for existing patients. At both hospitals, the number of patients turned away will increase unless additional patient beds are provided. In addition, the hospitals need to expand because the American Academy of Healthcare Architects recommends that all beds be in private rooms, which require right-sizing under the SUMC Project. With regards to outpatient services, in order to accommodate the growing demand, the hospitals propose to construct new and replacement clinics on the Main SUMC Site, as well as renovate the existing Hoover Pavilion building and construct a new building for use as clinics and medical offices.

Several alternatives are discussed and analyzed in Section 5 of the Draft EIR, Alternatives, that seek to reduce the building program of the SUMC Project. No Project Alternative A, No Project Alternative B, Reduced Intensity Alternative A, and Reduced Intensity Alternative B reduce the floor area and construction of the SUMC Project. Please refer to Master Response 8 for an explanation of alternatives to the SUMC Project.

The commentor also requests that building height and density increases should be compensated with open space protection. As stated on pages 3.3-38 through 3.3-39 of the Draft EIR, impacts to visual quality and character would be mitigated by Mitigation Measure VQ-2.1. The Architectural Review would consider, among other factors, whether the SUMC Project has a coherent composition and whether its bulk and mass are harmonious with surrounding development. City Council will then determine if the design promotes consistent transitions in scale and character and that the amount and arrangement of open space are appropriate to the design and function of the structures. Therefore,

implementation of Mitigation Measure VQ-2.1 would reduce visual character and quality impacts to less than significant.

In addition, as stated on page 3.14-9 of the Public Services section, the SUMC Project proposes to expand the existing open space at the SUMC Sites. The open space would include walkways, open plazas, and landscaped areas for employees, patients, and visitors. The SUMC Project would also incorporate new sections of open space and small grass fields, increasing pervious surfaces by 23 percent over existing conditions. In addition, the SUMC Project sponsors would provide access to Stanford University's fields for SUMC employees. This access would offset the potential deterioration new SUMC employees could cause on City parks. Therefore, additional open space would be included and access to other open space areas would be available.

CC3.47 *The commentor questions why the Stanford University 2000 Community Plan and General Use Permit (CP/GUP) is not included in the SUMC Project and the baseline conditions.* This comment specifically pertains to the transportation analysis. The City of Palo Alto Travel Demand Model includes traffic generated by the Stanford University CP/GUP in its background traffic levels. As stated on page 3-1 of the Transportation Impact Analysis, Appendix C of the Draft EIR, the 2025 Without Project traffic volumes were obtained from the 2009 City of Palo Alto travel demand forecasting model. This model was developed based on the Santa Clara Valley Transportation Authority (VTA) regional forecasting model, with Association of Bay Area Governments (ABAG) projections of housing and employment data. These models include the development proposed and approved under the CP/GUP in 2000. As such, CP/GUP traffic is accounted for in this analysis.

CC3.48 *The commentor requests that the Draft EIR provide a list of the requirements outlined in the CP/GUP that Stanford has actually addressed.* The CP/GUP is separate from the SUMC Project since the SUMC Sites are located outside of the CP/GUP jurisdiction. Please refer to Master Response 10 for a discussion of non-CEQA issues.

The commentor questions why a No Net New Trips requirement is not imposed on the SUMC Project, as it was with the CP/GUP. Please refer to Master Response 2 for a discussion of imposing a No Net New Trips requirement. Also, per CEQA Guidelines Section 15126.4(4)(B), mitigation measures must be roughly proportional to the impacts of the SUMC Project. The standards of significance applied to the transportation analysis are listed on pages 3.4-30 through 3.4-32 of this EIR. Based on these criteria, there could be some increase in traffic that would not result in a significant impact. As such, requiring no net new trips as a mitigation measure would be beyond the requirements of CEQA. See Staff-Initiated Change 2, which provides the revised analysis of LOS impacts, and the updated mitigation measures for significant LOS impacts. The mitigation measures identified in Staff-Initiated Change 2 are appropriate.

CC3.49 *The commentor states that the additional motor vehicles associated with SUMC Project operation would generate substantial amounts of carbon dioxide and interfere with attainment of the goals of City's Climate Protection Plan*. Please refer to Staff-Initiated Change 4 for a revised analysis of the SUMC Project's greenhouse gas emissions.

CC3.50 *The commentor states that the mitigation measures proposed by Stanford for traffic impacts are dubious*. With respect to the Caltrain GO Pass, please refer to Master Response 1. Please refer to Master Response 2 regarding transportation into East Palo Alto. Transit access to the East Bay is addressed in the Transportation Impact Analysis (Appendix C to the Draft EIR). As part of the enhanced TDM program under Mitigation Measure TR-2.3, the SUMC Project sponsors would be required to use reasonable efforts to lease spaces in the Ardenwood park-and-ride lot or similar facility for employees to use and then commute via the U-Line. The SUMC Project sponsors would also be required to use all reasonable efforts to assure that the controlling transit agency maintains load factors less than 1.0 on the U-Line. The best source of future employee location of residence is the place of residence of existing employees. Therefore, the Transportation Impact Analysis relied on the existing employee zip code information in the SUMC Project application, similar to the housing demand analysis.

CC3.51 *The commentor suggests that the SUMC Project use Continuous Performance Improvement (CPI) technology to evaluate the need for expanding current facilities*. Please refer to Master Response 10 for a discussion of non-CEQA issues.

The following is a description of the SUMC "performance improvements." Both the SUMC Hospital and the LPCH Hospital have dedicated "performance improvement" departments that are integral to in the development of the hospitals' programmatic requirements. These departments were fully engaged during the programming and planning process in order to optimize the square footage needs for the SUMC Project. The Process Excellence Department is a branch of the SHC Hospital and the Performance Improvement Department is a branch of the LPCH Hospital. As such, the SUMC Project would continue to use these departments that are dedicated to performance improvements.[3]

CC3.52 *The commentor questions the future of Caltrain and the effectiveness of the GO Pass mitigation measure*. Please refer to Master Response 1 regarding viability of Caltrain and steps that would be taken in the event mode splits are not achieved.

CC3.53 *The commentor states that any reference to the Palo Alto Shuttle should reflect current budget items and actions by the City Council, and support expansion of this shuttle service*. Please refer to Staff-Initiated Change 1 for the revised Mitigation Measure TR-7.2.

[3] Stanford University Medical Center, correspondence with PBS&J, November 1, 2010.

CC3.54 *The commentor asks if there is a linkage between air quality impacts identified in the Draft EIR and the failure of some intersections analyzed in the Draft EIR to meet the LOS criteria that have been adopted as indicators of acceptable local traffic flow conditions. The commentor asks about requiring improvements at other non-failing intersections.* The significant SUMC Project operational air quality impact identified in the Draft EIR is discussed under Impact AQ-2, pages 3.5-17 through 3.5-20, where project daily/annual emissions would exceed the BAAQMD significance thresholds (see Tables 3.5-6 and 3.5-7 in the Draft EIR). Motor vehicles associated with the SUMC Project were the most substantial component of these emissions, which occur over the entire course of all motor vehicle trips and not just at the intersections identified as failing the traffic study's LOS criteria. Motor vehicle trip reduction measures are the most effective ways of reducing these emissions below the BAAQMD criteria; however, it is not possible to reduce the SUMC Project emissions below these criteria because of the large number of vehicle trips generated by the SUMC Project.

CC3.55 *The commentor asks why localized carbon monoxide (CO) emissions would be less than significant with the resulting heavier traffic congestion.* Localized CO emissions were evaluated in the Draft EIR starting on page 3.5-20. The Draft EIR analyzed six intersections in the City that represented either the intersections with the worst congestion or the congested intersections that would have the greatest increase in congestion related to the proposed project traffic. All of these intersections would have CO concentrations far below the BAAQMD thresholds. As also noted in the Draft EIR, CO standards in the Bay Area have not been exceeded for almost 20 years and the CO background levels as measured at the Bay Area monitoring stations are typically only a quarter to a third of the ambient standards; therefore, traffic volumes would have to be very high to result in a local standard violations. This is evident in the recently adopted update to the BAAQMD's CEQA Guidelines. The new guidelines provide a screening threshold of 40,000 vehicles per hour to determine when an intersection would have the potential to exceed the CO standards. All the intersections in Palo Alto, including the most heavily congested intersections, would have traffic volumes that are far below the 40,000 vehicles per hour screening threshold.

CC3.56 *The commentor asks if the effects of tree removal were considered as part of the Draft EIR's air quality analysis.* Tree removal proposed under the SUMC Project is relatively small-scale compared with the background conditions and would have very little effect on local criteria pollutant levels. Relatively wide belts of trees have been shown to be effective in removing particulate matter from the air, but removals of isolated groups of trees in an urban setting would have no such effect.

CC3.57 *The commentor expresses concern regarding resulting spillover parking in the College Terrace neighborhood.* A parking permit program was recently implemented in the College Terrace neighborhood. The parking permit program is designed to eliminate Stanford employee and student spillover parking into the neighborhood.

The commentor also asks whether the effects of water use during construction have been analyzed. A Water Supply Assessment (Appendix M of the Draft EIR) was prepared for the SUMC Project to document the City's ability to provide water for the proposed uses. The comment concerns water use during construction, such as watering required for dust control in the air quality mitigation measures, and whether this water demand was included in the water demand analysis. The water supply assessment did not account for uses during construction, but instead looked at the net increase in water demand at full buildout of the SUMC Project. The Water Supply Assessment assumed 60 percent of the net increase in water demand would occur in year 2015 with an increase in demand until full buildout in 2025. Construction activities would contribute to the water demand during the construction period, but would be difficult to estimate since the water demand would vary depending on the phase of construction and its duration. However, the water demand contribution from construction would be negligible compared to the increase in water demand associated with full buildout.

CC3.58 *The commentor states the assumptions in the traffic model seriously understates future traffic growth, and contests the application of ABAG forecasts in the traffic model. The commentor specifies issues with quantified traffic at Welch Road and Durand Way*. Existing traffic along Welch Road in the vicinity of the future Durand Way extension is approximately 930 vehicles in the AM Peak Hour. The future traffic volume through this intersection without the SUMC Project during the AM Peak Hour would be 1,340 vehicles. With the SUMC Project, much of this traffic would shift from Pasteur Drive since Durand Way would provide a more convenient travel route for some people accessing the SUMC Project area. The SUMC Project would add 115 vehicles through the Durand Way intersection, an increase of 8.6 percent over future without Project conditions. The 115 vehicles represents about 16 percent of the 701 AM Peak Hour vehicles that the hospitals would generate. Given that the SHC parking structure would be located off Pasteur Drive, the Clinics parking would be located off of the Quarry extension, and the LPCH parking structure would be located at Quarry Road and Welch Road, the volume of traffic through Durand Way and Welch Road and the percentage increases are reasonable.

The current amount of parking serving the SUMC Project is approximately 8,900 spaces. A total of 2,051 spaces are proposed to be added without any TDM mitigation. With TDM mitigation, that number of new parking spaces would be reduced by 716. Please refer to Master Response 3 for more discussion on background growth.

The 2025 traffic projections used for the SUMC Project Transportation Impact Analysis (Appendix C of the Draft EIR) were developed by using VTA's regional model. Please refer to Master Response 3 for more information regarding the modeling process.

CC3.59 *The commentor points out that the City of Menlo Park has indicated that some of the identified roadway improvements in Section 3.4 of the Draft EIR would be feasible.* Please see Staff-Initiated Change 2 for a revised discussion of feasibility of the identified roadway improvements.

CC3.60 *The commentor suggests that Policy T-27 should not be applied to the SUMC Project.* A process was established as part of the technical analysis to develop intersection improvements and determine their feasibility. First, intersection impacts were determined as a result of the construction of the SUMC Project. Then the appropriate physical improvements to mitigate the impact were determined. These physical improvements were categorized as feasible or infeasible based on several factors, one of which was Policy T-27. The next step considered alternative mitigation measures, such as traffic-adaptive traffic signals, bicycle and pedestrian undercrossings, and enhanced TDM measures. These three mitigations were applied in the analysis (were prioritized over) before the physical roadway improvements. For all intersections in Palo Alto, these three mitigations measures were found to reduce the SUMC Project impacts to a less-than-significant level without the physical improvements. Therefore, no intersection mitigation measures have been rejected as infeasible within Palo Alto.

CC3.61 *The commentor requests clarification on how paying a fair share of mitigation measure would work.* Please refer to Master Response 6 for a discussion of fair share calculations.

CC3.62 *The commentor asks if roadway widening at Embarcadero Road would be precluded by Policy T-27, and if roadway improvements in Menlo Park could be implemented.* The SUMC Project would not cause a significant impact on Embarcadero Road; therefore, the suggested improvement at Embarcadero Road would not be required for the SUMC Project. As far as intersection impacts in Menlo Park that would be significantly impacted, the SUMC Project would pay a fair share cost allocation to Menlo Park, and Menlo Park would implement roadway improvements in its Traffic Impact Fee Program (TIF). There would be no unmitigated intersection LOS impacts after the implementation of the proposed mitigation measures.

CC3.63 *The commentor indicates that there will be a greater transition to the use of alternatively fueled vehicles between now and 2025 and asks if the analysis in the Draft EIR is should incorporate this trend towards alternative fueled vehicles.* Please refer to Response CC3.20, above, regarding the consideration of fuel efficient vehicles in the Draft EIR analysis.

CC3.64 *The commentor expresses support for the sustainability measures proposed under the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.65 *The commentor states the there would be a visual impact from the height of the buildings proposed under the SUMC Project*. As stated on pages 3.3-38 through 3.3-39 of the Draft EIR, impacts to visual character and quality would be mitigated by Mitigation Measure VQ-2.1. The required Architectural Review would consider, among other factors, whether the SUMC Project has a coherent composition and whether its bulk and mass are harmonious with surrounding development. City Council will then determine if the design promotes consistent transitions in scale and character and that the amount and arrangement of open space are appropriate to the design and function of the structures. Therefore, implementation of Mitigation Measure VQ-2.1 would reduce visual character and quality impacts to less than significant.

CC3.66 *The commentor asks, for the benefit of negotiating the Development Agreement, how the cost analysis will relate to the prioritization and the effects of mitigation of the traffic impacts*. The SUMC Project's fair share allocation is calculated for all traffic mitigation measures and included in Master Response 6.

CC3.67 *The commentor questions whether the SUMC Project would result in impacts related to solid waste, including hazardous waste*. As stated on page 3.15-10 of the Draft EIR, the City is contracted with GreenWaste Recovery Inc., for collection of garbage, recycling, and composting services in the City. GreenWaste Recovery, Inc., is a privately owned solid waste and recycling company that specializes in the collection and processing of residential and commercial trash, yard trimmings, curbside recyclables, food waste, and construction and demolition debris.[4] As concluded in Impact UT-4 (pages 3.15-25 through 3.15-28 of the Draft EIR), the SUMC Project would result in a less-than-significant solid waste impact because the Kirby Canyon Landfill and SMART recycling center have sufficient capacity to accommodate the SUMC Project's increase in solid waste. In addition, the SUMC Project would include recycling activities that would reduce the amount of solid waste the SUMC Project would generate, which would further reduce the amount of solid waste sent to the landfill.

The effects of increased use, storage, and transport of hazardous materials are discussed in Section 3.12, Hazardous Materials, of the Draft EIR. The SUMC Project would increase the on-site use and handling, disposal, and transport of hazardous materials relative to existing conditions. Implementation of State and federal controls would minimize the potential for exposure to adverse health or safety effects. These controls require the use, disposal, or transport of materials in a manner that does not pose substantial hazards to

[4] GreenWaste Recovery Inc., Website, available at http://www.greenwaste.com/about-us-we-are-a-brighter-shade-green, accessed September 15, 2009.

people, animal, or plant populations. Therefore, the SUMC Project would not result in a significant environmental impact related to the increased use, transport, handling, and disposal of hazardous materials, including hazardous waste.

CC3.68 *The commentor expresses support for expanding the Marguerite shuttle service.* With the exception of increased service between the SUMC Sites and Palo Alto Intermodal Transit Station (PAITS), expansion of shuttle service would not be needed to reduce intersection impacts to a less-than-significant level. Please refer to Staff-Initiated Change 1.

CC3.69 *The commentor suggests that SUMC Project sponsors work in conjunction with the City of Palo Alto Planning Department staff to conduct a borderless traffic study.* The request for a borderless traffic study can be undertaken through a process outside certification of the SUMC Project EIR. The Study Area for the transportation analysis includes 71 intersections covering a reasonably large catchment with respect to the area of SUMC Project influence. It is beyond the responsibility of the SUMC Project to analyze and mitigate impacts other than those generated by the SUMC Project.

CC3.70 *The commentor expresses support for increasing the supply of remote parking while still providing SUMC employees with the option of driving.* Please refer to Master Response 2 for a discussion of remote parking.

CC3.71 *The commentor notes that potential impacts to traffic conditions resulting from the SUMC Project is of major concern among community members.* Please see Staff-Initiated Change 2 for a revised analysis of intersection congestion impacts.

CC3.72 *The commentor expresses support for the alternative transportation uses proposed in the Draft EIR.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC3.73 *The commentor notes that intersection impact analysis is a critical component in understanding the overall impact of the SUMC Project on traffic. Additionally, the commentor expresses support for further intersection analysis in the Final EIR.* The intersection analysis is a major component of the transportation analysis. The Draft EIR considered 66 intersections in the analysis. The Final EIR includes analysis of five additional intersections not considered in the Draft EIR.

CC3.74 *The commentor questions the SUMC Project's reliance on the GO Pass as an effective mitigation measure to reduce traffic impacts.* Please see Master Response 1 for a discussion of the future of Caltrain service and the mode split assumptions used in the EIR.

CC3.75 *The commentor expresses support for the progress in understanding the SUMC Project and the Draft EIR.* Please refer to Master Response 11 for a discussion of the City's review process.

CC3.76 *The commentor expresses general support for the Draft EIR*. Please refer to Master Response 11 for a discussion of the City's review process.

CC3.77 *The commentor expresses general support for the EIR, but questions the adequacy of remote parking as a method for reducing traffic impacts*. The remote parking analysis was provided for informational purposes. It is not being proposed as mitigation at this time. Master Response 2 provides more discussion of remote parking.

CC3.78 *The commentor requests a post-project environmental analysis*. The Draft EIR considers environmental impacts during construction and operation of the SUMC Project. Impacts during the operation of the SUMC Project were analyzed based on growth projections in 2025. The 2025 year is considered to be full buildout, operation, and occupancy of the SUMC Project. The Draft EIR also includes an analysis of the SUMC Project impacts with the implementation of mitigation measures. In addition, as explained on pages 3.1-2 through 3.1-3 of the Draft EIR, the cumulative horizon for the cumulative analysis is also 2025, which is consistent with the *Santa Clara Valley Transportation Authority Transportation Impact Analysis Guidelines* (VTA Guidelines). Therefore, the Draft EIR already includes a post-project environmental analysis.

CC3.79 *The commentor states the need for further analysis of several traffic impact mitigation alternatives, namely bicycle rental programs, public transit service to East Palo Alto, construction related traffic, and increased parking supply*. Please refer to Master Response 2 for a discussion of other traffic mitigation measures.

With regard to construction traffic, Mitigation Measure TR-1.4 requires that the SUMC Project sponsors prohibit or limit the construction material deliveries from 7:00 a.m. to 9:00 a.m. and from 4:00 p.m. to 6:00 p.m. Those hours are based upon the peak congestion period in Palo Alto. Please refer to Master Response 4 for a further discussion of construction traffic.

The SUMC Project as proposed would include 2,051 additional parking spaces. This number may be reduced by 720 to 1,331 because of the GO Pass mitigation measure. While there would be additional parking provided, much of that would be new patient parking, not parking for employees.

CC3.80 *The commentor indicates that the lack of a conservative estimate of the use of alternative fueled vehicles in future years is an error in the Draft EIR*. Please refer to Response CC3.20, above, regarding the consideration of fuel efficient vehicles in the Draft EIR analysis.

CC3.81 *The commentor asks if the air pollutant emissions estimated for the SUMC Project would result in any increased incidents of asthma in the areas around the SUMC Sites*. Based on the BAAQMD CEQA guidance, the Health Risk Assessment (HRA) conducted for the

SUMC Project, as provided in Appendix F of the Draft EIR, examines the potential for carcinogenic and other chronic health effects, such as asthma incidence, with long-term exposure to diesel particulate matter generated by SUMC Project construction and trucking operations. As noted in the BAAQMD CEQA Guidelines,[5] "[a] large body of scientific evidence indicates that both long-term and short-term exposure to $PM_{2.5}$ can cause a wide range of health effects (e.g., aggravating asthma and bronchitis, causing visits to the hospital for respiratory and cardiovascular symptoms, and contributing to heart attacks and deaths). BAAQMD recommends characterizing potential health effects from exposure to directly $PM_{2.5}$ emissions through comparison to the applicable *Thresholds of Significance*." The chronic hazard indices at all on- and off-site sensitive receptors were found to be far below 1.0, the point at which the risk of onset for chronic illnesses becomes significant. Thus, asthma and other chronic health impacts are not anticipated to be significant impacts of the SUMC Project.

[5] Bay Area Air Quality Management District, California Environmental Quality Act Air Quality Guidelines, June 2010, page 5-2.

CC4

City Council Meeting July 19, 2010
Council Chambers, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

Mayor Burt: We will now proceed to Item Number 4, which is a Public Hearing on the Stanford University Medical Center Facilities Renewal and Replacement Project. A meeting to accept comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an Overview of the Noise, Geology, Soils & Seismicity, Hydrology, Hazardous Materials, and Utilities Chapters of the DEIR.

Welcome to our Staff members. Mr. Williams, did you want to begin?

Council Member Klein: Mayor Burt, if you will.

Mayor Burt: Council Member Klein.

Council Member Klein: I will not be participating in this item as my wife is a Stanford faculty member. Thank you.

Mayor Burt: Thank you.

ACTION ITEM

4. Public Hearing: Stanford University Medical Center Facilities Renewal and Replacement Project-Meeting to Accept Comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, Including an Overview of the Noise, Geology, Soils & Seismicity, Hydrology, Hazardous Materials, and Utilities Chapters of the DEIR.

Mr. Curtis Williams, Director of Planning and Community Environment: I think I can go ahead get started as we await the presentation coming up on the board. Mayor and Council Members I am Curtis Williams the Director of Planning and Community Environment.

This is a further meeting to entertain comments on the Draft Environmental Impact Report for the Stanford University Medical Center Facilities Rehabilitation and Expansion Project. Tonight we are dealing with several of the technical chapters in the Draft EIR, including Noise, Geology, Soils and Seismicity, Hydrology, Hazardous Materials, and the Utilities Chapters.

The order of business tonight is after my presentation Rod Jeung from the consultant will again give you an overview of the topics and the mitigation measures. The project sponsor, Stanford University Medical Center, will make some comments. We do have here tonight Eduardo Martinez from the Planning and Transportation Commission. I think he will be available for questions but does not have a presentation prepared for you, and you have the minutes in the packet as well.

The last of these series of meetings is scheduled for next week to talk about Alternatives and Mitigation Measures, and the close of the public comment period is scheduled for the day after that, July 27, 2010. Following that date we will be preparing the Final Environmental Impact Report to come back to you in late fall with the project entitlements.

I also want to point out to you that we distributed to you today hardcopies that should be at your places of the primary plan sets for the project. These include elevations, and site

plans, and the main pages of the plan set. There are a lot of details also associated with the plans that were not included there but they are in a CD that is provided to you.

The Lucile Packard Children's Hospital and main hospital models that have been prepared by the Medical Center were in the lobby earlier this evening for viewing. It will be there again next week before the Council meeting beginning at four o'clock. We also have put all of the plans that are submitted that are provided to you and the CD tonight on the website as well. So the public can view those as well as yourselves. With that I will turn it over to Rod Jeung from PBS&J to provide an overview of these sections. Thank you.

Mr. Rod Jeung, Project Director, PBS&J: Thank you Curtis. Mayor, Members of the Council, members of the public good evening. Thank you again for allowing us to come tonight and give you a whirlwind tour of several other chapters of the Environmental Impact Report. I am still Rod Jeung. I am still the Project Director for the project. Pleased to be that. With me tonight are some members of the staff who were instrumental in developing the sections that we are going to hear about tonight. First and foremost would be Trixie Martelino who served as the Project Manager. Kirsten Chapman is also with us. Geoff Hornek who prepared the Noise Analysis is here along with Leanne Albe who prepared the Wastewater related sections, and also prepared the Water Supply Assessment that was approved by the Council and informed the water related sections.

I am going to start off with Noise tonight. This chart that you see on the slide should look very familiar by this point. Aligned along the left column are the various impact categories that were described and evaluated in the environmental document. Right across the top are the column headings are the significance conclusions ranging from NI or No

Impact through Less Than Significant or LTS, impacts that were identified as significant but with mitigation measures could be reduced to less than significant. Finally, in the far right hand column those impacts that are considered to be significant and unavoidable even with the implementation of various mitigation measures that have been recommended.

The impacts related to Noise are really either less than significant or mitigable, and they include the construction vibration and noise from hospital operations. Things like the emergency generators and heating ventilation and air conditioning units on nearby residential units. The impacts for which mitigation measures have been identified but would still remain significant include noise during construction, traffic noise associated with some of the hospital operations, and cumulative impacts.

In particular, let me zero in on those impacts that are identified as significant and unavoidable. For construction, which would last approximately 12 years, these activities would involve a range of different heavy construction equipment as well as truck activities coming in along Palo Alto streets. The noise from the construction activities would significantly impact sensitive receptors within the project sites including the inpatients of the existing medical facility. Also, if construction occurred on the larger Stanford campus at the same time as construction occurred at the Stanford University Medical Center Project then we would have cumulative construction noise impacts and those would be considered to be significant for residences at 1100 Welch Road.

I want to point out that the analysis of the Stanford University Medical Center Project did not address noise and vibration effect of pile driving. That is something that is still being discussed with the state. However, those particular effects are considered as part of the

Tree Preservation Alternative, which is currently the preferred site plan. If pile driving is considered then both construction noise and vibration impacts would be significant and unavoidable as well. So regardless of which alternative ultimately got selected if the state did not allow certain ways of mitigating the noise from pile driving that would be a significant unavoidable impact.

Finally, I mentioned earlier that traffic associated with the hospital operations would trigger noise impacts. Interestingly enough it is not really the additional vehicular trips from employees and patients, it is really the new ambulance route that would expose new residents to noise from sirens. So to help illustrate that what you see on the left hand side is the existing route that ambulances use to reach the emergency department. With the relocation of the emergency department closer to Sand Hill Road there would be a new access route that would pretty much run along Sand Hill Road between El Camino Real and the proposed Durand Way extension. En route ambulances would pass the Stanford West Apartments, senior living residences, and the Ronald McDonald House. These sensitive receptors are not currently adversely affected by the sirens along the existing route. The new route would then expose these residences to the sirens, and that would be considered a significant and unavoidable impact.

As far as the mitigation measures that have been identified to deal with some of the impacts that have been previously described, there are a range of conventional best management practices to deal with construction related noise such as noise shielding, using quieter equipment, provisions for a Noise Disturbance Coordinator to receive complaints and things like that. However, even with these measures the noise levels have been identified to be significant and unavoidable for onsite uses. Also, during the operational

period when there is the potential to hear noise from the emergency generators and the heating ventilation and air condition equipment there are mitigation measures such as shielding that would reduce those impacts to less than significant.

Moving onto Geology, Soils, and Seismicity. I did want to note that one of the foremost reasons that the project is being proposed is to comply with state law for seismic safety. The Alquist Hospital Facility Seismic Safety Act and Senate Bill 1953 require that acute care hospitals throughout the state meet heightened seismic safety standards by certain deadlines so that they remain standing and operable after a major earthquake. The Stanford University Medical Center Project would upgrade seismic safety design at the Medical Center. It would reduce the geologic hazards to staff, patients, and visitors by complying with the design standards that have been established by the Office of Statewide Health Planning and Development, or OSHPD, throughout the various hospital facilities. In addition there are state building codes and safety codes that have also been adopted by the City that would reduce those same effects for the non-hospital facilities.

As a result, as indicated on the chart above the impacts related to seismic and other geotechnical hazards would be reduced to less than significant, and other impacts related to erosion would also be regarded as less than significant.

The next major physical environmental topic is Hydrology. When we talk about hydrology we are concerned about flood hazards, erosion, and sedimentation, the groundwater, drainage, and water quality. As shown in this slide and the next one all the impacts that have been identified for the Hydrology topic are reduced to generally less than significant. The only exception to that are those impacts that are related to degrading the

1 groundwater quality. There are mitigation measures that have been identified to deal with
2 the groundwater quality issue, and specifically the reason this has become a concern and is
3 really kind of a segue into the next topic, has to do with some of the existing contamination
4 that is found at the Hoover Pavilion and at 701 and 703 Welch Road where there is known
5 contamination. So the potential for groundwater contamination results from the exposure
6 of those contaminated soils and then the fact that the pollutants could infiltrate into the
7 groundwater during rainfall. As such the EIR has really identified these impacts on
8 groundwater quality very conservatively as potentially significant.
9
10 This is kind of a nice segue into the Hazardous Materials. In general, there are three major
11 concerns when we talk about hazardous materials. The first is exposure to hazardous
12 materials during construction and operations. The second is the accidental release of
13 hazardous materials that would be used during the construction or subsequent operations.
14 Finally, there are other safety related issues such as impeding emergency response,
15 construction in a high fire hazard area, or operations near an airport. All of these impacts
16 and all of these different impact categories are shown on this chart to be either no impacts
17 or less than significant.
18
19 Only three items are of particular concern that I want to highlight. Again, this comes back
20 to the known soil contamination that is found at 701 and 703 Welch and at the Hoover
21 Pavilion site. The state maintains something called the Cortese List. This is a list that
22 identifies sites with known hazardous materials, releases, or spills. The Hoover Pavilion
23 site is on the Cortese List. As a result there are a number of mitigation measures that have
24 been recommended as part of the Environmental Impact Report. First and foremost is
25 acknowledgement and recognition that there are a number of regulations that deal with the

1 handling, the use, the storage, and the disposal of hazardous materials. For the most part
2 those existing regulations adequately deal with the substantial or potential risk associated
3 with exposure to the hazardous materials. Those mitigation measures that have been
4 recommended in the Environmental Impact Report are beyond or support or implement
5 some of those regulations.
6
7 So identified on this chart are mitigation measures intended to deal with the demolition and
8 construction of related hazardous materials. So for some of the existing buildings, which
9 may have used asbestos for example or lead which was common in previous construction
10 practices there is the potential to encounter those during the demolition. So there are
11 certain standard practices that have to be followed in order to really alleviate the potential
12 risk for construction workers and members of the public and communities surrounding the
13 buildings.
14
15 During the construction period there is also the potential to be exposed to contaminated
16 soil or groundwater at the sites that I previously mentioned. There are a number of
17 measures that talk about the varied stage process of dealing with that potential risk.
18
19 Then finally there is concern about the emergency access for vehicles during the
20 construction. There are a number of mitigation measures that have been identified
21 primarily in the Transportation section that we discussed last week that would also help to
22 ensure that emergency access is provided. There are also some operational mitigation
23 measures that would also provide for that same protection.
24

The final topic that I am going to be mentioning tonight has to do with Utilities. For each of the utilities that are considered in the Environmental Impact Report and those include water, wastewater, drainage, solid waste, and energy. For each of these utilities the impacts would be considered to be less than significant. While the impacts are not significant the project does include a number of design measures to enhance its sustainability. These measures include water conservation features, energy conservation practices, and recycling, reuse, and composting programs that further the goals of the City's Zero Waste Strategic Plan. This is something I think Council Member Yeh brought up last week. So that concludes my remarks for tonight and would be happy to answer any clarifying questions or anything else that we can.

Mayor Burt: Thank you. We also have Planning and Transportation Commissioner Martinez here this evening. Should he provide his remarks at this time?

Mr. Williams: I think he prefers to just answer questions if you have them. He feels the minutes speak for themselves.

Mayor Burt: Great. Colleagues, questions for Staff? Council Member Scharff.

CC4.1 Council Member Scharff: Thank you for that presentation. I was looking at the ambulance trips. I notice that basically we increased the treatment spaces from 38 to 51, and we went up on ambulance trips an extra 16. I was trying to figure out why we end up with – I guess my understanding of the emergency room is that it is overcrowded and they need more space. I am wondering what is driving this. Are there more injuries? Why

CC4.1 Con't would there be more injuries? So I assume injuries remain constant. So I am wondering why there are more people going to the emergency room and where they are coming from.

Mr. Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center and Lucile Packard Children's Hospital: Good evening. I think we had a similar question at the Planning and Transportation Commission hearing. There will be a certain amount of additional emergency department traffic due to growth in the community. So there will be a certain amount of background growth. Our emergency department because it is so undersized is frequently on diversion. So ambulance traffic gets diverted to other hospitals. We can no longer continue that practice. So as we rebuild the emergency department we wont' be on diversion anymore because we will have adequate capacity for much of the traffic that already exists.

Council Member Scharff: So you know the number of trips that are being diverted, and that is how you come up with the extra trips here.

Mr. Tortorich: There is a component of that, yes. I don't recall the number of trips offhand but it is a fairly significant number every year.

Council Member Scharff: Okay, thank you.

Mayor Burt: Any other questions? Council Member Holman.

CC4.2 Council Member Holman: I have a couple having to do with landfill and what was counted and not, and demolition. Under Demolition and Recycling, recycling takes

CC4.2 Con't

energy. A considerable number of buildings are going to be taken down, and a lot of square footage of buildings is being taken down. The recycling of all that material takes energy and the hauling of it takes energy. It creates greenhouse gases and also takes energy. So I am just wondering if that fully covered in impacts and considerations for mitigation.

Ms. Trixie Martelino, Project Manager, PBS&J: The recycling of demolition debris I believe was addressed in the Climate Change analysis as part of the emissions reduction program.

Council Member Holman: Not just the recycling but the energy that it takes to recycle.

Ms. Martelino: I don't believe the analysis went that far. It did not.

Council Member Holman: I would believe that it should. Especially with this amount of square footage, a building being demolished, it should be considered. Transport of those materials as well. In addition to that transport of new materials to be used in the new buildings also should be a consideration. It is a premise for LEED using locally manufactured materials.

Mayor Burt: Council Member Price.

CC4.3

Council Member Price: I have a general question. Thank you for your presentation. Considering that this proposed project and construction continues over a period of 12 years at a point when we are looking at the mitigation monitoring plan, which I understand the

CC4.3

mitigations will be in more detail next week, how will the applicant address changes in technology, improved building performance options, and changes in the regulatory environment over or even post construction? We are identifying things right now. This is a document that has impacts over a long period of time. What should our expectations be regarding addressing that? Clearly, regulatory will require certain responses, but a lot of the things that we are identifying here may become passé or out of date in 15 or 20 years.

Ms. Cara Silver, Senior Assistant City Attorney: Council Member Price that is an excellent question. That frequently happens with these projects that are built out over a long period of time. What we try to do is structure a mitigation program that has some flexibility so if new technologies do come online the applicant primarily can request to substitute out different technologies. There is a procedure for doing that. Sometimes it requires a hearing, sometimes it can be done at an administrative level. We detail that out in the Conditions of Approval.

With respect to regulatory changes, those need to be evaluated on a case-by-case basis. For the most part the applicant does receive vested rights to develop the project in compliance with the regulations in effect at the time the project is approved, but there are certain exceptions to that. They need to be evaluated on an individual basis.

Ms. Martelino: If I may add that as well, to a certain extent the analysis does consider future requirements regarding technology. For example, in the Air Quality section there is an acknowledgement that through the subsequent years and construction, construction equipment will necessarily have cleaner emissions. That is factored in future years of construction.

Mayor Burt: Thank you. So at this time we would like to hear from the applicant.

Mr. Tortorich: Thank you Mayor Burt, Members of the Council. May name is Mark Tortorich, Vice President of Design and Construction, Stanford University Medical Center and Lucile Packard Children's Hospital.

We had some comments and an overview we wanted to talk to you about related to seismic safety. Then also Chris-Ann Hanson, from our General Services Department will be talking to you a little bit about sustainable operations. I think that is story really does help round out some of the sections that you are reviewing tonight, and will demonstrate to you how we at the hospital currently and in the future through operations will help reduce the impacts to the environment with our hospital projects. Rod, are you going to do the honors of the slides? Great, thanks.

Next. So SB 1953 the seismic regulations that govern all hospitals and that certainly have particular impact on Stanford Hospital and Clinics and our need to rebuild. Our facilities currently fall into four out of the five possible categories, the SPC1, 2, 3, and 4. SPC1 buildings are considered in the words of OSHPD and this law 'collapse hazards,' so they do definitely need to be replaced or taken out of service by 2013. SPC2 facilities are facilities that have to be replaced by 2030. In the particular case of Stanford Hospital, our building constructed in 1959, has no eligibility for retrofit beyond 2030. We have other facilities on the campus that meet the rating of SPC3 and 4. Those ratings tell you that your structure is suitable to OSHPD's standards for continued use beyond 2030 but in

some cases the facilities will suffer major structural damage in a major seismic event. So obviously we need to retrofit those structures as well.

Next slide. So the overview here shows you really the disposition of the Medical Center within those five different categories. So SPC1 and 2 comprises our 1959 hospital. Our 1973 hospital building that we are also asking to have replaced fits into that SPC3 category, and would probably suffer significant structural damage in the event of an earthquake. Our SPC4 category buildings we feel very comfortable with that is our 1989 hospital facility and the Children's Hospital. Then of course all new hospital buildings would have to be designed to an SPC5 standard. That is an extraordinarily difficult standard to achieve.

Next. This site plan of the Medical Center sort of gives you a diagram of how the facility lays out. So for purposes of clarity this 1959 structure is here. The yellow structure is the 1973 core expansion. This is the 1989 hospital modernization project here and then Lucile Packard Children's Hospital. So you can see the rating categories from 1, to 2, to 3, to 4, and then our new facilities would be SPC5. You can also see that there is a nonstructural category of compliance with OSHPD and none of our facilities fully meet OSHPD's requirements for 2013.

Next slide. So obviously Palo Alto is unfortunately right in between two major faults in the San Francisco Bay Area, both with significant capacity to create ground motions that would be upsetting to buildings. They are the San Andreas Fault and the Hayward Fault. Due to our proximity to this San Andreas Fault, quite honestly, the State of California and OSHPD are very concerned about the seismic criteria for our buildings. So that is why you

see that in our Tree Preservation Alternative we have asked for the alternative of driving piles for the foundation. We were hoping to be able to design this building with a mat foundation so that we do not have to use piles. OSHPD disagreed with us. They felt that the capacity of an earthquake generated by the San Andreas Fault was so significant that we would have to go to a pile foundation. Driving piles is very noisy and disruptive to the Medical Center we don't want to do that. But, this is the conundrum the State of California rarely approves an alternative method such as auger cast piles. We are still working with the state to try to use that method because we believe it would be less disruptive to our patients in the hospital.

Next slide. I also mentioned the nonstructural damage this is one of the lessons that came out of the Northridge Earthquake in Los Angles. As you can see by the eight hospitals studied by the *New England Journal of Medicine* many of the evacuations of hospital beds were a result of nonstructural damage. Not the structural frame collapsing or suffering irreparable damage, but fire sprinklers breaking and causing the hospital facility to be unusable. Clearly we have patients who are incapacitated, which is why there are such heavy regulations on us. So these hospital buildings had to be evacuated and as you can see in many cases over 200 or 300 beds in the hospital facility that would have to be evacuated. We would obviously have no place to evacuate these patients to. There are no hospitals in the surrounding community that could take the 400 to 500 patients that we would have to evacuate at any one time from our facilities. So our facilities do have to be earthquake safe for both structural and nonstructural damage.

Next slide. Obviously there are other elements of construction that relate to seismic safety. OSHPD has now required that all major manufacturers of medical equipment certify to the

state that the internal components of the major medical equipment can survive the shaking that is predicted to come from a major earthquake in California. So for example, a manufacturer of MRI machine has to perform tests on a shake table to demonstrate that their heavy magnet, the internal workings, can actually withstand the forces of a major earthquake coming our way.

Next. One of the methods that we are taking to reinforce ourselves from earthquake damage is to design our new Stanford Hospital with a seismic isolation system. It is a base isolation system similar to the one being used at Mills Peninsula Hospital and also at San Francisco International Airport. So these base isolators, and there will be over 250 of them at the Stanford Hospital Project, actually separate the foundation of the building from the structural frame so that the structural frame can be lighter, it can be less costly to build, and the contents of the facility will withstand again ground motions in a more significant manner, and so we will be able to continuously operate after a major event affecting this community.

Next slide. At this point I would like to ask Chris-Ann Hanson to talk to you a little bit about sustainable operations and what we are already doing at Stanford Medical Center.

Ms. Chris-Ann Hanson, General Services Department, Stanford: Thank you Mark. Good evening Mayor Burt, City Council Members. It is an honor to come and talk to you a little bit as we in the organization and you are here learning about the new facility to let you know what we do currently in our facility and our operations, touching on sustainability.

I appreciate if you could go to the next slide. The first slides talk a little bit about waste diversion. We have over a 30-year history of recycling what I have referred to as the big three cardboard, mixed paper, and mixed beverage containers. Annually we average approximately 700 tons of recycled material. We have a very longstanding tradition of donating our unused medical supplies, medical equipment, and medical furniture. On average it is around 15 tons per year. We have approximately ten years of history of a universal waste recycling program, which includes our electronic waste, our batteries, and our fluorescent light bulbs. On average it is approximately 28 tons a year. Some other unique recycling efforts that we have include recovery and recycling of cooking oil, managing our rag-out linens, shrink-wrap, and recyclable medical device programs. These together total average about 18 tons per year.

Thanks you. Touching on a few of our environmentally preferable purchasing strategies, in 2004 we implemented a reusable sharps container, as we were one of the first US customers for Daniels Sharpsmart. It is an Australian based company. Today reusable sharp containers by two companies are really considered best in class for hospitals initiating sustainable efforts, and we were one of the first ones back in 2004. The same year we implemented micro fiber mop cleaning systems to improve infection control. It has an added benefit though of significantly reducing the water that you consumed. To date almost 66,000 gallons have been reduced or eliminated and avoided chemical dilution totaling approximately 3,300 gallons. In 2007 the same Environmental Services group or housekeeping staff completely implemented green seal certified cleaning chemicals across the organization, all three entities. We also have a very unique medical supply delivery system in partnership with Owens and Minor where over 600 reusable totes are exchanged dialing with unit of measure stock that is taken directly up to the patient care unit.

Thank you. Touching a little bit on our healthy food initiatives, of course we use locally grown and produced fresh fruits, vegetables, meats, poultry, dairy, and offer fair trade coffee. In 2007 we introduced 100 percent post consumer recycled napkins and bulk condiment dispensing systems. In 2008 we were able to implement food service area recycling containers in the back or the production side, which is a very big step for us with space constraints in the old building. In 2008 we also introduced healthier snacks in our vending and retail settings. You may have heard about this in some our local sharing of this great event, in 2009 we partnered with Jesse Pool to introduce Farm Fresh. It is a program for our patients that include organic meal offerings for the patient to select from. In 2009 we selected and began offering our biodegradable containers specifically for our to-go efforts. In 2010 we will be implementing composting segregation out in the two cafeterias.

Recognition for these current sustainable efforts that are underway, we are honored to receive the 2010 Partner for Change Environmental Excellence Award from Practice Green Health. They really are the nation's leading membership organization for healthcare facilities that are really committed to environmental responsible operations and wanting to report those efforts on an annual basis. The award recognizes facilities that are continuously working to improve mercury elimination, working on waste reduction and introducing various pollution prevention programs. So thank you for allowing us to share what we currently do.

Mayor Burt: Thank you. I take it that completes the applicant's presentation tonight, is that correct? Alright, thank you very much. We have two members of the public who

have submitted cards. If anyone else wishes to speak, please bring your card forward. First is David Haray followed Beth Bunnenberg.

Mr. David Haray, Palo Alto: Mayor and fellow Council Members, I work for the Medical Center but I do not speak for the Medical Center. I am here as a Palo Alto resident. I believe I have the best of both worlds namely to work at a place that inspires and to retire every evening to a community by which I am able to renew myself for the next days challenges.

CC4.4

I know this evening focuses on DEIR chapters including Noise, Geology, Soils and Seismicity, and other environmental impacts. As you stated Mayor Burt in your State of the City Address Stanford and the City share in a vision of sustainability and we have more in common than that which separates. I am confident that together the Medical Center and the City will find acceptable solutions to manage their way through. I have been encouraged by the collaboration that is in evidence and the positive comments made by the City Manager and the Planning Staff. I am encouraged by the number of positive comments I hear from Members of the City Council. I am here to ask for your full support of the Stanford Renewal Project.

I agree with Council Member Holman on needing to have the necessary meetings so as to make informed discussions. As you may have seen in a recent Palo Alto Weekly story back in 1956 architect, Durell Stone even grew frustrated in the protracted negotiations. As you again stated Mayor Burt in your City Address, "I am determined that we will move this project forward expeditiously this year through review by our relevant Boards and Commissions, and finally the City Council. I ask all of you not to waver, conduct the

CC4.4 Con't

necessary meetings, do what is necessary to be informed, but to bring this to a vote by year end so we can begin to at last build our shared vision together." Thank you.

Mayor Burt: Thank you. Beth Bunnenberg.

Ms. Beth Bunnenberg, Palo Alto: Tonight I am speaking as an individual. This in response to the Stanford Draft EIR. My comments are about two historic structures that are in this plan. The plans for the 1930's Hoover Pavilion appear appropriate while perhaps a little more attention could be given to the entry façade where the stairs are being replaced. But the original ziggurat art-deco style is well maintained in the submitted plans.

CC4.5

The second is the Edward Durell Stone, 1959 hospital building. I strongly disagree with Stanford's report indicating that the hospital was not one of Stone's major achievements. The hospital has some characteristics that are much like his very famous embassy in Delhi, India. I very much agree with the ARG, Architectural Resources Group, peer review report that says that the Stone Building appears eligible for listing on the California Register, and should be considered under CEQA. Demolition of the Stone Building would be a significant adverse impact and could not be mitigated.

CC4.6

The Architectural Resources Board had an interesting suggestion on a historic preservation alternative to save the Stone Building. The suggestion was to use the Stone Building but not as a hospital but retrofit it for one of the buildings for medical offices, which Stanford says it needs. Additionally, please consider the cumulative adverse affects of Palo Alto's losing buildings one of two buildings of Stone's that are still in tact here. His work is internationally known. Also, to follow up on Council Member Holman's comment, think

CC4.7

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of the mass, the huge mass, of debris of the Stone Building. How many dump trucks would it take? How much landfill? Why not save the Stone Building and avoid all those dump loads of materials that could be retained in place. Thank you.

Mayor Burt: Thank you. At this time we would like to return to the Council for comments. Does anyone have any additional comments? Council Member Schmid.

Council Member Schmid: Let's see, it is more of a question than a comment. On the Utility side there is a water issue, and I know we have had a discussion of water use in Palo Alto. We are confronting a future with probably less water coming to us. We have a long-term goal as a city to cut our water usage. Then of course there are the dry years that come on which require a reduction of ten to 20 percent as time goes on. I note that the Medical Center calls for allocation of between four and five percent of the Palo Alto water supply. So I am wondering if this involves the City making planning decisions, which would cut into its ability to foster or sponsor new growth over time. Would anyone like to comment on that?

CC4.9

Mr. Steve Emslie, Deputy City Manager: I will just recon back to the water supply finding that the Council had made prior to the release of the Draft EIR to make the finding that adequate water supplies do exist. Just to give you a summary we found that there is amply supply in the normal years. In the second and third years of a drought condition conservation measures would have to be employed in order to meet the city's and the hospitals overall water consumption needs. The water conservation measures that were anticipated in the project either in the design or the landscaping or the mitigation measures in the Draft EIR were found to be adequate to achieve the level of water conservation

necessary in order to meet our water requirements for all existing uses with a buffer to allow for some increase use of water as well.

Ms. Martelino: If I may add to that as well just to echo what Mr. Emslie said, the conclusions with the conservation measures and additional measures going forward there would be adequate water during drought years. Those conclusions incorporate future growth projections that are in the Urban Water Management Plan. So that accounts for some future growth to the 2025 horizon already.

CC4.9 Con't

Council Member Schmid: It implies future growth in the City of Palo Alto. Is that what you are saying?

Ms. Martelino: Yes.

Council Member Schmid: Okay, I guess my concern is just to have a clear statement from I guess the City that while we are undergoing an expected reduced water supply and we are planning for dry years that any future growth planned for in our long-term planning takes into account the fact that we do have a declining water supply. This project, which accounts for between four and five percent of our water use, is actually increasing its usage over that time period.

Mayor Burt: Council Member Holman.

CC4.10 Council Member Holman: Just quickly to follow up on Council Member Schmid's comments. One thing that I did not find was adequate permeability comparisons of present to proposed.

Then not seeing a whole lot of other lights is it okay if I comment on what has been put at places this evening?

Mayor Burt: Yes, as long as it pertains to the agendized elements of the EIR.

Council Member Holman: I thought we could comment at any time, or is it just the public can comment at any time on what we have been given? Let me frame it this way. City Attorney will stop me if I am not supposed to say this. What I have been hoping to get, and been asking to get are plans that would indicate circulation, some aspects of context that address the various aspects of our review under the DEIR. While we just got this this evening at places what I am not finding here is what I was hoping to find.

Mayor Burt: Let me break this into two aspects. I would say that if there is a request then maybe Staff could confirm whether this is the protocol that we are intending to follow. Our next meeting is our wrap up on this subject. If there are requests for information to be provided in advance of that meeting then I think tonight would be an appropriate time to make that request. If it is to comment on items that are not tonight's focus then I would suggest we await next week's meeting which is an opportunity to look at all of the DEIR aspects comprehensively.

Council Member Holman: Thank you for the clarification. So it is the latter. I have been requesting almost since we began to get some better visuals that would give us better indication of circulation, linkages, pedestrian/bicycle paths, context for new buildings in relation to existing buildings, certainly in relation to Hoover Pavilion because there is an interest there. Perhaps it is on the disk. I don't know and won't know until I have a chance to look at those. What I am finding as I just quickly go through since we got this at places, as I go through what is in front of us this evening what I find are, and I am exceedingly frustrated so you will hear that. I am exceedingly frustrated because what I am finding primarily here is a parking garage with no context, elevations, and wall sections, various floor plans that have nothing to do with relevance to a DEIR. So I am more than frustrated.

CC4.11

Mayor Burt: Let's let Staff see if they any responses to the concerns that you stated on looking at circulation and connectivity issues.

Council Member Holman: And context. I know the Planning Commission also had considerable questions about trees. What are these trees? Where are these trees? What are the ones we are taking down? We still have no information that I have found on those topics.

Mr. Williams: Thank you Mayor and Council Member Holman. Some of those I think are deficiencies in here about where or the number of trees or details of trees. If it is not in there we need to respond to as part of the Final EIR. As far as the circulation overall context we will go back and see if there is something we missed. I believe that a lot of that is in the EIR itself. There are site plans that show the whole project. There are circulation

CC4.11 Con't

plans that show pedestrian and bicycle pathways connecting through to all of the elements of the project. So I am not sure how much more we have available to provide at this point.

Council Member Holman: Maybe my expectation has not been clear, but what I have been expecting is when we started this process two and a half years ago or so there were diagrams presented to us that were far more descriptive than what is in the DEIR. They were more readable because they were of a size, and had more information on them so you could interpret what was being presented. What are primarily in the DEIR are reduced drawings to such an extent that there is really not a way for me to grasp them, and I have a background of 30 years in graphics. I can't grasp with what is in there what is connected to what. You get to a certain size and you can't read streets, or there aren't streets on them. So my expectation has been that we would have at least the level of information that we had prior to starting the EIR process, and we have not seen it. So you are hearing my frustration. Sorry about that.

Mayor Burt: Let me ask for clarification. Aside from the particular issue of to what degree the graphics in the DEIR are readable can you also put into context how much of that issue is appropriate for the DEIR and how much for the project consideration as we go forward with the Development Agreement?

Mr. Williams: Well, it is both to some extent. I think we have addressed in the DEIR what needs to be addressed in terms of making the determinations of significance as far as particularly like impairment of views, and those kinds of things, and as far as adequacy of bicycle and pedestrian facilities and to that extent. It doesn't mean we can't have clearer exhibits that show some of those things, and that show the context if that is not here right

CC4.11 Con't

now. So I think there may be something that we can do just in terms of creating larger exhibits of what we have and trying to address some of that concern. I think it is probably more relevant to the project design specifics than to the EIR, but I understand and apologize we have not gotten that through at this point to create the documents.

Mayor Burt: So is that something that would be readily available prior to next week or is that something difficult to provide?

Mr. Williams: I don't know. Steven or Zach could you maybe come up and indicate what is available?

Mr. Steven Turner, Advance Planning Manager: Good evening. A lot of the information that perhaps Council Member Holman is referring to can be found in the project application materials. The initial application was submitted in 2007 and amended over time as the project was analyzed and developed. All of those project information materials are up on the website so they are available. They have not been packaged in a manner that is perhaps more usable as a tool for the Council. Certainly as Staff we have been hearing that it would be helpful to you to have those tools in order to move forward with the review of the project. Certainly at this point we are reviewing the Draft EIR and the impacts and the mitigations. Certainly as we go forward past this point into the review of the actual project, complete the review with Architectural Review Board, Staff would begin to develop those tools that are essentially the final set of materials that the Council can then begin to review and ask questions, make comments, and then finally review with Staff and the public.

CC4.11 Con't

Mr. Williams: So it sounds like we should be able to pull some of those application materials and make, as you said at the beginning you saw something, and we can update those.

Mayor Burt: Anything else at this time?

Council Member Holman: Please, yes. I know there is sort of a gray line between the DEIR and the project review. My concern is that I don't want to look back and say, oh gee, I wish I had known then. There are aspects of this kind of review that inform mitigations. If mitigations appear to be adequate or is there something we could do to reduce an impact if we had only had the information to see it. So I just don't want to be looking back and say oh it is too late that was a DEIR topic. Can Staff indicate when we might be able to get some of these visuals to Council?

Mr. Williams: I would expect within the next couple of days.

Mayor Burt: Vice Mayor Espinosa.

CC4.12

Vice Mayor Espinosa: Two areas, two questions on Noise and two on Hydrology. I am hoping to just understand the comment about cumulative construction projects at Stanford and what we understand and what we don't, and if there are additional information that would be helpful to gather as we move past the Draft.

Mr. Jeung: Let me just go ahead and generally address that comment to the best that I can, and then if anything else more specific comes up I will ask Staff to support me.

CC4.12 Con't

Recognizing that the hospital project is expected to occur over a 12-year period, it is a period when there are other projects that could be entertained by Stanford University either as part of its GUP or other improvements. To the extent that we don't know right now what those projects might be we are acknowledging in the Draft Environmental Impact Report, which again needs to disclose potential impacts, we are acknowledging that there is the potential for those construction projects to coincide with one another. To the extent that they occur at the same time the noise and vibration, and construction related affects associated with the Stanford University Medical Center Project could also compound with those related to other Stanford projects.

Vice Mayor Espinosa: I get the impact. What I am saying is Stanford has a pretty good sense of what is coming online. You look out a decade or a little bit longer than that they have a good sense of that. I wonder how that conversation goes in terms of getting specifics about those projects and where they are and really understanding that timeline.

Mr. Jeung: Thank you. I appreciate that clarification. The other thing that is going to be happening as part of the Mitigation Monitoring and Reporting Program, and that is part of the Construction Traffic Management Plan, is a return by Stanford at various phases as they begin to move forward into the construction aspects of the different components of the project. So at the time that those specific phases occur we can have a better appreciation of some of the other activities that are being entertained by Stanford and be able to do a better job in terms of the cumulative impacts.

Vice Mayor Espinosa: Do you think you have a good sense of that now? Could you map out over a 12-year period what you foresee Stanford building?

CC4.12 Con't

Mr. Jeung: We have a sense from what is currently provided and permitted by the GUP. We have other information from the Stanford community plans and things like that. So there is the potential to go ahead and map something out to see on a schedule basis what might overlap.

Ms. Martelino: I would like to add to that as well. I refer you to pages 3.1-4 and 3.1-5 of the Draft EIR. It goes into the contemplated future development under the GUP. On page 3.1-4 there is a general description of what would occur overall under the GUP, but there is also a paragraph that lists specific buildings that are expected to be constructed and their timelines. It is a fairly brief list of buildings but it is the best information we have at this point.

Vice Mayor Espinosa: Let me just be frank. That is what struck me. Here we are we are referencing information that we get from the GUP. In your presentation even talking about how we don't have a full sense of this necessarily, and here we are with the applicant. They know what they are building. I just wonder about how that dialogue goes to really come to understand projects that are coming online within the next decade. Do we have a good understanding about that? Is it worth going back to the table and having a conversation face-to-face as opposed to the materials that you are getting from the GUP to really come to understand that?

Mr. Williams: I think that is something we should do. We should just put together a timeline and try to match it up with the stages of this project and see what is happening at the same time, and try to address it.

CC4.13

Vice Mayor Espinosa: Thank you. Very quickly, there was mention at the Planning and Transportation Commission meeting about routes for construction traffic, and particular mention of Sand Hill Road and Willow and their proximity to the project. I wonder how we go about, and I just don't know and am hoping for my own edification how we go about those conversations with adjoining cities or municipalities to talk about what are going to be the preferred traffic routes for construction traffic, and how much oversight or leeway we have in mandating where those are when they are not within our jurisdiction.

Mr. Emslie: As we have indicated in prior meetings we are in regular conversations with our neighboring cities of East Palo Alto, Menlo Park primarily, and we are in conversations regarding the environmental impacts of this. In fact, we are receiving comments tomorrow evening as we are attending the Menlo Park City Council Meeting where they will be reviewing their comments. We are also talking with the Staff regarding preferred mitigations for issues that arise outside of our jurisdiction. So I think the lines of communication are open to have that dialogue.

CC4.14

Vice Mayor Espinosa: Great. Then two quick questions on Hydrology, one is for Stanford. I notice in the PTC minutes as well a very quick dismissal referencing OSHPD about gray water. I was just hoping to understand that better. It seems like the way we should be going. I know it is not where you are just repeating back the response but I am hoping to come to a better understanding of why that is.

Mr. Tortorich: So we are taking a few measures within the design of the project to try to capture rainwater and condensate water so it would help reduce our irrigation load. In

terms of gray water systems it just runs up against the infection control measures at the state. I can't disagree with them quite honestly, nor can the professionals working on our project disagree with them. There is just too much risk of trying to have a gray water system at a hospital building. Somewhere, ten years down the road, a plumber accidentally connects one pipe to the other pipe. It is not a simple system to do.

CC4.14 Con't

The other thing is that given the nonstructural requirements that come with everything that we have to do the cost of a gray water system would be extraordinary. You would have to double pipe almost all of your fixtures. So it really is not a system that is economical to install, and second, one that would be permitted by the regulatory authority.

Vice Mayor Espinosa: Is that both inside and outside all structures? There is no way to segment out water systems? It is such a significant and large project one would think that there are either parts of the buildings within or really outside measures that could be taken.

Mr. Tortorich: No, unfortunately OSHPD has jurisdiction over the entire hospital building. In fact, they have jurisdiction over the School of Medicine buildings right now because the hospital is not appropriately separated by the School of Medicine buildings. So it is a pretty strict standard.

CC4.15

Vice Mayor Espinosa: Thank you. Then finally, I was just noticing the significant thresholds around substantially impeding the water flows especially related to flood areas into the creeks. I just wonder if I could get a better understanding and if we feel we have adequately covered, I know in our previous Council this was much more of a discussion

point, but retention basin and how that has played into the conversations and if we feel that has been fully addressed.

CC4.15 Con't

Mr. Jeung: I will say that the state has very, very rigorous standards now regarding stormwater retention during both the construction and post-construction. So the requirements to date are such that there is virtually no net new increase during the peak period. Whatever means Stanford has to take in order to accommodate and fulfill those standards that are under the National Pollution Discharge Elimination System are going to have to satisfy the state. So the additional sort of net new increase into San Francisquito Creek should be commensurate with what is permitted under the regulations.

Vice Mayor Espinosa: That said this is for City Staff. We have competing interests here or compounded interests in really addressing creek issues, and addressing impacts of this project. I just want to make sure that we have had those conversations both internally and with the applicant to come to fully understand whether or not there isn't some joint agreement that could be made that could help address mutual concerns.

Ms. Silver: We certainly have had those discussions with the applicant, Vice Mayor Espinosa. I think the EIR at this point does not identify an impact such that a detention basin would be a feasible mitigation measure. But it would be appropriate discussion for a Development Agreement item.

Vice Mayor Espinosa: Thank you.

Mayor Burt: Council Member Yeh.

CC4.16

Council Member Yeh: Thank you. Thank you to Staff and the PTC for their comments. I just had a series of questions for the Utilities and Utilities area. I know PTC had discussed the idea of anaerobic digestion as it related to the COGEN plant. It was just a quick discussion. I know in the Staff presentation and also in Stanford's presentation there was discussion about segregation of compostable materials in the waste diversion. I am just curious, I mentioned in the past about redundancy for electricity for the hospital. It is more a philosophical question for Stanford, which is through this EIR process the analysis criteria has primarily been about sufficiency of electric resources. Whereas, the issue and really what I understand the primary driver for this project overall is addressing seismic needs of the hospitals. So my question to Stanford is how do you see redundancy as it relates to electric supply? Not necessarily sufficiency of electric supplies but the redundancy aspect.

Mr. Tortorich: Council Member Yeh, in terms of the backup power supply for the two hospital buildings the State of California and the Joint Commission requirements that regulate hospital accreditation throughout the country demand that we have been 92 and 96 hours of emergency generator capacity for all life safety systems, and predominantly for most systems within the hospital. So the emergency generators are our primary backup.

As to redundancy of primary power supply, we currently use Palo Alto power and plan on doing so in the future. We are investigating whether there are other options to have backup power either from Cardinal COGEN or from some other source. It is not a simple thing to do. There are all sorts of issues with the electrical engineer. They can explain to me and I

CC4.16 Con't

forget immediately after they tell me. The emergency generators are our primary redundant power supply for the two hospital buildings.

Council Member Yeh: One quick follow up question on that then. I know in terms of that redundancy, and my understanding too is that there might be a kind of parallel and a separate path going on than just the discussions between the City and Stanford. Just for COGEN specifically whether or not Stanford does see this waste diversion as opportunities for that COGEN plant specifically and if Stanford is contemplating anaerobic digestion as one of the options.

Mr. Tortorich: I don't know that for a fact. The University is studying what to do for the next generation of COGEN. I am not sure whether they are planning on buying power off the grid or generating their own power by other means. So that is certainly something I can bring back to the University and get their opinion on.

Council Member Yeh: Thank you.

Mayor Burt: Council Member Scharff.

CC4.17

Council Member Scharff: Thank you. Most of my questions were actually answered. I do have one technical issue. On 3.15-11 it says, Palo Alto's refuse disposal landfill is expected to reach its total permitted capacity of 7.76 million in late 2010. I am just assuming we are going to need to change that. I guess that is sort of one of my question. Is someone going to go through this and fix all of that for the EIR? Okay, thanks.

1 Mayor Burt: I see no more lights on this subject. So that concludes our discussion of Item

2 Number 4.

CC4. City Council Hearing, July 19, 2010

CC4.1 *The commentor asks why the proposed increase in SUMC Project treatment spaces seems to generate a disproportionate increase in ambulance trips reported in the Draft EIR.* The present SUMC emergency department (ED) is undersized, resulting in ambulance trips frequently being diverted to other hospitals. The ED planned as part of the SUMC Project would have a greater capacity to fully serve existing and future community needs for ambulance service.[1] This future growth in ambulance trips is partially responsible for the significant ambulance noise impact identified in Impact NO-3, as discussed on page 3.7-25 of the Draft EIR. However, the more important contribution to this impact, as discussed on page 3.7-33 of the Draft EIR, is the fact that the El-Camino-Real-to-Durand-Way portion of the ambulance route on Sand Hill Road would be new. The present location of the ED greatly favors ambulance access from Quarry Road rather than Sand Hill Road. With the proposed ED relocated much closer to Sand Hill Road, as shown in Figures 3.7-6 and 3.7-7 in the Draft EIR, the Draft EIR assumes all ambulance trips that access the ED from El Camino Real would use Sand Hill Road. Thus, the SUMC Project-related ambulance noise increment would be due to rerouting of all the ambulance trips associated with the SUMC from this direction (existing plus future) and not just the additional trips due to the SUMC Project.

CC4.2 *The commentor states that recycling of building materials and the energy required to recycle should be taken into account in the construction/demolition emissions inventory for the SUMC Project.* Mitigation Measure CC-1.5 on page 3.6-59 of the Draft EIR requires the recycling of at least 50 percent of construction and demolition materials.

Transportation emissions associated with hauling building materials and recycling/ demolition debris, as well as the energy consumed in the recycling process, would require a life-cycle analysis. A life-cycle analysis determines the emissions from all of the raw material production, manufacture, distribution, use, and disposal including all intervening transportation steps necessary or caused by a project's existence. This would include the energy required to create the building materials and their transportation from the manufacturer to the distributor as well as to the SUMC Sites. Providing a life-cycle analysis requires that the exact type of material, the manufacturing location, and transportation route for each piece of material is known. At the time of the Draft EIR analysis, this level of information was not available. However, the Draft EIR provides a project-level analysis for construction, which includes emissions of onsite equipment and operations that are directly under the control of the construction contractor.

The energy required to recycle construction materials depends on the type of material being recycled. Concrete and asphalt material could be recycled onsite into the new construction

[1] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, City Council Hearing, July 19, 2010.

of roads and paving. Other recycled construction material would need to be recycled off site. Because it is unknown at this time exactly what demolition debris would be recycled, it is not possible to provide an estimate of the energy and associated emissions that would go into the construction/demolition material recycling.

CC4.3 *The commentor questions how the Mitigation Monitoring and Reporting Program (MMRP) will consider the change in technology and regulatory requirements that could occur between now and 2025 (full buildout of the SUMC Project).* The mitigation measures in the Draft EIR are designed to allow for flexibility when new technology becomes available as well as to meet any current requirements of the regulatory agencies, with the understanding that the regulations may be revised over time. The SUMC Project sponsors could request to substitute different technologies from those currently included in the Draft EIR mitigation measures. This would require a specific procedure, for example a public hearing or an administrative review. Procedures for responding to changes in technology could be included in the Conditions of Approval.

The analysis of impacts in the Draft EIR considers, to a certain extent, future requirements regarding technology. For example, Section 3.5 of the Draft EIR, Air Quality, analyzes the changes in technology during the construction of the SUMC Project. Page 3.5-14 of the Draft EIR states that construction emissions would generally decrease from year-to-year as the SUMC Project construction program would proceed. Construction equipment would be required to comply with new future air quality regulations, which would emit fewer pollutants in future years as controls mandated for off-road diesel-powered equipment under California law phase-in over time.[2]

With respect to State and local regulatory changes, those would be evaluated on a case-by-case basis. Generally, the SUMC Project sponsors would receive vested rights to develop the SUMC Project in compliance with the regulations in effect at the time that the SUMC Project is approved. However, there would be certain exceptions to that, which would be evaluated on an individual basis when the issues arise.

CC4.4 *The commentor expresses support for the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC4.5 *The commentor requests that more attention be given to the entry façade at the Hoover Pavilion during renovation under the SUMC Project.* Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the Hoover Pavilion entry, as explained by the SUMC Project sponsors at the public hearing. The original design of the Hoover Pavilion building

[2] California Code of Regulations, Article 4.8, Section 2449, General Requirements for In-Use Off-Road Diesel-Fueled Fleets.

did not include Americans with Disabilities Act (ADA) access and a flight of stairs was built to access the building from the second floor. Therefore, in order to meet current ADA requirements, the primary access to the Hoover Pavilion building as part of the SUMC Project cannot be through the original entrance. The SUMC Project has been designed to preserve, to the extent possible, the architectural character of the original building entrance and clean up the entry, restore the canopy over the entry, and make that the primary entry for the majority of the clinics. As part of the new building design, a separate entrance is included for pediatricians who are community physicians with direct access from the street.[3] The proposed changes to the main entry were minimized and as such, do not threaten the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR) eligibility of the Hoover Pavilion. Please refer to Staff-Initiated Change 5 for additional information about proposed renovations to the main entrance of Hoover Pavilion.

CC4.6 *The commentor does not support the study conducted by Stanford University's Director of Heritage Services and University Archaeologist, but supports the conclusion of the Architectural Resources Group (ARG) report*. As described on page 3.8-15 of the Cultural Resources section, two studies were performed to evaluate the historical significance of the Stone Building complex. One study was conducted in 2007 by Stanford University's Director of Heritage Services and the University Archaeologist, who concluded that the complex is not one of E.D. Stone's major achievements but is important for its connection to the heart transplant. However, because of a lack of integrity, the building is probably not eligible for listing on the California Register of Historic Resources (CRHR).[4] In 2008, the City hired ARG to perform a separate study, which included a peer review of Stanford University's evaluation. ARG concluded that the Stone Building complex appears eligible for listing on the CRHR and should be considered an historical resource for the purposes of the CEQA review.[5] ARG's complete peer review is included as Appendix I in the Draft EIR. In addition, the City's Historic Preservation Planner concurred with ARG that the Stone Building complex is a historical resource pursuant to CEQA.[6]

Based on the findings by ARG, and the consensus of the City's Historic Preservation Planner, the Draft EIR considers the Stone Building complex as a significant historic resource. As such, due to the demolition proposed under the SUMC Project, the Draft EIR concludes that the SUMC Project would result in significant and unavoidable impacts on

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[3] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 9, 2010.

[4] Jones, L., *Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project*, 2007.

[5] Architectural Resources Group, Inc., Stanford University Medical Center Historic Resource Evaluation and Peer Review, 2009.

[6] Dennis Backlund, Historic Preservation Planner, City of Palo Alto, *Staff Comments on the Stanford Shopping Center and University Medical Center: Historic Resource Evaluation and Peer Review*, prepared by Architectural Resources Group, Inc., memorandum to Julie Caporgno, Chief Planning and Transportation Official, and Steven Turner, Advance Planning Manager, May 15, 2008.

cultural resources. See Impact CR-1 on pages 3.8-18 through 3.8-23 for the impact analysis and proposed mitigation measures that would lessen the impacts from demolition of the Stone Building complex, but not to a level of less than significant.

CC4.7 *The commentor suggests the inclusion of a Historic Preservation Alternative*. The Historic Preservation Alternative is described on pages 5-22 through 5-26 of the Draft EIR in Section 5, Alternatives. Please refer to pages 5-166 through 5-195 of the Draft EIR for the impact analysis of the Historic Preservation Alternative. In addition, please refer to Master Response 8 for the range of alternatives analyzed and considered in the approval process.

The commentor also requests that the Draft EIR consider the cumulative impacts of the demolition of one of E.D. Stone's buildings in the City of Palo Alto. As described on page 3.8-27 of the Draft EIR, E.D. Stone constructed three other buildings within the City in addition to the Stone Building complex. However, according to an evaluation by ARG, only one of these buildings, the Palo Alto Main Library, has been determined eligible for the National Register of Historic Places. The library is planned to undergo renovation and expansion, which could impact its historical integrity. In combination with the SUMC Project, development at the Main Library and other historic buildings in the City would have cumulatively significant impacts on historic resources. The Draft EIR states that the demolition of the Stone Building complex would have a cumulatively considerable significant and unavoidable impact due to the small body of E.D. Stone's work present in the City that retains sufficient integrity to be eligible as historical resources. Therefore, the conclusions in the Draft EIR are consistent with the commentor's remarks.

CC4.8 *The commentor requests information regarding the solid waste generated by the proposed demolition of the Stone Building*. Page 3.15-27 of the Draft EIR notes that construction of the entire SUMC Project would generate an undetermined amount of solid waste, including demolition debris. The amount of solid waste generated from demolition of the Stone Building has not been determined. Therefore, the amount of truck trips and resulting landfill to dispose of the demolition waste is unknown.

Construction of the SUMC Project, including demolition of the Stone Building would be subject to the Requirement to Divert Construction and Demolition Waste from Landfill Ordinance (Palo Alto Municipal Code 5.24). This ordinance requires that a minimum of 90 percent of inert solids (e.g., concrete, asphalt, and rock) and a minimum of 50 percent of the remaining debris, generated from construction and demolition projects, be diverted from landfills through reuse and/or recycling. Please refer to Response CC4.2 for further discussion of construction-related emissions and construction/demolition material recycling requirements.

In addition, the Historic Preservation Alternative considers retention of the Stone Building complex, which would reduce construction waste. Please refer to page 5-22 of the Draft

EIR for a description of the Historic Preservation Alternative and page 5-166 of the Draft EIR for the analysis of this alternative.

CC4.9 *The commentor requests a statement from the City of Palo Alto Utilities that the SUMC Project EIR takes into account future growth planned for in the City's long term planning and the declining water supply situation.* The SUMC Project Draft EIR evaluates future water supplies and demands using data from the City's 2005 Urban Water Management Plan (UWMP), which included growth forecasts through year 2030, as shown in Table 3.15-1 on page 3.15-2 of the Draft EIR. The 2005 UWMP utilized growth forecasts from the San Francisco Public Utilities Commission 2004 Wholesale Customer Water Demand Projections Study, which analyzed water demands associated with each customer sector and then forecasted demands over a 25-year planning horizon. The UWMP evaluated future demands and available supplies for existing and potential future customer growth and these findings were incorporated into the water supply discussion on pages 3.15-2 and 3.15-3 of the Draft EIR. Therefore, the Draft EIR has considered future growth within the City of Palo Alto, in addition to the SUMC Project, and has evaluated available water supplies accordingly.

CC4.10 *The commentor seeks a comparison of existing and proposed permeability.* Page 3.11-34 of the Draft EIR states the amount of new impervious land surfaces that would be created and that could affect groundwater recharge would result in a less than 2 percent increase. As presented in Footnote 101 on page 3.11-34 of the Draft EIR, "'Land surface' refers to the footprint area of structures and landscaping." Page 3.11-40, last partial paragraph and continuing on to page 3.11-41 of the Draft EIR, notes the SUMC Project effects on pervious surface that could contribute to stormwater runoff (7 percent increase). It is important to note that permeability that could affect groundwater recharge is not the same as permeability that would affect stormwater runoff; even though green roofs are permeable surfaces with regard to effects on stormwater runoff, they would not allow percolation of rainfall to recharge the groundwater aquifer and would effectively act as impervious surfaces for groundwater recharge. Page 3.11-46, last paragraph and page 3.11-48, first paragraph of the Draft EIR also note that the SUMC Project would reduce overall impervious surfaces that could contribute to stormwater runoff by about 7 percent or 6 acres, which is 9 percent of the SUMC Sites. Presentation of this data could be confusing and text has been added as the third sentence of the first paragraph on page 3.11-34 of the Draft EIR, as follows:

> **Groundwater Recharge**. During construction, the balance between pervious and impervious land surfaces[101] would repeatedly change. Consequently, there is a potential for a temporary increase in impervious land surfaces and therefore, temporary reduction in groundwater recharge. <u>Impervious land surfaces, including green roof areas, would prevent the downward percolation of rainfall and groundwater recharge.</u>

Page 3.11-40, last partial paragraph, and continuing on to page 3.11-41, first partial paragraph of the Draft EIR:

> The SUMC Site surface is currently about 27 percent pervious land surfaces (refer footnote 101 on page 3.11-34) with about 3 percent of green roofs for a total of 70 percent impervious surfaces that could contribute to stormwater runoff. Both pervious land surfaces and other pervious surfaces, such as green roofs, would allow for percolation and storage of rainfall and reduce runoff by effectively reducing the amount of impervious surfaces that could contribute to stormwater runoff. Implementation of the SUMC Project would replace existing buildings and surface parking lots with new buildings, underground parking, and a new parking structure, and ultimately ~~create~~ result in about 26 percent pervious land surfaces and about 11 percent of green roofs for a total of 63 percent impervious surfaces that could contribute to stormwater runoff.[106] Green roofs can detain 60 to 100 percent of precipitation, depending upon the substrate and size of storm event.[107] The ~~increased~~ reduced amount of impervious surfaces that could contribute to stormwater runoff (~~land surface plus green roof area; a~~ (7 percent total ~~increase~~ reduction in effective impervious surfaces) would reduce the amount of stormwater runoff from the SUMC Project compared to existing conditions. Because there would be no net-increase in directly-connected impervious surfaces and the SUMC Sites are within an area designated as exempt from HM controls on the County HM map, the SUMC Project would be exempt from the HM stormwater controls requirements; a no-net-increase-indirectly-connected-impervious-area condition is considered to be sufficient to determine that there would be no increase in runoff rates, volume, or flow duration (maintenance of the preexisting hydrograph) for the small (less than two-year) to medium (10-year) storm events. Because the pre-development hydrograph would be maintained, post-construction conditions under the SUMC Project would not substantially increase off-site bed or bank erosion or sedimentation in San Francisquito Creek.

CC4.11 *The commentor expresses concerns about the visual aids provided in the Draft EIR and at the public hearings*. Throughout the Draft EIR, figures and visual simulations are included to help visualize the buildings, site plans, design features, and linkages as proposed under the SUMC Project. The figures address potential impacts with the general proposed layout as provided in Section 2, Project Description; view obstruction, scenic qualities, compatibility with existing surroundings, and shadow impacts as provided in Section 3.3, Visual Quality; bicycle and pedestrian facilities, transit routes, truck routes, and trip distribution as provided in Section 3.4, Transportation; sound contours, ambulance routes, and mechanical equipment locations as provided in Section 3.7, Noise; geology maps as provided in Section 3.10, Geology; locations of Underground Storage Tanks as provided in Section 3.12, Hazardous Materials; and alternatives as provided in Section 5, Alternatives. In total, the 63 figures are included in the Draft EIR to demonstrate existing and future conditions under the SUMC Project. In addition, other available figures were provided to

the Draft EIR preparers and considered during the analysis process; however, due to the extent of these figures, it was not feasible to include all of them in the Draft EIR. Nonetheless, additional figures depicting the Hoover Pavilion Site and renovation are provided in Appendix DD of this document.

Additional figures, diagrams, and simulations were presented during the public hearings for the City Council and the Planning and Transportation Commission. In addition, preliminary SUMC Project plans are available to download at the City's website.[7]

CC4.12 *The commentor requests consideration of the cumulative construction projects at Stanford.* The cumulative analysis methodology and assumptions are included on pages 3.1-2 through 3.1-6 of the Draft EIR. As stated on pages 3.1-4 and 3.1-5 of the Draft EIR, the cumulative analysis includes development under the Stanford University CP/GUP. It is anticipated that some of the projects proposed under the CP/GUP would be constructed concurrently with the SUMC Project.

The Draft EIR identifies known CP/GUP construction projects that would be located near the SUMC, where construction traffic could combine with SUMC Project construction traffic. However, in response to this comment, Master Response 4 includes an updated and expanded list of the potential development under the CP/GUP and discusses the associated construction-period traffic impacts. No other changes to the cumulative analysis are triggered by the updated CP/GUP construction list.

CC4.13 *The commentor questions the process by which construction related traffic routes are determined both within the City of Palo Alto and through adjoining cities.* Please refer to Master Response 4 for a discussion of construction traffic.

CC4.14 *The commentor asks if the SUMC Project sponsors examined the use of greywater and if it is possible to divide the water systems.* Greywater is used domestic water (except for sewage) that is recycled for irrigation purposes. The SUMC Project sponsors considered a greywater system under the SUMC Project. However, based on discussions with OSHPD, hospitals are not allowed to use greywater systems since there is a risk of potential errors.[8] As such, greywater systems would not be installed under the SUMC Project due to regulatory concerns. In addition, all the fixtures would need to be double-piped, which would create a significant financial burden on the SUMC Project sponsors.[9]

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[7] City of Palo Alto, Planning and Community Environment Department, "SUMC Project - Development Simulation & Architectural Design," accessed on September 23, 2010 at: http://www.cityofpaloalto.org/depts/pln/news/details.asp?NewsID=1596&TargetID=85.

[8] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 30, 2010.

[9] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, City Council Hearing, July 19, 2010.

CC4.15 *The commentor questions whether flow impedance issues within flood areas to creeks in particular have been adequately addressed, with some concern regarding use of retention basins*. The potential for flow impedance within creeks or off-site storm drains during construction is not substantial. The SUMC Project would not affect flood areas of creeks. Page 3.11-7 of the Draft EIR explains that the SUMC Sites are not located in a 100-year flood hazard area. Page 3.11-44 of the Draft EIR describes some of the construction Best Management Practices (BMPs) that would be required during development of the SUMC Project and that a SWPPP would have to be developed including specific minimum BMPs. The Construction General Permit details what these minimum BMPs would be, including runoff and run-on controls and requirements for temporary impoundments (e.g., detention or retention basins), if used. Page 3.11-33 of the Draft EIR identifies construction dewatering requirements that would prevent storm drain system and San Francisquito Creek conveyance capacity constraints that could occur from construction dewatering. As such, page 3.11-42 of the Draft EIR concludes that potential construction impacts on flooding and conveyance capacities would be less than significant.

The potential for SUMC Project impacts on operational flooding and flow impedances would also not be substantial. Page 4.11-46 of the Draft EIR notes that the SUMC Project would have to implement permanent stormwater quality BMPs and Low Impact Development (LID) requirements. As presented on page 3.11-27 of the Draft EIR, LID goals include reduction of runoff and maintenance of the existing conditions hydrograph by minimizing disturbed areas and impervious cover and then infiltrating, storing, detaining, evapotranspiring, and/or biotreating stormwater runoff. Retention basins are not required and all of these goals would reduce the potential for increased stormwater runoff and flow impedance in the drainage systems. Furthermore, as noted on pages 3.1-41 of the Draft EIR the SUMC Project would reduce the amount of stormwater runoff compared to existing conditions. The Public Works Department requires that the existing drainage patterns be maintained, including accommodation of runoff from adjacent properties. Therefore, runoff and flow conveyance from adjacent properties would not be altered. Impact HW-5, included on pages 3.11-41 to 3.11-44 of the Draft EIR, identified that flooding and stormwater conveyance capacity effects, without incorporation of a retention basin, are less than significant. Therefore, a retention basin would not be required to mitigate potential effects of stormwater runoff from the SUMC Sites and is not included in the SUMC Project features.

The commentor also requests conversations both internally and with the SUMC Project sponsors to come to fully understand whether or not there is a joint agreement that could be made that could help address mutual concerns. Please refer to Master Response 11 for a detailed description of the City's review process and the next steps in the EIR review. Also, please see Master Response 12 for a discussion of the Development Agreement.

CC4.16 *The commentor asks for an explanation of redundancy in electricity service for the hospital in addressing seismic needs.* The primary power supply for the hospital is from the City of Palo Alto. Currently, emergency generators are the primary redundant power supply for the hospital buildings. The State of California and the Joint Commission on Accreditation of Healthcare Organizations require 92 to 96 hours of emergency generator capacity for all life safety systems, and predominantly for most systems within the hospital.[10]

The SUMC Sites are currently served by 12 emergency generators that have a total capacity of 9.4 megawatts. However, in order to meet the increased demand for emergency back-up power under the SUMC Project, up to an additional 21 megawatts of emergency generator capacity would be required for the SUMC Project. As described on pages 2-50 and 2-52 of the Draft EIR, ten new 2-megawatt generators would be provided within the Main SUMC Site: seven for SHC between Welch Road and the proposed hospital, and three for LPCH adjacent to the existing generators near Quarry Road. In addition, each of the proposed SoM buildings (FIM 1, 2, and 3) would have an emergency generator in proximity to the proposed building with no more than two generators at any location. In total, the SUMC Project would add 13 emergency generators to the Main SUMC Site. The existing and new emergency generators are shown on page 2-51 in Figure 2-17 of the Draft EIR. In the case of an emergency or power outage, these generators would be able to provide energy to the SUMC Project facilities.

The commentor also asks if Stanford is contemplating anaerobic digestion as an option for waste diversion at the Cardinal Cogeneration Plant. Anaerobic digestion is not currently included in Stanford's long-term energy plans; however, Stanford continues to investigate anaerobic digestion and other waste-to-energy options including biomass as it continues to develop long-term energy plans.[11]

CC4.17 *The commentor requests an update of the current remaining capacity of the Palo Alto Refuse Disposal Landfill.* The ceased operation date for the Palo Alto Refuse Disposal Landfill is December 30, 2011. As stated on page 3.15-11 of the Draft EIR, upon closure of the facility, it is expected that all non-recyclable solid waste currently delivered to Palo Alto's landfill would be diverted to various local disposal sites. Regardless of the final closure date of Palo Alto's landfill, the Kirby Canyon Landfill has sufficient capacity to serve the SUMC Project.

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[10] Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, July 19, 2010.

[11] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

City Council Meeting, July 26, 2010
Council Chambers, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

CC5

Mayor Burt: Our next item is a Public Hearing to consider Stanford University Medical Center Facilities Renewal and Replacement Project. It is a meeting to accept comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an overview of the Alternative Chapter and Mitigation Measures of the DEIR. Would Staff like to kick this off with a presentation?

Council Member Klein: Mr. Mayor.

Mayor Burt: I am sorry I always forget to do this at the outset. Council Member Klein.

Council Member Klein: Since my wife is a Stanford Professor I will not be participating in this item.

Mayor Burt: Thank you. Hope to see you soon. Mr. Williams.

2. Public Hearing: To Consider Stanford University Medical Center Facilities Renewal and Replacement Project-Meeting to Accept Comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, Including an Overview of the Alternative Chapter and Mitigation Measures of the DEIR.

Mr. Curtis Williams, Director of Planning and Community Environment: Thanks you Mayor and Council Members. Our meeting agenda tonight on this last opportunity for

comments and review of the Environmental Impact Report is to review the Alternatives Chapter of the Draft EIR, and the project mitigations by our consultant, Rod Jeung of PBS&J. We will then have Stanford University Medical Center make a brief presentation to you as well.

Before we go to questions and comments, Dan Garber, the Chair of the Planning and Transportation Commission is here and can also provide you with some information on the Commission's deliberation.

The close of the public comment period for the comments on the EIR is tomorrow, July 27, at the close of business. I just want to reiterate that the purpose of these meetings has been to entertain these comments that will then be responded to in the Final Environmental Impact Report by the consultants and Staff. It will come back to you in conjunction, or actually slightly ahead of the project entitlements for the various permits that are requested. So the merits of the project itself are not properly before you tonight but any comments as to the adequacy of the Draft EIR are appropriate.

We will then be looking at the preparation of the Final EIR following this and through October. There will be some ARB reviews. We also do anticipate at some point in that period coming to the Commission and Council to talk about zoning and design issues. Then the formal entitlement reviews would be conducted by the Council and the Commission in November and December.

A reminder that at the last meeting, as well as tonight, before this agenda the models for the Stanford University main hospital and the Lucile Packard Children's Hospital were

setup in the lobby. Last week in addition to the plans we had provided we also provided you with a copy of the Draft Design Guidelines, and some other project images, and made all of that available on the website.

Also, I wanted to comment that we have tried to get some more detailed tree identification and protection plans prepared for you as well. We believe that what is in the EIR provides an overview of the types of impacts that we would be concerned about, but we have been working with the applicant as recently as today to try to pull the detailed plans together for trees. We are at a little bit of a loss. Our Planning Arborist is not here this week until later in the week. So we have not been able to reconcile some of that yet. We will get that to you when we can, but again we think the basic information in the document will address that. We will be talking quite a bit tonight about the Tree Preservation Alternative so there will be some additional details I think presented as part of that. With that I will turn it over now to Rod Jeung from PBS&J. Thank you.

Mr. Rod Jeung, Project Director, PBS&J: Thank you Curtis. Mayor Burt, Members of the Council, members of the public tonight is our final night together for the Draft EIR hearings. It is dedicated as your Planning and Community Environment Director explained to talk about ways to reduce significant and potentially significant impacts.

One way of accomplishing that as required by CEQA is to look at alternative ways of accomplishing most of the project objectives, ways that substantially reduce those significant impacts. A second way is to focus on specific measures or actions that reduce, avoid, rectify, or compensate for identified impacts. These are modifications or refinements to the basic project, whereas the alternatives alter the basic project itself.

With me tonight to help respond to any of your questions or comments are Trixie Martelino who is our Project Manager, Kirsten Chapman who helped assemble the Alternatives Analysis, Geoff Hornek who prepared the Air Quality and Noise documentation. Dennis Struecker and Nicole Sou from AECom who prepared the traffic analysis, and Jodi Stock and Charles Chase of Architectural Resources Group who contributed to the analysis of the Historic Preservation Alternative.

So just by way of definition let go ahead and first explain the role of alternatives and what we are trying to accomplish in presenting this in the Draft Environmental Impact Report. First off it is a requirement that the California Environmental Quality Act examine a range of what are considered reasonable alternatives to a proposed project. Those alternatives have to attain the basic objectives that are identified both by the project sponsor and in this case the City, and at the same time try to avoid or reduce the significant impacts. It is important to understand that not every conceivable alternative needs to be analyzed. Case law and CEQA itself talks about a reasonable range of alternatives just so that the public and the City Council can make informed decisions. Among those alternatives that have to be considered is the No Project Alternative.

There were seven basic alternatives that were developed to give this reasonable range and to afford the public with an opportunity for informed decisions. If I can, the alternatives fall into four basic types. There is the No Project Alternatives that fulfill CEQA and defines the future baselines against which project effects can be evaluate. There is another set of basic type called the Reduced Intensity Alternatives. These examine lesser square footages or floor areas to reduce the overall effects that have been identified in the Draft

Environmental Impact Report for the proposed project. The third type would be considered Preservation Alternatives. There is a Historic Preservation Alternative to reduce the effects to the 1959 Stone Building and there is a Tree Preservation Alternative that you have heard about a little bit to reduce the effects to protected trees. Finally, there is a Village Concept Alternative that seeks to offset indirect housing demand created by the new Stanford University Medical Center jobs and to improve pedestrian and bicycle linkages to the surrounding area and the regional transportation network.

I am going to go over each of these different alternatives in fairly quick order. The No Project Alternative A of the two would involve retrofitting the hospital facilities to meet the guidelines or the deadlines that have been established by Senate Bill 1953. These are the deadlines established for 2013 and 2030. There would be no new building constructed under this Alternative. If you look at the two sites, at the Hoover Pavilion it would remain unchanged and there would be no upgrades to meet current standards or technological requirements. As a practical consequence one of the two hospitals would close by 2030 in order to provide space for the shared hospital functions and to provide enough beds for one of the hospitals.

The second No Project Alternative essentially would replace the noncompliant hospital facilities with required structural standards. This would involve replacing those facilities with new structures. Consistent with the site's existing PF zoning there would be an allowable increase in square footage of an additional 9,000 square feet that would comply with the maximum floor area ratio of 1.0. As with the No Project Alternative A there would be no new work at Hoover Pavilion. The School of Medicine facilities would be within the 1959 hospital building but could continue to operate if they are separated from

other functions at the hospitals with a fire barrier and they are retrofitted to meet the City of Palo Alto's seismic standards.

Under the No Project Alternative B there would be a decrease in patient beds at the Stanford Hospital. Basically, there would be a reduction to 287 beds from the current 456. The Lucile Packard Children's Hospital would continue to operate at it is that is over-crowed, or if right sizing were to occur with a reduced number of beds. So there would approximately 141 beds versus the current 257.

Moving over to the Reduced Intensity Alternatives, Reduced Intensity Alternative A would right size the hospitals without adding beds. Noncompliant hospital facilities would be replaced with new structures. The hospital space at the two hospitals would increase by 446,000 square feet to provide the additional space for the hospital's existing number of beds, associated support areas, and the emergency room. This would require a change to the existing zoning, which would not allow this expansion otherwise. No new buildings would be added around the Hoover Pavilion but Hoover Pavilion would itself be renovated. The School of Medicine facilities would be demolished and replaced in the proposed Foundations in Medicine or FIM buildings. Because this Alternative assumes right sizing to properly serve the current activities there would be no increase in operations.

Reduced Intensity Alternative B involves again right sizing the hospitals like the Reduced Intensity Alternative A but this alternative also proposes expansion that would increase the square footage to 924,000 square feet versus the 446,000 that is needed for right sizing only. The other physical changes to the Hoover Pavilion and the School of Medicine

would be the same as identified earlier for Reduced Intensity Alternative A. The expanded floor area that accompanies this Alternative would increase the operations at the facilities but the increase would only be to 60 percent of those identified for the proposed project.

Switching to the third type of alternatives, the Historic Preservation Alternative, this alternative seeks to preserve all of the essential historic aspects needed to maintain the eligibility of the 1959 hospital complex for listing on the California Register of Historic Resources. In addition, this alternative would preserve the historic integrity of Pasteur Drive and its landscaping which serve as the main approach to the 1959 hospital building complex. To accomplish these goals of preservation a new Stanford Hospital building would be constructed and the 1959 Stone Building complex would be reused by the clinics and the School of Medicine. The Lucile Packard and the Hoover Pavilion facilities would be expanded as under the proposed project. As a result of these changes the floor area expansion under the Historic Preservation Alternative as well as the increase in operations would be identical to the proposed project.

The Tree Preservation Alternative would modify the proposed site plan to preserve what are called 'aesthetically and biologically significant' protected trees. This would be accomplished by eliminating one of the building modules that was proposed for the Kaplan Lawn under the proposed project, reconfiguring the proposed Foundation in Medicine Building 1, and making some adjustments along Welch Road. The net effect of the Tree Preservation Alternative would be to reduce the number of trees that would be lost under the proposed project. The development program and the increase in operations would effectively be the same as the proposed project. Notably, before we go on, this Alternative is now considered the preferred site plan by Stanford.

This slide helps to illustrate those trees that would be protected under the Tree Preservation Alternative. The areas that are shown in green represent the trees that would now be preserved because of the various building modifications that I explained a little bit earlier. The trees that identified in the plum color are the trees that are intended to be protected through relocation.

Just for clarification, because I know there were some questions that came up during the Planning Commission hearing regarding definitions of aesthetically and biologically significant tree. Biologically significant refers to a protected oak or redwood of a certain size. These trees are defined in the City's Municipal Code under Chapter 8.10. Trees that are also aesthetically significant are important or prominent visual features. They contribute to a larger grove or theme, and/or poses unique character.

In summary, under the Tree Preservation Alternative there are 13 biologically and aesthetically significant protected trees that would be retained. There are three biologically and aesthetically significant protected trees that would be replaced. These are trees that would otherwise be lost under the Stanford University Medical Center Proposed Project. As mentioned a little bit earlier there will be maps that will be made available in the Final Environmental Impact Report to clarify some of the numbers and so people can better see and understand where the trees are.

The seventh and final Alternative was developed by the City primarily for the purposes of reducing the vehicle miles traveled, traffic congestion, vehicular air, and noise emissions of the proposed project. These objectives are proposed to be accomplished by dedicating

previously approved housing units in three locations for Stanford University Medical Center employees, and by providing and enhancing pedestrian connections between the project sites and the Shopping Center, the Palo Alto Intermodal Transit Station, and the Downtown.

This slide shows the location of the targeted housing sites that would be proposed for use by the Stanford University Medical Center employees. These are projects that have already been approved under the Stanford Community Plan and the General Use Permit. The slide also shows the epicenter, if you will since we are talking about seismic retrofit, the epicenter of the Transit-Oriented Development centered around the Palo Alto Intermodal Transit Station. There are circles that emanate from that transit station that show the distances roughly from one-quarter mile to one mile out, and the proximity to the different transit options.

For comparison purposed this is a quick summary on the effects of the Tree Preservation Alternative relative to some of the significant and unavoidable impacts that were identified for the proposed project. In terms of air emissions the Tree Preservation Alternative would eliminate the significant unavoidable impacts that were identified for the proposed project during construction. In terms of noise and vibration during the construction period the Tree Preservation Alternative, because it considers pile driving, would result in significant and unavoidable impacts similar to the proposed project for onsite uses, but also offsite uses. I should go ahead and say parenthetically, as pointed out by the project sponsors that the issues of pile driving have been raised with OSHPD and it is still an area where we are trying to get some further clarification. So it may be that with whatever alternative is

selected there would be pile driving impacts that would be significant and unavoidable for other alternatives as well.

Finally, as befitting its name the Tree Preservation Alternative would result in an additional 13 protected trees that would be preserved in place. The Tree Preservation Alternative does involve some additional mitigation measures that were not identified for the proposed project. In particular, as I mentioned earlier, this alternative does consider pile driving as a technique for constructing some of the facilities so there are noise mitigation measures that have been identified in the environmental document. Similarly for Hydrology this Alternative did not have a site plan so we could not ascertain with certainty that it would not result in a no net increase in runoff. So this was added as an additional mitigation measure as a safeguard.

Similar to the previous table this one shows a comparison of the proposed project against the Village Concept Alternative. The Village Concept Alternative with respect to intersection congestion actually results in significant congestion to more intersections in the study area than under the proposed project. In terms of pedestrian and bicycle safety both alternatives result in significant but mitigable impacts. However, the Village Concept Alternative would offer additional pedestrian safety features.

In terms of accomplishing the objectives of reducing vehicle miles traveled the Village Concept Alternative would meet this goal by reducing vehicle miles traveled by 10,300 miles per day. The corollary to this reduction in vehicle miles traveled is that there would also be a reduction in greenhouse gas emissions under the Village Concept Alternative relative to the proposed project of roughly 2,800 metric tons of carbon dioxide equivalents.

In terms of the jobs to employed residents ratio it would not increase as much under the Village Concept Alternative since housing is included in the Village Concept Alternative.

The California Environmental Quality Act requires the declaration of an environmentally superior alternative. That is that alternative that does the best job in terms of reducing environmental impacts identified for the proposed project. Based on the analysis in the Draft Environmental Impact Report the Reduced Intensity Alternative A is the environmentally superior Alternative. The reasons for this are cited on the slide. This is basically the conclusion because there is no increase in operation, and this Alternative has the effect of reducing some of the significant unavoidable impacts identified for the proposed project. These are things related to traffic, air emissions, and greenhouse gas emissions during operations.

So just to give you a sense of relief, I am not going to summarize all the mitigation measures that identified in the Draft Environmental Impact Report. Rather I am just going to give a quick explanation for more the benefit of the community listening in and watching on what a mitigation measure is and how the City can be assured that they are actually going to be implemented. The identified mitigation measures that are in the Draft Environmental Impact Report are intended to minimize, avoid, rectify, or compensate for any of the significant identified impacts. The mitigation measures need to be feasible and they have to have a proportional nexus to the impact. All of these mitigation measures are listed in Table S-4 of the Draft Environmental Impact Report. If the proposed project is approved the City has to adopt a Mitigation Monitoring and Reporting Program. The Mitigation Monitoring and Reporting Program will describe in more detail each of those

mitigation measures, the monitoring actions that will be taken, what particular department or agency is responsible for ensuring that those are accomplished, and the timeframe for when those have to be implemented.

There is one very important mitigation measure that I just wanted to mention simply because traffic is foremost in the minds of very many. This is regarding the Transportation Demand Management Measures. They are essentially a menu of different strategies and options to reduce travel demand. I just wanted to make sure that everyone was clear that the City of Palo Alto is permitted to require such programs to reduce traffic impacts and to determine the feasibility of transportation demand measures. So that concludes our presentation. Thank you.

Mayor Burt: Thank you. We don't have a presentation from the Planning Commission this time, right?

Mr. Williams: I believe we do.

Mayor Burt: Great, okay. Chair Garber, welcome.

Mr. Dan Garber, Chair, Planning and Transportation Commission: Good evening. The Commission spent quite some time and I will summarize however. Regarding the process questions that we addressed at the beginning of our meeting on this portion of the DEIR review we spent some time taking a look at the HRB and the ARB's involvement in the project and the project process, investigating whether and questioning whether and how those different Boards were utilized. At the end of that we didn't have any specific or

substantial comments that changed the use or process of the Boards, and therefore did not have specific recommendations for how they might be used. So the process that is in place seemed to be serving the process well at the current time.

CC5.1 One of the other questions that came up during the process review was the role of housing in particular in the Village Concept Alternative, and its role relative to the overall GUP, and how housing serves the GUP and how it is counted. Those comments are recorded and now part of the DEIR that will have to be answered.

CC5.2 Relative to the Alternatives them selves Alternative A and B, the No Project Alternatives, and then Reduced Intensity Alternative A the Commission had no real comments that added to the mitigations or the impacts that were already recorded in the report. There was some significant discussion in the Reduced Intensity Alternative B, which was looking at the functional alternatives that were described a moment ago, and then the quantitative alternative of the 60 percent of operations versus some other number. Recognizing that that is a somewhat arbitrary number that was used to simply evaluate what the impacts were and if there were new impacts that were revealed as a result of that the Commission had some significant discussion as to whether 60 percent was the right number of if there is another functional threshold. For instance taking off a floor off all the towers if that was a better way to understand or to raise other impacts. However, our discussions were relatively inconclusive in determining if significant impacts could be found that were in addition to the conclusions that were already a part of the Alternative B.

Regarding the Preservation Alternatives the Commission had a number of comments regarding the historic structures primarily relative to their value. There was some

clarification made by the consultants that were at hand, and are here this evening I believe. In general, the comments did not reveal specific impacts or mitigations that were not already recorded.

CC5.3 Regarding the Tree Preservation Alternative there was significant discussion there, and included comments that have been recorded regarding if the amount of trees, the threshold that has been identified in the report and described this evening was the right amount of trees to be aiming for. If that should have been more trees or less trees and as described if the definitions were correct. Those comments have been recorded.

CC5.4 Finally, in the Village Concept Alternative there was some general surprise by some of the Commissioners that that particular Alternative did not result in greater mitigations to the various impacts be they environmental, be they traffic, parking, etc. I think there was an expectation that there would be greater impacts, greater number of impacts mitigated, and in fact if you look down the Table S-4 or 5 I believe it is, it doesn't really move the needle one way or the other. Some of those conclusions were challenged by requesting some additional information to be discussed in the comments that are to follow the DEIR regarding the spousal impacts and the various ways that the use and occupancy of the various units being proposed would have relative to traffic, and if those had been rolled up appropriately, if there was a different way of counting them to reveal significant impacts, or impacts that might have greater impacts to have moved the needle if you will.

CC5.5 Under Mitigations and the discussion regarding mitigations the GO Pass was discussed as we reviewed two meetings ago. There was general agreement on behalf of the Commission as to the viability of the use of the GO Pass but that goes hand-in-hand with

CC5.5 Con't

the potential limitations. There are an awful lot of mitigations that are based on the use of the GO Pass and you are familiar with those arguments or concerns.

Then I guess there is just a general final comment that clearly many of the unavoidable consequences have to do with traffic, and were there any alternatives that could be explored or found that would lessen or allow some of those impacts to be mitigated more than have been revealed. That's it. Questions?

Mayor Burt: I see none at this time. Council Member Holman.

CC5.6

Council Member Holman: Yes, Chair Garber, your note finally there about the traffic impacts. Were there conclusions or suggestions as to how some of those impacts might be reduced?

Mr. Garber: There were many although they were discussed primarily in light of the Transportation section. I didn't come prepared specifically with those this evening in that we had reviewed some of those in some of the past meetings. But yes there were several. Several come to mind, which included expansion of the TDM plan to look at the specific routes and how they are used by construction, the use of offsite parking areas that has been suggested as satellite parking, increases in the use of the various shuttle services to points that are in addition to what are currently being served. I am just reaching from my memory.

CC5.7

Mayor Burt: I have a question for Staff. Under the Village Concept Alternative it seems like there are two major elements to it. One is the design concept of having a more

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walkable, bikeable, mixed use community with the connections that we had been starting to talk about three or four years ago. The second part is the Housing Element, which would potentially have the housing units that are already identified under the General Use Permit be units that would be dedicated for the Medical Center employees as BMR units. Has there been any evaluation of looking at those two aspects, the design aspect, and the housing aspect separately?

Mr. Williams: Thank you Mayor. We have not looked at them separately in terms of developing separate alternatives. We have both of them included in here so that if one component, say the integration of the bike network and the connections we talked about could be added to one of the other alternatives that would be a possibility. We have not, I don't think, segregated them out in any plan in and of itself. That is fairly easily done because they are pretty discrete portions of the Village Concept. They are also discussed to some extent in the applicant's design guidelines in some other places in the project specifically as well.

Mayor Burt: So that would come to us as we look at the actual plan approval process. It does not need to be broken out into two segments of the environmental impacts.

Mr. Williams: No, in fact we have been working with the applicant to as much as possible get those elements of the interconnections incorporated into their design.

Mayor Burt: Thank you. Council Member Price.

CC5.8

Council Member Price: I had a couple of questions again on the Village Concept, which I was intrigued with and very supportive of, the issue of the traffic impacts and the spousal impact. I am assuming that is related to work trips. Is that an assumption that I should be making? Work trips in terms of spousal impact being work trips generated out of the various housing units.

Mr. Williams: Right, that is correct.

Mr. Jeung: Dennis, I don't think you need to respond with any further explanation, but yes those are the work trips.

CC5.9

Council Member Price: The second question I am sure Dennis can answer this as well. The issue of TDM measures, I am assuming that the traffic impacts and the TDM measures would be utilized by the potential residents of the housing units within this Village Concept. Is that right? If this were approved there will be a variety of housing unit sizes, correct? Is that in the Concept or you are not at that point yet?

Mr. Williams: Dennis Struecker is our traffic consultant and could respond to that.

Mr. Dennis Struecker, AE Com: Yes, the TDM measures that are available for the base project would also be available for the Village Concept project. For the base project you would have more employees using a GO Pass for instance because those employees now that are in the Village Concept housing would essentially walk or bike to work. That pass would still be available to them because the GO Pass has to be given to all employees.

For the spousal trips we did also reduce the trip generation slightly to account for transit-oriented development. Rod showed the slide with the concentric circles going out from the transit center. So we based on national statistics reduced the trip generation to account for the proximity to a pretty significant transportation hub.

In terms of the size of the units we assumed an average size of 2.2 persons per unit. That was just the average that we used and they would vary from one to three or more.

CC5.10

Council Member Price: My last question is on the traffic modeling assumptions you have made. The traffic model that you are using for the DEIR is that similar to the traffic model that was used for the preparation of the GUP? Is the methodology similar? Also, I am assuming that the full build out of the GUP is something a part of the projects that are being evaluated as part of the overall analysis of the DEIR, because it is in the pipeline and as we noted earlier it is on the Notice of Preparation, a project that has been previously approved. So it is considered in the evaluation. Could you just clarify that, please?

Mr. Struecker: Sure. Yes, the process followed by both projects was exactly the same. The difference was only the separation of the number of years, so the difference in expected development. Both projects used the VTA-based model to project the background non-project traffic. Then the project traffic for either GUP or for this project was added on top of that to determine the impacts. So yes any of the GUP development that has not been built is included in the County's land use for the Stanford lands. So that is taken into account in the background numbers used in this analysis.

Mayor Burt: Council Member Scharff.

CC5.11

Council Member Scharff: Thank you. I actually wanted to follow up on the Village Concept. Am I correct in understanding that what the Village Concept does on housing is takes housing that is pre-approved or designated for medical students and graduate housing students at Stanford and simply shifts that over to employees? So my question is does the EIR then not take that into consideration in terms of the trips generated by those individuals who no longer have the housing that they were going to have, they are now going to have to live somewhere else and travel to the Stanford campus. I didn't see that being taken into consideration. I think it should be taken into consideration. I am not sure why it wasn't. Is there an answer to that or does anyone know?

Ms. Cara Silver, Senior Assistant City Attorney: Council Member Scharff that was not taken into account. That is certainly one methodology you could take into account. What we were thinking is that the GUP has a linkage requirement so that 2,400 units must be built if the maximum build out of the academic campus is constructed. The GUP also contains approval rights for 600 additional units. So we considered those 600 additional units as excess units. They could be built. They didn't have to be built. So it is just one way of viewing the situation. It can be viewed differently.

Council Member Scharff: So if I am understanding this correctly, if out of the 600 an additional 490 housing units are then built then we wouldn't have the impact of people who are going to be designated to have to live somewhere else because we just have 490 new housing units. Shouldn't we then be taking into consideration in the EIR the fact that you are then planning to build 490 units of new housing, or is that taken into

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consideration? Wouldn't there be traffic impacts of having 490 new housing units? You would have spouses? I am assuming there are other impacts but maybe there are not.

Mr. Williams: Yes, Council Member Scharff, those units were already essentially covered by the Environmental Impact Report for the General Use Permit, which accounted for all 3,000 units. So to some extent they are, however, those were adjusted because to some extent because the make up of those units, the families as opposed to individuals kind of thing, would be a bit different with the employee housing as opposed to the postdoctorals, etc. So that is where this issue of spousal trips and that became a little more important so that was factored in, and it does drive some of the benefit of the Village Concept down a bit.

Council Member Scharff: Right. I can clearly see it driving the Village Concept down because all you are doing is basically putting individuals with more trips there than the graduate students who probably have less trips. I clearly see that.

CC5.12

My other question then on the Village Concept is in Stanford's comments to the Planning Commission they basically indicated that they thought the linkage components were very valuable components of the Village Concept. They said we have suggested in our offer of the Development Agreement that we would put money towards these things. In the Village Concept aren't those linkages part of the approval and part of the plan or am I missing that?

Mr. Williams: Yes, they are part of the Village Concept plan but that is not necessarily part of the applicant's project proposal. So as this is the EIR looking at the various

CC5.12 Con't

1 impacts, as the project proposal comes back to the Council then to the extent that those
2 elements are not incorporated in the project it may be that that is the recommendation of
3 Staff or Planning Commission to be sure those are incorporated into the project
4 specifically.
5
6 Council Member Scharff: So just to clarify and following up on Mayor Burt's comment.
7 We can separate the housing from the linkages and we can include the linkages in the Tree
8 Preservation Alternative.
9
10 Mr. Williams: Absolutely, yes.
11
12 Council Member Scharff: Including those in the Tree Preservation Alternative wouldn't
13 have an affect other than the linkages would then be included. Is that a fair statement?
14
15 Mr. Williams: That is right. It would improve the connections.
16
17 Council Member Scharff: Great. I appreciate that. Thanks very much.
18
19 Mayor Burt: At this time we would like to hear from members of the applicant and then
20 members of the public. Welcome.
21
22 Mr. Mark Tortorich, Vice President of Facilities Planning, Design and Construction,
23 Stanford University Medical Center and Lucile Packard Children's Hospital: Thank you
24 Mayor Burt and Members of the Council. I want to review with you just a few key points

1 on the Tree Preservation Alternative and the Historic Preservation Alternative. Then Bill
2 Philips and I will review the Village Concept and some key issues of linkages and housing.
3
4 So first the Tree Preservation Alternative. As you know, this is our preferred Alternative.
5 We are pursuing a design that complies with the description of the Tree Preservation
6 Alternative. The way that it differs substantially from the base application is the in the
7 rearrangement of our nursing units for the growth of Stanford Hospital.
8
9 This is an essential diagram that is in your project application and the Draft EIR. It
10 describes our base project. In the Alternative for Tree Preservation removes the pavilion
11 that was sitting here on Kaplan Lawn, which is part of the Pasteur Mall. It also condenses
12 the underground parking structure into a parking structure that is both below grade and
13 above grade. Then we redesigned the first of the School of Medicine laboratory buildings,
14 FIM 1. All three of these moves have been taken to accommodate existing trees,
15 biologically and aesthetically protected trees that are on those sites.
16
17 So here is the diagram of the Tree Preservation Alternative that is being studied under the
18 Draft Environmental Impact Report. Again, it is the project that we are pursing and the
19 designs that we have submitted to the State of California for their approval.
20
21 So this is that area of Kaplan Lawn where we preserve the grove of oak trees. Here is the
22 adjustment to the School of Medicine laboratory building again to accommodate trees.
23 Then here is the realignment of the parking structure and the pavilions to accommodate
24 trees on the Stanford Hospital site. To make these accommodations we have in effect
25 shrunk the floor plan of the adult hospital. We have also adjusted the size of the pavilions,

1 and reorganized from an exterior atrium concept into one of an interior atrium concept, all
2 in an attempt to really protect the landscape there and to preserve what our aesthetic and
3 biologically protected trees in the City of Palo Alto.
4
5 The Historic Preservation Alternative. Obviously this is an Alternative that has generated
6 some discussion and dialogue about the preservation of the 1959 hospital. So to orient you
7 into how this building really works for us and how we see the site being used in the future,
8 again here is the Pasteur Mall. This is the Kaplan Lawn. The three buildings that are titled
9 1101 Welch Road really is the site for the new Stanford Hospital as well as the parking
10 structure 3 that will be replaced. The 1959 hospital, which is occupied by both the School
11 of Medicine laboratories and Stanford Hospital and Clinics, has two significant issues.
12 One obviously you know very well, we cannot use it legally as a hospital beyond 2030,
13 and to continue to use the building beyond 2013 we need to be well underway with a
14 replacement hospital strategy or undertake what is a logistically impossible retrofit project.
15
16 For the School of Medicine the issue is similar but governed slightly differently. The
17 buildings that the School of Medicine occupies are not suitable for modern research
18 functions. It would very hard for any researcher in the Stone Building to build a new
19 research program based upon the space that they would inhabit in the Stone Building.
20 Those structures are also seismically unsuitable for long-term occupancy. In fact if they
21 were within the City of Palo Alto's jurisdiction they would fall under your seismic hazard
22 ordinance and we would have to undertake a rather dramatic retrofit that would be no
23 different than the retrofit that we see having to undertake if we were to ever preserve those
24 buildings.
25

1 That retrofit project is dramatically invasive. It changes the historic character of the
2 building. As well as to then reuse the building for some other occupancy other than for
3 healthcare delivery or research leaves us a little bit of a loss to find 800,000 square feet of
4 occupants that would need to come back to the Medical Center site.
5
6 Then finally, we are using the ground occupied by that 1959 hospital to create modern
7 research laboratories and to create modern clinics for the future of Stanford medicine. We
8 have also done something with the arrangement of the School of Medicine buildings and
9 the future clinics I think that relates a little bit to what you see in the Village Concept, and
10 that is that we are establishing a very strong pedestrian promenade that links School of
11 Medicine with the adult hospital with the Children's Hospital and eventually up into the
12 Stanford Shopping Center and then off into Downtown Palo Alto. That linkage really
13 doesn't work well with the existing orientation of the Stone Building where there is a
14 tremendous amount of one-way traffic here in this location. We would be reorienting the
15 clinics entrance and aligning a parking structure here so that there would actually be a
16 backdoor entry as well as a front door entry into the hospital and preserving this pedestrian
17 walkway and promenade through the site.
18
19 As I mentioned, modern research labs try to survive in the Stone Building today. These
20 are the kinds of interventions we need to take with that facility just to accommodate the
21 basic air conditioning loads that come with laboratory functions, and certainly not
22 buildings that are suitable for future use.
23
24 Now finally I want to just address some of the linkages of the Village Concept Alternative.
25 Of course, the Village Concept would I am sure be occupied by Village People. So there

are some linkages obviously from Downtown Palo Alto to the Stanford Medical Center, which we want to reinforce, those linkages start at El Camino Real and Quarry. We will obviously be working hard with the development of Quarry Road. You can see some of that development in our design guidelines. Then there are the linkages through the Stanford Barn that would connect the Medical Center to the Shopping Center and then into Downtown Palo Alto. Just by example I have an office in the Stanford Shopping Center. When we have meetings here in the Council Chambers during the day I actually walk to the meeting. So these linkages are actually personal for me and certainly personal for my staff.

So that first linkage we wanted to talk about was with the transit mall. Right now the existing condition is kind of a meandering path. Quite honestly I usually get lost right about here trying to find my way across El Camino or across the railroad tracks into Downtown Palo Alto. Through dialogue with the City over really I think about a four-year period and with Bruce Fukuji, your consultant, we have talked about ways to make a better-organized path to really reinforce the pedestrian and bicycle experience into Downtown Palo Alto. So there may be a variety of alternatives and these alternatives would connect up with existing and proposed Palo Alto projects to improve the linkages from one side of the tracks to the other.

We have also been planning for public transportation and bus shelters to the medical office complex at the Hoover site. We see the redevelopment of the Hoover Pavilion really as a great opportunity, as a base for our community physicians. The fact that those facilities are proximate to public transportation, they are close to the transit mall, they are close to

Downtown Palo Alto is not an accident. We think that is an ideal location for community-based services for healthcare.

Then finally is the linkage that we are proposing at the Stanford Barn. Right now if you want to move from the Shopping Center into the Medical Center you kind of have to walk through the parking lot, and again not in a very organized way. So the proposal that is part of the Village Concept that we support is again reinforcing the path, providing some dedicated pathways along the Barn up against some of the retail space that is here, through to the Shopping Center. Also provide an alternative route through a reorganized parking structure between our Children's Hospital, Clinics buildings, and the Barn. Then we would be creating an intersection here so that there is a smart alignment across Welch Road. Now I would like to ask Bill Philips to talk about the housing component of the Village Concept.

Mr. Bill Philips, Associate Vice President, Land, Buildings, and Real Estate, Stanford University: I am going to be mercifully short on this because I think there has been quite a bit of discussion already between Council Member Scharff and Curtis Williams and Chair Garber.

I would like to make the strong point that is also made in the DEIR that the demand for housing as a result of the project would be less than significant. There is a goal for the Village Concept Alternative that is a very important and wide-ranging goal relating to villages, which I think we all believe in. I would just make the point that with the occupancy of the Quarry sites by the campus population that we are talking about that is medical residents and postdoctoral fellows we are getting essentially the same

demographic and we are getting the same benefits and we are getting the same TOD advantage out of both populations. I think that is the reason why you hear that there is very little moving of the needle in connection with the making this be housing for hospital employees.

This just reinforces that. The housing that is being talked about for hospital employees is basically shifting occupancy but that is all it is doing and that is why the needle moves so little. We are talking about the same density, essentially very much the same demographic, and either way we are talking about people who will take advantage of the alternative modes of transit.

The DEIR concludes this as Chair Garber mentioned. There is less than a one percent reduction in VMT when we talk about employee and patient trips, and no significant reduction in VMT or greenhouse gases compared with the approved GUP housing. This just reflects that. You see the percent change in the last column is to some degree significant in that we do reduce some trips but overall from the standpoint of the Village Concept Alternative what we are trying to achieve, VMT and greenhouse gas, very little change.

I am going to digress on one thing just because I have some experience with this and I feel something needs to be said about it. That is the TDM requirement and the ability to impose that that City has referred to comes about from this state regulation. I think it is pretty clear that in our mind, and I am not going to make the legal arguments up here, the regulation is clear in terms of what it says about what can be done about imposing TDM on an employer. Stanford and the hospitals are employers. It is important to follow that with

the concept of does that really change the objective? Do we have misaligned objectives here? Clearly not. Stanford wants TDM for this project. The hospitals want TDM for this project. The University in past projects has suggested and offered TDM. I have been associated with those projects and I know that in the past what we have seen is a willingness for the City to accept TDM with an understanding that the City could not impose TDM on these projects because of that state regulation. That was the case with the Mayfield Development Agreement. It was the case with the Cancer Center. This specific Condition of Approval was laid out with Cancer Center, and that is a recognition by the City that the applicant was voluntarily agreeing and that the state law did prevent the City from imposing employee trip reduction programs. Even the DEIR seems to suggest that that is the apparent state of affairs. However, once again I want to go back to the most important consideration and that is our goals are totally aligned with the City regarding TDM.

So just summing up, the hospital's proposal includes GO Pass that has the major affect on improving climate change and reducing traffic. We also have from a housing standpoint the $23 million offer that is being made by the hospitals, which unlike the Quarry sites which is just a change of use results in $23 million that could be used by Palo Alto to help the City achieve new housing, achieve ABAG objectives, and increase the City's overall housing supply. Thank you very much.

Mayor Burt: Thank you. So we now have about 15 members of the public. Each member has up to three minutes to speak. Please don't feel obliged to use all three minutes if you don't need to. We are going to be here late tonight. Our first speaker is Michael Weiland followed by Adele Ullman. Welcome.

CC5.13

Mr. Michael Weiland, Palo Alto: Hello. I am a Palo Alto resident. I am also a nurse at Stanford and have been for the past 19 years. I am here to support the hospital expansion. What we really do need is to have the hospitals modernized and improved for our families and loved ones. Our community, our patients, and our employees deserve it. What we need to have is a modern, functioning, and world-class hospital facility. We also need to have world-class nurses there for our patients.

The hospital's last offer to their nurses would demote the most experienced nurses and cut their medical benefits. Some experienced nurses have already left to work elsewhere. The hospitals need to bargain in good faith with the nurses to ensure that they retain the experienced nurses that our community needs and wants. Thank you for your time.

Mayor Burt: Thank you. I should have gone through as I have at previous meetings to clarify for all the speakers that tonight's subject is comments on the adequacy of the Draft Environmental Impact Report. In the fall we are going to have additional periods where we will be looking at both the Final Environmental Impact Report as well as the Development Agreement for the project as a whole. So I want to clarify that and ask everyone if possible to focus their comments on the Environmental Impact Report. Adele Ullman followed by Paul Cole.

CC5.14

Ms. Adele Ullman: Good evening. Since 1988 I have been an A for Aces Nurse at Stanford. As an A for Aces Nurse I do a wide variety of procedures at both Stanford and Lucile Packard Hospitals. At A for Aces we do stem cell collections for transplant, we do plasma and red cell exchanges, we do white cell and platelet depletions, and we do photo-

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freezes for many types of diseases and disorders. We have regular daytime work hours, seven days a week, 365 days a year. After hours a nurse is always available in case there is a need to treat a patient like someone with leukemia who is having trouble breathing because there are too many white cells in their circulatory system, or a patient with cycle cell who doesn't have enough functioning red cells, or a patient who is having a heart or lung transplant in the middle of the night and needs a plasma exchange to remove antibody. A lot of the patients I treat have been transferred from other hospitals because of the A for Aces service we provide at Stanford and LPCH.

Tonight I am here to support the hospital expansion. We very much need to have a hospital that is modernized and improved for our patients. What we need to have modern, functioning, world-class hospitals we also need world-class nurses. Our contract expired in March. Some of our best nurses have already left for other facilities. I urge you to ask the hospital administration to come back to the negotiation table. Thank you very much for your time.

Mayor Burt: Paul Cole followed by Bonnie Balfour.

CC5.15

Mr. Paul Cole, Palo Alto: Good evening Mayor Burt and Members of the Palo Alto City Council. I have been a nurse at Packard Children's Hospital for 19 years and at Stanford Hospital for six years before that. I am also a resident of Palo Alto. I am also a Board Member of CRONA, which is the Committee for the Recognition of Nursing Achievement at both hospitals. That Committee represents more than 2,600 nurses at Stanford and Packard Hospitals. I am here in both capacities tonight, both as a resident of Palo Alto and as a Board Member of the Committee for the Recognition of Nursing Achievement.

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It is my pleasure to be able to support the hospitals expansion plans in both of those capacities. I have to say that I had little idea how extensive a process this is. I have not been to many Board Meetings, Council Meetings and just to see what went on here tonight was a revelation to me. It seems to me that the Village Alternative is a very good one. I like the idea of saving trees. I have worked with David Dockter, the City Arborist, to plant trees in my neighborhood in the park behind my house. But I am in full support of the hospital's expansion plans and I hope that you will approve what in your wisdom seems to be the best plan for all of us.

I would also like to urge the hospitals to support our nurses by coming back to the bargaining table and negotiating a fair contract with us. Thank you for your time.

Mayor Burt: Thank you. Bonnie Balfour followed by Mary Ann Carmack.

CC5.16

Ms. Bonnie Balfour, Palo Alto: Good evening your honor and Members of the Council. I am one of the fellow nurses whom you have heard from before. I work at Stanford Hospital. I work in a multidisciplinary intensive care unit with critical patients. We take care of trauma patients, neurosurgical patients, medical patients, surgery patients, medicine patients, and on a daily basis I help train and educate and teach new members of the staff until they are quite capable of functioning on their own.

I do support fully the notion of the expansion for the facility. We need upgrades and modernization of the hospital to accommodate our changing patient population. We need it for our med students, our residents, our staff, but most importantly we need it for the

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patients. While I support the upgrade and the modernization for our world-class hospital we also have world-class nurses. These world-class nurses are leaving. They are leaving to find employment elsewhere. What we need is your help to help get the hospital to negotiate with us in a fair contract, and we need your assistance in this way. We can ill-afford to lose our experienced staff and we are doing so. Our staff needs it and our patients deserve it. The patients of this community and this whole area deserve the best that we can possibly offer them. Thank you for your time.

Mayor Burt: Thank you. Mary Ann Carmack followed by Bruce Codding.

Ms. Mary Ann Carmack, MD, PAMF: Thank you for this opportunity to speak. I am pediatrician at Palo Alto Medical Clinic where I have been for the past 14 years. A major reason that the pediatricians in this community can offer the highest standard of care to our young patients is that we can partner with Packard Children's Hospital. When we diagnose a child with meningitis or cancer for example we turn to Packard to cure that child. We and the community are incredibly fortunate in this regard.

CC5.17

Tonight in the Draft EIR presentation we reviewed alternatives that do not allow for more beds. The reality is that our fortuitous situation is already threatened by a shortage of beds at Children's Hospital. Currently it can be extremely difficult to admit a patient to our hospital, to Packard, due to lack of space. Most of the time, right now when we do admit a patient to the hospital we have to explain to the family that they will have to travel to another community in order to have their child admitted. So, expansion of our local hospital is essential to maintaining the standards that we have come to enjoy in this community.

Fortunately, most children's diseases are much less frequent than those of adults, heart disease, and cancer to name just two examples. The implication of this is something that most people don't really appreciate and that is namely children's hospitals in this country have to be regionalized to draw large enough population of patients to provide the range of services. Packard Children's Hospital is one such regional hospital, world-class in fact. We are blessed to have it in our community.

CC5.18 I would like to close by sharing an experience from my practice. About a month ago late in the day on a Thursday I saw a ten-year old girl from Palo Alto who had noticed a lump in the muscle above her knee. The father's gaze met mine in unspoken understanding of our fear. Could this be cancer? The father commented that they had plans to travel to Colorado the next day to celebrate the grandmother's 100th birthday. I quickly called the oncologist at Packard and explained the situation, and yes they would see her tomorrow. This story has a happy ending the lump was benign. Regardless of outcome, this kind of compassionate, sensitive, comprehensive, integrated care is possible here only if we are able to continue to have enough space for these children. So we owe it to our community to ensure that this level of care is not compromised. Thank you.

Mayor Burt: Thank you. Bruce Codding followed by Fred Taleghani.

CC5.19 Mr. Bruce Codding, Redwood City: Mayor Burt, Members of the Palo Alto City Council I work at Stanford Hospital and I support the expansion of the facilities. I am here to ask you to give serious consideration to the Tree Alternative, which is the applicant's preferred Alternative. Primarily because it does save trees on the campus and compared to the

CC5.19 Con't Village Concept Alternative 13 more trees as you have heard tonight. So hopefully you will give the Tree Alternative your serious consideration. Thank you.

Mayor Burt: Thank you. Fred Taleghani followed by Richard Greene.

Mr. Fred Taleghani, Palo Alto: Mayor Burt and Members of the City Council, thank you very much for your time. I am resident of Midtown, a member of CRONA, and I have worked at Packard Children's Hospital for 11 years. My role there is as a critical care transport nurse specialist. As Dr. Carmack spoke previously, my job is to pick the kids up and bring them back to our very world-renowned facility. I too have been in the position where I have had to explain to very stressed-out parents that they cannot come to Packard because there are no beds.

CC5.20 I am very concerned that any adoption of any plan that would reduce the projected expansion of beds would be detrimental long-term to the facility. On that end I would like to wholly endorse the hospital's expansion on that end. I would like to compliment both the Council and Stanford for doing what they can to mitigate any environmental impacts that the expansion would have. We need world-class facilities. This expansion will ensure that these world-class facilities will remain there for the near future, will serve not only the community of Palo Alto but those surrounding. On that note, it is more than just building a building. You have to have world-class staff to staff these facilities. To that end we need your support and your help to get the hospital back to the tables to negotiate with the nurses. We can't do it without you. Thank you very much.

Mayor Burt: Thank you. Richard Greene followed by George Liddle.

CC5.21

Mr. Richard Greene: Mayor Burt, Members of the Council I am going to repeat some of the pleas by the CRONA nursing staff. I wanted to address the healthcare impact of the Draft EIR, which many of the speakers have already mentioned. This is from the perspective of a Palo Alto pediatrician. I have been in Palo Alto and practiced here longer than any of the current pediatricians in the whole community. I am in my 44th year of practicing pediatrics at the Palo Alto Clinic.

In the last several years, probably about the last four or five years, it has become as has been alluded to very hard for us pediatricians to get our patients into Stanford Hospital and to the Children's Hospital. These children are our sickest patients. They need hospitalization in this world-class hospital that you all are aware of and are proud of I am sure that you have this hospital in your very own community. So these are the sickest kids we see. There are not enough beds to take care of them. I don't think you think that it is in the best interest of the child or the parents for any patient to go to a hospital in another community when they are from Palo Alto. So I am here to support the Children's Hospital's effort to increase its capacity. To accomplish that it is absolutely necessary for us pediatricians and that is to put our Palo Alto patients in our Palo Alto hospital. So on behalf of the 33 pediatricians who practice at the Palo Alto Clinic, probably another 30 or 50 family practitioners who do hospitalize their patients at the Packard Children's Hospital and Stanford, I urge you to proceed as promptly as possible with your approval, which seems to me to be dragging on and on and on, so that we can continue to deliver the outstanding care that you are all used to getting from us physicians in Palo Alto. Thanks a lot.

Mayor Burt: Thank you. George Liddle followed by Howard Wolf.

Mr. George Liddle, Menlo Park: Members of the Council. First of all I have it on my mind to be sure to thank you for the time and effort that you are taking on this review. You have a lot on your plate. You will be interested to know that the five items that I wanted to discuss with you have shrunk to two. The emergency room right now as on a daily basis has twice as many patients as it was designed for. Expansion of the ER will be a major benefit to the community. When I was last in the emergency room I spent some time on a gurney out in the hallway. No harm, no foul, but an expansion there would be very much appreciated.

CC5.22

This next item, if you don't remember anything else I say please pay attention to this one. The new facilities will provide over 2,200 new permanent jobs for people in this area. During construction that doesn't include the 6,400 jobs that will be provided during the construction. I doubt if any applicant has ever come before a City Council and been able to say that they are going to provide 2,200 new good permanent jobs in the community.

So my wrap up is that I appreciate your thorough review of this project. I urge prompt approval of the project, consistent with your public hearing schedule, and with your due diligence obligations. Thank you.

Mayor Burt: Thank you. Howard Wolf followed by Beth Bunnenberg.

CC5.23

Mr. Howard Wolf, Palo Alto: Good evening Mayor Burt and Members of the City Council. I live in Crescent Park in a home I have occupied for the last 21 years. I have

been a resident of Palo Alto for almost 30 years. In the spirit of full disclosure I think you should also know that I work at Stanford where I am the Vice President of Alumni Affairs for the University.

I come here today not as a member of the Stanford staff but instead as a member of this community to tell you a personal story that speaks directly to some of the alternatives that you are considering here tonight. A year ago last June 14 my 17 year old son had a traumatic brain injury sustained as part of a skateboarding accident. He was cared for at Stanford Hospital in the emergency room you just heard about. I did not know what a Level 1 or Level 2 or a Level 3 trauma center meant a year ago last June, but I certainly know what it means now. That trauma center saved my son's life. The neurosurgeon told us as such and also the members of the paramedics that dealt with him that afternoon told us the same.

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I can't tell you how important it is to me that others have the same opportunity for the level of care that we received a year ago last June. We know what happened to young Tim Sullivan, a former graduate of Gunn High School, who was UC Santa Cruz with a similar accident as my son this last spring who was not able to attain services at a Level 1 trauma center because his accident occurred when he was a student at UC Santa Cruz. By the time they air lifted him to San Jose's hospital where there was a Level 1 trauma center he did not make it. So I just implore you to think about that as you think about the alternatives, especially the reduced intensity ones.

Second point. With regard to the downsizing or right sizing, I don't know what all the language exactly means, but I will tell you this. As someone who has spent 30 days with

my son as he was in a drug-induced coma recovering from his surgery and then another 30 days in the hospital over a series of five different surgeries I can tell you this – we received excellent care from a physician standpoint. The only area in which we had concerns about the care we received was with regard to the overcrowding and this hospital. In one case as he came out of brain surgery we were put into a room with three other people who had also just come out of brain surgery, only because there was not enough room for us in any smaller place. In one situation we came out of surgery and were left in a hall as we awaited a room to be readied for us because that is how tight Stanford hospital runs. In the final case, when we were at a rehab hospital up in Marin getting ready to come down for surgery we literally have to drive slowly because the room in not ready at Stanford Hospital. These are real stories and people's lives are involved. I just implore you as you think about the Reduced Intensity Alternatives that you consider what this might do to our community. Thank you.

CC5.23 Con't

Mayor Burt: Thank you. Beth Bunnenberg followed by Raymond Neal.

Ms. Beth Bunnenberg, Palo Alto: Hello. I am speaking as an individual tonight. I wanted to talk just a little more with you about particularly the Stone Building because Stanford plans call for its demolition. Please notice that the Architectural Resources Group peer review strongly states that this appears eligible for the California Register. Remember the events that the first heart transplant in the United States occurred in this Stone Building. In terms of person, Dr. Norman Shumway has practiced there. He has done an outstanding body of research and work in heart transplant. For the third category it appears eligible as pivotal work of an internationally known architect.

CC5.24

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This building merits serious consideration under CEQA. Demolition of the Stone Building would be a very significant adverse impact, which could not be mitigated. The ARG, I was delighted to hear, has a person here tonight. The peer review suggests this Historic Preservation Alternative. To use it for medical office space and for research, which Stanford says it needs.

The suggestions for retrofitting the building are included in the report, and I would remind us that the City has had very good response from ARG in solving problems such as internal seismic retrofits. So please do insist on a careful evaluation. Do not let Palo Alto join the list of cities that have failed to realize the importance of mid-century architectural treasures until it is too late. Demolition cannot be mitigated. Besides, it is a green solution to find a reuse for the building. Thank you.

Mayor Burt: Thank you. Raymond Neal followed by Dr. Bruce Baker.

CC5.25

Mr. Raymond Neal, Palo Alto: Good evening. I am an architect here in Palo Alto. Hospitals like City Halls are singular elements in our community. They provide us with unique opportunities for community service. Unlike residential or commercial development these projects cannot be mimicked nor are they precedent setting as they are unique components within our community. I believe that that concept of our community fabric the proposed hospital and Medical Center improvements, its massing and organization are compatible with the character of our community. I also believe that their heights as they are proposed are a unique and appropriate solution for these improvements to our community as a whole. Thank you.

Mayor Burt: Thank you. Dr. Bruce Baker followed by Bob Moss.

CC5.26

Dr. Bruce Baker, Palo Alto: Thank you. I serve on the Community Resource Group for the Stanford General Use Permit. The comments that follow are my own personal comments as a Palo Alto resident. The Draft EIR evaluates Reduced Intensity Alternatives. Let's look at what has been set forth by some as a Reduced Intensity Alternative for the hospital. This Alternative is promoted as a small community hospital by some. Is that what the citizens of Palo Alto and neighboring communities really want? A small community hospital. That train left the station in the 1950's when Stanford moved its hospital from San Francisco to Palo Alto. Since then Stanford Hospital and Clinics has gained world recognition for its pioneering work in numerous areas including heart and stroke treatments, organ transplants, cancer treatments for children and adults, neurosurgery, and aging issues. Many of these specializations serve a local community as well as larger areas because of the outstanding reputations of these departments. I doubt if the Palo Alto community would want merely a maternity hospital with some service for men, women, and children with minor injuries. You don't just flush down the drain the expertise that this teaching hospital has and will continue to have on the forefront of many medical disciplines. I urge the Council to recognize the reality of the need for timely, expanded, and seismically strong buildings for the Stanford Hospitals and Clinics.

I would like to also point out my study of 650 diverse projects showed that when a sense of urgency prevails among all of the principle stakeholders of a project the project is perceived as more successful. Thank you.

Mayor Burt: Thank you. Bob Moss followed by Herb Borock.

CC5.27

Mr. Robert Moss, Palo Alto: Thank you Mayor Burt and Council Members. First I would like to address the adequacy of the EIR. Staff and Planning Commission and some members of the public have pointed out a number of errors, omissions, and problems with the EIR. I want to just address one of them and that is the impacts on traffic. One of the things that the EIR misses is identifying all the intersections, which are going to be adversely affected. The Staff picked it up and I picked it up also. For example, Middlefield and Lytton, and Middlefield and University among others. If you look at the intersections that are identified as being significantly impacted, where there is going to be more traffic, and more air pollution every one of those even if it is El Camino and Page Mill, or El Camino and Churchill is within a quarter mile or less of housing. Therefore the residents are going to be exposed to higher levels of air pollution. That has been ignored in the EIR, but that is an impact and that has to be resolved.

CC5.28

Now when you took a look at the various Alternatives that were proposed I think the superior one as is mentioned in the report is Alternative A, which doesn't increase the overall size of the hospital. Well, some people will say, well gee this is going to give you an inadequate facility. But that will maintain the existing level of service and then some. If Stanford adopts the CPI kaizen approach that I spoke about a week or so ago. It was in the report, the article from the *New York Times*. They can increase the number of people they serve and the efficiency with which they serve them. One of the examples really happened was a children's hospital increased the number of patients they saw by almost 50 percent, and decreased the amount of time patients were in the hospital by almost 20 percent. When I gave the City Clerk the article I missed giving part of it because of the

CC5.28 Con't

way it formatted. Let me do one paragraph, the final paragraph. This is a hospital, which is already under construction. Actually they opened last week.

The final design, because they are using CPI, reduced walking distances and waiting times for patients and grouping relating facilities together creating rooms that could be used for more than one purpose. They are able to reduce the size of the building by 30,000 square feet and save $20 million. So I think going with Alternative A and also going with the Tree Preservation, Historic Preservation, and Village Concept is the best overall approach. That will give us a facility that will have minimal impacts, will continue to serve the community, it may not serve people in other states or other countries, but we don't need to do that. Stanford by being more efficient can increase the number and the effectiveness of the patients they service. Thank you.

Mayor Burt: Thank you. Herb Borock followed by our final speaker Stephanie Munoz.

CC5.29

Mr. Herb Borock, Palo Alto: Good evening Mayor Burt and Council Members. The EIR needs an adequate model and the one in the lobby is not adequate. It is too small. It is not in context, and it is too far down. It is like flying over the hospital at several hundred feet above it. A model would need to be a scale of at least a quarter inch to one foot on a table five foot high so you could see the ground floor at eye level. It needs to be in context showing other buildings and properties around it.

CC5.30

If any part of the county residential approval is used for this project then the County Community Plan and General Use Permit would need to be amended to delete those housing units from counting towards entitlement for academic square footage. If any part

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of this approval includes county land, such as for example the Medical School, then that academic square footage would have to be counted against the academic square footage entitlement in the county approvals.

CC5.31

The legal arguments about Transportation Demand Management are misleading because they are not relevant. The applicant has applied for a Development Agreement. In a Development Agreement you could include any kinds of conditions including TDM.

CC5.32

The list of significant trees is not adequate. Any trees that become a Condition of Approval are defined in the Municipal Code as significant. Those can include other trees that are already there besides the ones that have been mentioned by the applicant.

CC5.33

The applicant essentially proposes single rooms or private rooms. Yet I believe in both Medicare and Medical payments come for semi-private rooms. Can these rooms accommodate two patients? If so, then the EIR should be adjusted for two patients to a room instead of one. If it is just a question of payment and everyone is going to be in a private room what kind of rationing is there going to be as to what kinds of patients and their source of insurance are going to be allowed in the hospital.

CC5.34

The hospital is the largest user of electricity in the City, about eight percent of the electricity used but only four percent of the revenue. You should consider in lieu payments so the amount of revenue matches the amount of usage. Similarly in the Utility Users Tax, which is a graduated scale of three tiers, there is a five percent, a three percent, and two percent tax. You can consider as in lieu payments five percent tax on all utility

CC5.34

payments just as residents pay fiver percent tax on all utility payments. That is my three minutes. Thank you.

Mayor Burt: Thank you. Our final speaker is Stephanie Munoz.

Ms. Stephanie Munoz, Palo Alto: Good evening Mayor Burt and Council Members. With all due respect, I believe the Council has to look at Stanford's proposal in light of Prop 13. I don't believe you can allow the largest landowner in the county to hog all the high revenue land use leaving the low-income housing to be provided by nonprofits and the community at large.

CC5.35

Before Prop 13 you could sacrifice good planning to the mammon of inequity because whenever property values went up taxes went up, even if the property owner was a widowed washerwoman. She had to pay or get out. Now taxes go up only two percent a year unless the property changes hands. Stanford's property never changes hands.

Fifty years ago Palo Alto let Stanford develop a great shopping center only it wasn't so great for the merchants of Palo Alto who had been paying the taxes and being good citizens all along. Downtown was a ghost town. Nice old businesses went bankrupt. You are doing the same thing with the medical office marketplace if you let Stanford develop the hospital as a million square foot high-rise without giving up development rights to the land freed for maximum medical and legal office rental. You are gifting them at the expense of the rest of the business property owners of Palo Alto who land diminishes in value through the law of supply and demand. You depend on those citizens for civic spirit and civic betterment.

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CC5.36

CC5.37

When the Democrats clamor for an increase in minimum wage, and you wonder who works for minimum wage, look no further. People who work in hospitals work for minimum wage. They have to live somewhere. Stanford could and they should run a shuttle at midnight and eight in the morning for its night workers from East Palo Alto. East Palo Alto is being gentrified as we speak. It is the high cost of land that keeps affordable housing from being built. Stanford has the land to house its workers. It is the only land that could be used to house them at reasonable cost. It is extremely unfair to ask a young couple who can afford $400,000 period for a modest home to sign up for a mortgage they can't afford that is going to be foreclosed on so as to subsidize the below market program. Stanford is going to make millions on compulsory private health insurance. It is insane for the community to spend money housing Stanford's workers, which ABAG is going to demand that we do as sure as God made little green apples, when we are firing teachers, which are the lifeblood of our economy. It is irresponsible. Please don't do it. Thank you very much.

Mayor Burt: Thank you. That concludes our public comments. Thanks to everyone for participating. Now we will return to the Council for any follow up questions and comments. Who would like to go first? Council Member Price.

Council Member Price: Thank you. I would like to thank all of the members of the public who spoke, and the applicant, the Staff, and the consultants. I would like to acknowledge the high quality of the care received at our hospitals. I hope that both parties, Stanford University and the nurses union CRONA, will be able to resolve their differences by resuming a negotiations. I hope really there can be a productive resolution of these

complex issues. I remain very hopeful that that will occur. I want to again acknowledge the importance of having direct communication with one another to resolve these issues. We will continue to deliberate on the various aspects of the proposal before us. Thank you.

Mayor Burt: Council Member Holman.

Council Member Holman: I would like to get some clarification on a few statements that were made. There were differences between what I understood the Staff to say and the applicant to say. One of them has to do with the aesthetically and biologically significant trees.

Mayor Burt: Council Member Holman, for some reason the last couple of meetings your microphone has had feedback. You might want to see if Council Member Schmid's is available.

Council Member Holman: How is that?

Mayor Burt: That is better.

CC5.38

Council Member Holman: Okay. So you probably heard what I said and I don't have to repeat that, right? Having to do with the aesthetically and biologically significant trees, in the Staff presentation and as I read it in the DEIR it talks about 13 biologically and aesthetically significant protected trees would be retained in place, three that would be relocated, and 16 that potentially would be removed. In the applicant's presentation under

the Tree Preservation Alternative it says that no biologically and aesthetic tree resources would be removed under the Tree Preservation Alternative. That is different than what I understood the Staff presentation to be and it is also different than what I have read in the DEIR. So can Staff clarify that please or correct?

Mr. Jeung: I am going to go ahead and try to provide a response. The Draft Environmental Impact Report does, as you have indicated Council Member Holman, identify 16 trees that would be preserved under the Tree Preservation Alternative that would not be preserved under the proposed project. The Tree Preservation Alternative that the applicant is considering right now is being further refined based on better mapping and better information. I don't believe that the discrepancy is as much as zero trees versus the 16 trees that we have identified in the Draft Environmental Impact Report. I thought that number was something less than that. That certainly doesn't answer your question. I am not sure where Stanford's numbers are coming from.

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Council Member Holman: The City Attorney looks like she wants to make a comment or not.

Ms. Silver: I apologize I didn't hear the beginning part of your question.

Council Member Holman: It had to do with discrepancies or apparent discrepancies between the applicant's presentation that says no biologically and aesthetic tree resources would be removed under the Tree Preservation Alternative. That is not my understanding from the DEIR or Staff presentation.

Ms. Silver: I think where that discrepancy is is the difference between just a biological impact and a biological and aesthetic. The Tree Preservation Alternative really focused on identifying the biological trees that also had aesthetic impact. Dave Dockter was very active in this process and went through and surveyed all of the trees and came up with a list of both biologically and aesthetic trees. The Tree Preservation Alternative then made some significant design modifications to save the trees that had been identified as both biologically and aesthetically significant. I think there are some slight discrepancies in the numbers between what the EIR says and the current refinements to the Tree Preservation Alternative, which now is in 50 percent design stage. Those discrepancies will be mapped. They are in the process of being mapped and will be available in the Final EIR.

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Council Member Holman: I guess what my confusion has been about this and concern has been about this is, I am probably not going to remember the right number, and I am sort of remembering that there were 41 biologically and aesthetically significant trees. That number may not be right so don't hold me to that. Curtis, do you have the right number?

Mr. Williams: I think you may be thinking there were 71 protected trees, and of those 23 are in this class of significant aesthetic.

Council Member Holman: That sounds right. Without having the final numbers it is very difficult. I am not really sure how we comment because we don't know what the numbers are, we don't know what the locations are of the trees that are being saved or not. One other tree comment is on page 5-16 under the Tree Preservation Alternative it also says, in the second paragraph from the top regulations in the district would include applicability, preservation, and exemption for removal and replacement of protected trees. The Hospital

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District would create a procedure to permit the removal of approximately 48 protected trees. So if we are permitting removal that sounds to me like we are not going to require mitigation for the removal of those trees. If I could get clarification on that that would be helpful too.

Ms. Silver: My understanding is that we will be requiring mitigation for any protected trees or regulated trees that are removed. I think that one of the comments was to actually add a mitigation measure that made it very clear that we would require some replacement or some payment into a tree mitigation fund for those trees that are removed.

Council Member Holman: Will that be what consistent with the City's Tree Preservation Ordinance now?

Ms. Silver: It would be consistent with the Tree Technical Manual. The Tree Preservation Ordinance would have to be amended and we were going to amend that through the hospital zone to permit the removal.

Council Member Holman: So this wouldn't be a negotiated mitigation. This would be consistent with the Tree Technical Manual.

Ms. Silver: That is correct.

CC5.40

Council Member Holman: Okay. Just a couple of comments about the Preservation Alternative. It states in the DEIR that there are three mitigations that are listed for the demolition of the Stone Hospital Building, and there are no mitigations for the demolition

CC5.40 Con't

of an historic resource. So those really could not be categorized as mitigation measures. They are nice things to do but they are not mitigations because there is no mitigation. Once the historic resource is gone it is just gone. So that would be a comment.

Then the Village Concept. Thank you by the way for these larger drawings. They were somewhat more helpful certainly. The Figure 2, there is no page number on it that I see so Figure 2 Village Concept improvements. It is also in the presentation in here but having it larger helps, having it in color also helps. Figure 2, Village Concept Improvements, Quarry and El Camino Real Intersection. Can Staff find which one I am referring to? That is it. Great job, Steven. I guess the question is this. The future long-term path, it shows the existing tunnel going under the Caltrain right-of-way there by the Palo Alto train terminal. This talks about future interim path in the blue and in the red is future long-term path. So a couple of questions about this. One is going along see where it says near-term

CC5.41

option one that goes along the Caltrain right-of-way on the Stanford side. It is hard to read, but on it says on it, interim path extension to existing tunnel. So why is that considered interim as opposed to long standing? Why is the sort of stepped path, why is that interim because those both go to the transit station? Then the red, which is considered the future long-term path, goes to Everett avoiding the train terminal. So guess I am confused as to the purpose of that approach, and also as a part of that who would be constructing the Everett tunnel connection? How would we prevent significant parking in the neighborhood given that connection to Downtown North offsite parking by employees in the neighborhood?

Mr. Williams: Thank you, Council Member Holman. I think it is difficult to get into that level of detail at this point. Those are intended to be conceptual. That there is intent here

to create the Everett undercrossing and I think the word 'interim' there probably doesn't mean that there is not going to still be a connection to the other crossing. It is just that until the construction is complete you could go down there to that point, turn right, and get back to Lytton. In the long-term there would be both available. Again, those details as well as the issue of how costs are shared, etc. are part of the project as it comes forward, and some of the details of participation and fair share that will outlined as Conditions of Approval with project entitlements when they come through.

CC5.41 Con't

Council Member Holman: My interest in this topic is, understand that it is sort of the planning or designing of the project, but at the same time my interest in this has to do with mitigations and connectivity. If we want to get people to take Caltrain I guess I was concerned to see these as interim, the ones that go to the Caltrain station. To me those are connections and potential mitigations, and how you get people from the train to these sites. Also with the Everett connection the concern there in speaking to the environmental aspects of this is I am concerned about people then having impacts, drivers having impacts, on other intersections in the Downtown North neighborhood because they would choose to park in there instead of on the SUMC site. So those are the reasons for bringing those up are the environmental impacts.

Mr. Williams: We will try to address those more specifically.

Council Member Holman: Thank you.

Mayor Burt: Vice Mayor Espinosa you have a follow up to that?

Vice Mayor Espinosa: Just to point out that on pages 37 to 40 of the PTC notes there were questions specifically about the difference in the 13 versus 23 trees, and pretty good responses from Dave Dockter about both the differentiation and also some of the definitions around it, which I am sure you saw because I know you read the PTC minutes very closely. So just as a reminder to others who might have those same questions there were pretty clarifying answers from Dave Dockter.

Mayor Burt: Dave Dockter and the PTC will both be gratified that this level of attention has been paid to their work. Council Member Scharff.

Council Member Scharff: Thank you. I actually had a question for the applicant. In reading the Planning and Transportation Commission notes and listening to you I actually had the sense that the linkages in the Village Concept were part of the preferred alternative at least for Stanford. Is that correct or not?

CC5.42

Mr. Tortorich: We have been discussing the linkages with Staff for over four years. It started with the area plan. So these linkages have been discussed with Stanford University staff, our Medical Center staff, and Palo Alto Staff. So we support them. They are part of the Village Alternative but we definitely support them.

Council Member Scharff: So when you say you support them and when you say the preferred alternative is the Tree Preservation Alternative, we should take that to mean it is the Tree Preservation Alternative plus all of the linkages in the Village plan? Maybe you could identify which ones you support and which ones you don't, or maybe you support all

CC5.42 Con't

of them. Your comments to the Planning and Transportation Commission indicated frankly I thought that you supported all of them, but I was unclear on that.

Mr. Tortorich: So the linkages obviously that we reviewed this evening and at Planning and Transportation Commission through these PowerPoint presentations, and in our Development Agreement offer we actually put forward a proposal of funds to support development of these linkages. So technically I am not sure if it is all that is in the Draft EIR of that alternative. We do have one slide that talks about the complimentary linkages. I think this slide gives you a good overview. This represents all of the linkages as discussed in the Village Alternative but I am sure technically.

Council Member Scharff: So in general then I should be comfortable that you support all of those linkages, and that you think they are all a good idea.

Mr. Tortorich: Generally, yes.

Council Member Scharff: Thank you.

CC5.43

Mayor Burt: I have one more granular question and one broader question. Back to actually Figure 2 of the Village Concept improvements, the Quarry/El Camino Real intersection. Curtis you partially answered this when you spoke to Council Member Holman's question. So if I understood it correctly, the blue that is the interim path is intended to have something approximating that remain in place as a second permanent path. Is that correct?

Mr. Williams: I am going to ask Steven to address that.

Mr. Steven Turner, Advanced Planning Manager: Yes, Mayor Burt. I think what this slide is showing are various options and stages of development of linkages in and around the transit center. You will notice a couple of features on this map. One of them is the proposed VTA driveway that is coming from the VTA terminal. That is a project that has been recognized I believe as a future project, but we don't know the specifics behind the project. So until that project is more fully developed it is difficult to actually plan for the long-term solution.

CC5.43 Con't

Mayor Burt: That is why I had kind of used the term 'approximation.' Is it fair to say that the intention is to have two pathway linkages? One that would go approximately directly toward the future Everett Avenue connection and another that would move toward the tunnel between Lytton and University.

Mr. Turner: Yes, in the end there would be really two pathways. The blue pathway would be constructed very soon, very quickly after the projects are approved. The orange pathways are ones that would be developed further on in the future, but in the end there would be two.

Mayor Burt: I would appreciate it if you have not gone to this level of detail yet but I don't see any indication here of differentiating between pedestrian and bike travel through these areas. They look like they are intended to be shared on a single path.

CC5.43 Con't

Mr. Turner: The intent is for shared use of bikes and pedestrians, and having appropriate widths that would accommodate both users.

Mayor Burt: Well, I would just comment that I think that if we are really trying to promote bike and pedestrian use we may want to evaluate whether it would be more effective to have those separated than shared.

CC5.44

The next thing is that if you are coming from the hospital on Quarry, and you are on the Arboretum side it shows a requirement to cross over to the Shopping Center side of the road, and then cross at El Camino. Those are very long intersections. I am just concerned that two long waits will actually have a fairly significant impact on the travel time of either bike or pedestrians. So this is just a small thing there to look at whether it is possible to have a direct crossing.

CC5.45

Then the broader issue has to do with what Mr. Philips raised about the state health and safety code provision that speaks about not being able to require an employer to implement a trip reduction program. Could the City Attorney speak to that issue? I know that there has been some contention over interpretation. I want to really as fully as possible understand the City's perspective as compared to Stanford's.

Ms. Silver: Thank you Mayor Burt. There actually is a legal memo attached to the Staff Report written by our outside counsel, Rick Jarvis, who is here tonight. I think I will ask him to come up and summarize that memo that is an attachment to the Staff Report.

Mayor Burt: Thank you. Can you remind us which attachment number that is?

Mr. Turner: Attachment E.

Mayor Burt: Thank you. Right before the minutes. Thank you, Attachment E.

Mr. Rick Jarvis, CEQA Consultant Partner, Jarvis, Fay & Doporto: Good evening Mr. Mayor and Members of the Council. I am outside legal counsel for the City particularly with respect to CEQA issues as well as with respect to general land use matters.

I have looked at the health and safety code section referenced. You have a memo in your packet with respect to my legal opinion that that health and safety code section does not prohibit the City from imposing TDM through an exercise of its lease powers if the City were to so choose. There are sort of two different ways of reaching that conclusion, or looking at that conclusion. One is there is a general principle that applies to what are called Charter Cities. The City of Palo Alto is a Charter City. Under the California Constitution as a Charter City the City has primary authority over matters that are local to the city and there is law that provides that a state law cannot limit a Charter City's authority over local lease power matters, except and only to the extent necessary to meet legitimate state issues. We have looked at the issue and the issue of traffic congestion is a particularly local concern of the city. The health and safety code section referenced primarily air quality determinations made by the state legislature and reflects a determination whether it is correct or incorrect is debatable, but it reflects a policy determination by the state legislature that TDM measures are not an efficient way of achieving air quality objectives. It does not speak to or consider the issue of local traffic congestion.

My memo is in part a response to a memo done by Stanford's legal counsel that argues that a Charter City does not have legal authority to ignore state laws relating to regulation of traffic flow. I would distinguish the authorities that they rely upon. They deal with the mechanisms of traffic control. You can't have individual Charter Cities having their own traffic rules that are different from statewide rules but I would distinguish those cases from cases dealing with local authority to control traffic congestion itself.

So from one perspective the short answer to the question is we are Charter City. This is an area of particular local concern, i.e., traffic congestion as well as land use regulation. The City as a Charter City has primary authority over that not withstanding the state regulation to the contrary. Another way of looking at the same question is even if that code section applies to the City the City Council certainly has the authority to deny the project on the grounds of traffic impacts. inherent in that authority to deny the project if Stanford comes forward with a proposal to reduce the traffic impacts to a level that is acceptable including TDM measures that is sort of an effective way that the City has of in essence requiring. If you say you are going to deny the project because of the traffic impacts but you will approve the project if different feasible measures are implemented to control traffic – the bottom line question is is this a feasible mitigation measure? In some ways this whole legal argument is a sideshow on that because it is feasible because Stanford is coming forward and saying they are willing to do it. But if even if Stanford were not willing it is my opinion that the City Council has that authority.

Mayor Burt: Thank you. Council Member Shepherd.

CC5.46

Council Member Shepherd: Thank you and thank you for that question Mayor because that was my big question. For me this project is pretty much all about traffic because of the new increased load that we have. I don't want to see this project get denied but I do want to see this clear mitigation so that it supports not just Palo Alto, but Stanford and other regions. This is why I continue to consider the fact that we should probably be doing a traffic study, a comprehensive, borderless, looking at some of the other angles that come into play when we get of Highway 1 or 280, in addition to looking into really tying up links with shuttles. That seemed to be – well, the newspapers are starting to talk about the shuttle that Facebook has now. It just seems like we could study this and do a better job of it for both parties. So I look forward to that happening. I really appreciate the clarification on what type of mitigation this would be.

Mayor Burt: Thank you. Council Member Holman, you had something else?

CC5.47

Council Member Holman: I do have just a handful here and I am just going to read them off, if people don't mind. If the FEIR could answer how Menlo Park and Palo Alto's different traffic analysis methodologies are different and yet how they both according to the DEIR satisfy CEQA I would be most interested in that.

CC5.48

Interested in the contiguous projects and if we have considered the comprehensive impacts of contiguous projects, contiguous to this proposal.

CC5.49

Interested also in what the linkage is for Hoover Pavilion and the necessity for it to satisfy CEQA and the Secretary of the Interior's Standards given that Hoover Pavilion is not on the local inventory. We in the general public don't have plans to see what the restoration

CC5.49 Con't

program is. The DEIR talks about possible window retention and restoration. It also talks about window replacement, which is not one of the primary acceptable preferences of the Secretary of the Interior's Standards. I have heard that they are proposing to replace all the windows. I don't know that because we don't have that information. So I am wanting to know what the linkage is there, and also in the satisfaction of the Secretary of the Interior's Standards if the State Historic Building Code has been considered. Also in consideration of the Preservation Alternative if the State Historic Building Code was considered in how that building might be reused.

CC5.50

More on the viewscapes because there are still a number of viewscapes, and I won't list all of them, but Stanford West Apartments to the project, Oak Creek Apartments to the project. I didn't locate those views.

CC5.51

I am not sure if I have done this just privately or publicly the context and sphere of influence at Hoover Pavilion site. The addition of the new large buildings I believe the Secretary of the Interior's Standards have a CEQA impact because of their scale and blocking of view. The historic resource is supposed to be the dominant building on site. In other words, the other buildings should be subservient and in scale and mass and appearance, and that is not apparently what is the case. The model does not include the Hoover Pavilion site. Apparently from what there is in the DEIR it looks like it is not. I will stop there for the moment.

CC5.52

Mayor Burt: I have one additional question. One member of the public had raised issues about whether the Draft Environmental Impact Report had taken into account the impacts

CC5.52 Con't

that were evaluated under the 2000 Stanford General Use Permit. Curtis, can you comment on that?

Mr. Williams: Yes, Mayor Burt. I think this refers back to Council Member Price's question before. Yes those were all taken into account as part of the background situation for the analysis.

Mayor Burt: Thank you. We do not have any other comments. So at this time I would to – well I guess I should have closed the hearing already and second conclude this item. The process will be that actually there are written comments that can still be provided through tomorrow. Is that correct, Curtis?

Mr. Williams: That is correct, through the end of tomorrow. Email to Steven Turner or to the City of Palo Alto website for Stanford.

Mayor Burt: Then just to refresh everybody the next process step, could you give us a little bit of the timeline?

Mr. Williams: We will be coming back to you with check-ins on the Development Agreement in the fall. As I mentioned, we will come back at some point also with some discussion on the zoning and design components before we actually bring back the Final EIR and the entitlements as a package in the fall, November/December timeframe.

Mayor Burt: Thank you. That concludes this item.

CC5. City Council Hearing, July 26, 2010

CC5.1 *This comment is a reiteration of comments from the Planning and Transportation Commission (Commission) hearing on July 7, 2010.* Please refer to the Responses to PTC6, Staff-Initiated Change 8 and Master Response 8 for information regarding the housing recommended under the Village Concept Alternative.

CC5.2 *This comment is a reiteration of comments from the Commission hearing on July 7, 2010.* Please refer to the Responses to PTC6 and Master Response 8 for information regarding variations on Reduced Intensity Alternative B.

CC5.3 *This comment is a reiteration of comments from the Commission hearing on July 7, 2010.* Please refer to the Responses to PTC6 and Staff-Initiated Change 6 for responses regarding the Tree Preservation Alternative and the number of trees to be removed.

CC5.4 *This comment is a reiteration of comments from the Commission hearing on July 7, 2010.* Please refer to the Responses to PTC6, and Staff-Initiated Changes 4 and 8 for information regarding the effects of the Village Concept Alternative.

CC5.5 *This comment is a reiteration of comments from previous Commission hearings.* Please refer to the Responses to PTC3. Please refer to Master Response 1 for a complete discussion of the effectiveness of GO Pass and steps that would be taken in the event mode splits were not achieved.

CC5.6 *This comment is a reiteration of comments from previous Commission hearings.* Please refer to the Responses to PTC3 and PTC6. Please see Staff-Initiated Change 2, which explains that all significant intersection LOS impacts of the SUMC Project would be mitigated to a less-than-significant level through Mitigation Measure TR-2.1 through TR-2.4 (involving traffic-adaptive signal technology, payment toward new undercrossings, the implementation of the GO Pass, and intersection improvements, respectively). Inclusion of a bicycle sharing program is discussed in Master Response 2. Additional shuttle service to East Palo Alto is evaluated in Master Response 2. Please see Master Response 4 for a discussion of construction traffic and mitigation.

CC5.7 *The commentor asks if the Draft EIR examined the two additional components of the Village Concept Alternative, the design aspect and the housing aspect, separately.* The Draft EIR does not examine the design aspect of the Village Concept Alternative separately from the housing aspect. Rather, the evaluation of the Village Concept Alternative examines the impacts related to the SUMC Project component, the pedestrian linkages, and the housing units as a whole. Nonetheless, since the impacts of the Village Concept Alternative components are disclosed in the CEQA document, the favorable components could be applied to the SUMC Project. It is ultimately at the discretion of City Council whether to approve portions of the proposed alternatives that would mitigate or avoid significant

environmental impacts, while rejecting the alternatives that are deemed to be infeasible or that would not substantially reduce SUMC Project impacts. As such, the final SUMC Project could be the SUMC Project as proposed plus several aspects of the alternatives. Please refer to Master Response 11 for a detailed description of the City's review process and the next steps in the EIR review.

CC5.8 *The commentor questions the method used to determine spousal trip generation under the Village Concept Alternative.* Please refer to Staff-Initiated Change 8 for a revised trip generation and LOS analysis under the Village Concept Alternative.

CC5.9 *The commentor asks whether the TDM measures would be used to reduce the traffic impacts generated by the Village Concept Alternative; and additionally, if there will be a variety of housing unit sizes.* The TDM measures that are available for the SUMC Project are assumed to be available for the Village Concept Alternative. For spousal trips, the trip generation was also reduced to account for transit-oriented development and the proximity of the Village Concept Alternative housing to PAITS. The size of the Village Concept Alternative housing units was 2.2 persons per unit on average. Please refer to Staff-Initiated Change 8 for a complete discussion of the traffic effects of the Village Concept Alternative.

CC5.10 *The commentor asks whether the traffic model and underlying methodology used in the Draft EIR is similar to that used for the preparation of the Stanford University 200 Community Plan and General Use Permit (CP/GUP). Additionally, the commentor asks whether the CP/GUP was considered in the SUMC Project evaluation.* The traffic model used in the CP/GUP EIR is similar to the traffic model used in the SUMC Draft EIR. Both models were adapted from the VTA regional model and used land use forecasts from ABAG. The differences are between the projected land use in 2000 that was used for the CP/GUP model and the projected land use in 2006 used in the SUMC analysis, and the horizon years (2010 for the CP/GUP EIR and 2025 for SUMC Project EIR). The development allowed by the CP/GUP that has not been constructed is included as background growth in the SUMC Project EIR analysis. Please refer to Master Response 3 for a complete discussion on the background growth.

CC5.11 *The commentor asks if the Village Concept Alternative would displace previously dedicated occupants, and thus shift trips from the previously dedicated occupants elsewhere. The commentor asks several questions regarding housing occupancy under the Village Concept Alternative and the analysis of the Village Concept Alternative.* The CP/GUP allows up to 3,018 units, but only requires that 2,420 of those units be constructed as a condition to full academic build out. As there is no regulatory requirement to build 598 units, up to 598 CP/GUP units have been identified by the City as excess units that could be the subject of a housing agreement if mutually agreed upon. Stanford asserts that the units have been

"programmed" for other uses, but the CP/GUP does permit the units to be used for postdoctoral fellows and medical residents.

While the CP/GUP provides strict limits on non-residential development, including a specific development cap, it provides greater latitude for residential development. The Framework section of the CP/GUP clarifies that additional housing is exempt from the development cap. The Housing section of the CP/GUP also expressly provides that upon approval of the Santa Clara County Planning Commission and subject to further environmental assessment, additional housing beyond 3,018 units may be constructed. Read together, if the parties mutually agree, the housing can be used for hospital housing.

As stated on pages 5-34 through 5-35 of the Draft EIR, recommendations to dedicate the housing to SUMC employees would have some implications on the analysis in the CP/GUP EIR. Specifically, the CP/GUP EIR transportation analysis applied trip generation rates specific to campus residents, including graduate students and post doctoral fellows. However, the trip rate of SUMC employee occupants of the housing, as proposed under the Village Concept Alternative, would differ from the trip generation rate for graduate students and post doctoral follows. The change in the trip rate and the corresponding VMT, air quality, climate change, and noise emissions are also analyzed on pages 5-198 through 5-210 of the Draft EIR.

In light of Stanford's assertion that the units have been "programmed" for other uses (see Letter 22), the trip generation and LOS analysis of the Village Concept Alternative has been revised since the publication of the Draft EIR. For the revisions to the analysis, refer to Staff-Initiated Change 8, which assumes displacement of the campus population could occur if GUP housing were allocated to SUMC employees.

CC5.12 *The commentor asks if the pedestrian linkages in the Village Concept Alternative are included in the site plan.* As explained on pages 5-35 and 5-38 of the Draft EIR, and depicted in Figure 5-4 on page 5-36, the pedestrian linkages are included as part of the Village Concept Alternative. However, offsite pedestrian linkages are not included in the site plan of the SUMC Project. As such, the SUMC Project sponsors have offered to include pedestrian linkages as a component of the Development Agreement for the SUMC Project. In addition, several of the pedestrian connection improvements would be implemented by Mitigation Measure TR-6.1, as presented in the Transportation section of the Draft EIR on pages 3.4-76 through 3.4-77.

The commentor also asks if certain features of the Village Concept Alternative could be applied to the final SUMC Project. Please refer to Response CC5.7, above.

CC5.13 *The commentor expresses support for the SUMC Project.* Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.14 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.15 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.16 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.17 *The commentor expresses opposition to No Project Alternatives A and B and Reduced Intensity Alternatives A and B*. Per CEQA Guidelines Section 15126.6, an EIR must include a range of potentially feasible alternatives that attain most of the project objectives and reduce the significant and unavoidable impacts of the proposed project. In addition, CEQA Guidelines Section 15126.6(e) requires the inclusion of a "no project" alternative in order to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, the SUMC Project Draft EIR analyzes seven alternatives, including two No Project and two Reduced Intensity Alternatives. This comment concerns the merits of the SUMC Project alternatives. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

CC5.18 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.19 *The commentor expresses support for the Tree Preservation Alternative*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.20 *The commentor expresses opposition to No Project Alternatives A and B and Reduced Intensity Alternatives A and B*. Per CEQA Guidelines Section 15126.6, an EIR must include a range of potentially feasible alternatives that attain most of the project objectives and reduce the significant and unavoidable impacts of the proposed project. In addition, CEQA Guidelines Section 15126.6(e) requires the inclusion of a "no project" alternative in order to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, the SUMC Project Draft EIR analyzes seven alternatives, including two No Project and two Reduced Intensity Alternatives. This comment concerns the merits of the SUMC Project alternatives. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

CC5.21 *The commentor expresses support for the LPCH hospital expansion*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.22 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.23 *The commentor expresses support for the SUMC Project and opposes the Reduced Intensity Alternatives*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.24 *The commentor opposes the demolition of the Stone Building complex and supports the Historic Preservation Alternative*. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives. In addition, please refer to Master Response 8 for the range of alternatives analyzed and considered in the approval process.

The commentor also states that the Stone Building complex merits serious consideration under CEQA and that demolition of the building would result in significant and unavoidable impacts. This statement is consistent with the findings in the Draft EIR under Impact CR-1 on pages 3.8-18 through 3.8-23. As noted on page 3.8-21 through 3.8-22 of the Draft EIR, implementation of Mitigation Measures CR-1.2 through CR-1.4 would reduce the impacts from the loss of the Stone Building complex; however, the impact would remain significant and unavoidable due to the demolition of the buildings. The analysis in the Cultural Resources section, Section 3.8 of the Draft EIR, uses the findings from the Architectural Resources Group (ARG) peer review to make this significance conclusion. Based on ARG's findings that the Stone Building complex is eligible for listing on the California Register of Historic Resources (CRHR), the Stone Building complex is considered an historic resource.

CC5.25 *The commentor expresses support for the SUMC Project*. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

CC5.26 *The commentor expresses opposition to Reduced Intensity Alternatives A and B*. Per CEQA Guidelines Section 15126.6, an EIR must include a range of potentially feasible alternatives that attain most of the project objectives and reduce the significant and unavoidable impacts of the proposed project. In addition, CEQA Guidelines Section 15126.6(e) requires the inclusion of a "no project" alternative in order to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, the SUMC Project Draft EIR analyzes seven alternatives, including two No Project and two Reduced Intensity Alternatives. This comment concerns the merits of the SUMC Project alternatives. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

CC5.27 *The commentor states that residents would be exposed to higher levels of pollution due to increased traffic at certain intersections*. The air quality impacts around congested intersections are primarily related to localized emissions of carbon monoxide (CO). Localized CO emissions were evaluated starting on page 3.5-20 of the Draft EIR. The Draft EIR analyzed six intersections in the City that represented either the intersections with the worst congestion or the congested intersections that would have the greatest increase in congestion related to the proposed project traffic. All of these intersections

would have CO concentrations far below the Bay Area Air Quality Management District (BAAQMD) thresholds. As also noted in the Draft EIR, CO standards in the Bay Area have not been exceeded for almost 20 years and the CO background levels as measured at the Bay Area monitoring stations are typically only a quarter to a third of the ambient standards, as such, traffic volumes would have to be very high to result in a local standard violations. This is evident in the recently adopted update to the BAAQMD's CEQA Guidelines. The new guidelines provide a screening threshold of 40,000 vehicles per hour to determine when an intersection would have the potential to exceed the CO standards. All the intersections in Palo Alto, including the most heavily congested intersections, would have traffic volumes that are far below the 40,000 vehicles per hour screening threshold.

CC5.28 *The commentor supports Reduced Intensity Alternative A*. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

The commentor also suggests that the SUMC Project use Continuous Performance Improvement (CPI) technology to evaluate the need for expanding current facilities. Please refer to Master Response 10 for a discussion of non-CEQA issues. The following is a description of the SUMC "performance improvements." Both the SUMC Hospital and the LPCH Hospital have dedicated "performance improvement" departments that are integral to in the development of the hospitals' programmatic requirements. These departments were fully engaged during the programming and planning process in order to optimize the square footage needs for the SUMC Project. The Process Excellence Department is a branch of the SHC Hospital and the Performance Improvement Department is a branch of the LPCH Hospital. As such, the SUMC Project would continue to use these departments that are dedicated to performance improvements.[1]

CC5.29 *The commentor requests better models than the ones displayed at the public hearings*. The SUMC Project sponsors displayed the existing 3-D models for the Main SUMC Site (the SHC and LPCH buildings) prior to the start of the City Council hearing on July 19, 2010. These 3-D models depicted the Tree Preservation Alternative, which is the SUMC Project sponsors' preferred alternative. The SUMC Project sponsors and City staff were available to answer questions during the viewing period. Following the City Council hearing, the models were removed from the City Hall lobby since they are working models that are under development and subject to change.

Although it is not anticipated that supplementary 3-D models will be provided for public viewing, other forms of visual images that depict the SUMC Project are available. A computer simulation "fly through" of the site plans and visual simulations are available on the City website at: www.cityofpaloalto.org/sumc. In addition, the Draft EIR provides several visual simulations of the SUMC Project, as included in Section 3.3, Visual Quality.

[1] Stanford University Medical Center, correspondence with PBS&J, November 1, 2010.

Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

CC5.30 *The commentor states that if any part of the County residential approval is used for the SUMC Project, then the CP/GUP would need to be amended to delete those housing units from counting towards entitlement for academic square footage.* Changes in occupancy of housing units at the Quarry Road sites would be subject to entitlements through Santa Clara County. Please see Response CC5.11 above.

CC5.31 *The commentor states the legal arguments about TDM are misleading because they are not relevant. Additionally, the comment notes that the SUMC Project sponsors have applied for a Development Agreement and therefore may include various types of development conditions including a TDM.* The Draft EIR includes an analysis of an enhanced TDM program.

CC5.32 *The commentor states that the list of significant trees is not adequate.* Impact BR-4 on pages 3.9-24 through 3.9-28 of the Draft EIR analyzes the impacts of the SUMC Project on Protected Trees. The analysis in the Draft EIR concludes that the removal of Protected Trees would result in significant and unavoidable impacts, even with the implementation of mitigation measures. Staff-Initiated Change 6 corrects the number of Protected Trees to be removed under the SUMC Project and the Tree Preservation Alternative and refines the mitigation measures presented in Section 3.9.

CC5.33 *The commentor questions the concept of right-sizing and whether patients would have to pay more for private rooms.* As described on page 2-44 of the Draft EIR, right-sizing refers to increasing floor area per inpatient bed or service without substantially increasing the number of patients or employees. Approximately 34 percent of the building program under the SUMC Project would be attributable to right-sizing, and 66 percent would be attributable to increased operation. The American Academy of Healthcare Architects recommends 100 percent single-bed rooms to ensure patient safety, privacy, and family-centered care. As such, all of the patient rooms at the SHC and LPCH hospitals would be single-occupancy.

The patient cost of occupying these private rooms is a financial issue. Please refer to Master Response 10 for a discussion of non-CEQA issues.

CC5.34 *The commentor suggests that the SUMC Project sponsors pay in lieu payments for energy consumption.* As stated on pages 3.15-29 through 3.15-33 of the Draft EIR, the SUMC Project would have a less-than-significant impact on energy demand. The SUMC Project would be an urban infill project that would not require the expansion of natural gas facilities and primarily would use existing utility facilities. In addition, the SUMC Project would not significantly increase electricity and natural gas usage over existing conditions. The net increase of electricity use would be less than 5 percent of the City's 2007 peak load

demand and also less than five percent of the City's remaining peak load capacity.[2] Based on the capacity of the natural gas facilities serving the SUMC Project, the net increase in peak natural gas demand would be minor.[3] Additionally, as outlined on pages 3.15-30 through 3.15-31 of the Draft EIR, the SUMC Project sponsors have included measures to reduce energy consumption associated with the SUMC Project operations beyond the levels otherwise required by Title 24 and OSHPD requirements. As such, the SUMC Project would have less-than-significant impacts associated with energy consumption.

According to CEQA Guidelines Section 15126.4(a)(3), mitigation measures, such as the ones suggested by the commentor, are not required for impacts that are not found to be significant. Therefore, since less-than-significant energy consumption impacts would occur under the SUMC Project, mitigation measures are not required under CEQA. Please see Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption.

CC5.35 *The commentor states that the City Council has to look at the SUMC Project in light of Proposition 13, which limits property taxes in California.* Please refer to Master Response 10 for a discussion of non-CEQA issues.

CC5.36 *The commentor states that the Marguerite shuttle should expand its service to early morning hours to provide service for employees that work the night shift.* Under Mitigation Measure TR 2.3, the SUMC Project sponsors would expand shuttle service as needed to accommodate increased ridership in connection with provision of the Caltrain GO Pass to existing and future employees.

CC5.37 *The commentor requests that affordable housing be provided as part of the SUMC Project.* As indicated on page 3.13-14 of the Draft EIR, housing affordability is considered to be a socioeconomic issue. Neither a shortfall of affordable units, increased demand for affordable housing, nor socioeconomic impacts due increased demand for affordable housing is considered to be a physical environmental impact. Please see Master Response 7 for a discussion of the SUMC Project's indirect demand for affordable housing in Palo Alto.

In addition, as part of the SUMC Project, a Development Agreement would be approved if such an agreement could be mutually agreed upon. One component of the Development Agreement between the City and the SUMC Project sponsors would be the payment of a housing in-lieu fee in the amount of $23.1 million, which is equivalent to what a commercial project would pay. Refer to pages 2-27 through 2-28 in the Project Description of the Draft EIR for a full list of the Development Agreement terms.

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[2] Jim Bujtor, Utilities Engineering Division, City of Palo Alto, electronic communication with PBS&J, June 4, 2008.

[3] Greg Scoby, Senior Project Engineer, Utilities Department Water Gas Wastewater Engineering, communication with PBS&J, April 22, 2008.

In addition, as an alternative to the SUMC Project, the Draft EIR discusses and analyzes the Village Concept Alternative, which would recommend affordable housing. The housing would be provided at three sites within the vicinity of the SUMC Sites on Stanford lands and would be dedicated to SUMC employees. For a description and analysis of the Village Concept Alternative, refer to Section 5 of the Draft EIR, Alternatives as well as Staff-Initiated Changes 4 and 8 and Master Response 8.

CC5.38 *The commentor questions the inconsistency between the number of Protected Trees to be retained or removed as outlined in the Draft EIR versus those outlined in the SUMC Project sponsors' presentation.* Since the publication of the Draft EIR, the number of Protected Trees to be removed and retained has been corrected. Refer to Staff-Initiated Change 6 for the corrected Protected Tree numbers.

CC5.39 *The commentor questions the tree removal procedures and associated mitigation measures under the Tree Preservation Alternative.* As discussed on page 5-153 in Section 5, Alternatives, Mitigation Measures BR-4.1 through BR-4.5 for the SUMC Project would apply to the Tree Preservation Alternative as well. Since the publication of the Draft EIR, the mitigation measures regarding tree removal have been revised and further enhanced, as outlined in Staff-Initiated Change 6. However, these measures would not be able to avoid the removal of up to 59 Protected Trees under the Tree Preservation Alternative. Therefore, even with the implementation of the mitigation measures, the Tree Preservation Alternative would result in a significant and unavoidable impact. Mitigation Measure BR-4.6, as presented for the SUMC Project, would not be required under the Tree Preservation Alternative because this alternative implements Mitigation Measure BR-4.6 in its site plan. Please refer to Staff-Initiated Change 6 for the corrected Protected Tree numbers and revisions to the mitigation measures.

CC5.40 *The commentor states that there are no mitigation measures for the demolition of the Stone Building complex.* Mitigation Measures CR-1.2 through CR-1.4 on pages 3.8-21 through 3.8-22 of the Draft EIR would reduce impacts due to the loss of the Stone Building complex; however, the impact would remain significant and unavoidable. Mitigation Measure CR-1.2 would require HABS documentation with site-specific history, accurate mapping of all buildings, architecture descriptions, and photographic documentation. As included in Mitigation Measure CR-1.3, all written and photographic documentation regarding the Stone Building complex would be submitted to applicable agencies. In addition, CR-1.4 would require the SUMC Project sponsors to install interpretive displays within the SUMC Sites that provide information to visitors and residents regarding the history of the Stone Building complex. Therefore, although the SUMC Project would require the demolition of the Stone Building complex, these mitigation measures would lessen the significant and unavoidable impact.

CC5.41 *The commentor questions the design of the existing tunnel and the proposed Everett undercrossing connection under the Village Concept Alternative.* The Village Concept Alternative proposes to create several pedestrian linkages that would connect the SUMC Project with the Palo Alto Intermodal Transit Station (PAITS), the Stanford Shopping Center, and Downtown. One of these linkages includes a new Class I shared-use bicycle and pedestrian path extending from the planned Everett undercrossing at Caltrain and El Camino Real. As explained on pages 3.4-56 through 3.4-57 of the Draft EIR, the undercrossing would facilitate walking and bicycling from residential and commercial areas in north Palo Alto. The Everett undercrossing could be constructed regardless of the implementation of the SUMC Project or Village Concept Alternative and is not considered part of the SUMC Project or Village Concept Alternative. However, Mitigation Measure TR-2.2, as presented on page 3.4-67 of the Draft EIR, requires the SUMC Project sponsors to make a fair-share financial contribution towards the construction of the Everett Avenue and Middle Avenue undercrossings. This mitigation measure would also be applicable to the Village Concept Alternative. The existing undercrossing at University Avenue would still be operational in the future.

Although the SUMC Project sponsors are expected to contribute financially to the construction of the Everett undercrossing, the construction of the undercrossing is not included in the SUMC Project. The path extension would be a short-term connection because of the anticipated construction in the area, which would provide a VTA bus driveway to El Camino Real. The construction of the path is not meant to impede the development of this driveway. In the long-term, there will be a path in this area. At this point, the City does not know who will construct the Everett Tunnel and when it will be constructed.

Because the undercrossing is not included in the SUMC Project, the environmental impacts of the planned undercrossing would be subject to separate environmental review. Additional design details of the tunnels or the associated linkages are not available at this time. The design and the fair-share costs of the pedestrian linkages under the Village Concept Alternative would be determined during the entitlement process. Please refer to Master Response 10 for a discussion of non-CEQA issues.

CC5.42 *The commentor asks if the pedestrian linkages under the Village Concept Alternative are included in the SUMC Project sponsors' preferred alternative, which is the Tree Preservation Alternative.* The SUMC Project sponsors support several of the pedestrian linkages outlined in the Village Concept Alternative. In addition, the SUMC Project sponsors have proposed complementary linkages to those in Section 5 of the Draft EIR. The additional linkages were included in the SUMC Project sponsors' presentation at the hearing on July 26, 2010. Although these linkages are not included in the SUMC Project as discussed in the Draft EIR, these linkages would likely be included in the final design of the SUMC Project. However, none of the complementary linkages proposed by the SUMC

Project sponsors are expected to result in additional impacts over those analyzed under the Village Concept Alternative. As such, no further analysis is warranted.

CC5.43 *The commentor questions the design of the pedestrian linkages at the Quarry Road/El Camino Real intersection under the Village Concept Alternative.* Currently, there are various options and development stages of linkages in and around the PAITS. These linkages would be shared by bicyclists and pedestrians and would be implemented at different phases after the approval of the SUMC Project. However, as explained in Response CC5.41, above, additional design details of the pedestrian linkages are not available at this time. Section 5 of the Draft EIR, Alternatives, addresses the physical impacts of constructing the linkages under the Village Concept Alternative. Please refer to Master Response 10 for a discussion of non-CEQA issues.

CC5.44 *The commentor questions the design of the pedestrian linkages along Quarry Road.* As explained in Response CC5.41, above, additional design details of the pedestrian linkages are not available at this time. Please refer to Master Response 10 for a discussion of non-CEQA issues.

CC5.45 *The commentor requests clarification on the City's ability to require the SUMC Project sponsors to implement a transportation demand management (TDM) program.* The SUMC Project sponsors have indicated previously that State law prohibits public agencies from requiring a mandatory TDM program. The City's outside legal counsel, Jarvis, Fay, Doporto & Gibson, LLP, has provided a written response that indicates that the health and safety code section does not prohibit the City from imposing TDM through an exercise of its lease powers if the City were to so choose (see Appendix CC of this document). As indicated in the response by Jarvis, Fay, Doporto & Gibson, LLP, as a charter city, the City has the power to require the SUMC Project sponsors to implement an employee trip reduction program to mitigate traffic congestion, despite the apparent prohibition in Section 40117.9 of the Health and Safety Code (Section 40117.9). Moreover, even if Section 40117.9 applied to the City, it would not prohibit the City from refusing to amend its Comprehensive Plan and zoning ordinances to accommodate the SUMC Project based upon its adverse traffic, air quality, and climate change impacts. Thus, the City could effectively and appropriately require the SUMC Project sponsors to agree to such mitigation before granting the SUMC Project sponsors the legislative approvals needed for the SUMC Project to go forward.

CC5.46 *The commentor states that the SUMC Project should include a comprehensive borderless Transportation Impact Analysis.* The request for a borderless traffic study can be undertaken through a process outside certification of the SUMC Project EIR. The Study Area of the SUMC Project includes 71 intersections covering a reasonably large catchment with respect to the area of SUMC Project influence. It is beyond the responsibility of the

SUMC Project to analyze and mitigate impacts other than those generated by the SUMC Project.

CC5.47 *The commentor requests clarification of the difference between Palo Alto and Menlo Park traffic analysis methodologies and how each satisfies CEQA.* The traffic analysis methodologies for each city are very similar and the approach to the analysis is nearly identical. Each city requires that the existing transportation setting be established. The transportation setting describes existing traffic volumes, intersection geometrics, traffic control, transit facilities, bicycle and pedestrian facilities, and other general aspects of the overall transportation system. The next step is to establish the future transportation system. The future conditions can be established in two ways. For projects that would be built in a relatively short time period, Menlo Park uses a list of approved or reasonably foreseeable projects and generates traffic from those projects. Menlo Park also uses an annual percentage increase in traffic where each traffic movement through an intersection is increased by an established percentage, such as 1 percent per year. Palo Alto takes a different approach to establishing future conditions and uses its Travel Demand Forecasting Model to project future traffic. The use of traffic projections from the City's model were used for the SUMC Transportation Impact Analysis for both intersections within Palo Alto and for intersections outside of the City. Each approach is acceptable for a CEQA analysis.

The next step in the process is developing traffic projections from the SUMC Project itself and assigning these trips to the transportation network to determine if impacts would occur. Both cities conduct this step in an identical manner. The final step is to assess the traffic impacts to determine if established thresholds have been exceeded resulting in a significant impact. Each city can establish its own thresholds of significance. The City of Palo Alto's thresholds are documented on page 3.4-31 of the Draft EIR; the City of Menlo Park's thresholds are documented on page 3.4-32 of the Draft EIR. Menlo Park has more rigorous standards of significance in terms of intersection impacts and impacts on arterial, collector, and local streets than does Palo Alto.

CC5.48 *The commentor asks if contiguous projects were considered in the Draft EIR.* Contiguous projects (ones that are immediately adjacent to the SUMC Sites) include development at 777 Welch Road and development allowed under the CP/GUP. These projects are considered in the cumulative analysis of the Draft EIR, where appropriate. As explained on page 3.1-2 of the Draft EIR, after providing the impact from the SUMC Project for each topic in Section 3 of the Draft EIR, the analysis provides a discussion of impacts from cumulative development. Cumulative development includes the incremental impact of the SUMC Project plus other closely related present and reasonably foreseeable probable future projects. Cumulative impacts refer to "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects" (CEQA Guidelines Section 15355). Please refer to Appendix B of the Draft EIR

for the cumulative projects within Palo Alto and the two projects contiguous to the SUMC Sites.

In addition, Master Response 4 includes an updated and expanded list of the potential development under the CP/GUP and discusses the associated construction-period traffic impacts. No other changes to the cumulative analysis are triggered by the updated CP/GUP construction list.

CC5.49 *The commentor questions the restoration plans for the Hoover Pavilion.* The impacts from interior and exterior renovation of the Hoover Pavilion are discussed on pages 3.8-19 through 3.8-20 of the Draft EIR. ARG has provided additional review of the Hoover Pavilion (included as Appendix Y of this document) and concluded that the proposed alterations to this building would not significantly alter the physical characteristics that convey the building's historical significance such that it would no longer be eligible for inclusion in the National Register of Historic Places (NRHP) and the CRHR. Therefore, the SUMC Project would not result in a substantial adverse change in the significance of this historical resource and the impact under CEQA would be less than significant. Additional information and review of the impacts to the Hoover Pavilion are included in Staff-Initiated Change 5. Please refer to Staff-Initiated Change 5 for more details.

In addition, the commentor asks if the State Historical Building Code was considered for the reuse of the Stone Building complex under the Historic Preservation Alternative. The purpose of the California Building Code (CBC, section 3403.5), also known as the California Historical Building Code (CHBC), is "to provide regulations for the preservation, restoration, rehabilitation, relocation or reconstruction, of buildings or properties designated as qualified historical buildings or properties."[4] In addition, "A qualified historical building is defined as any building, group of buildings, district, site or object, which is listed by any level of government as having historic importance."[5] The SHC Hospital and the School of Medicine (SoM) are both aware of the provisions of the CHBC. The CHBC does not create exceptions to OSHPD's seismic safety requirements. Accordingly, the Stone Building complex cannot be reused as hospital facilities regardless of whether the buildings are historic structures as defined by the CHBC. In addition, the CHBC does not change the programmatic needs of the SHC and SoM for seismically safe, efficient, state-of-the-art facilities and for meeting modern standards for air exchange, bench space, ratios of research to support space, and other factors identified in the SUMC Project sponsors' analysis of reuse alternatives. As such, the CHBC would not allow for the reuse of the Stone Building complex. However, the CHBC will be implemented for renovation of the Hoover Pavilion.[6]

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4 CHBC, Part 8 of Title 24, Section 8-101.2.

5 Office of Historic Preservation, "State Historical Building Code," accessed at: http://ohp.parks.ca.gov/?page_id=21410, on October 21, 2010.

6 Stanford University Medical Center, correspondence with PBS&J, November 1, 2010.

The Historic Preservation Alternative was reviewed by the ARG and it was determined that the alternative would be consistent with the Secretary of the Interior's Standards. The Secretary of Interior's Standards provide a standard guide to recommended treatments of historic properties. As stated in Section 15064.5(b)(3) of the CEQA Guidelines, "a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings... shall be considered as mitigated to a level of less than a significant impact on the historical resource."

CC5.50 *The commentor states that viewscapes at the Stanford West Apartments and Oak Creek Apartments should be included in the Draft EIR.* The Draft EIR includes visual simulations of the SUMC Project from five vantage points. These vantage points were selected based on identified viewer locations or roadways, and on vantage points that were identified during the scoping process as areas of concern. As described on pages 3.3-39 of the Draft EIR, these locations represent views from which the SUMC Project would be most visible and as such represent the worst-case impacts on views.

Figure 3.3-7 on page 3.3-25 of the Draft EIR provides a map of the five vantage points from which the visual simulations are depicted. Figures 3.3-8 through 3.3-10 in Section 3.3, Visual Quality, show views of the Main SUMC Site from visually sensitive locations. The alteration of public viewsheds and view corridors under the SUMC Project is analyzed under Impact VQ-3. As explained, a change in view is considered adverse if the resulting development pattern demonstrably contravenes the vision for the City that is expressed in the Comprehensive Plan. Due to building massing and vegetation that would remain under the SUMC Project, direct and unobstructed views of the site or the proposed buildings from other locations are not anticipated. However, as shown in these figures, the SUMC Project buildings at the Main SUMC Site would be visible from Quarry Road/Vineyard Lane, Sand Hill Road/Pasteur Drive, and Sand Hill Road/Arboretum Road. Implementation of Mitigation Measure VQ-2.1, which is presented on page 3.3-39 of the Draft EIR and would require adherence to the City's Architectural Review process, would ensure that the visual impacts would be less than significant. Mitigation Measure VQ-2.1 would reduce the impacts from all locations that would have views of the SUMC Project.

Views from the Stanford West Apartments are generally represented by Vantage Point 1, which depicts views of the Main SUMC Site looking south from Sand Hill Road and Pasteur Drive. The Stanford West Apartments are located across the street from Vantage Point 1. As stated on page 3.3-42 of the Draft EIR, the Stanford West Apartments have been determined to be visually sensitive. These apartments would have limited, channelized views of the Main SUMC Site; however, no significant views of the foothills from the common open spaces are visible and, therefore, the SUMC Project would not obstruct views of the foothills from the Stanford West Apartments.

The Oak Creek Apartments are located to the west of the SUMC Sites along Sand Hill Road. Although views from this location are not specifically addressed in the Draft EIR, it is acknowledged on page 3.3-42 that views from a larger geographic context may be affected. However, as explained above, the selected vantage points represent views from which the SUMC Project would be most visible and as such represent the worst-case impacts on views. Therefore, no additional visual simulations need to be included for the Oak Creek Apartments.

CC5.51 *The commentor questions the impacts of the proposed medical office building and parking structure on the Hoover Pavilion.* The impacts of the new structures at the Hoover Pavilion Site on the Hoover Pavilion are discussed on pages 3.8-19 through 3.8-21 of the Draft EIR. As explained above in Response CC5.49, ARG has provided additional review and concluded that the proposed alterations to Hoover Pavilion would not significantly alter the physical characteristics that convey the building's historical significance such that it would no longer be eligible for inclusion in the NRHP and CRHR. Please refer to Staff-Initiated Change 5 for more details.

CC5.52 *The commentor asks whether the Draft EIR considers the impacts evaluated under the CP/GUP.* The purpose of this EIR is to disclose the environmental impacts of the SUMC Project. As explained on page 3.2-7 of the Draft EIR, the CP/GUP for Stanford University, as approved by Santa Clara County, allows new development on the Stanford University campus. The CP/GUP pertains only to land within unincorporated Santa Clara County, and does not include lands within the jurisdiction of the City of Palo Alto. Therefore, within the SUMC Project sites, the CP/GUP currently applies only to a small portion of the Main SUMC Site, which is the 0.75-acre parcel that would be annexed into City boundaries for expansion of the SoM facilities. After annexation as part of the SUMC Project, the CP/GUP would no longer cover this 0.75-acre area. Therefore, the CP/GUP and the SUMC Project are separate projects.

The Draft EIR for the SUMC Project considers CP/GUP development in three areas: cumulative, the 2025 Future Conditions in the transportation analysis, and the Village Concept Alternative. As included on page 3.1-3 of the Draft EIR, the development allowed under the CP/GUP is considered throughout the Draft EIR in the cumulative analysis for several topics including, but not limited to, Visual Quality, Noise, Cultural Resources, Biological Resources, and Hazardous Materials. The cumulative analysis considers past, current, and foreseeable future projects and their impacts combined with the SUMC Project.

In addition, the Transportation Impact Analysis includes the CP/GUP in its analysis. As stated on page 3-1 of the Transportation Impact Analysis, Appendix C of the Draft EIR, the 2025 traffic volumes were obtained from the 2009 City of Palo Alto Travel Demand Forecasting Model. This model was developed based on Santa Clara County regional VTA

forecasting model, with ABAG Projections 2005 of housing and employment data. These models include the development proposed and approved under the CP/GUP in 2000. As such, the 2025 Conditions in the transportation analysis (see Section 3.4, Transportation, of the Draft EIR) include trip generation that would result from full buildout of the CP/GUP. This 2025 Conditions traffic scenario is applied to the transportation and air quality analyses of the SUMC Project and its alternatives.

Third, the analysis of the Village Concept Alternative addresses the implications of this alternative on the analysis in the CP/GUP EIR, certified by the County of Santa Clara in December 2000. As explained on pages 5-30 through 5-35 of the Draft EIR, the analysis of the Village Concept Alternative assumes that the two housing sites included in the CP/GUP would be used for SUMC employees. However, the recommended terms (dedication of housing to SUMC Project employees and an accelerated construction timeline) would have some implications on the analysis in the Stanford CP/GUP EIR. These impacts are discussed in the analysis of the Village Concept Alternative on pages 5-195 through 5-228, and under Staff-Initiated Change 8. Therefore, the CP/GUP was considered when analyzing cumulative conditions and alternatives.

ARB1

Thursday July 1, 2010
REGULAR MEETING - 8:30 AM
City Council Chambers, Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, CA 94301

ROLL CALL:

Board members:
Alexander Lew (Chair)
Clare Malone Prichard (Vice Chair)
Grace Lee
Judith Wasserman (absent)
Heather Young

Staff Liaison:
Russ Reich, Senior Planner

Staff:
Amy French, Planning Manager
Steven Turner, Planning Manager

NEW BUSINESS:

Public Hearings (Major)

Stanford University Medical Center Facilities Renewal and Replacement Project- Request by Stanford University Medical Center on behalf of Stanford University for Preliminary Review of the School of Medicine FIM1 building. Environmental Assessment: An environmental impact report has been prepared. Zone District: Medical Office Research (MOR).

Board Member Lew: Okay Steven, should we move onto the EIR? This is item number two, which is Stanford. A Study Session to accept comments on the Visual Quality chapter of the Draft Environmental Impact Report for the Stanford University Medical Center Facilities Renewal and Replacement Project.

Study Session:

Stanford University Medical Center Facilities Renewal and Replacement Project- Study Session to accept comments on the Visual Quality chapter of the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project.

Mr. Steven Turner, Advance Planning Manager: Thank you Chair Lew and Board Members. I am Steven Turner, Advance Planning Manager, and Project Manager for the Stanford projects. Staff is recommending that the ARB provide comments on the Visual Quality Chapter of the Stanford Draft EIR, and for the comments to Planning and Transportation Commission and City Council.

This is a Study Session. It is not a public hearing on the EIR. To give you a little bit of a background on how we are approaching receiving public comments on the Draft, as you know we released the Draft EIR on May 20 for a 69-day public review period. It is a little bit odd to have a 69-day public review period but that corresponds to the 11 public hearings that we have scheduled between the Planning Commission and Council that would conclude on July 26th. Therefore the public review period will close the following day, close of business on July 27th.

In the meetings that we have had so far with the Planning Commission and City Council there seemed to be direction from them that both the ARB and the HRB should be reviewing relevant portions of the Draft EIR and providing or at least affording the opportunity for public comment, and Board Member comments on both of those items. So today we are focusing on the Visual Quality Chapter as that is the chapter that is most relevant to the Architectural Review Board. Next week we are bringing the Cultural Resources Chapter to the HRB for a similar opportunity for the HRB to provide comments on that chapter. However, both of those meetings are Study Session meetings. They are not official public hearings. However we are taking comments from the Board Members of both bodies to be considered. After the public review period we will collect all of the comments together and respond to them in the Final EIR. The Draft and the Final will eventually go to the Planning Commission and Council for their review and hopefully certification later on in the year.

Getting back to the purpose of this particular meeting here of reviewing the Visual Quality Chapter, what we have been telling other Boards and Commissions is that we are accepting comments but we are not necessarily making comments on the merits of the project itself. We have been doing that through ARB meetings for the past few years. Essentially we are focusing on whether or not the EIR adequately analyzes the impacts and the mitigations. So we would certainly like your comments on those as it relates to the Visual Quality Chapter.

As you read through the Visual Quality Chapter and what is kind of outlined in the Staff Report of how we approached looking at Visual Quality, is that the City has significance thresholds that we use to determine significance on visual quality. Those are outlined on page 2 of the Staff Report. Just really quickly those significance thresholds are substantially degrading the existing visual character or quality of the site and the surroundings; significantly altering public viewsheds or view corridors or scenic resources; require substantial train modifications; allow for new development that would violate existing Comprehensive Plan policies regarding visual resources; creating a new source of substantial light or glare that would adversely affect day or nighttime views; or substantially shadowing public open spaces. So the EIR essentially does an analysis of each of those significance thresholds and determines if this project presents any impacts or would have a significant impact on those significance thresholds.

We found that the project would have a significant impact on meeting those significance thresholds. Therefore we have proposed mitigations to reduce those impacts to a less than significant level. Those are also briefly outlined in the Staff Report. We have found that there are significant impacts with regard to visual impacts during construction, and so therefore there is a mitigation measure that would require construction management plans, and construction visual plans to make sure that during the construction period, a very lengthy construction period up to 2025 that the sites minimize their look as a construction site. That might be through the use of fences with materials, ways where this is going to be an actively used site and it is important that it doesn't look like a construction site to the greatest extent possible. So we feel that that mitigation measure would reduce that impact to a less than significant level.

The other impacts that we have found, as outlined in the Staff Report, include impermanent dedication of visual character post construction; alternation of public viewsheds; and new sources of light and glare. This would be expected in a project that is adding over 1.3 million square feet of new floor area and new hospital towers that reach to 130 feet up to the parapets and up to 170 feet with

mechanical equipment, the helicopter landing pad, and such. So it does make sense that we would have significant impacts as a result of these buildings. However, we feel that these impacts could be mitigated to a less than significant level primarily through the architectural review process. This is not really a new mitigation. Whenever we produce either Mitigated Negative Declaration or EIRs often we state that going through the extensive ARB process that as long as the ARB can recommend that the project is consistent with the ARB Standards of Review then that review essentially is the mitigation for the project.

So it is very important as we bring the projects back to the ARB that it is very clear how these projects are being consistent with those 16 Standards of Review. Those Standards of Review you are very familiar with them but they are included in Attachment C to the Staff Report. A lot of what the Standards of Review look for really is consistent with the impacts that have been identified in the Environmental Impact Report. So thus we feel that if the ARB can find that the projects are consistent with those findings that the project impacts would be mitigated to a less than significant level. That is really the thrust of the Visual Quality Chapter itself.

In addition to meeting the ARB Standards of Review there is also consistency with the Comprehensive Plan. With regard to the Comprehensive Plan and visual quality the Comprehensive Plan has a number of policies actually that state that projects should be guided in development to respect the views of the foothills. So as part of the project analysis we will be looking to see how the projects affect the views of the foothills, both the Santa Cruz Mountain foothills and the East Bay foothills, as well as how the projects affect the view corridors down scenic routes. So for instance, Sand Hill Road has been designated as a scenic route and so we would want to look to see how the projects and these new buildings, especially the towers at 130 feet, would be consistent with the Comprehensive Plan policies to guide development to respect the foothills. The Comprehensive Plan doesn't state that you cannot block the foothills. It says guide development so it respects them. So it is a little bit of a dance to determine how that is essentially done. For us in trying to evaluate that we have a number of massing simulations that were taken from specific vantage points that were chosen to hopefully best kind of show what those impacts on the foothills and those view corridors would be. Based upon that analysis we have come up with the mitigations that still we feel that architectural review and meeting the findings would constitute reducing the impacts to a less than significant level.

That is just a very brief overview of the Visual Quality Chapter. It should be noted that visual quality is also addressed in other portions of the chapter. The applicant, as you know, is promoting the Tree Preservation Alternative, which is a project alternative that is also analyzed in the EIR. There are visual quality aspects to that Tree Preservation Alternative that affect the project. It is not a big change between what is analyzed in the main part of the EIR versus the Tree Preservation Alternative in that the site plan has been compressed slightly, building masses have changed a little bit, but essentially the towers are still towers. We have one less tower on Kaplan Lawn but the towers essentially are 130 feet tall in essentially the same locations. So there is a not a big difference between the main project and the Tree Preservation Alternative with regards to Visual Quality.

With regard to how we might receive your comments certainly this is an opportunity for Staff to receive your oral comments on the Visual Quality Chapter. If you have had a chance to read any other portions of the chapter we will certainly take those as well. There are also opportunities to provide written comments. I know Board Member Wasserman had forwarded a few questions to me

that seemed appropriate to be addressed during the Final EIR by our environmental consultant. Board Members are encouraged and may also submit their written comments before the end of the public review period at the end of July. Another way to it if you feel like the Board wants to make maybe a consistent comment is that written comments could be forwarded to the Chair, and the Chair and Staff could review those comments in total and prepare a document that could be essentially reviewed by the Board and/or submitted to the EIR consultant as kind of a consolidation comment from the ARB itself. So there are a number of ways that we can accept comments and the Board may discuss how you feel might be best to provide comments. If you are confident with just oral comments to us that is fine, individual comments are also fine, and if you want to speak as a group in a written format that is appropriate as well. So that concludes the Staff Report. We don't have any of our EIR consultants here who prepared the analysis, but I can try to answer any clarifying questions that you may have. Other types of questions would probably be best answered during the Response to Comment period after the public review period. Thank you.

Board Member Lew: Does anybody have any questions?

Board Member Wasserman: Is this freeform?

Board Member Lew: Yes, because it is a Study Session.

Board Member Young: So this is an opportunity for discussion between us.

ARB1.1 Board Member Wasserman: Everybody, I guess. Okay. Well, I had an interesting observation. On page 4 of the chapter that we got there has to be a mistake in the definition of street trees. In the first paragraph it says, Palo Alto regulates street trees, which are trees commonly achieving ten feet in height and capable of being shaped and pruned to develop a branch free trunk at least nine feet in height. There is something wrong there. That is an umbrella. That is not a tree. That was just sort of a technical thing.

ARB1.2 I thought that the pictures in the chapter were extremely helpful. How anybody could possibly visualize those things without some kind of a mockup I have no idea. Of course it doesn't give you viewpoints from everywhere. For example, I have a friend who lives in the Hyatt and they have views of Hoover Tower that may or may not be partially obstructed by this building. That is not considered a view corridor and that is not part of this thing. So the one thing that I thought was really missing was a view from upper Sand Hill Road back toward the campus. I have been wondering about that since this project was proposed. People who have these fabulous simulation programs should generate that I think, maybe from more than one point or one of those fabulous flybys, a road trip down Sand Hill Road and what do you see? When does it go away? That kind of thing would be really helpful.

Board Member Lew: Judith, could you clarify? When you say upper Sand Hill do you mean like Menlo Park the hilly part or are you saying upper Sand Hill in Palo Alto meaning like Oak Creek?

Board Member Wasserman: Menlo Park the hilly part.

Board Member Young: Like from 280.

ARB1.2 Con't

Board Member Wasserman: Yes, because from Oak Creek you are not going to see it. It is all covered in trees. Also, the School of Medicine buildings screen that for part of the way. It is not until you get to Pasteur and turn, so you are going to the shopping center from Oak Creek and you turn to the right and you look down Pasteur and then you will see stuff. Then you are going forward again and there is this screening again. But from up the hill, from like Sharon Heights and those places as you come down Sand Hill you are going to see something. It may not be much but it would be nice to know what it was.

ARB1.3

The other basically two things that the chapter brought up to me that I had not thought about before that I think could be really important are the lighting and reflection issues. I am not worried about the exterior lighting at night because that is ground level. I am worried about the interior lighting and the effect that is going to have on particularly the apartments at 1100 Welch. We never think about them but they are there.

ARB1.4

The other thing that I was concerned about is the sun reflections off the glass at low angles. That is basically a geometry and optics problem that can be done with a protractor. You don't need a rocket scientist to figure that one out. It would be really nice to know just like we had the shadow studies, which I thought were really great because the shadow studies essentially say it doesn't affect anything outside the project area. No shadows are cast outside the project area so not a problem. So I think the reflection is a similar question that could be addressed in a similar way. That was pretty much all I had here.

ARB1.5

I did have a response to the temporary degradation of visual character during construction. To think that you could make that place look like a non-construction zone reminded me very much of Winnie the Pooh with his balloon when he was trying to fool the bees into thinking he wasn't there by using a blue balloon and pretending he was a cloud. You can put up a scrim, you can make a beautiful construction fence with a mural, but to pretend it is not a construction site is naïve. So I think the level of mitigation has to be realistic even if it is a 25-year project. It is not 25 years all in one place it does move around. What do they do in Italy? They hang scrims on the buildings while they are working on them. They don't pretend the buildings aren't there. It is like saying the towers are reflective, you won't see them. Give me a break. Anyway, that is what I have to say.

ARB1.6

Board Member Young: I think we actually should request updated images from the view corridors with the current building designs. There have been significant changes to the hospital. I also think the Hoover Pavilion and the medical office building is a big one on that one. Although they did present some view corridor images during the presentation I was less enthusiastic about the siting and the massing of the medical office building.

ARB1.7

ARB1.8

The reflectivity at low levels and into the residential developments at 1100 Welch, I think you are spot-on. All of these projects have to me a fairly high level of transparency and glass, sorry, Lucile Packard I think has done a much better job at addressing that. The medical office building adjacent to Hoover, the hospital towers, and to some extent the FIM building today I think there could be a higher level of sophistication in the use of glass. It is very much a plainer approach in many locations. I don't know if it is design intent or budget or they have not gotten to a full level of detailing but there are a lot of really flat planes for large areas. They are big buildings, but they are

ARB1.8 Con't

big buildings that I think those three in particular are still waiting for that next level of detail. It is a three-dimensional detail off the plainer-ness of the glass itself.

ARB1.9

The comment about the realistic constriction mitigation, so much of it is timing of truck arrival and departure, dust control, trash control, making good neighbors of the local occupied non-construction areas that the contractor really has to take the onus of that on. Palo Alto has a very strict construction methodology for pollution prevention and for runoff. So many of the new sustainability requirements address trash and recycling that I think we have the policies in place it is just a question of levels of implementation. You are right, you can't pretend it is not existing but you can treat it in a more professional manner.

ARB1.10

What was the other one? The permanent degradation of visual character post-construction. Through the continued evolution of the elevations in the issues that we have just been talking about, the viewshed issues, the public corridor issues, and continued interaction with the ARB regarding the development of the elevations and how they are humanized and scaled – they are huge buildings relative to the Palo Alto landscape. The continued dialogue from this group with the different applicant architects, and the design teams I think is a very critical part of that. We just have to maintain that high level of discussion with them.

Mr. Turner: Board Member Young, I would agree with you and I think I neglected in my presentation to state that although this is a Draft document the mitigations that we are proposing in terms of the architectural review process is something that we have been doing for the past two years. I would say that from Staff's opinion it has been a successful progression of review during those two years, and a good evolution of the project to try to address some of these issues during this preliminary review and study session phase. The Tree Preservation Alternative is a perfect example of how the project was modified based upon the review that the ARB has given, based upon the review of trees through our City Arborist, and it has resulted in some pretty significant changes to the overall site plan that I think are beneficial. So I think the process that we have described in the Draft EIR is actually working. I think that is a good sign.

Board Member Young: That is actually a really good point because Lucile Packard has continued to push the trees and the landscape. The last time they came back to us they came back with another garden and more development on those. I think if we can continue that trend then we are headed in a positive direction. That is all I have.

ARB1.11

Board Member Malone Prichard: I will be brief. My take on this is exactly what the Staff has said, which is that we are going through very carefully every project and looking at the visual aspects of the project. So I feel that the ARB review and the fact that we will be going through our findings absolutely demonstrates that any degradation will be mitigated.

ARB1.12

Board Member Lew: Steven, could you explain to me how other jurisdictions get incorporated into the process? Say like Judith mentioned Menlo Park view corridor or say internally on the Stanford side if there are Stanford residents.

Mr. Turner: Well, this project is special not only because of the amount of development but its location, certainly right along the border of Palo Alto and Menlo Park. So special consideration for

Menlo Park specifically has been considered throughout the environmental document more specifically on the transportation and traffic impacts. If you choose to read that chapter you will see that we have studied 66 intersections, I think 23 of those are in Menlo Park. So there was a significant analysis to show how the project would impact traffic in Menlo Park. We have made a number of presentations, most recently about two weeks ago to Menlo Park City Council by both the applicant and the Staff, to essentially introduce those impacts to their Council, to tell them about the latest updates to the project, and project design, to let them know about the schedule, their opportunities for comment, and what our intentions are for review for the rest of the year. We have also reached out to East Palo Alto. They are not really more specifically affected by the project but they are certainly one of our neighbors and they have expressed an interest for the City to give a similar presentation that we gave at Menlo Park to East Palo Alto. So we are doing a good outreach to those specific jurisdictions in terms of presentations. We have also over the years made presentations in Portola Valley upon request, and certainly we would go to just about any other jurisdiction in the vicinity that requests information from us.

The visual aspects of the project really focused on or were guided by the Comprehensive Plan and the review of view corridors, especially along Sand Hill Road. We did not look specifically at any vantage points in the Menlo Park area. We kept it essentially to Palo Alto and those specific corridors that our Comprehensive Plan requires us to look at, but beyond that Menlo Park specifically as being a close neighbor has been considered throughout the document.

ARB1.13 Board Member Lew: David is still here. Would there be any concern say like on visual quality? Like say Mausoleum and the Arboretum like the view toward the hospital? Is there anything on Stanford's side that should be considered too?

Mr. David Lennox, Campus Architect, Stanford: I don't think there is anything that we have not considered in the design, so yes.

ARB1.14 Board Member Lew: Okay, great. Okay, so I think I am onboard with the other Board Members comments on this. I think Judith mentioned lighting. I was actually worried about the exterior lighting. I agree with you on the interior stuff but I was actually concerned about the exterior lighting, say like lighting on top of the parking deck that looks out over 1100 Welch.

Board Member Wasserman: I figured we would see that.

ARB1.15 Board Member Lew: Okay, that was my next question, which is we are not necessarily going to see all of the details before this comes up for the development.

Mr. Turner: This along with our preliminary reviews is opportunities for the Board to direct Staff and the applicant to bring certain things back. Certainly we are doing that with site planning and landscaping and details of the building. Lighting is one of those things that would normally come to the Board as well. We are still in preliminary stage and so our expectation would be that a certain level of completeness could be shown on the plans to show what the approximate say exterior lighting may be with the understanding that as the projects get further developed that that may change. A typical condition of ARB approval is coming back on Consent Calendar or a separate meeting.

ARB1.16 Board Member Wasserman: I was actually thinking of what these four towers would look like as beacons at night. Are we going to have the lighthouse effect here, or because it is all patient rooms maybe they all go to sleep early and the lights go off? On the other hand they made a big point about this being a flexible floor plane and that in the future, God knows when, they may be laboratories or offices or who knows what. If as Heather says all they have is a flat glass skin there is no mitigation of that at all. I just don't think it is appropriate to have four 130-foot towers glowing like lighthouses at night.

Board Member Young: Or reflecting.

ARB1.17 Board Member Wasserman: Yes, that is a different question. You know, I would have to see the actual geometry to see if that is really going to be an issue, and where it would be an issue. Obviously it is not an issue on the north side, and it is probably not an issue on the south side either, but on the east and west sides early in the morning and late in the afternoon who knows whether the magnifying glass of those reflective surfaces are going to cause fires in the Arboretum. I made it up, I doubt if that would happen, but you know.

Board Member Young: But traffic accidents or ….

Board Member Wasserman: Or just annoying.

ARB1.18 Board Member Lew: Okay. Steven, do you see any overlap between us and the HRB? I have not really been thinking about the cultural aspects of it, but is there anything where you think there is an overlap between the ARB and the HRB?

Mr. Turner: Well, we will be sharing with the HRB the renovations that are proposed at Hoover Pavilion. We will be sharing with them the proposed new structures at Hoover and their relationship to the existing Hoover Pavilion site. In addition, we will bring to them the Cultural Resources section. Interesting that this particular Board actually is quite sensitive to Hoover Pavilion and I think the HRB appreciates that. I think they will be having similar comments to what the ARB had, and I think it is probably appropriate then to bring for your information those HRB comments back to the Board so you can hear what their concerns are. They do not have any sort of recommendation authority on these projects, although the projects have been identified as historic resources through CEQA they are not Category structures on the City's Inventory. So they are not Category 1, 2, 3, or 4 structures.

Board Member Wasserman: Not even Hoover? Interesting.

Mr. Turner: Not even Hoover. It could be. It is eligible for both California and National Register but the way our ordinance is setup there is not any sort of automatic categorization of those buildings. It is a process they have to go through in order to designate the buildings as Category and those have not been done. So therefore the HRB does not have any specific recommendation ability on these projects. We have heard that the Commission and Council are interested in what they have to say on it so we are taking these buildings to them for their comment.

ARB1.18 Con't

Board Member Wasserman: Do you think that they will wax nostalgic over the Stone Building?

Mr. Turner: They might. I think we will see what their comments are. I think the main focus has been on Hoover Pavilion, and making sure that the new buildings do not overwhelm that structure.

Board Member Wasserman: I have this written down. There is not much to it. Do you want to collate these things Alex, or do you think we are done?

Board Member Lew: I would be happy to.

Board Member Wasserman: Okay.

Board Member Lew: Okay. So I think we can close the study session. Are there any Board Member business announcements? No. Okay. Amy is not here so we don't have any Reports From Officials. So the meeting is adjourned. Thank you.

ARB1. Architectural Review Board Hearing, July 1, 2010

ARB1.1 *The commentor states that the definition of a "street tree," as provided in Section 3.3 of the Draft EIR, Visual Quality, is incorrect.* The definition of a street tree, which is included on page 3.3-4 of the Draft EIR, is consistent with the definition provided in the City of Palo Alto Municipal Code. As defined by Municipal Code Chapter 8.04, Street Trees, Shrubs, and Plants, a street tree "means and includes any woody perennial plant having a single main axis or stem commonly achieving ten feet in height and capable of being shaped and pruned to develop a branch-free trunk at least nine feet in height."

ARB1.2 *The commentor requests additional visual simulations from other viewpoints, including at the Hoover Pavilion and the western portion of the Sand Hill Road.* The Draft EIR includes visual simulations of the SUMC Project from five vantage points. These vantage points were selected based on identified viewer locations or roadways, and on vantage points that were identified during the scoping process as areas of concern. As described on pages 3.3-39 of the Draft EIR, these locations represent views from which the SUMC Project would be most visible and as such represent the worst-case impacts on views.

Figure 3.3-7 on page 3.3-25 of the Draft EIR provides a map of the five vantage points from which the visual simulations are depicted. Figures 3.3-8 through 3.3-10 in Section 3.3, Visual Quality, show views of the Main SUMC Site from visually sensitive locations. The alteration of public viewsheds and view corridors under the SUMC Project is analyzed under Impact VQ-3. As explained, a change in view is considered adverse if the resulting development pattern demonstrably contravenes the vision for the City that is expressed in the Comprehensive Plan. Due to building massing and vegetation that would remain under the SUMC Project, direct and unobstructed views of the SUMC Sites or the proposed buildings from other locations are not anticipated. However, as shown in these figures, the SUMC Project buildings at the Main SUMC Site would be visible from Quarry Road/Vineyard Lane, Sand Hill Road/Pasteur Drive, and Sand Hill Road/Arboretum Road. Implementation of Mitigation Measure VQ-2.1, which is presented on page 3.3-39 of the Draft EIR and would require adherence to the City's Architectural Review process, would ensure that the visual impacts would be less than significant. In addition, Mitigation Measure VQ-2.1 would reduce the impacts from all locations that would have views of the SUMC Project.

Although visual simulations are not included for the western portion of Sand Hill Road, a discussion of the visual impacts from this segment of Sand Hill Road is included on page 3.3-40 of the Draft EIR. As stated, the 130-foot-tall replacement SHC Hospital modules would be visible from this area of Sand Hill Road and could partially obstruct views of the East Bay hills. The resulting views from the Sand Hill Road scenic route would be significant if the SUMC Project were not addressed properly through the City's Architectural Review process.

The Oak Creek area is to the west of the SUMC Sites along Sand Hill Road. Although views from this location are not specifically addressed in the Draft EIR, it is acknowledged on page 3.3-42 that views from a larger geographic context may be affected. However, as explained above, the selected vantage points represent views from which the SUMC Project would be most visible and as such represent the worst-case impacts on views. Therefore, no additional visual simulations need to be added to the Draft EIR from the Oak Creek area.

ARB1.3 *The commentor is concerned with interior lighting of the buildings proposed under the SUMC Project and the impact that it would have on adjacent properties.* The SUMC Project would be required to adhere to Section 18.23.030 of the Palo Alto Municipal Code with respect to interior lighting. As stated in Section 18.23.030, "Interior lighting shall be designed to minimize nighttime glow visible from and/or intruding into nearby properties and shall be shielded to eliminate glare and light spillover beyond the perimeter property line of the development Compliance with the Municipal Code would ensure that although interior lighting would be visible from adjacent properties, it would not be such that it would create a nuisance at those properties. This would ensure a less-than-significant impact with respect to interior lighting.

ARB1.4 *The commentor expresses concern with light reflection from the buildings proposed under the SUMC Project and the impact that it would have on adjacent properties.* Light reflection is discussed in the Draft EIR under Impact VQ-5. As stated on page 3.3-43, incorporation of new materials could include reflective surfaces that could emit glare that serves as a nuisance or hazard in surrounding uses and roads. Pursuant to Section 18.23.030 of the Municipal Code, facades with glazed and/or reflective materials are not allowed on buildings that face residential areas. However, without Architectural Review of the building facades to ensure that appropriate surfaces are incorporated, reflective surfaces could result in a significant impact. Implementation of Mitigation Measure VQ-2.1, as presented on page 3.3-39 of the Draft EIR, would reduce glare impacts from the proposed buildings under the SUMC Project to less than significant. Architectural Review, as required under Mitigation Measure VQ-2.1, could require the use of uncoated, colored glass with a low solar reflectance rating in order to reduce glare impacts.

ARB1.5 *The commentor states that the mitigation measure for visual character during construction would not be reduce impacts because it is infeasible.* As stated on page 3.3-27 of the Draft EIR under Mitigation Measure VQ-1.1, "The intent of the [Construction Visual Improvement] plan is to aesthetically improve portions of the project site that would remain unimproved for an extended period and screen the construction zone from view by passersby along the public streets and sidewalks." As noted by the commentor, not all areas would be completely blocked from view; however, the SUMC Project sponsors are expected to install barriers, such as fencing materials, along public sidewalks and streets. These fences, along with the other visual improvements outlined in Mitigation Measure

VQ-1.1, would screen direct street views of the SUMC Sites during construction. The specifics of the Construction Visual Improvements Plan would be developed and implemented by the SUMC Project contractor(s) and approved by the Planning Director. The City believes that construction area screening is feasible; therefore, no changes to the text are warranted.

ARB1.6 *The commentor requests new visuals based on the updated site plan from the SUMC Project sponsors*. As stated in Section 1 of this document, the SUMC Project as proposed in the application and described in the Draft EIR is the project that is analyzed in this Final EIR. The Tree Preservation Alternative, which is the SUMC Project sponsors' preferred alternative, is still considered an alternative for the purposes of this CEQA review. Nonetheless, the majority of the visual simulations included in Section 3.3 of the Draft EIR (Figures 3.3-8, 3.3-10, and 3.3-11) would pertain to the SUMC Project as well as the Tree Preservation Alternative. These visual simulations depict the Hoover Pavilion Site and the proposed LPCH building, which would have the same building program as the SUMC Project. The only visual simulation that would be different, Figure 3.3-9, was regenerated to show the Tree Preservation Alternative and is included in Section 5, Alternatives, as Figure 5-6 on page 5-139 of the Draft EIR. Figure 5-6 depicts the SHC Hospital building under the Tree Preservation, which would differ from the SHC Hospital building under the SUMC Project, with views looking south from Sand Hill Road and Pasteur Drive.

Although additional site plans for the Tree Preservation Alternative are not included in the Draft EIR, an analysis of the visual impacts and other site-layout impacts is provided in Section 5 of the Draft EIR. If the Architectural Review Board (ARB) would like to see additional figures for the Tree Preservation Alternative, the SUMC Project sponsors can provide the most recent site plans and design figures upon request. In addition, preliminary project plans are available to download at the City's website.[1]

ARB1.7 *The commentor requests additional simulations at the Hoover Pavilion*. Please see Response ARB1.2, above, for an explanation of the visual simulations provided in the Draft EIR. In addition, Figures 3.3-11 and 3.3-12 on pages 3.3-35 and 3.3-36, respectively, of the Draft EIR show views of the Hoover Pavilion Site from visually sensitive locations. As shown in Figure 3.3-11, most of the Hoover Pavilion, including its frontage at the Quarry/Palo Road intersection, would still be visible from Quarry Road even after construction of the proposed medical office building. In addition, it is important to note that although Hoover Pavilion is a visually distinctive structure, it is not a visually protected resource under the Comprehensive Plan. Therefore, visual impacts to this structure would not be considered significant. Nonetheless, additional visual simulations and site plans for the Hoover Pavilion Site are included in Appendix DD of this document.

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[1] City of Palo Alto, Planning and Community Environment Department, "SUMC Project - Development Simulation & Architectural Design," accessed on September 23, 2010 at: http://www.cityofpaloalto.org/depts/pln/news/details.asp?NewsID=1596&TargetID=85.

ARB1.8 *The commentor expresses concern with light reflection from the Hoover Pavilion medical office building, the SHC Hospital building, and the FIM buildings proposed under the SUMC Project and the impact that it would have on adjacent properties.* Refer to Response ARB1.4, above, for anti-reflection requirements to be implemented under the SUMC Project.

In addition, the commentor states that the exterior of several SUMC Project buildings should be redesigned with more detailing. It is important to note that the SUMC Project is currently undergoing Architectural Review and the design details are not yet finalized. Nonetheless, changes to the exterior building design would not have additional impacts beyond those identified in the Draft EIR. As such, this comment pertains to the design of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

ARB1.9 *The commentor states that construction practices would adhere to the City of Palo Alto's construction methodology for pollution prevention and runoff and that the construction mitigation should be more professional.* Mitigation measures to be implemented during the construction period are presented throughout the Draft EIR in the respective subsections of Section 3. As discussed above in Response ARB1.5, Mitigation Measure VQ-1.1 would require a Construction Visual Improvement Plan to aesthetically improve portions of the SUMC Sites during construction. The Draft EIR also requires the implementation of other construction-related mitigation measures, including measures to reduce transportation impacts during construction (Mitigation Measures TR-1.1 through TR-1.9); construction criteria air pollutant emissions (AQ-1.1 and AQ-1.2); construction noise impacts (Mitigation Measure NO-1.1); impacts to historic, archeological, and paleontological resources and human remains (CR-1.1 through CR-1.5, CR-2.1, CR-3.1, and CR-4.1); impacts on special-status species habitats and movements (BR-1.1 through BR-1.5 and BR-3.1 through BR-3.2); impacts to Protected Trees (BR-4.1 through BR-4.6); impacts to groundwater quality during construction (HW-3.1); impacts related to hazardous materials disturbance during demolition and construction (HM-2.1); exposure to contaminated soils and/or groundwater during construction (HM-3.1 through HM-3.4); and impairment of emergency plans due to construction-period traffic (TR-9.1 and HM-10.1). Although these mitigation measures are provided in full in the Draft EIR, several measures have been revised, as presented in Sections 3 and 6 of this document.

As explained on page 1-5 of the Draft EIR, if the City Council decides to approve the SUMC Project, then a Mitigation Monitoring and Reporting Program (MMRP) must be adopted. Pursuant to CEQA Guidelines Section 15097, an MMRP is a mechanism used for the monitoring and reporting of revisions to the project or conditions of approval that the public agency has required as mitigation measures to lessen or avoid significant environmental effects. The City can conduct the reporting or monitoring, or it can delegate

the responsibilities to another public agency or private entity that accepts the delegation. Please refer to Master Response 11 for an additional description of the MMRP and the City process for deciding on the SUMC Project.

In addition to the mitigation measures outlined above, the SUMC Project would be required to adhere to all of the federal, State, and local regulations. The regulations that would apply to the SUMC Project are presented throughout Section 3 of the Draft EIR under the subtopic Applicable Plans and Regulations.

ARB1.10 *The commentor requests continued dialogue with the SUMC Project sponsors' architects and design team.* Mitigation Measure VQ-2.1, presented on page 3.3-39 of the Draft EIR, is an ongoing measure that the City of Palo Alto has been implementing during the last two years. The SUMC Project sponsors have refined the site plans and building designs to address the ARB comments and recommendations. The Tree Preservation Alternative is an example of how the SUMC Project has been modified based on the review from ARB and the City's Arborist, and has resulted in beneficial changes to the overall site plan. Therefore, the process that is described in Section 3.3 of the Draft EIR, Visual Quality, and mandated by Mitigation Measure VQ-2.1, has been implemented over the past two years and would continue to be executed until the final SUMC Project site plans are approved. Continued dialogue, as requested by the commentor, would be required through Mitigation Measure VQ-2.1.

ARB1.11 *The commentor supports Mitigation Measure VQ-2.1 and states review by the ARB would ensure that visual degradation would be mitigated.* The comment supports the findings of the Draft EIR and no further response is necessary.

ARB1.12 *The commentor questions how neighboring jurisdictions are involved with the SUMC Project review.* The SUMC Sites are located in the City of Palo Alto and within close proximity to the border of the City of Menlo Park. Therefore, the Draft EIR identifies potential impacts on Menlo Park, particularly transportation and traffic impacts, as explained in Section 3.4 of the Draft EIR, Transportation. In addition to the impacts identified in the Draft EIR, the City of Palo Alto and the SUMC Project sponsors gave a presentation to the Menlo Park City Council during the public review period on June 22, 2010. This presentation to the City Council introduced the identified Menlo Park impacts from the Draft EIR, discussed the updates to the site plan and building design, addressed the schedule, and explained the procedure for submitting official comments. The City of Palo Alto and the SUMC Project sponsors also presented the Draft EIR findings and the site plans to the City of East Palo Alto on July 13, 2010, although no specific impacts were identified in that jurisdiction. In addition, City staff attended a hearing at the Town of Portola Valley on July 14, 2010 for informational purposes only and did not present Draft EIR findings. The purpose of this meeting was for the Town Council to review the draft

comment letter that they submitted on the Draft EIR (see Letter 9 in Section 4, Written Comments and Responses, of this document).

In addition, the neighboring jurisdictions expressed their concerns via comment letters submitted to the City of Palo Alto. The comments on the Draft EIR from East Palo Alto, Menlo Park, and Portola Valley are included in Letters 7, 8, and 9, respectively, in Section 4 of this document. Responses to these comments are provided in Section 4 of this document.

ARB1.13 *The commentor asks if the SUMC Project architect has any concern regarding visual quality*. According to the SUMC Project sponsors, all design considerations have been addressed.[2] Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

ARB1.14 *The commentor is concerned about interior and exterior lighting*. Interior lighting is addressed in Response ARB1.3, above. An analysis of the exterior lighting impacts under the SUMC Project is discussed in Impact VQ-5. As stated on page 3.3-43 of the Draft EIR in the Visual Quality Section, additional exterior lighting features would be installed at the SUMC Sites. The SUMC Project would be subject to Section 18.23.030 of the City of Palo Alto Municipal Code, which would preclude significant glare and off-site spillage. A lighting plan for all exterior lighting under the SUMC Project would be developed per Section 18.23.030; however, without Architectural Review of the lighting plan to ensure appropriate levels of illumination, exterior lighting could result in a significant impact. As outlined on page 3.3-39 of the Draft EIR, Mitigation Measure VQ-2.1 would reduce exterior lighting impacts on adjacent properties to less than significant levels.

ARB1.15 *The commentor asks if the ARB will be able to see all of the design details before the SUMC Project comes up for development*. The preliminary review of the SUMC Project design and site plans provides an opportunity for the ARB to provide recommendations to the City and the SUMC Project sponsors in the planning stage. Since the SUMC Project is still in the preliminary design stage, the details of the building design, landscaping, lighting, and other features are not yet complete. However, as the SUMC Project is further developed, more details are likely to become available for the ARB to review.

ARB1.16 *The commentor expresses concern about the lighting at the proposed SHC Hospital building*. Refer to Response ARB1.3, above, regarding interior lighting impacts and requirements and Response ARB1.14, above, regarding exterior lighting impacts and requirements.

[2] David Lenox, University Architect, Stanford, Architectural Review Board Hearing, July 1, 2010.

ARB1.17 *The commentor expresses concern about the glare from the proposed SHC Hospital building*. Refer to Response ARB1.4, above, for anti-reflection requirements to be implemented under the SUMC Project.

ARB1.18 *The commentor questions the overlap between the ARB and the Historic Resources Board (HRB)*. This comment pertains to the review process of the EIR and the SUMC Project in general. Please refer to Master Response 11 for a detailed description of the City's review process and the roles of the ARB and the HRB.

HRB1

HISTORIC RESOURCES BOARD MINUTES

MEETINGS ARE CABLECAST LIVE ON GOVERNMENT ACCESS CHANNEL 26

Wednesday, July 7, 2010
REGULAR MEETING – 8:00 AM
Council Chambers
Civic Center, 1st Floor
250 Hamilton Avenue
Palo Alto, California 94301

ROLL CALL:

Board Members:
David Bower, Chair
Natalie Loukianoff, Vice-Chair
Roger Kohler
Patricia DiCicco
Beth Bunnenberg
Michael Makinen
Martin Bernstein

Staff:
Steven Turner, Advance Planning Manager
Dennis Backlund, Hist. Pres. Planner
Diana Tamale, Admin. Associate

NEW BUSINESS

Study Session

3. **Stanford University Medical Center Facilities Renewal and Replacement Project-** Meeting to accept comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Medical Center Facilities Renewal and Replacement Project, including an overview of the Cultural Resources chapter of the DEIR.

Steven Turner, Advance Planning Manager: The third and final topic for our study session today is a receipt of comments and questions with regards to the Cultural Resources chapter of the Draft EIR. And in my opening comments I provided a bit of a background about how we are treating the public review process and public hearing process for the Draft EIR, and that we are breaking up the review of the Draft EIR into sections with review at the Planning and Transportation Commission and the City Council. And as we've been going through that public review, it became clear that it was important to have the HRB also review the Draft EIR, and more specifically focus on the Cultural Resources chapter as the chapter that is most relevant to the work of the Historic Resources Board. So, as part of the Staff Reports and Staff materials, we've provided to you the chapter on cultural resources as well as links to other sections of the

Draft EIR where cultural resources are described. Cultural resources are also described in the Alternatives section [unintelligible] specific project alternative called the Historical Preservation Alternative, which would essentially keep the Stone Building at its current location and the rest of the project would be reduced in size and site planning would change in order to accommodate the retention of the Stone Building. And so we've provided links for you regarding the Historical Preservation Alternative. You're welcome to comment on that.

But I wanted to focus a little bit on the Cultural Resources chapter itself, which is really the main discussion chapter of cultural resources in the Draft EIR, and that is in Section 3.8. The section is really based upon the applicant's information in a report titled Cultural Resources at Stanford University Medical Center Renewal and Replacement Project, and that report is contained in the Staff Report that you have today. There is also a peer review of that report prepared by Stanford that was done by the City's consultant Architectural Resources Group, and that peer review report is contained in Attachment C to the Staff Report. But in terms of how the EIR looks at cultural resources, our analysis is based upon significant thresholds that have been determined by the City of Palo Alto to help guide the analysis.

And as indicated on page 2 of the Staff Report, it lists the significant thresholds that we used to evaluate the project. I'll just go briefly through those. They are cause a substantial adverse effect on a historic resource listed or eligible for a listing on the National and/or California Register, or listed on the City's historic inventory. And for this project, it's certainly Hoover Pavilion and the Stone Building as the two primary resources. Again, those are eligible for National and California Register but are not listed on the City's historic inventory. Second, elimination of important examples of major periods of California history or pre-history, cause damage to historic or unique archeological resource, disturb Native American human remains, directly or indirectly destroy a unique paleontological resource or other unique genealogical feature, or directly or indirectly destroy a local cultural resource that is recognized by the City Council resolution.

So, that's really the framework of our analysis, and based upon that analysis, we find that there are a number of significant impacts with regards to the project, most of which could be avoided through the use of mitigation measures. So, if we employ certain mitigation measures, those significant impacts become less than significant impacts once the mitigation has been completed. And typically most of the mitigation measures that can be reduced to a less than significant level have to do with the impacts on prehistoric or archeological or paleontological resources. And they are typical types of mitigations that we would find in many larger projects in Palo Alto and the region – these are mitigation measures that would be required during construction. Say they were constructing the parking garage and they have to dig down deep and excavate up a lot of fill, they could uncover remains or other resources or artifacts, and the mitigations speak to the requirement of having a plan to deal with those discoveries. And those mitigation measures are summarized in the Staff Report and go into certainly a lot of detail of the body of the Cultural Resources chapter.

However, there are significant and unavoidable impacts, meaning that even with the application mitigations the mitigations cannot reduce the impacts to a less than significant level and, therefore, remain as significant and unavoidable. Those are listed on page 3 of the Staff Report, saying that the project would have a significant and unavoidable impact on historic resources and would also a cumulative impact on historic resources. I may ask Dennis to provide some

clarification or other detail if I do not state it well enough, but essentially by demolishing the Stone Building there is no real mitigation that would be possible for maintaining that building and maintaining that resource. So it is a significant and unavoidable impact in the demolition of the Stone Building. There are ways that reduce the impact, and those are summarized there, but once you remove that building that resource is gone and that cannot be mitigated. But what would need to happen in order to certify the EIR and the project would be Council would need to adopt a statement of overriding considerations, which basically states that even though it is a significant and unavoidable impact, the project itself has benefits to it that outweigh the impacts of the loss of the Stone Building. The City Council would be required to make those findings as part of their final approval of the project.

In terms of cumulative resources, the Stone Building, I believe, is one of four Stone historic resources in Palo Alto, and by removing the Stone Building it would essentially leave only one intact Stone Building, which I believe is the main library. And so, the other Stone Buildings in town have been altered to a state where they could no longer be considered historic resources. So, by removal of the Stone Building, it has a cumulative impact in saying that now we are moving one more Stone Building, so only one Stone Building remains that has the significant impact resources. Therefore, we found in our analysis that that would also be a significant and unavoidable impact, cumulatively looking at the Stone resources. Again, the EIR goes into more detail about those impacts.

As I mentioned before, there are a number of construction mitigation impacts that have to do with vibration and protecting of Hoover Pavilion during construction, and vibration impacts would occur to Hoover Pavilion, and if they are not mitigated properly they could damage Hoover Pavilion and we want to make sure that does not happen. Those are also described in the EIR.

What we are looking for the HRB to do today is to provide their comments on the Cultural Resources chapter. We would also take comments if you have had a chance to review the Historic Preservation Alternative, and whether or not you feel that is an appropriate alternative and whether or not the impacts of that alternative have been properly analyzed. As I mentioned earlier, we can take your individual comments today; we can also accept comments from individual board members until the close of the public review period, which would be July 27. Or if the HRB so chooses, the HRB could respond in writing as a group. All of your written comments could be forwarded to the Chair and combined into one document that is forwarded to Staff and ultimately would be addressed in the final EIR of this project. What we do is we collect the comments from the public then the City and our EIR Consultant spends time in responding to each one of those comments, and those responses to the comments are included in the Final EIR which ultimately gets transferred to the City Council for their review and action. With that, I will hand it back to Chair Bower and questions and comments from the HRB.

HRB1.1 David Bower, Chair: Before we start, can you tell us what the other Stone Buildings are. There's the library, there's the hospital, and what are the two other ones? This building? So this building has been modified to such an extent that it no longer qualifies?

Dennis Backlund, Hist. Pres. Planner: It's the removal of the arcade that went all the way around the site. There are pieces of it you can see through the drapes that were left because they are attached to the police department, but the freestanding part of the arcade was seismically unsafe.

Chair Bower: And what's the other one?

Dennis Backlund: The last one is the Mitchell Park Library, and that early ran into problems that continue that it was too small for a rapidly expanding neighborhood, so it got expanded to the point that it was no longer with the integrity of Stone's design.

Chair Bower: Isn't that being replaced entirely?

HRB1.1 Dennis Backlund: And that's being replaced entirely; it's allowed to be demolished because it no longer is classified as a historic resource due to loss of integrity.

Chair Bower: Okay. Thank you.

Beth Bunnenberg: Consultants report on that.

Dennis Backlund: Architectural Resources Group reviewed both this building and Mitchell Park Library and found loss of integrity in both cases.

Chair Bower: Thank you. I guess, Beth, it's your turn to start.

HRB1.2 Beth Bunnenberg: I am very glad that Dr. Jones was working on the archaeology portion of this report. It seemed very, very appropriate and her expertise is very special in terms of looking at the possibility of Native American and other types of remains; she certainly is a specialist on what has been found in Stanford properties in that line. I do see the Hoover Pavilion as very, very important to protect in every way that we possibly can, so that all the efforts on vibration appear to me to be very important. And certainly the little buildings that are particularly out to the back of the Hoover Pavilion are shacks in many ways and really should be taken down carefully, and it will be a good thing for the whole site.

HRB1.3 In terms of the Stone Building, I am extremely concerned about the loss of that building. I very much like the historic preservation alternative and would suggest that it could even provide some space that would be available, again, for physicians' offices and special kinds of services or research labs if the Stone Building were changed in use so that it no longer was a hospital space. I think it has had some shortcomings in terms of serving as a hospital space, but still has a great deal of what might appear to be very usable space for a number of other functions. And, in fact, if it would cut down in any way the size of the medical building that is near the Hoover Pavilion, why that would be a good, positive cumulative kind of effect. I think it is very important that ARG disagreed with Stanford's estimate of the value of the Stone Building. So, I really would like a lot of consideration to be given to that preservation.

Chair Bower: Thank you, Beth. Michael.

HRB1.4 Michael Makinen: Thank you, Chair Bower. I think Beth's comments are pretty much the comments I would have also. I think the background for that is also on page 7 of 8. It looks like the second paragraph they talk about the building has low seismic reading does not comply with structural safety requirements that must be met by 2015 deadline to retrofit for replacement of hospital facilities. The question is, could it be used for some other use without extensive retrofit

HRB1.4 Con't also? Probably not as extensively as you would do for a hospital, but would probably still require some seismic upgrades. So I think it should be analyzed for alternate use what seismic retrofits would be required to make it some other type of use, a more rigorous use seismic retrofit for a hospital. Like I said, if you want to approach it, it should be looked at.

Chair Bower: Thank you, Michael. Natalie.

HRB1.5 Natalie Loukianoff, Vice-Chair: I very much agree that the Stone Building complex is an extremely important resource and needs to be considered with a lot of care and time. I'm going to reserve my comments on the historic preservation alternative for a little more of my own review before I say anything else. But I do wholeheartedly agree with ARG and Dennis Backlund that this is a very important structure and no mitigation could ever replace that building. I prefer to not have that happen.

Chair Bower: Thank you, Natalie. Roger.

Roger Kohler: I agree with pretty much what everyone said. It's quite an interesting building and very open and airy and have been there a lot, but if it doesn't meet seismic requirements I would not want to be there in an earthquake, that dampens my enthusiasm. I have not studied it enough to know right now what I would say. My first choice is, sure, the building can stay, but it doesn't sound like the alternatives are very feasible. Were we just supposed to make comments today?

HRB1.6 Chair Bower: Yes. Certainly you can make comments, ask questions; those will be entered into the record for our response. Again, since we have until the end of July to accept comments if you need more time to review the material to respond.

Roger Kohler: My only thought that I was thinking about as they were talking is that if there is any way of keeping a portion of the building and working around that, like the main entry lobby, spinning off of that. I don't know if that is even a possibility and I don't know if that would comply with historic guidelines, demoing most of the building but leaving a portion. Some possible remnant of what was there could remain.

Chair Bower: Thank you, Roger. Beth.

HRB1.7 Beth Bunnenberg: I would concur with Natalie and Roger that I reserve comment on the historic preservation alternative for my further review and actually walking on the property again. As Roger said, given the problems for the building that have to be resolved rather quickly, I don't know of any other thing feasible other than demolition.

Chair Bower: Thanks, Beth. Martin.

HRB1.8 Martin Bernstein: The main comment that I would like to make is in support with what Dennis and Steve had mentioned, and other board members, about the few number of Stone Buildings that there are in Palo Alto. If you remove this significant, major building, that really diminishes the footprint on Palo Alto. That's a huge loss, so I definitely support the building not be raised.

HRB1.9 Chair Bower: I think if I could summarize the Board's feelings, I concur with everyone else that this is a significant building, both in its architecture and its history in Palo Alto. I should say, that as a matter of disclosure which is not necessary, my father-in-law was the Dean of Stanford Medical School and he negotiated the sale of the hospital from Palo Alto to Stanford in the late 60's. I remember as a child how important the building of this hospital was; it was a very significant event. I note in the report that the one medical milestone that was noted was the first heart transplant, but there are dozens of other significant events in medicine that have occurred there, not the least of which was Henry Kaplan developed a cure for Hodgkin's Disease. A cure. People with Hodgkin's Disease can survive now. That's just one, and there are many, many others. But I'm also a realist and I think we all express our frustration at having a building that we feel is significant and yet not being able to reconcile that with the need to make this building safe for those people who use it. So, with reluctance, I think that we all feel that this building may not survive. If we can figure out a way to have it survive, I think that would be a plus for everyone.

HRB1.10 What I would like to do is suggest that all board members who want to make additional comments, send them to Steven. Steven, you, with Dennis, can correlate them and then forward them onto the Council. At least in this study session we have been able to, I think, recognize that we saved one significant building here, and that's the Hoover Pavilion. Fortunately, it was not part of the demolition plan. And I think that is a pretty significant save.

We do not have any motions that we are going to vote on today, so unless the applicant wants to make a final comment, I think we could probably finish up here.

Steven, would you like to make any further comments?

Steven Turner: No other comments at this time.

Chair Bower: Okay. Thank you all for your time and the information you brought. Good luck with the project.

HRB1. Historic Resources Board Hearing, July 7, 2010

HRB1.1 *The commentor inquires about the other buildings in Palo Alto that were designed by E.D. Stone.* As explained on pages 3.8-26 through 3.8-27 of the Draft EIR, E.D. Stone designed three other buildings in Palo Alto, in addition to the Stone Building complex. These buildings include the Palo Alto Civic Center, the Palo Alto Main Library, and Mitchell Park Library. The Palo Alto Civic Center and the Mitchell Park Library were evaluated by the Architectural Resources Group (ARG), a historic consultant for the City. In this evaluation, it was determined that both of these buildings lacked sufficient integrity to quality as historical resources. However, the Palo Alto Main Library has been determined eligible for the National Register of Historic Places (NRHP).

Projects have been proposed that would alter or demolish the other E.D. Stone buildings in the City. Currently, plans call for the renovation and expansion of the Main Library, which could affect the historic integrity of the building. In addition, due to the seismically unsafe conditions at the Palo Alto Civic Center, the freestanding part of the arcade would be removed and the City Police Department and Emergency Operations facilities would be relocated from this area of the building. The third building, Mitchell Park Library, is proposed to be demolished since the existing facility is too small to house the demand of the expanding neighborhood.[1] As stated on page 3.8-27 of the Draft EIR, the demolition of the Stone Building complex would have a cumulatively considerable significant and unavoidable impact due to the small body of E.D. Stone's work present in the City that retains sufficient integrity to be eligible as historical resources. Therefore, the conclusions in the Draft EIR are consistent with the commentor's remarks.

HRB1.2 *The commentor expresses support that Dr. Jones is working on the archaeology portion of the report.* This comment does not address the adequacy of the Draft EIR or the SUMC Project's compliance with CEQA. Accordingly, no further response is necessary.

The commentor also states that the Hoover Pavilion should be protected and that impacts from vibration should be limited. Construction at the Hoover Pavilion Site under the SUMC Project could adversely impact the Hoover Pavilion. As explained on page 3.8-21 of the Draft EIR, SUMC Project construction activities, which would result in potential vibration, could damage the historic fabric of the Hoover Pavilion. However, implementation of Mitigation Measures CR-1.1 and CR-1.5, as presented on pages 3.8-21 and 3.8-23, respectively, of the Draft EIR, would reduce the impacts to less than significant.

Mitigation Measure CR-1.1 requires the structures proposed to be demolished under the SUMC Project to be manually demolished. Mitigation Measure CR-1.5 requires the

[1] Dennis Backlund, City of Palo Alto Historic Preservation Planner, Historic Resources Board hearing, July 7, 2010.

implementation of the Stanford Hoover Pavilion Protection Documents (Documents), as prepared by ARG. Compliance with the Documents would lessen the potential construction impacts by providing specifications for the treatment and protection of the Hoover Pavilion including the installation of protective covering of certain exterior surfaces and the removal, cataloging, and storage of selective historic elements. The Documents are based on the National Park Service and National Fire Protection Agency protection guidelines and include details on materials and methods of installation for the protective coverings to prevent damage from nearby demolition. The removal of historic elements would ensure their protection of some of the more fragile elements from construction activities and property cataloging and storage of such elements would ensure their proper care and reinstallation. Refer to Appendix J of the Draft EIR, Stanford Hoover Pavilion Protection Documents, for a complete list of specifications for the Hoover Pavilion.

HRB1.3 *The commentor expresses support for the Historic Preservation Alternative.* Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives. In addition, please refer to Master Response 8 for the range of alternatives analyzed and considered in the approval process.

HRB1.4 *The commentor asks if the Stone Building complex can be retrofitted to house a use other than a hospital.* The Historic Preservation Alternative, as presented in Section 5 of the Draft EIR, Alternatives, includes the retention of the Stone Building complex and the retrofit and reuse of the building for clinic and medical office, as well as the School of Medicine (SoM). These uses would not require as extensive retrofits as for a hospital. Refer to Master Response 8 for additional information about variations on alternatives studied in the Draft EIR (including alternate uses for the existing Stone Building complex).

HRB1.5 *The commentor states that the Stone Building complex should not be demolished.* Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives. In addition, please refer to Master Response 8 for the range of alternatives analyzed and considered in the approval process.

HRB1.6 *The commentor asks if portions of the Stone Building complex could be retained and incorporated into the architecture of the proposed SHC clinic/medical office building.* At this time, the SUMC Project sponsors do not anticipate using portions of the Stone Building complex façade in the design of the new buildings. If any part of the Stone Building complex were retained, it would have to be physically separated from the remaining hospital buildings in order to comply with the requirements of OSHPD. This would necessitate demolition of the 1973 Core Expansion Building and separation of utility systems. In addition, any portion of the Stone Building complex that would remain in place would need to undergo substantial seismic retrofit work. The buildings in the Stone Building complex do not meet current standards for fire separations, air exchange, and

ventilation. Upgrading these systems would require duct work that would reduce available interior space, diminishing the functionality of the interior space.[2]

In addition to the functional obstacles, preservation of a portion of the Stone Building complex would not substantially reduce the effect on historic resources caused by demolishing the rest of the building complex. CEQA Guidelines Section 15064.5(b)(2) states that the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR. The primary façade of the Stone Building complex faces the main entry and its fountain plaza on Pasteur Drive. Three sections of the Stone Building Complex are visible from the Pasteur entry: the Boswell, Edwards, and West Pavilion buildings. This represents about 1,050 linear feet of façade and the complex as a whole has approximately 3,000 linear feet of unobstructed façade. Even if one of the buildings facing the front entry, the West Pavilion, were preserved and re-used, the Stone Building complex would no longer retain sufficient physical characteristics to justify its eligibility for the CRHR.

Re-use of the West Pavilion would preserve approximately 560 linear feet (18.6 percent) of the total façade for the Stone Building complex façade, only 325 feet (10.8 percent) of which would be visible from Pasteur Drive. While retaining the West Pavilion would preserve some of the architectural features of the building, the scale and proportion would be severely compromised and, at less than 20 percent of the original complex and less than a third of the front façade, the surviving element would not retain enough integrity to qualify as a historic resource. In addition, the West Pavilion displays some incompatible rooftop additions and lacks the interior courtyard that is one of the essential features of the Stone Building complex.[3] Accordingly, preservation of the West Pavilion would not avoid or substantially lessen the significant effects of the SUMC Project and therefore is not required by CEQA.

However, Mitigation Measures CR-1.2 through CR-1.4, as presented on pages 3.8-22 through 3.8-23 of the Draft EIR, would be required as part of the mitigation for the SUMC Project. Mitigation Measure CR-1.2 would require HABS documentation with site-specific history, accurate mapping of all buildings, architecture descriptions, and photographic documentation. As included in Mitigation Measure CR-1.3, all written and photographic documentation regarding the Stone Building complex would be submitted to applicable agencies. In addition, Mitigation Measure CR-1.4 requires the SUMC Project sponsors to install interpretive displays within the SUMC Sites that provide information to visitors and residents regarding the history of the Stone Building complex. The displays, signs, and/or

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[2] Barbara Schussman, Bingham McCutchen LLP, Memorandum: "Historic Preservation Alternative," November 12, 2008.

[3] Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.

plaques would be installed in highly visible areas. Therefore, although the SUMC Project would require the demolition of the Stone Building complex, these mitigation measures would lessen the significant and unavoidable impacts associated with the loss of this historic structure, but not to a less-than-significant level.

HRB1.7 *This comment concerns the merits of the SUMC Project alternatives.* Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives. In addition, please refer to Master Response 8 for the range of alternatives analyzed and considered in the approval process.

HRB1.8 *The commentor does not support the demolition of the Stone Building complex due to the cumulative loss of E.D. Stone buildings in the City of Palo Alto.* Please refer to Master Response 9 regarding the merits of the SUMC Project. In addition, refer to Response HRB1.1, above, regarding the cumulative impacts on E.D. Stone buildings.

HRB1.9 *The commentor summarizes the HRB conclusions.* Please refer to Responses HRB1.1 through HRB1.8, above.

HRB1.10 *The commentor supports the retention of the Hoover Pavilion under the SUMC Project.* Please refer to Master Response 9 regarding the merits of the SUMC Project.

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Section 6
Revisions to the Draft EIR

6.1 INTRODUCTION

This section consists of text and graphics changes to the Draft EIR either as a result of comments or requests by City of Palo Alto staff to correct any inaccuracies. These changes are made to revise or update information in the Draft EIR. The revisions are organized by section according to their order in the Draft EIR. The paragraphs with revisions are reproduced here as they appear in the Draft EIR, with new text underlined and deleted text denoted with ~~strike through~~.

6.2 CHANGES TO DRAFT EIR SUMMARY

The following edit has been made to the fourth sentence of the second paragraph on page S-7 in the Summary section of the Draft EIR.

> A ~~half~~ 0.75-acre area at the northwest corner of the Main SUMC Site, just west of Pasteur Drive, is located in unincorporated Santa Clara County, and falls within the A-1 district in the County of Santa Clara Zoning Code.

Draft EIR text on page S-10, second bullet, is revised as follows:

- Annexation to Palo Alto of a 0.75-acre property within Santa Clara County jurisdiction, but within the City's Urban Service Area, with a Major Institution/Special Facilities land use designation to be applied to this property.

The following edit has been made to the first full paragraph under the subheader "Development Agreement" on page S-12 in the Summary section of the Draft EIR. Please note that the terms that follow the below paragraph are those proposed by the SUMC Project sponsors; the City's supplemental terms are provided separately.

> **Development Agreement.** A Development Agreement would be approved as part of the SUMC Project if the terms of such an agreement could be mutually agreed upon. The terms proposed by ~~the City~~ the SUMC Project sponsors and amended by the City to be included in the Development Agreement are as follows:

The fourth bullet under the subheader "Other City Approvals" on pages S-13 to S-14 of the Draft EIR has been revised as follows:

- Regulations in this district would include applicability, preservation, and exemptions for removal and replacement of Protected Trees. The Hospital District would create a procedure to permit the removal or relocation of ~~approximately 48~~ Protected Trees while preserving ~~approximately 23 Protected Trees~~ trees that are considered both biological~~ly~~ and aesthetic~~ally significant~~ tree resources. The existing Protected Trees that are considered

both biological~~ly~~ and aesthetic~~ally~~ ~~significant~~ tree resources are discussed in more detail in Section 3.9, Biological Resources, and Section 5, Alternatives. The Hospital District ordinance would include provisions for ~~an applicable timeline (development vs. non-development) and for~~ specific Protected Tree retention and preservation through development standards and regulations. Some Protected Trees that qualified for exemption to the regulations could be removed, providing that they are replaced per the City Tree Technical Manual (TTM) standards (TTM, Section 3.00). In addition, the Hospital District ordinance would require a minor amendment to the Tree Ordinance (PAMC 8.10) to recognize and cross-reference with the Hospital District ordinance.[11]

Footnote 20 on page S-23 has been revised as follows:

[20] The 36,192-square-foot increase in ED size includes 25,000 square feet of "right-sizing" or decompression space, which refers to expanded floor area to serve as treatment space. The right-sizing or decompression trend is typically seen in modernizing hospitals as modern treatment standards require increased floor area per bed or treatment space, compared to older hospital facilities. As such, only ~~5,600~~ 11,192 square feet of the ED expansion would be associated with an increased level of operations.

Table S-4 on page S-25 through S-92 of the Draft EIR has been revised as follows. For consistency, Table S-4 is provided here in its entirety and includes both unchanged and edited impact statements, mitigation measures, and impact conclusions, as shown below.

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.2 Land Use			
LU-1. Conflicts with Adopted Land Use Plans and Policies. Without mitigation measures to ensure consistency with the Comprehensive Plan's policies adopted for the purpose of avoiding or mitigating an environmental effect, the SUMC Project could conflict with Comprehensive Plan policies that avoid or reduce impacts related to visual quality, cultural resources, pedestrian circulation, urban forest resources, groundwater and runoff pollution, air quality degradation, and noise incompatibility.	S	MITIGATION MEASURES. The mitigation measures identified below would ensure that the SUMC Project would have no conflicts with Comprehensive Plan policies adopted for the purposes of avoiding or mitigating environmental impacts. These measures include Mitigation Measure VQ-2.1, which requires compliance with the City's Architectural Review process and recommendations; CR-1.2 through 1.4, which involves measures to minimize the loss of the historic Edward Durell Stone Building complex; CR-1.1 and CR-1.5, which involve measures to minimize vibration impacts on the Hoover Pavilion; TR-6.1, which requires improvements for bicycle and pedestrian safety and access at intersections affected by SUMC Project traffic; BR-4.1 through BR-4.5, which require the preparation of a Tree Preservation Report, a solar access study, a Tree Relocation Feasibility Plan, a Tree Preservation Bond/Security Guarantee, and minor site modifications to the current site plans; HW-3.1, which requires a work plan to protect groundwater from contamination; AQ-1.1 through AQ-1.2, which would control construction dust and reduce diesel emissions; NO-4.1, which requires noise shielding or enclosure of equipment; and NO-1.1, which controls construction noise	LTS
LU-2. Conflicts with Established Residential, Recreational, Educational, Religious, or Scientific Uses in the Area. The SUMC Project would not conflict with residential, recreational, educational, religious or scientific uses.	NI	None required.	N/A
LU-3. Physical Division of an Established Community. The SUMC Project would not physically divide an established community.	NI	None required.	N/A
LU-4. Farmland Conversion. The SUMC Project would have no impact on conversion of farmland to non-agricultural uses.	NI	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
LU-5. Adverse Changes to Overall Existing or Planned Land Uses in the Area. Because the SUMC Project would intensify the planned uses within the SUMC Sites, the SUMC Project would have a significant impact pertaining to on-site character and views.	S	MITIGATION MEASURE. Mitigation Measure VQ-2.1, requires and ensures compliance with Architectural Review Board (ARB) recommendations for final design and would reduce impacts from increased intensity under the SUMC Project. Based on the SUMC Project design guidelines, the Architectural Review would consider, among other factors, whether the SUMC Project has a coherent composition and whether its bulk and mass are harmonious with surrounding development. Thus, implementation of Mitigation Measure VQ-2.1 would reduce the significant impacts on overall surroundings to a less-than-significant level.	LTS
LU-6. Cumulative Impacts on Changes to Overall Existing or Planned Land Uses in the Area. The SUMC Project, in combination with other reasonably foreseeable probable future development in the area, would have a less-than-significant cumulative impact on overall existing or planned land uses in the vicinity of the SUMC Sites.	LTS	None required.	N/A
3.3 Visual Quality			
VQ-1. Temporary Degradation of Visual Character During Construction. The SUMC Project would substantially degrade the existing visual character and quality of the SUMC Sites during construction. (S)	S	MITIGATION MEASURE. Mitigation Measure VQ-1.1, below, would reduce visual impacts during construction to less than significant. (LTS) *VQ-1.1* *Implement Construction Visual Improvements Plan.* The SUMC Project sponsors shall develop and implement a Construction Visual Improvements Plan that would make visual improvements to construction zones within a given construction phase and between phases if the zone is not scheduled for construction activity or would remain unused for a period greater than six months. Construction zones subject to this mitigation measure shall be defined by the Planning Director, and shall consider the size of the area, the nature and timing of the construction activity, and the proximity or visibility of the area to public vantage points or residential uses. The Construction Visual Improvements Plan shall be implemented by the project contractor(s) and must be approved by the Planning Director. The intent of the plan is to aesthetically improve portions of the	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		project site that would remain unimproved for an extended period and screen the construction zone from view by passersby along the public streets and sidewalks. Possible improvements in the plan include, but are not limited to, the following: a. The SUMC Project sponsors shall conceal staging areas with fencing material to be approved by the Planning Director prior to commencement of use of the staging area for construction equipment and vehicles. b. The SUMC Project sponsors shall frequently remove construction debris and refuse from the SUMC Sites. c. The SUMC Project sponsors shall install all landscaping as early as feasible to decrease visual impacts of construction. Existing landscaping within the SUMC Sites that would not be removed by the construction shall be maintained.	
VQ-2. Permanent Degradation of Visual Character Post Construction. The SUMC Project would have a significant impact pertaining to degradation of the existing visual character or quality of the SUMC Sites and their surroundings.	S	MITIGATION MEASURE. Mitigation Measure VQ-2.1, below, requires and ensures compliance with ARB recommendations for final design. Such compliance would ensure that impacts on on-site visual character and quality would be less than significant because the ARB's recommendations, through the Architectural Review process, would address massing, layout, landscaping, and architectural design impacts from the SUMC Project, as described further below. *VQ-2.1* *Adhere to City's Architectural Review Process and Recommendations*. The SUMC Project sponsors shall submit final building and site plans to the ARB prior to issuance of any development permits. Architectural Review shall assess the appropriateness of proposed demolitions, proposed building heights and massing, siting of buildings and structures, architecture and façade treatments, landscaping, circulation plans, and parking. The ARB may ~~require~~ recommend alterations to any of the above project features, or the ARB may suggest new features, such as new landscaping or public art, to improve the proposed SUMC Project design. Any ~~recommendations made by the ARB~~ conditions required by the	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		City Council as a result of the Architectural Review process with respect to the design of the SUMC Project shall be implemented by the SUMC Project sponsors.	
VQ-3. Alteration of Public Viewsheds, View Corridors, or Scenic Resources. The SUMC Project would result in significant impacts on views.	S	MITIGATION MEASURE. Mitigation Measure VQ-2.1, above, requires and ensures compliance with ARB recommendations for final design and would reduce impacts on views from the proposed buildings under the SUMC Project. The Architectural Review of the SUMC Project would consider, among other factors, whether the SUMC Project has a coherent composition and that its bulk and mass are harmonious with surrounding development. The ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The City Council would then review the recommendations and make findings, as appropriate, that natural features are appropriately preserved and integrated with the SUMC Project; the design promotes harmonious transitions in scale and character in areas between different designated land uses; and the planning and siting of the various functions and buildings on the site create an internal sense of order and provide a desirable environment for occupants, visitors, and the general community. Implementation of Mitigation Measure VQ-2.1 regarding the Architectural Review process would ensure that impacts on views would be less than significant.	LTS
VQ-4. Terrain Modifications. The SUMC Project would not require substantial terrain modifications that would degrade the visual character of the SUMC Sites.	NI	None required.	N/A
VQ-5. New Sources of Light and Glare. The SUMC Project could increase light and glare nuisance from exterior lighting, resulting in a significant impact.	S	MITIGATION MEASURE. Mitigation Measure VQ-2.1, above, requires compliance with ARB recommendations for final design and would reduce light and glare impacts from the proposed buildings under the SUMC Project. The Architectural Review of the SUMC Project would consider, among other factors, whether the SUMC Project incorporates quality materials, harmonious colors, appropriate ancillary features, a cohesive design with a coherent composition, and an appropriate lighting plan. The ARB's recommendations regarding these factors will be forwarded to the City Council for consideration. The City Council would then review the	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		recommendations and make findings, as appropriate, that the design is compatible with the immediate environment of the SUMC Sites; is appropriate to the function of the SUMC Project; promotes harmonious transitions in character in areas between different designated land uses; and is compatible with approved improvements both on and off the site. This Architectural Review process would ensure that exterior treatment would not emit substantial glare and that exterior lighting impacts would be less than significant.	
VQ-6. Shadowing of Public Open Space. The SUMC Project would not substantially shadow public open space (other than public streets and adjacent sidewalks) between 9:00 a.m. and 3:00 p.m. from September 21 to March 21.	LTS	None required.	N/A
VQ-7. Cumulative Impacts on Visual Character. The SUMC Project, in combination with other reasonably foreseeable probable future development in the area, would have a less-than-significant cumulative impact on visual character in the vicinity of the SUMC Sites.	LTS	None required.	N/A
VQ-8. Cumulative Impacts on Sensitive Views. The SUMC Project, in combination with other reasonably foreseeable future development in the area, would have less-than-significant cumulative impacts on sensitive views.	LTS	None required.	N/A
VQ-9. Cumulative Light and Glare. The SUMC Project, in combination with other reasonably foreseeable probable future development in the area, would be subject to Architectural Review and Municipal Code, and County requirements pertaining to light and glare. Impacts would therefore be less than significant.	LTS	None required.	N/A
VQ-10. Cumulative Shadows. Shadows from the SUMC Project are not expected to combine with shadows from other nearby reasonably foreseeable probable future development. There would be no cumulative impacts.	NI	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.4 Transportation			
TR-1. Construction Impacts. Construction activity associated with the SUMC Project could result in significant traffic impacts.	S	MITIGATION MEASURES. With implementation of the following mitigation measures, the significant construction related traffic impacts would be reduced to less-than-significant levels. *TR-1.1* *Provide Off-Street Parking for Construction Related Vehicles.* The SUMC Project sponsors shall be required to provide adequate off-street parking for all construction-related vehicles throughout the construction period. If adequate parking cannot be provided on the construction sites, a remote parking area shall be designated, and a shuttle bus shall be operated to transfer construction workers to the job site. *TR-1.2* *Maintain Pedestrian Access.* The SUMC Project sponsors shall be prohibited from substantially limiting pedestrian access while constructing the SUMC Project, without prior approval from the City of Palo Alto Department of Public Works. Such approval shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less-than-significant levels. Pedestrian access-limiting actions would include, but not be limited to, sidewalk closures, bridge closures, crosswalk closures or pedestrian re-routing at intersections, placement of construction-related material within pedestrian pathways or sidewalks, and other actions which may affect the mobility or safety of pedestrians during the construction period. If sidewalks are maintained along the construction site frontage, covered walkways shall be provided. *TR-1.3* *Maintain Bicycle Access.* The SUMC Project sponsors shall be prohibited from limiting bicycle access while constructing the SUMC Project without prior approval from the City of Palo Alto Department of Public Works. Such approval shall require submittal and approval of specific construction management plans that warn cyclists prior to reaching the impacted bicycle lanes and provide alternative routing around the construction sites to	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation		Mitigation Measures	Impact Significance With Mitigation
			mitigate the specific impacts to a less-than-significant level. Bicycle access-limiting actions would include, but not be limited to, bicycle lane closures or narrowing, closing or narrowing of streets that are designated bicycle routes, bridge closures, the placement of construction-related materials within designated bicycle lanes or along bicycle routes, and other actions which may affect the mobility or safety of bicyclists during the construction period.	
		TR-1.4	*Restrict Construction Hours*. The SUMC Project sponsors shall be required to prohibit or limit the number of construction material deliveries from 7:00 a.m. to 9:00 a.m., and from 4:00 p.m. to 6:00 p.m. on weekdays. The SUMC Project sponsors shall be required to limit the number of construction employees based upon an approved construction management plan from arriving or departing the site from the hours of 7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:00 p.m. Although not needed to reduce the impact to a less-than-significant level, the SUMC Project sponsors also shall limit the number of construction employees from arriving at the site from 7:00 a.m. to 9:00 a.m., contingent upon the City's granting of an exception to its construction hours under its noise ordinance to allow construction to commence at 7:00 a.m.	
		TR-1.5	*Restrict Construction Truck Routes*. The SUMC Project sponsors shall be required to deliver and remove all construction-related equipment and materials on truck routes designated by the cities of Palo Alto, East Palo Alto and Menlo Park. Heavy construction vehicles shall be prohibited from accessing the site from other routes. Figure 3.4-6 and 3.4-7 of the EIR illustrates the Stanford Area Truck Routes which must be used by all trucks.	
		TR-1.6	*Protect Public Roadways During Construction*. The SUMC Project sponsors shall be required to repair any structural damage to public roadways, returning any damaged sections to original	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		structural condition. The SUMC Project sponsors shall survey the condition of the public roadways along truck routes providing access to the proposed project site before construction, and shall again survey after construction is complete. A before-and-after survey report shall be completed and submitted to the City of Palo Alto Public Works Department for review, indicating the location and extent of any damage.	
		TR-1.7 *Maintain Public Transit Access and Routes*. The SUMC Project sponsors shall be prohibited from limiting access to public transit, and from limiting movement of public transit vehicles, without prior approval from the Santa Clara County Valley Transportation Authority or other appropriate jurisdiction. Such approval shall require submittal and approval of specific impacts to a less-than-significant level. Potential actions which would impact access to transit include, but are not limited to, relocating or removing bus stops, limiting access to bus stops or transfer facilities, or otherwise restricting or constraining public transit operations.	
		TR-1.8 *Prepare and Implement Construction Impact Mitigation Plan*. In lieu of the above mitigation measures, the SUMC Project sponsors shall submit a detailed construction impact mitigation plan to the City of Palo Alto for approval by the Director of Public Works prior to commencing any construction activities with potential transportation impacts. This plan shall address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. Details such as the routing and scheduling of materials deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access shall be described and approved. Prior to its approval of the construction impact mitigation plan, the City of	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		Palo Alto shall provide a copy of the construction impact plan to the City of Menlo Park for review and comment.	
		TR-1.9 *Conduct Additional Measures During Special Events.* During major athletic events or other special events which attract a substantial number of visitors to the campus, the SUMC Project sponsors shall implement a mechanism to prevent roadway construction activities from reducing roadway capacity ~~during major athletic events or other special events which attract a substantial number of visitors to the campus~~ along those roadways that would be affected by the SUMC Project and that would provide access to the athletic or other special events. This measure may require a special supplemental permit to be approved by either Santa Clara County or the City of Palo Alto prior to hosting such events during significant construction phases.	
TR-2. Intersection Level of Service. Implementation of the SUMC Project would result in significant impacts to intersections during Peak Hour conditions.	S	MITIGATION MEASURES. Given the magnitude of the SUMC Project's intersection impacts, there is no single feasible mitigation measure that can reduce the impacts to a less-than-significant level. However, there are a range of measures that, when taken individually, would each contribute to a partial reduction in the SUMC Project's impacts. When combined, these measures could result in a substantial reduction in the SUMC Project's impacts. ~~Under all combinations of feasible mitigation measures below, impacts of the SUMC Project on intersection LOS would remain significant and unavoidable. Of all of the feasible combinations, the one that would have the largest reduction in impact, and that mitigates the greatest number of the intersection impacts, is~~ The combination of mitigation measures involving traffic-adaptive signal technology, additional bicycle and pedestrian undercrossings, enhanced ~~Travel~~ Transportation Demand Management (TDM) program, and feasible intersection improvements~~. This combination of mitigation measures~~ would reduce the SUMC Project impacts to a less-than-significant level at all of the impacted intersections during the AM and PM Peak Hours. ~~However, intersection impacts would~~	~~SU~~LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		~~remain significant and unavoidable in the PM Peak Hour at three intersections with mitigation.~~	
		TR-2.1 *Install Traffic-Adaptive Signal Technology*. The SUMC Project sponsors shall contribute to the Palo Alto Citywide Traffic Impact Fee program, for the installation of traffic-adaptive signals. ~~However, this fee is not structured to mitigate one hundred percent of project related impacts, and an additional fee could be imposed by the City on the SUMC Project sponsors to mitigate the remaining share of the SUMC Project impacts.~~ In Menlo Park, the SUMC Project sponsors shall contribute their fair share amount, which shall be tied to the amount of traffic added to analyzed intersections by the SUMC Project. The SUMC Project sponsors' contributions shall apply towards the installation of traffic-adaptive signals as listed below. • Sand Hill Road (Oak Creek to Shopping Center) - 4 signals • Arboretum Road (Shopping Center to Palm Drive) - 3 signals • Embarcadero Road (Bryant to Saint Francis) - 7 signals • University Avenue (Palm to Lincoln) - 13 signals • Lytton Avenue (Alma to Middlefield) - 10 signals • Hamilton Avenue (Alma to Middlefield) - 10 signals • Middlefield Road (San Antonio to Homer) - 9 signals • Charleston Road (Alma to Middlefield) - 2 signals • El Camino Real (northern city limits of ~~Menlo Park~~ Palo Alto to southern city limits of Palo Alto) – signals would require approval of Caltrans In addition, the SUMC Project sponsors shall pay a fair share contribution towards installation of traffic-adaptive signals at the below significantly-impacted intersections in Menlo Park. These	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		intersections are among those at which Menlo Park anticipates installing traffic-adaptive signals: • Middlefield Road/Willow Road (intersection #18) • Middlefield Road/Ravenswood Avenue (intersection #46)	
		TR-2.2 *Fund Additional Bicycle and Pedestrian Undercrossings*. The SUMC Project sponsors shall contribute their fair share to the cost of construction of the Everett Avenue undercrossing of the Caltrain tracks in Palo Alto and the Middle Avenue undercrossing in Menlo Park. In Palo Alto, there is a Citywide Traffic Impact Fee program that the SUMC Project sponsors shall contribute to. ~~However, this fee is not structured to mitigate one hundred percent of the SUMC Project related impacts, and an additional fee may be imposed by the City to mitigate the remaining share of the SUMC Project impacts.~~ In Menlo Park, the fair share contribution shall be tied to the amount of traffic added to analyzed intersections by the SUMC Project. The construction of the Everett Avenue and Middle Avenue undercrossings would reduce traffic volumes on nearby streets, such as Ravenswood Avenue and University Avenue.	
		TR-2.3 *Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program*. The SUMC Project sponsors shall enhance the currently-implemented TDM program in order to achieve 35.1 percent usage of alternative transportation modes (i.e., carpool, vanpool, bus, Caltrain, bicycle, and walk) by ~~SUMC~~ Hospital employees. The initial enhancements to the SUMC TDM program shall include the following: • Provide Caltrain GO Passes, or an equivalent TDM measure, to all eligible hospital employees and set target Caltrain mode share for hospital employees equal to 15.8 percent. If the GO Pass program is no longer available in its current form, then the SUMC Project sponsors shall contribute the amount of funding that they would have paid	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		toward purchase of GO Passes, in an amount not to exceed $1.8 million per year, toward one or more similar programs to encourage use of transit by SUMC employees as mutually agreed upon the SUMC Project Sponsors and the City's Director of Planning and Community Environment. • ~~If Caltrain GO Passes would be provided to SUMC employees, make arrangements~~ Use all reasonable efforts to arrange with AC Transit to lease 75 spaces at the Ardenwood Park & Ride Lot, or an equivalent facility, to serve SUMC employees who commute from the East Bay. • ~~Expand bus service in support of the issuance of GO Passes.~~ • Expand the Marguerite shuttle bus service ~~and integrate it with the other City of Palo Alto shuttle bus service.~~ between the SUMC and PAITS as needed to accommodate increased ridership by hospital employees. • ~~Maintain~~ Use all reasonable efforts to assure that the controlling transit agency maintains load factors less than ~~or equal to~~ 1.00 on the U Line ~~and~~. • Maintain a load factor less than or equal to 1.25 on the Marguerite shuttle. • Expand and improve the bicycle and pedestrian networks as specified by Project site plans. • Provide a full-time on-site TDM coordinator by 2015 for the Hospital components. The coordinator would be responsible for organizing and disseminating TDM information primarily to Hospital employees and also to Hospital patients. A central location would be made available to provide information on alternative travel modes. Also, the SUMC or Hospitals' website would contain information on TDM programs.	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		• Provide a guaranteed ride home program for all employees who use transit and other transport alternatives like carpool and vanpool. The guarantee ride home shall allow employees with dependent children the ability to use alternative modes to travel to and from work but still be able to travel home mid-day in case of an emergency. • Provide employees with shower facilities within the SUMC Sites to encourage bicycling to work. The SUMC Project sponsors shall also provide bicycle storage facilities on the SUMC Sites that would be conveniently located near the employee showers. • Establish, in conjunction with the GO Pass implementation, a "Zip Car" (or other similar car-sharing program) with Zip Cars available at the medical complex. • Perform annual TDM monitoring and submit the report to the City of Palo Alto to ensure that the assumed modal split to alternative forms of travel and away from autos would be actually achieved. This report also shall be submitted to the City of Menlo Park for its review. • Within six (6) months of project approval, the SUMC Project sponsors shall submit to the City's Director of Planning and Community Environment, a Hospital TDM Program Report that documents the existing TDM programs offered to the Hospital employees, participation levels in the programs, and the current mode split of Hospital employees. The report will include the level of staff support, educational efforts, and outreach strategies used for the program. This initial Hospital TDM Program Report will serve as the baseline conditions for measuring the future TDM Program effectiveness as program enhancements are implemented to reach the 35.1 percent target in 2025.	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		• Subsequent to preparing the Baseline TDM Report, the Hospitals shall prepare an annual report in the spring of each year that will document the same information as the baseline report and provide a comparison with the previous year. The annual report shall be submitted to the City's Director of Planning and Community Environment. • In addition to implementing the program enhancements described above, the Hospitals and Stanford Parking & Transportation Services shall regularly consider other enhancements to the SUMC TDM Programs on an ongoing basis. Based on its experience in running TDM programs, Stanford's Parking & Transportation Services has found that adaptability and flexibility are two key factors when providing new services. For new or enhanced programs to be successful, the programs must evolve in consideration of employee preferences and desires, the availability of new services in the marketplace (such as zip cars), pilot programs, and ongoing research and data collection regarding the comparative effectiveness of various options. As necessary, the Hospitals shall regularly consider incorporating new services into their TDM Program, and shall meet with the City annually to exchange information about new innovations, research and strategies. These enhancements may not immediately change the mode split for ~~SUMC~~ Hospital employees, because many employees would be unable to change long standing commute patterns overnight. However, with the passage of a mutually agreed amount of time, it is expected that the enhanced TDM program would gradually result in a shift in the mode split of ~~SUMC~~ Hospital employees. ~~If this proves not to be the case, then a second round of improvements to the TDM program shall be implemented. Examples of additional measures could be to increase the parking permit charges while increasing the incentives to those~~	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		~~who carpool or do not drive. If, by the year 2025, at least 35.1 percent of SUMC employees are not using alternative transportation modes, then a second round of improvements to the TDM shall be implemented. Examples of additional measures could be to increase the parking permit charges while increasing the incentives to those who carpool or do not drive. Thereafter, SUMC Project sponsors shall monitor/survey employee use of alternative modes of transportation on an at least bi-annual basis, and shall continue to improve its TDM program, until it is confirmed to the satisfaction of the City that the target of 35.1 percent usage has been met.~~ The following interim targets in Table 3.4-19A in Section 3 of this document shall be used to measure the progress toward meeting the desired mode split in 2025. These interim targets assume that in the early phases of implementation, there may be larger shifts to alternative modes than the shifts that may occur in later phases of the TDM program enhancement. New programs, such as the implementation of the Caltrain GO Pass, would generate a large shift once it is offered; however, other program enhancements may generate more modest shifts in mode choice. For each of the interim target years, following submission of the Hospitals TDM Annual Report, the City shall determine if the interim year target has been met. If the Hospitals have not met the interim target, the Hospitals and the City shall meet to review the TDM Program and to identify possible additional TDM Program enhancements that the Hospitals should consider incorporating into their TDM Program in order to increase the Program's effectiveness. If the Hospitals do not meet the applicable interim targets for any two consecutive years prior to 2025, the Hospitals shall provide alternative transportation funding to the City of Palo Alto in the amount of $175,000 per year until the Hospitals achieve the applicable interim mode split target. The alternative transportation funding shall be used by the City of Palo Alto for	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		local projects and programs that encourage citywide use of alternative transportation mode uses. If by 2025, the Hospitals have not demonstrated substantial compliance with the 35.1 modal split for alternative transportation modes, the following measure shall be required: • The Hospitals shall make a lump sum payment of $4.0 million to the City of Palo Alto for local projects and programs that encourage and improve citywide use of alternative transportation mode uses. The City of Palo Alto shall identify capital projects and program enhancements for which the funds may be applied. Sample projects may include contributions towards regional transportation projects of interest to the City of Palo Alto and that are identified within the Valley Transportation Authority – Valley Transportation Plan or other local planning documents.	
		TR-2.4 *Fund or Implement those Intersection Improvements that Have Been Determined to be Feasible*. The SUMC Project sponsors shall implement the following measures: • ~~For the intersection of El Camino Real/Page Mill Road – Oregon Expressway, the SUMC Project sponsors shall pay a fair share towards (1) provision of exclusive right-turn lane for westbound Oregon Expressway, in addition to the two through lanes, (2) increasing the cycle length to 160 seconds. Improvements to the westbound right turn lane would require right-of-way from the Santa Clara Valley Transportation (VTA) park and ride lot.~~ • At the intersection of Arboretum Road/Galvez Street, the SUMC Project sponsors shall install a traffic signal. • At the intersection of Bayfront Expressway/Willow Road, the SUMC Project sponsors shall pay a fair share towards	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		providing one more right-turn lane for eastbound Willow Road. • At the intersection of Bayfront Expressway/University Avenue, the SUMC Project sponsors shall pay a fair share towards widening southbound Bayfront Expressway to include an additional through lane and re-stripe the exclusive right turn lane to a shared through right turn lane. As a result, two additional receiving lanes in the southbound direction on Bayfront Expressway would be needed. ~~*TR 2.5 Coordinate with Other Jurisdictions for Potentially Feasible Roadway Improvements*. The City of Palo Alto shall work with other jurisdictions to try to achieve feasibility for the following roadway improvements or adjustments. In the event that one or more of the below improvements would then be determined to be feasible, the SUMC Project sponsors shall pay their fair share towards implementation of the improvements, if a fair share contribution would apply.~~ ~~• Alpine Road/I-280 Northbound Off-Ramp – Signalize this intersection. The City shall coordinate with Caltrans regarding feasibility of these improvements.~~ ~~• El Camino Real/Ravenswood Avenue – Re-stripe the exclusive right-turn lane on southbound El Camino Real to a shared through/right lane. Also, provide an additional through lane for northbound El Camino Real by removing the right-turn slip island. Also, provide an exclusive right-turn lane for eastbound Menlo Avenue. The City shall coordinate with the City of Menlo Park and Caltrans regarding feasibility of these improvements.~~ ~~• Bayfront Expressway/Willow Road – Provide one more right-turn lane for eastbound Willow Road and make the right-turn movement for southbound Bayfront Expressway "overlap" with the left-turn of eastbound Willow Road. The~~	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		~~intersection has signals for the right-turn movement for southbound Bayfront Expressway, but the "overlap" phase is not implemented. The City shall coordinate with the City of Menlo Park regarding feasibility of these improvements.~~ • ~~Middlefield Road/Ravenswood Avenue — Provide an additional exclusive left-turn lane for northbound Middlefield Road. The City shall coordinate with the City of Menlo Park regarding feasibility of this improvement.~~ • ~~Junipero Serra Boulevard/Campus Drive West — Request that Santa Clara County change the signal cycle length at this intersection to 90 seconds. The City shall coordinate with the County of Santa Clara regarding feasibility of this adjustment.~~	
TR-3. Impacts on Roadway Segments. The SUMC Project would result in adverse traffic impacts to roadway segments in the City of Menlo Park.	S	MITIGATION MEASURES. With the provision of additional bicycle and pedestrian undercrossings (Mitigation Measure TR-2.2), the enhanced TDM program (Mitigation Measure TR-2.3), and contribution to the City of Menlo Park shuttle fee (Mitigation Measure TR-7.2), there would still be significant impacts on four Menlo Park roadways, including Marsh Road, Willow Road, Sand Hill Road, and Alpine Road. Therefore, the traffic impacts to Marsh Road, Sand Hill Road, Willow Road, and Alpine Road would remain significant and unavoidable with mitigation.	SU
TR-4. Local Circulation Impacts. The SUMC Project could result in significant traffic impact to the local circulation network in the immediate vicinity of the SUMC Sites.	S	MITIGATION MEASURES. ~~Mitigation Measure TR-4.1, involving funding and implementation of a traffic impact study, and~~ Mitigation Measure TR-4.2, involving re-striping of Durand Way, would reduce the SUMC Project's impact to a less-than-significant level. ~~*TR-4.1 Fund Traffic Impact Study*. Upon construction of the SHC and LPCH hospital components, the SUMC Project sponsors shall fund an independent traffic evaluation, commissioned by the City, based on actual travel patterns, volumes and emergency access, with an emphasis on ease of circulation around and through the medical complex to determine if the private street connection between Roth Way and Pasteur Drive should be~~	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		~~operated as a public street. If the independent traffic study demonstrates that the connection between Roth Way and Pasteur Drive as a public street would improve circulation, then the connection shall be designated as a public street for all vehicular, bicycle, pedestrian, and transit traffic.~~ *TR-4.2* *Fund Signing and Striping Plan and Signal Optimization.* In addition to paying for the construction of the extension of Durand Way from Sand Hill Road to Welch Road, the SUMC Project sponsors shall also pay for the following improvements to ensure that queues from the Durand Way/Sand Hill Road intersection do not spillback onto the Durand Way/Welch Road intersection. • A signing and striping plan for the Durand Way extension, which would maximize the storage capacity by creating a four-lane roadway with a left and through/right at Sand Hill Road and a right and through/left at Welch Road; • The installation and optimization of the two signals at the intersections of Durand Way/Sand Hill Road and Durand Way/Welch Road.	
TR-5. Freeway Impacts. The SUMC Project would result in less-than-significant impacts on freeways.	LTS	None required.	N/A
TR-6. Bicycle and Pedestrian Impacts. The SUMC Project could impede the development or function of planned bicycle or pedestrian facilities, and result in a significant impact.	S	MITIGATION MEASURES. Mitigation Measure TR-2.3 involving trip-reducing measures, plus Mitigation Measure TR-6.1, which involves several bicycle and pedestrian improvements, would reduce the SUMC Project's impact to a less-than-significant level. The improved facilities would mitigate the hazards to pedestrians and bicyclists brought about by the increased vehicular traffic and congestion. *TR-6.1* *Bicycle and Pedestrian Infrastructure Improvements.* The SUMC Project sponsors shall fund the expansion and improvement of the bicycle and pedestrian network in the immediate vicinity of the SUMC Project. The intent of these improvements is to:	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		• reduce auto related traffic by providing the infrastructure for alternative travel modes; • improve the bicycle and pedestrian linkages between the SUMC Project and Downtown Palo Alto, and between the SUMC Project and the surrounding residential neighborhoods; and • mitigate the safety hazards to pedestrians and cyclists that will result from the SUMC Project related increase in vehicular traffic and congestion. The specific improvements to be funded by the SUMC Project sponsors shall include the following: ~~• Provide an enhanced pedestrian crossing at Quarry Road/El Camino Real to establish a strong connection between the SUMC Project and Downtown Palo Alto. The pedestrian crossing shall be 12 feet wide, have contrasting pavement, countdown signal heads, and high visibility markings. Even though the intersection of Quarry Road and El Camino Real is projected to operate at acceptable levels of service, added vehicular traffic through the intersection and added bicycle and pedestrian volumes across the intersection would potentially create safety hazards which would be mitigated by the proposed enhanced crossings.~~ • Create a bicycle and pedestrian connection between the Stanford Shopping Center and SUMC. The connection shall provide an alternative route to Quarry Road, which is auto dominated. This connection shall extend between Vineyard Lane and Welch Road. Pedestrian traffic signals and crosswalks shall be placed at the crossing of Vineyard Lane and Welch Road. The crosswalk shall be enhanced either by striping or by the use of contrasting paving. • Provide a connection from the planned Everett Avenue bicycle and pedestrian undercrossing to the El Camino	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		Real/Quarry Road intersection. Once the tunnel is completed, this linkage shall provide a direct connection between the SUMC Project and Downtown North. • ~~Provide a bicycle and pedestrian trail through the Arboretum Drive as part of future campus planning in the SUMC area. This trail shall improve access to the SUMC Project. To support this off-street path, bicycle and pedestrian crossings at Arboretum Road and Palo Road shall be enhanced to provide safe crossing of these streets. The crosswalks shall be properly signed, marked, and lighted with enhanced pavement markings and imbedded crosswalk lights. Signalization of this crossing may ultimately be required.~~ • Incorporate into the Quarry Road corridor, from El Camino Real to Welch Road, ~~continuous sidewalks according to the SUMC Project's Design Guidelines. The extension of Quarry Road west of Welch Road shall continue the pedestrian facilities into the SUMC Project~~ improvements to and within the public right-of-way to enhance the pedestrian and bicycle connection, including urban design elements and way finding, wider bicycle lanes, as necessary, on Quarry Road, enhanced transit nodes for bus and/or shuttle stops, and prominent bicycle facilities. • Enhance all signalized intersections in the Project Vicinty, particularly along Quarry Road, Vineyard, and Welch Roads to include 12-foot pedestrian crosswalks on all legs, with textured or colored paving or diagonal or longitudinal zebra striping as determined by the City, pedestrian push buttons and countdown pedestrian signal heads, and other specific improvements that are determined as necessary during the design process, such as median refuge islands, advanced signing, flashing beacons, in-pavement lighting, etc. • Install the appropriate number of Class I and Class III bicycle parking spaces as required by the City's Zoning	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		Ordinance for the total amount of existing and future development. The SUMC Project sponsors shall install the required number of bicycle parking spaces equally distributed throughout the SUMC Sites.	
TR-7. Transit Impacts. ~~Implementation of the SUMC Project could impeded the operation pf the transit system as a result of increased ridership, and result in a significant impact.~~ The SUMC Project would not adversely impact either AM or PM Peak Hour bus service in Palo Alto or Caltrain service. Nonetheless, mitigation to provide enhanced bus stops and shuttle service is identified here.	~~S~~LTS	Mitigation Measure TR-7.1 involves the addition of ~~transit centers~~ enhanced bus stops to the SUMC Project's site plans, and Mitigation Measure TR-7.2 involves financial contributions towards the expansion of transit service. Implementation of these measures would ~~reduce~~ ensure that the the SUMC Project's transit impacts to a less-than-significant level. *TR-7.1* *Incorporate ~~Transit Centers~~ Enhanced Bus Stops Into Site Plans*. The SUMC Project sponsors shall revise their SUMC Project site plan to incorporate two ~~transit centers~~ enhanced bus stops to reduce the impacts to transit service caused by the SUMC Project. These ~~transit centers~~ enhanced bus stops shall be located at Hoover Pavilion and at SHC, and shall be on ~~off~~-street facilities. The ~~transit centers~~ enhanced bus stops shall accommodate ~~three to four~~ two buses simultaneously, and shall have shelters, seating, lighting, signs, maps, bus schedules, and bicycle parking. On-street bus stops along Welch Road and Quarry Road shall also be provided, but the ~~transit centers~~ enhanced bus stops shall accommodate the majority of transit riders and shall be located to maximize the convenience of employees, patients and visitors. One ~~transit center~~ enhanced bus stop shall be located in the vicinity of Welch Road and Pasteur Drive to serve SHC. The other ~~transit center~~ enhanced bus stop shall be located near the entrance to Hoover Pavilion. Both of these ~~transit centers~~ enhanced bus stops shall provide the focal point for transit use for the SUMC. *TR-7.2* *Provide Expanded Transit Service*. The SUMC Project ~~S~~sponsors shall fund expansion of the Marguerite Shuttle service between the SUMC and PAITS, and shall make a fair share financial contribution to the cost of expanding ~~existing bus service of the~~	~~SU~~ N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		~~Marguerite, Crosstown~~ and ~~Menlo Park Shuttle~~ U-Line bus services~~, and to the VTA Community Bus Service~~. • **Marguerite Shuttle.** The SUMC Project ~~S~~sponsors shall fund expansion of ~~make a financial contribution to expand~~ the Marguerite shuttle service into Palo Alto between SUMC and PAITS. • **U-Line.** The SUMC Project ~~S~~sponsors shall use reasonable efforts to assure that the controlling transit agency maintains ~~. Arrangements with AC Transit shall be made to increase U Line service (such as decreasing headways) to meet the increase in demand attributable to the SUMC Project, and ensure that~~ load factors of less than 1.0 on the U-Line. • ~~**Crosstown Shuttle.** The SUMC Project sponsors shall participate in operating the Palo Alto Crosstown Shuttle service by contributing to the Citywide Traffic Impact Fee, which would include covering the costs of this service. Then current fee is $2,861 per net new PM Peak Hour trips. A portion of Stanford's Citywide Traffic Impact Fee shall be used by the City to expand City Shuttle services.~~ • ~~**VTA Community Bus Service.** The SUMC Project Sponsors shall contribute to fund the project's fair share of Palo Alto's share of expanded VTA Community Bus Service.~~ • ~~**Menlo Park Shuttle Bus.** The SUMC Project sponsors shall pay into the City of Menlo Park shuttle fee at $0.105 per square foot of new development annually or a percentage agreed between Menlo Park and SUMC Project sponsors. In Menlo Park, the contribution shall be tied to the amount of project traffic added to analyzed roadway segments and intersections.~~	
TR-8. Parking Impacts. The SUMC Project would provide adequate parking for its demand, and would thus have a less-than-significant parking impact.	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
TR-9. Emergency Access. Implementation of the SUMC Project could potentially result in inadequate emergency access due to increased congestion, a significant impact.	S	MITIGATION MEASURES. Mitigation Measure TR-9.1 involves the installation of emergency vehicle traffic signal priority (OptiCom) at all intersections significantly impacted by the SUMC Project. Implementation of this measure would reduce the SUMC Project's impact to less-than-significant levels. *TR-9.1* *Pay Fair Share Towards OptiCom Installation.* The SUMC Project sponsors shall pay their fair-share financial contribution towards the City of Palo Alto, to assist with the installation and operation of emergency vehicle traffic signal priority (OptiCom) at all significantly impacted intersections.	LTS
TR-10. Cumulative Construction Impacts. The SUMC Project, in combination with concurrent construction projects in the vicinity of the SUMC Sites, could result in a significant construction-period impact. The contribution of the SUMC Project would be cumulatively considerable.	S	MITIGATION MEASURES. With implementation of Mitigation Measures TR-1.1 through TR-1.9, which involve transportation-related construction management measures, the SUMC Project's contribution to the significant cumulative construction-period impact would be reduced to less than cumulatively considerable.	LTS
TR-11. Cumulative Transit Impacts. Cumulative growth would result in a less-than-significant cumulative impact on transit services.	LTS	None required.	N/A
3.5 Air Quality			
AQ-1. Construction Criteria Air Pollutant Emissions. Without mitigation, construction activities associated with the SUMC Project could cause emissions of dust and pollutants from equipment exhaust that could contribute to existing air quality violations or expose sensitive receptors to substantial pollutant concentrations. Impacts would be significant.	S	MITIGATION MEASURES. To minimize dust emissions, the Bay Area Air Quality Management District (BAAQMD) has identified a set of feasible PM_{10} control measures for all construction activities in the air basin. Implementation of the BAAQMD-recommended measures (Mitigation Measure AQ-1.1 below) would reduce the impacts caused by construction dust to a less-than-significant level. Additionally, implementation of construction equipment emission reduction measures (Mitigation Measure AQ-1.2 below) would further reduce NOx, ROG, PM_{10} and $PM_{2.5}$ emissions during construction. However, reduction of NOx emissions below 80 lbs/day during the first year of construction could not be guaranteed, and this impact would still be considered significant and unavoidable.	SU

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		AQ-1.1 *Implement Recommended Dust Control Measures.* To reduce dust emissions during project demolition and construction phases, the SUMC Project sponsors shall require the construction contractors to comply with the dust control strategies developed by the BAAQMD. The SUMC Project sponsors shall include in construction contracts the following requirements: a. Cover all trucks hauling soil, sand, and other loose materials including demolition debris, or require all trucks to maintain at least two feet of freeboard; b. Water all active construction areas (exposed or disturbed soil surfaces) at least twice daily; c. Use watering to control dust generation during demolition of structures or break-up of pavement; d. Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved parking areas and staging areas; e. Sweep streets daily (with water sweepers) all paved access roads, parking areas and staging areas during the earthwork phases of construction; f. Sweep daily (with water sweepers) if visible soil material is carried onto adjacent public streets; g. Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more); h. Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.); i. Limit traffic speeds on unpaved roads to 15 mph; j. Install sandbags or other erosion control measures to prevent silt runoff to public roadways; and k. Replant vegetation in disturbed areas as quickly as possible.	
		AQ-1.2 *Implement Equipment Exhaust Emission Reduction Measures.* To reduce emissions from construction equipment during project	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		demolition and construction phases, the SUMC Project sponsors shall require the construction contractors to comply with the following emission reduction strategies to the maximum feasible extent. The SUMC Project sponsors shall include in construction contracts the following requirements: a. Where possible, electrical equipment shall be used instead of fossil-fuel powered equipment. b. The contractor shall install temporary electrical service whenever possible to avoid need for fossil-fuel powered equipment. c. Running equipment not being actively used for construction purposes for more than five minutes shall be turned off. (e.g., trucks waiting to deliver or receive soil, aggregate, or other bulk materials; however, rotating-drum concrete trucks may keep their engines running continuously as long as they are on site). d. Trucks shall be prohibited from idling while on residential streets serving the construction site (also included in Mitigation Measure NO-1.1). e. Diesel-powered construction equipment shall be Tier III or Tier IV California Air Resources Board (CARB) certified equipment to the maximum feasible extent. f. The engine size of construction equipment shall be the smallest practical to accomplish the task at hand.	
AQ-2. Operational Criteria Air Pollutant Emissions. Combined mobile and stationary source emissions during operation of the SUMC Project would exceed the Bay Area Air Quality Management District's significance threshold of 80 pounds/day of ROG, NOx and PM_{10}. Therefore, air emissions would result in a substantial contribution to an existing regional air quality problem and a significant impact.	S	MITIGATION MEASURES. Mitigation Measure TR-2.3 involves implementation of enhanced TDM measures. The enhanced TDM measures include provision of the Caltrain GO Pass to ~~SUMC~~ Hospital employees, or an equivalent TDM measure. If the GO Pass would be provided, then remote parking spaces at the Ardenwood Park and Ride Lot in the East Bay would also be provided to serve commuters from the East Bay. Provision of the GO Pass plus remote parking spaces in the East Bay would reduce Vehicle Miles Travelled by 13.5 percent. This reduction in	SU

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		SUMC Project VMT, however, would not be sufficient to prevent project ROG, NOx and PM_{10} emissions from exceeding the BAAQMD significance thresholds. In addition, the City shall consider the feasibility of Mitigation Measure PH-3.1. Nonetheless, impacts would be significant and unavoidable even with mitigation.	
AQ-3. Localized Carbon Monoxide Impacts from Motor Vehicle Traffic. The SUMC Project would have less-than-significant localized air emissions resulting from additional traffic.	LTS	None required.	N/A
AQ-4. Toxic Air Contaminants. Simultaneous exposures to DPM and TACs from the construction and operational components of the SUMC Project would have a less-than-significant impact on air quality.	LTS	None required.	N/A
AQ-5. Objectionable Odors. The SUMC Project would have a less-than-significant impact related to exposing the public to objectionable odors that would affect a substantial number of people.	LTS	None required.	N/A
AQ-6. Cumulative Construction Emissions. Construction equipment NOx emissions associated with the SUMC Project could contribute considerably to regional air quality problems.	S	MITIGATION MEASURES. Mitigation Measures AQ-1.1 and AQ-1.2 would reduce the SUMC Project's contribution to cumulative construction emissions, although the contribution to NOx would remain cumulatively considerable.	SU
AQ-7. Cumulative Operational Emissions. SUMC Project operation could contribute considerably to a degradation of regional air quality as defined by the BAAQMD.	S	MITIGATION MEASURES. Mitigation Measure TR-2.3 involves implementation of enhanced TDM measures. The enhanced TDM measures include provision of the Caltrain GO Pass to ~~SUMC~~ Hospital employees, or an equivalent TDM measure. If the GO Pass would be provided, then remote parking spaces at the Ardenwood Park and Ride Lot in the East Bay would also be provided to serve commuters from the East Bay. As additional mitigation, the City shall consider the feasibility of Mitigation Measure PH-3.1, as identified and discussed in more detail in Section 3.13, Population and Housing. These measures would reduce the contribution to criteria pollutants during operation of the SUMC Project.	SU

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		However, even with mitigation, emissions would still exceed the BAAQMD significance thresholds, and the contribution would remain considerable.	
AQ-8. Cumulative Construction and Operational TAC and Fine Particulate Matter Emissions. SUMC Project TAC and fine particulate matter emissions ~~could contribute considerably to the health risk of sensitive receptors on and near the SUMC Project site and, thus, have a significant cumulative impact.~~ , and TAC and fine particulate matter emissions from other sources within a 1,000-foot zone of influence of the Main SUMC Site, would have a less-than-significant cumulative impact on public health.	~~S~~LTS	None required. ~~MITIGATION MEASURE. Mitigation Measure AQ-1.2 (Implement Equipment Exhaust Emission Reduction Measures) has been identified primarily to reduce construction phase criteria pollutant emissions, but it would also reduce Diesel Particulate Matter (DPM) emissions. However, the emissions of criteria and DPM emissions from project construction sources were based on current best estimates of the type, number, and duration of use of the SUMC Project construction equipment. While some additional reductions of Toxic Air Contaminants (TACs) would be expected with Mitigation Measure AQ-1.2, where their implementation is feasible, their potential additional reductions were not included in the SUMC Project's DPM estimates that were the basis of the Health Risk Assessment. However, it is not likely that the additional reductions in SUMC Project TAC emissions resulting from their implementation would reduce the SUMC Project health risk to the point where it would not be cumulatively considerable in the context of Palo Alto's high TAC background levels. Thus, SUMC Project TAC emissions would remain cumulatively significant even after the implementation of all feasible TAC reduction measures.~~	~~SU~~ N/A
3.6 Climate Change			
CC-1. Furthering ~~Goals and~~ Individual Policies of the Palo Alto Climate Protection Plan. The proposed Emissions Reduction Program would minimize greenhouse gas emission increases associated with the proposed development program. However, the proposed Emissions Reduction Program would not be sufficient to further ~~the goals~~ some of the individual policies of the City's Climate Protection Plan.	S	MITIGATION MEASURES. The mitigation measures below, ~~which~~ in addition to the proposed Emissions Reduction Program, would enable the SUMC Project to meet all of the individual policies of the City's Climate Protection Plan. ~~further minimize the increase in greenhouse gas emissions from this project. However, even with these measures the SUMC Project would contravene the goals in the City's Climate Protection Plan and would have a cumulatively considerable contribution to global climate change.~~ *CC-1.1 Commission and Retro-Commission Energy Systems for New Buildings*. New construction ~~and existing buildings altered by construction of~~ for the SUMC Project shall undergo	~~SU~~LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		commissioning[76] of energy and HVAC systems~~— during construction and on an annual basis during the first five years of operation~~ within one year following building occupancy. The commissioning process shall follow the standards of the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Guideline 0-2005 or the International Performance Measurement and Verification Protocol (MVP). The SUMC Project sponsors shall provide the City of Palo Alto with commissioning verification data within 12 months of OSHPD (or City) certificate of occupancy for each new SUMC Project building component (parking structures excluded). These components shall include: SHC Hospital (Phase 1), SHC Hospital (Phase 2), LPCH Hospital Expansion, Hoover Medical Office Building, School of Medicine (FIM 1, FIM 2 and FIM 3) and 429,000 square feet of clinic space for SHC. The commissioning of the new SHC and LPCH Expansion Hospitals shall be conducted as part of LEED Enhanced Commissioning in compliance with the ASHRAE Guideline 0-2005. During years two to five after completion of the entire SUMC Project, the SUMC Project sponsors shall annually provide the City of Palo Alto with an EPA Energy Star Statement of Energy Performance report for each new building component. This report shall be generated using the EPA Energy Star Portfolio Manager system. Building profiles and consumption details entered in the Portfolio Manager system and a resulting energy efficiency rating is provided based on similar facilities (i.e., academic teaching facility, community hospital, free-standing surgery center, etc.) This process would ensure that new and existing energy systems would perform interactively according to construction documents, the SUMC Project design intent and the owner's operational needs.	
		CC-1.2 *Participate in ~~Palo Alto Green Energy Program, Other Equivalent Renewable Energy Program, or combination thereof.~~ a Renewable Energy Program.~~— Under the Palo Alto Green~~*	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		~~program, residential, business and industrial customers purchase renewable energy equivalent to their electricity needs at an additional cost of 1.5 cents per kWh above standard electric rates.~~ The SHC and LPCH Project sponsors ~~facilities~~ shall participate in ~~this~~ a renewable energy program approved by the City to partially offset electricity emissions; develop new renewable generation sources in collaboration with the CPAU; incorporate a renewable energy source (such as photovoltaics) into the SUMC Project, ~~or a combination thereof, such that a minimum of 54,640 MWh of electricity usage is offset annually.~~ and/or otherwise promote expansion of the use of renewable energy by CPAU customers ("Renewable Energy Program"). The Renewable Energy Program shall be approved by the City and need not directly reduce the emissions from the SUMC Project facilities, and may be designed to promote expansion of the use of renewable energy by CPAU customers, either by providing a new source of renewable energy, educating the public about use of renewable energy, or contributing to research and development of renewable energy sources.	
		CC-1.3 *Provide Annual Greenhouse Gas Reporting*. The SHC and LPCH shall perform an annual inventory of greenhouse gas emissions associated with hospital and medical facilities on the SUMC Sites. This inventory shall be performed according to a common industry-standard emissions reporting protocol, such as the approaches recommended by California Air Resources Board, The Climate Action Registry, or Business Council for Sustainable Development (BCSD). This inventory shall be shared with the City of Palo Alto to facilitate the development of future collaborative Emissions Reduction Programs. Emissions associated with energy, water, solid waste, transportation, employee commute and other major sources shall be reported in this inventory.	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		CC-1.4 *Prepare Waste Reduction Audit*. The SUMC Project sponsors shall perform a waste reduction audit of waste management practices at the hospitals prior to construction of new facilities and after completion of the SUMC Project to determine post-project diversions. ~~This audit shall be repeated annually, and with the results being made available to the public or to City of Palo Alto staff.~~	
		CC-1.5 *Implement Construction Period Emission Reduction Measures*. Prior to the issuance of a grading permit the SUMC Project sponsors shall incorporate the following measures into the construction phasing plan and submit to City Planning for approval. • Use alternative-fueled (e.g., biodiesel, electric) construction vehicles/ equipment of at least 15 percent of the fleet; • Use local building materials of at least 10 percent; and • Recycle at least 50 percent of construction or demolition materials.	
CC-2 Emit Significant Greenhouse Gas Emissions. The proposed Emissions Reduction Program would minimize the greenhouse gas emission increases associated with the proposed development program, ~~although~~ and the proposed Emissions Reduction Program along with regulations adopted after the CARB Scoping Plan would ~~not~~ reduce emissions to ~~30~~ 36.09 percent below BAU (excluding emissions from patients and visitor trips). Therefore the SUMC project would not result in ~~have~~ a cumulatively considerable contribution to global climate change. (~~S~~ LTS)	~~S~~LTS	None required. ~~MITIGATION MEASURE. Mitigation Measures CC-1.1 through CC-1.5, and TR-2.3 would reduce greenhouse gas emissions. In addition, to further reduce impacts related to greenhouse gas emissions, the City shall consider the feasibility of Mitigation Measure PH-3.1.~~ ~~However, even with the implementation of all feasible mitigation measures, the anticipated emissions would remain above both the City of Palo Alto's Climate Protection Plan and the CARB's reduction emission goals of 30 percent below BAU emissions. Because these reduction levels cannot be achieved, the SUMC Project would emit significant amounts of greenhouse gases and would have a cumulatively considerable contribution to global climate change.~~	~~SU~~N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.7 Noise			
NO-1. Construction Noise. Construction of the SUMC Project would create a substantial temporary increase in ambient noise levels on the SUMC Sites compared to existing ambient noise levels. The noise increase would be a significant impact to the sensitive uses (i.e., patients) on the Main SUMC Site during construction.	S	MITIGATION MEASURE. The following mitigation measures would not reduce construction noise impacts to on-site sensitive receptors to less-than-significant levels, although they would lessen construction-related noise. *NO-1.1 Implement Best Management Practices to Reduce Construction Noise*. The SUMC Project sponsors shall incorporate the following practices into the construction documents to be implemented by the SUMC Project contractor: a. Provide enclosures such as heavy-duty mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy operations on the site. b. Use quiet construction equipment whenever possible, particularly air compressors. c. Provide sound-control devices on equipment no less effective than those provided by the manufacturer. d. Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from sensitive receptors. e. Prohibit unnecessary idling of internal combustion engines. f. Require applicable construction-related vehicles and equipment to comply with the City's truck route ordinance. g. Designate a noise disturbance coordinator who shall be responsible for responding to complaints about noise during construction. The telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site and shall be provided to the City. Copies of the construction schedule shall also be posted at nearby noise-sensitive areas.	SU
NO-2. Construction Vibration. Construction of the SUMC Project would have less-than-significant vibration impacts.	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
NO-3. Operational Noise Impacts from Transportation Sources. Increased traffic and helicopter noise levels due to implementation of the SUMC Project would be less than significant. However, noise from ambulances due to implementation of the SUMC Project would increase along Sand Hill Road west of El Camino Real, and would increase roadside noise levels by an amount considered unacceptable under the policies of the City Comprehensive Plan.	S	MITIGATION MEASURE. No mitigation measure (short of forbidding ambulance access to the new emergency room via the Durand Way access route; a measure that may be practically impossible given the emergency nature of ambulance activity) would prevent or reduce the identified SUMC Project-related ambulance noise impact at the noise-sensitive uses along Sand Hill Road. As such, the impact would be significant unavoidable impact.	SU
NO-4. Operational Stationary Source Noise Impacts. Operational stationary source noise generated by the SUMC Project could potentially increase ambient noise levels in the vicinity of the SUMC Sites and result in a significant impact.	S	MITIGATION MEASURE. The following mitigation measure would reduce noise impacts to sensitive receptors from HVAC equipment and emergency generators proposed for SUMC Project. Implementation of this measure would reduce the SUMC Project's noise impacts at 1100 Welch Road. *NO-4.1 Shield or Enclose HVAC Equipment and Emergency Generators.* Noise levels from mechanical equipment shall be minimized to the degree required by the City Noise Ordinance by proper siting and selection of such equipment and through installation of sufficient acoustical shielding or noise emission controls. Noise levels for the emergency generators near Welch Road shall be reduced such that noise levels do not exceed the City's General Daytime Exception standard of 70 dBA at 25 feet. An acoustical analysis shall be prepared by a qualified professional to ensure that the new mechanical equipment is in compliance with noise standards of the Noise Ordinance.	LTS
NO-5. Cumulative Construction Noise Impacts. If other foreseeable construction in the immediate vicinity of the SUMC Sites would occur simultaneously with the proposed SUMC Project construction, then significant cumulative noise impacts to adjacent residential and other noise-sensitive uses could occur. The SUMC Project's contribution would likely be cumulatively considerable.	S	MITIGATION MEASURE. Although measures under Mitigation Measure NO-1.1 would lessen the resulting noise contribution from the construction of the SUMC Project at 1100 Welch Road and on-site receptors, the contribution of the SUMC Project construction noise would remain cumulatively considerable.	SU

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
NO-6. Cumulative Construction Vibration Impacts. Vibration during construction activities under the cumulative scenario would result in a less-than-significant cumulative impact.	LTS	None required.	N/A
NO-7. Cumulative Operational Transportation Source Noise Impacts. Cumulative development would result in less-than-significant cumulative noise impacts.	LTS	None required.	N/A
NO-8. Cumulative Operational Stationary Source Noise Impacts. Cumulative development would not result in a significant increase in cumulative noise levels from operational stationary sources at sensitive receptors.	LTS	None required.	N/A
3.8 Cultural Resources			
CR-1. Impacts on Historical Resources. The SUMC Project would have a significant impact on historical resources.	S	MITIGATION MEASURES. Implementation of the Mitigation Measures CR-1.1 and CR-1.5 would reduce potential vibration and construction-related impacts to the Hoover Pavilion resulting from demolition of adjacent sheds and storage facilities, impacts from falling construction debris, and impacts from movement of heavy equipment to a less-than-significant level. Implementation of Mitigation Measures CR-1.2 through CR-1.4 would reduce impacts due to the loss of the Stone Building complex; however, the impact would remain significant and unavoidable. Mitigation Measure CR-1.5 requires implementation of the Stanford Hoover Pavilion Protection Documents (Documents) prepared by ARG and dated September 21, 2009 (see Appendix J). These Documents provide specifications for the treatment and protection of the Hoover Pavilion during SUMC Project construction activities that could damage the historic fabric of the building including the installation of protective covering of certain exterior surfaces and the removal, cataloging, and storage of selective historic elements. The Documents are based on National Park Service and National Fire Protection Agency protection guidelines and include details on materials and methods of installation for the protective coverings to prevent damage from nearby demolition. Proper installation, as required in the Documents would prevent the protective covering itself	SU

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		from damage the building. The removal of historic elements would ensure their protection of some of the more fragile elements from construction activities and property cataloging and storage of such elements would ensure their proper care and reinstallation. The Documents include such details as specifying under what weather conditions it is acceptable to perform the various tasks that could be negatively impacted by different weather conditions. Any variations on the specifications of the Documents would not be allowed without prior consultation with ARG, or a qualified preservation architect. Refer to Appendix J, Stanford Hoover Pavilion Protection Documents, for a complete list of specifications for the Hoover Pavilion. *CR-1.1* *Manually Demolish Structures at the Hoover Pavilion Site.* Where feasible, the project sponsors shall establish a perimeter of construction fencing around the Hoover Pavilion at a minimum of 25 feet to establish a protective buffer around the building. The demolition of these sheds and storage facilities shall be accomplished manually without the use of vibration causing equipment. Additional protective fencing at a height sufficient to prevent any debris from hitting the building shall also be installed between the Hoover Pavilion and demolition activities occurring within the 25 foot buffer. *CR-1.2* *Prepare HABS Documentation for the Stone Building Complex.* The SUMC Project sponsors shall prepare HABS-like documentation using the National Park Services' Historic American Building Surveys Level III guidelines for each of the buildings in the Stone Building complex prior to demolition of each building that comprises this historic resource (East, West, Core, Boswell, Edwards, Lane, Alway, and Grant). HABS-like recordation shall not be required until each of the individual buildings is vacated and prepared for demolition. The documentation shall include written and photographic documentation of each of the historic structures within the Stone Building complex. The documentation shall be prepared by a qualified professional meeting the Secretary of the Interior's	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		Professional Qualifications Standards for Architectural History or History. The documentation shall be prepared based on the National Park Services' HABS standards and include, at a minimum, the following: • Site-specific history and appropriate contextual information regarding the Stone Building complex. This history shall focus on the reasons for the buildings' significance: heart transplantation program and the role of E.D. Stone in the design of the complex. • Accurate mapping of all buildings that are included in the Stone Building complex, scaled to indicate size and proportion of the buildings to surrounding buildings; if existing plans accurately reflect these relationships these may be reformatted for submittal per HABS guidelines for CAD submittals. • Architectural descriptions of the major exterior features and public rooms within the Stone Building complex as well as descriptions of typical patient, office, laboratory, and operating rooms. • Photographic documentation of the interior and exterior of the Stone Building complex and Thomas Church-designed landscape features. Either HABS standard large format or digital photography may be used. If digital photography is used, the ink and paper combinations for printing photographs must be in compliance with National Register-National Historic Landmark photo expansion policy and have a permanency rating of approximately 115 years. Digital photographs will be taken as uncompressed .TIF file format. The size of each image shall be 1600x1200 pixels at 300 ppi (pixels per inch) or larger, color format, and printed in black and white. The file name for each electronic image	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		shall correspond with the Index to Photographs and photograph label.	
		CR-1.3 *Distribute Written and Photographic Documentation to Agencies.* The written and photographic documentation of historic resources shall be disseminated on archival-quality paper to Stanford University, the Northwest Information Center, and other local repositories identified by the City of Palo Alto.	
		CR-1.4 *Prepare Permanent Interpretive Displays/Signage/Plaques.* The SUMC Project sponsors shall install interpretive displays within the SUMC Sites that provide information to visitors and residents regarding the history of the Stone Building complex. These displays shall be installed in highly visible public areas such as the property's open space or in public areas on the interiors of buildings. The displays shall include historical data and photographs as well as physical remnants of architectural elements. Interpretive displays and the signage/plaques installed on the property shall be sufficiently durable to withstand typical Palo Alto weather conditions for at least five years. Displays and signage/plaques shall be lighted, installed at pedestrian-friendly locations, and be of adequate size to attract the interested pedestrian. Maintenance of displays and signage/plaques shall be included in the maintenance program on the property. Location and materials for the interpretative displays shall be subject to review by the Palo Alto Architectural Review Board and approval by the Planning Director.	
		CR-1.5 *Implement Protection Documents for the Hoover Pavilion.* The SUMC Project sponsors shall ensure the implementation of the Stanford Hoover Pavilion Protection Documents (Documents) prepared by ARG and dated September 21, 2009. The SUMC Project sponsors shall comply with the specifications for the treatment and protection of the Hoover Pavilion during SUMC Project construction activities that could damage the historic fabric of the building as provided in the Documents.	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
CR-2. Impacts on Prehistoric or Archaeological Resources. The SUMC Project could potentially encounter archaeological resources and result in a significant impact.	S	MITIGATION MEASURE. Mitigation Measure CR-2.1 provides discovery and evaluation procedures for any previously unknown archaeological resources on the SUMC Sites and requires that a professional archaeologist employ preservation in place, data recovery, or other methods that meet the Secretary of the Interior's Standards for Archaeological Documentation to reduce impacts on unique archaeological resources. Therefore, implementation of the following mitigation measure would ensure the impact remains less than significant. (LTS) *CR-2.1* *Construction Staff Training and Consultation.* Prior to any construction or earth-disturbing activities, a qualified archaeologist shall inform construction supervisors of the potential to encounter cultural resources. All construction personnel shall be instructed to be observant for prehistoric and historic-era artifacts, subsurface archaeological features or deposits, including accumulations of dark, friable soil (“midden”), stone artifacts, animal bone, and shell. In the event that any prehistoric or historic subsurface archaeological features or cultural deposits are discovered during construction-related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City shall be notified. The City shall consult with the Stanford University Archeologist to assess the significance of the find. If the find is determined to be an historical resource or a unique archaeological resource as defined by CEQA, then representatives of the City and the Stanford University Archaeologist shall meet to determine the appropriate course of action. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and a report shall be prepared by the qualified archaeologist according to current professional standards.	LTS
CR-3. Impacts on Human Remains. The SUMC Project could potentially encounter human remains and result in a significant impact.	S	MITIGATION MEASURE. Mitigation Measure CR-3.1 summarizes the procedures to be taken in the event that any previously unknown human remains are discovered on the SUMC Sites. Therefore, implementation of the following mitigation measure would ensure that the potential impact	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		remains less than significant. *CR-3.1* *Conduct Protocol and Procedures for Encountering Human Remains*. If human remains (including disarticulated or cremated remains) are discovered at any SUMC Project construction site during any phase of construction, all ground-disturbing activity within 100 feet of the human remains should be halted and the Stanford University Archaeologist, City of Palo Alto, and the County coroner notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC adhered to in the treatment and disposition of the remains. The SUMC Project sponsors shall retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the City of Palo Alto, including the excavation and removal of the human remains. If the human remains cannot be avoided, and the Most Likely Descendant requests that the human remains be removed from its location, the SUMC Project sponsors shall implement removal of the human remains by a professional archaeologist. The City of Palo Alto shall verify that the mitigation is complete before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.	
CR-4. Impacts on Paleontological Resources. The SUMC Project could have a significant impact on unique paleontological resources or unique geologic resources.	S	MITIGATION MEASURE. Mitigation Measure CR-4.1 provides protocol for encountering paleontological resources and would reduce the potential impacts resulting from disruption to unique paleontological resources to a less-than-significant level. *CR-4.1* *Conduct Protocol and Procedures for Encountering Paleontological Resources*. Should paleontological resources be	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		identified during SUMC Project ground-disturbing activities, the SUMC Project sponsors shall notify the City and the Stanford University Archaeologist and cease operations in the vicinity of the potential resource until a qualified professional paleontologist can complete the following actions when appropriate: • Identify and evaluate paleontological resources by intense field survey where impacts are considered high; • Assess effects on identified resources; and • Consult with the City of Palo Alto and the Stanford University Archaeologist. Before operations in the vicinity of the potential resource resume, the SUMC Project sponsors shall comply with the paleontologist's recommendations to address any significant adverse effects where determined by the City of Palo Alto to be feasible. In considering any suggested mitigation proposed by the consulting paleontologist, the SUMC Project sponsors shall consult with the Stanford University Archaeologist and the City to determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, cost policies and land use assumptions, and other considerations. If avoidance is infeasible, other appropriate measures (e.g. data recovery) shall be instituted to avoid a significant impact. Work may proceed in other parts of the SUMC Sites while mitigation for paleontological resources is completed.	
CR-5. Cumulative Impacts on Historic Resources. The SUMC Project, in combination with other past, current, and probable future development in the City, would cause a substantial change in the significance of the City's historic resources and thus have a significant cumulative impact. The SUMC Project's contribution to the cumulative impact would be cumulatively considerable.	S	MITIGATION MEASURES. Due to the demolition of the Stone Building complex, the SUMC Project's contribution would remain cumulatively considerable as this impact cannot be avoided. Implementation of Mitigation Measures CR-1.2 through CR-1.4 would reduce the SUMC Project's contribution to the cumulative impact, but not to a less than cumulatively considerable level.	SU

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
CR-6. Cumulative Impacts on Prehistoric and/or Archaeological Resources and Human Remains. The SUMC Project, in combination with other reasonably foreseeable probable future development, could cause a substantial change in the significance of prehistoric and/or archaeological resources or human remains and thus contribute to a significant cumulative impact. The SUMC Project is conservatively assumed to have a considerable contribution.	S	MITIGATION MEASURES. Compliance with Mitigation Measures CR-2.1 and CR-3.1 would reduce the SUMC Project's contribution to the cumulative impact to a less than cumulatively considerable level.	LTS
CR-7. Cumulative Impacts on Paleontological Resources. The SUMC Project, in combination with other reasonably foreseeable probable future development where the Pleistocene-age creek bed may occur, could have a significant cumulative impact. Such an impact would occur if the buried Pleistocene-age creek bed is exposed in lengths greater than approximately 100 feet (or a sufficient length to support detailed hydrological study) and if such deposits contain substantially intact skeletons of extinct species. These conditions would represent a major find for regional paleontology. In the case that significant paleontological finds—such as stretches of buried Pleistocene-age creek bed greater than 100 feet in length and containing intact skeletons of extinct species—are made on the SUMC Site, then the SUMC Project's contribution to the cumulative impact on paleontological resources could be cumulatively considerable.	S	MITIGATION MEASURE. Compliance with Mitigation Measure CR-4.1 would reduce the SUMC Project's contribution to the cumulative impact to a less than cumulatively considerable level.	LTS
3.9 Biological Resources			
BR-1. Impacts on Special-Status Plant or Wildlife Resources. The SUMC Project could have a significant impact on special-status wildlife resources.	S	MITIGATION MEASURES. Mitigation Measures BR-1.1 through BR-1.5, below, to be implemented by the SUMC Project sponsors, would reduce the SUMC Project's impact on special-status bats and Cooper's hawk to a less-than-significant level. *BR-1.1* *Conduct Pre-Demolition Survey*. The SUMC Project sponsors shall retain a qualified biologist ("bat biologist") to conduct a pre-construction survey for roosting bats in trees to be removed	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		or pruned and structures to be removed. If no roosting bats are found, no further mitigation is required. If a bat roost is found, the SUMC Project sponsors shall implement the following measures to avoid impacts on roosting bats.	
		BR-1.2 *Avoid Roosting Areas*. If non-breeding bats are found in a tree or structure to be removed, the individuals shall be safely evicted, under the direction of a qualified bat biologist, by opening the roosting area to allow airflow through the cavity. Demolition should then follow at least one night after initial disturbance for airflow. This action should allow bats to leave during darkness, thus increasing their chance of finding new roosts with a minimum of potential predation during daylight. If active maternity roosts are found in structures that will be removed as part of project construction, demolition of that structure shall commence before maternity colonies form (generally before March 1) or after young are flying (generally by July 31).	
		BR-1.3 *Develop and Employ Bat Nest Box Plan*. If special-status bats are found in structures to be removed, the SUMC Project sponsors shall develop a bat nest box plan for the SUMC Sites employing state-of-the-art bat nest box technology. The design and placement of nest boxes shall be reviewed by a qualified bat biologist.	
		BR-1.4 *Avoid Tree Removal During Nesting Season*. Tree removal or pruning shall be avoided from February 1 through August 31, the nesting period for Cooper's hawk, to the extent feasible. If no tree removal or pruning is proposed during the nesting period, no surveys are required.	
		BR-1.5 *Protect Cooper's Hawk in the Event of Nest Discovery*. If tree removal or pruning is unavoidable during the nesting season, the SUMC Project sponsors shall hire a qualified biologist to conduct a survey for nesting Cooper's hawk within five days prior to the	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		proposed start of construction. If active Cooper's hawk nests are not present, project activities can take place as scheduled. The qualified biologist shall visit the site daily to search for nests until all nesting substrates are removed. This will avoid impacts to Cooper's hawk that may have moved into the site and initiated nest-building after the start of tree removal activities. Additionally, if more than 5 days elapses between the initial nest search and the tree removal, it is possible for new birds to move into the construction area and begin building a nest. If there is such a delay, another nest survey shall be conducted. If any active Cooper's hawk nests are detected, the SUMC Project sponsors shall delay removal of the applicable tree or shrub while the nest is occupied with eggs or young who have not fledged. A qualified biologist shall monitor any occupied nest to determine when the Cooper's hawk nest is no longer used.	
BR-2. Loss of Riparian or Other Sensitive Habitats, Including Wetlands as Defined by Section 404 of the Clean Water Act. Construction of the SUMC Project would have a less-than-significant impact on riparian or other sensitive habitat resources, including wetlands.	LTS	None required.	N/A
BR-3. Interference with the Movement of Any Native Resident or Migratory Fish or Wildlife Species or with Established Native Resident or Migratory Wildlife Corridors, or Use of Native Wildlife Nursery Sites. The SUMC Project would have no impact on the movement of any native resident or migratory fish or wildlife species, or use of native resident or migratory wildlife corridors, but could impede the use of native wildlife nursery sites and thus result in a significant impact.	S	MITIGATION MEASURES. Mitigation Measures BR-3.1 and BR-3.2, below, would reduce the SUMC Project's impact on nesting migratory birds to a less-than-significant level. *BR-3.1* *Avoid Tree Removal During Nesting Season.* Tree or shrub removal or pruning shall be avoided from February 1 through August 31, the bird-nesting period, to the extent feasible. If no tree or shrub removal or pruning is proposed during the nesting period, no surveys are required. *BR-3.2* *Protect Birds in the Event of Nest Discovery.* If tree and shrub removal or pruning is unavoidable during the nesting season, the SUMC Project sponsors shall hire a qualified biologist to conduct a survey for nesting raptors and other birds within five days prior	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		to the proposed start of construction. If active nests are not present, SUMC Project activities can take place as scheduled. The qualified biologist shall visit the site daily to search for nests until all nesting substrates are removed. These procedures would avoid impacts to any birds that may have moved into the sites and initiated nest-building after the start of tree and shrub removal activities. Additionally, if more than five days elapses between the initial nest search and the vegetation removal, it is possible for new birds to move into the construction area and begin building a nest. If there is such a delay, another nest survey shall be conducted. If any active nests are detected, the SUMC Project sponsors shall delay removal of the applicable tree or shrub while the nest is occupied with eggs or young who have not fledged. A qualified biologist shall monitor any occupied nest to determine when the nest is no longer used.	
BR-4. Result in a Substantial Adverse Effect on any Protected Tree as Defined by the City of Palo Alto's Tree Preservation Ordinance (Municipal Code Section 8.10). The SUMC Project could have a significant impact on Protected Trees.	S	MITIGATION MEASURES. Mitigation Measures BR-4.1 through BR-4.5, below, to be implemented by the SUMC Project sponsors, would reduce the SUMC Project's impact on Protected Trees. In addition, Mitigation Measure BR-4.6 would require minor SUMC Project site plan adjustments to avoid removal of some biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources. However, ~~the new Hospital District under the SUMC Project would allow the removal of up to 48 Protected Trees that are protected under the Municipal Code~~ up to 61 Protected Trees that are not aesthetic tree resources could be removed under the SUMC Project. In addition, minor modifications to the SUMC Project site plans would not be able to avoid the nine biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources in the Kaplan Lawn area. Therefore, the SUMC Project would result in a significant and unavoidable impact to Protected Trees. *BR-4.1* *Prepare a Tree Preservation Report for all Trees to be Retained.* An updated tree survey and tree preservation report (TPR) prepared by a certified arborist shall be submitted for review ~~and acceptance by~~ and approval by the Director of Planning and	SU

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		Community Environment in consultation with the City ~~Urban Forester~~ Arborist. For reference clarity, the tree survey shall include (list and field tag) all existing trees within the SUMC Sites, including adjacent trees overhanging the SUMC Sites. The approved TPR shall be implemented in full, including mandatory inspections and monthly reporting to City ~~Urban Forester~~ Arborist. The TPR shall be based on latest SUMC plans and amended as needed to address activity ~~or~~ within the dripline area of any existing Protected ~~t~~Tree to be preserved, including incidental work (utilities trenching, street work, lighting, irrigation, etc.) that may affect the health of a preserved Protected ~~t~~Tree. ~~The SUMC Project shall be modified to address recommendations identified to reduce impacts to existing ordinance regulated trees.~~ The TPR shall be consistent with the criteria set forth in the Tree Preservation Ordinance, Palo Alto Municipal Code Section 8.10.030, and the City Tree Technical Manual, Section 3.00, 4.00 and 6.30. To avoid improvements that may be detrimental to the health of ~~regulated~~ Protected ~~t~~Trees, the ~~TPR~~ Director of Planning and Community Environment, in consultation with the City Arborist, shall review the SUMC Project sponsors' landscape plan to ensure the new landscape is consistent with Tree Technical Manual, Section 5.45 and Appendix L, Landscaping under Native Oaks.	
		BR-4.2 *Prepare a Solar Access Study (SAS) of Short and Long Term Effects on Protected Oaks*. The SUMC Project sponsors shall prepare a SAS of Short and Long Term Effects on Protected Oaks that are aesthetic tree resources for review and approval by the Director of Planning and Community Environment in consultation with the City Arborist. The SAS shall be prepared by a qualified expert team (horticulturalist, architect designer, consulting arborist) capable of determining effects, if any, to foliage, health, disease susceptibility and also prognosis for longevity. The SAS shall ~~provide alternative massing scenarios to provide sufficient solar access and reduce shading detriment at~~	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		~~different thresholds of tree health/decline, as provided for in the SAS. The SAS adequacy shall be subject to peer review as determined necessary by the City. The SAS design alternatives shall be the subject of specific discussion at all levels of ARB, Planning Commission, City Council, and public review in conjunction with the SUMC Project sponsors, the City Urban Forester, and Director of the Planning and Community Environment Department, until a final design is approved.~~ contain the same information as the SAS for FIM 1 trees that are aesthetic tree resources submitted September 23, 2010. If the Director of Planning and Community Environment, in consultation with the City Arborist, determines that the SUMC Project would have an adverse effect on solar access to a Protected Tree that is an aesthetic tree resource such that the tree is unlikely to survive, then the SUMC Project sponsors shall relocate the Protected Tree to a site with sufficient solar access, as determined by the Direct of Planning and Community Environment, in consultation with the City Arborist. The SAS has been completed and accepted by the City for trees #608, Kaplan Lawn (trees #33 through 41), and FIM (trees #317 through 320 and #322).	
		BR-4.3 *Prepare a Tree Relocation Feasibility Plan for Any Protected Tree Proposed for Relocation and Retention.* Relocation of Protected Trees with the SUMC Sites shall be allowed only upon issuance of a Protected Tree relocation permit from the Director of Planning and Community Environment in consultation with the City Arborist. Because of inherent mortality associated with the process of moving mature trees, the SUMC Project sponsors shall prepare a Tree Relocation and Maintenance Plan (TRMP) ~~shall be prepared subject to Urban Forester's approval~~ to be reviewed in connection with the Protected Tree relocation permit. ~~The SUMC Project sponsors shall submit a~~ The TRMP ~~to determine~~ shall evaluate the feasibility of moving the Protected Trees to an appropriate location on site. Feasibility shall	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		consider current site and tree conditions, a tree's ability to tolerate moving, relocation measures, optimum needs for the new location, aftercare, irrigation, and other long-term needs. The tree relocation permit shall specify that if the relocated trees do not survive after a period of five years, the ~~tree canopy~~ relocated tree or trees shall be replaced with ~~a tree of equivalent size or security deposit value~~ trees or a combination of trees and Tree Value Standards consistent with Section 3.20, Table 3-1 Tree Canopy Replacement, of the Tree Technical Manual. The TRMP shall be inclusive of the following minimum information: appropriate irrigation, monitoring inspections, post relocation tree maintenance, and for an annual arborist report of the condition of the relocated trees. If a tree is disfigured, leaning with supports needed, in decline with a dead top or dieback of more than 25 percent, the tree shall be considered a total loss and replaced ~~in kind and size~~ as described above. ~~The final annual arborist report shall serve as the basis for return of the Tree Security Deposit (see Mitigation Measure BR-4.4, below, for a discussion of the Tree Security Deposit).~~	
	BR-4.4A	~~*Provide a Tree Preservation Bond/Security Guarantee*~~ *Enter into a Memorandum of Understanding for Tree Maintenance*. ~~The natural tree resources on the SUMC Site include significant Protected Trees and those that provide neighborhood screening, including two trees proposed for relocation. Prior to building permit submittal, the Tree Security Deposit for the total value of the relocated trees, as referenced in the Tree Technical Manual, Section 3.26, Security Deposits, shall be posted to the City Revenue Collections in a form acceptable by the City Attorney.~~ As a security measure, the SUMC Project sponsors shall be subject to a Memorandum of Understanding (MOU) between the City of Palo Alto and the SUMC Project sponsors describing a tree retention amount, the list of trees to be retained, an appraised value for each listed tree, a five-year tree growth and establishment, ~~criteria and~~ timeline for return of security, and	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		conditions of approval related to Protected Trees, as cited in the ~~Record of Land Use Action~~ Conditional Use Permit for the SUMC Project. The SUMC Project sponsors and SUMC Project arborist~~, to be retained by the SUMC Project sponsors,~~ shall coordinate with the City ~~Urban Forester~~ Arborist to determine ~~the amount of bonding~~ conditions required to guarantee the protection and/or replacement of the regulated trees on the site during construction and within five years after occupancy. ~~The SUMC Project sponsors shall bond for 150 percent of the value for the relocated trees, and 50 percent of the value of the remaining trees to be protected during construction (as identified in the revised and final approved Tree Protection Report).~~ The SUMC Project sponsors shall also ~~provide an appraisal of the trees with the proposed level of bonding in a tree value table to be reviewed and accepted by the Director of Planning and Community Environment with the description of each tree by number, value, and total combined value of all the trees to be retained. A return of the guarantee shall be subject to an annual followed by a final tree assessment report on all the relocated and retained trees from the SUMC Project arborist, as approved by the City Urban Forester, five years following final inspection for occupancy, to the satisfaction of the Director of the Planning and Community Environment Department.~~ provide a security guarantee for the trees, as determined by the Director of Planning and Community Environment, in consultation with the City Arborist, in an amount consistent with the City of Palo Alto Tree Technical Manual.	
		BR 4.4B *Replace Protected Trees in Accordance with the Tree Technical Manual.* Removal of Protected Trees shall be allowed only upon issuance of a Protected Tree removal permit from the Director of Planning and Community Environment, in consultation with the City Arborist. Protected Trees that are removed without being relocated shall be replaced in accordance with the ratios set forth in Table 3-1 of the City of Palo Alto Tree Technical Manual in	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		the following way, in order to maintain the appropriate landscape approach at the SUMC Sites, which has limited opportunities to plant the required replacement of trees: • The Protected Tree removal permit issued shall stipulate the tree replacement requirements for the removed tree, including number of trees, location, and irrigation; • The number and size of trees required for replacement would be calculated in accordance with Table 3-1; and • The difference between the required tree replacement and the number of trees planted at the SUMC Sites would be mitigated through contribution to the Forestry Fund in the City of Palo Alto. Payment to the Forestry Fund would be in the amount representing the value of the replacement trees that would be required under the TTM standard.	
		BR-4.5 *Provide Optimum Tree Replacement for Loss of Publicly-Owned Trees Regulated Tree Category*. There are many publicly owned trees growing in the right-of-way along various frontages (Welch Road, Pasteur Drive, Quarry Road, Sand Hill Road, etc.). These trees provide an important visual and aesthetic value to the streetscape and represent a significant investment from years of public resources to maintain them. As mitigation to offset the net benefits loss from removal of mature trees, and to minimize the future years to achieve parity with visual and infrastructure service benefits (CO_2 reduction, extended asphalt life, water runoff management, etc.) currently provided by the trees, the new public trees on all roadway frontages shall be provided with best practices design and materials, including, but not limited to,	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		the following elements: • Consistency with the City of Palo Alto Public Works Department Street Tree Management Plan, in consultation with Canopy, Inc.[1] • Provide adequate room for natural tree canopy growth and adequate root growing volume. For large trees, a target goal of 1,200 cubic feet of soil shall be used. • For pedestrian and roadway areas that are to include tree planting or adjacent to existing trees to be retained, utilize City-approved best management practices for sustainability products, such as permeable ADA sidewalk surfaces, Silva Cell base support planters, engineered soil mix base, and other advantage methods.	
		BR-4.6 *Implement Minor Site Modifications to Preserve Biological~~ly~~ and Aesthetic~~ally~~* ~~*Significant Protected Trees*~~ *Tree Resources*. The SUMC Project sponsors shall design and implement modifications to building design, hardscape, and landscape to incorporate the below and above ground area needed to preserve ~~as many biologically and aesthetically significant Protected Trees as possible~~ the following trees that are both biological and aesthetic tree resources: • *FIM 1 Grove*. Retain one Protected Tree that is an aesthetic tree resources (#319) and relocate two Protected Trees that are aesthetic tree resources (#323 and 324) in the FIM 1 Grove. • *Adjacent to Welch Road*. Retain the century-old solitary oak located between Welch Road to the north and the Blake-	

[1] Canopy, Inc. is a non-profit organization that advises the City with regards to public trees. The City typically interfaces between applicants and the Canopy, Inc., but it is recommended that the SUMC Project sponsors consult with Canopy, Inc. as well.

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		Wilbur Clinic building to the south (#608). In addition, relocate the mature Protected oak tree located to the east of the proposed LPCH hospital building (#996).	
BR-5. Conflict with any Applicable Habitat Conservation Plan or Natural Community Conservation Plan. The SUMC Project would have no impact on any applicable Habitat Conservation Plan or Natural Community Conservation Plan.	NI	None required.	N/A
BR-6. Cumulative Impacts on Special-Status Wildlife Resources. The SUMC Project, in combination with other foreseeable development, would have a less-than-significant impact on Special-Status Plant Resources.	LTS	None required.	N/A
BR-7. Cumulative Loss of Riparian or Other Sensitive Habitats, Including Wetlands as Defined by Section 404 of the Clean Water Act. Cumulative impacts on riparian or other sensitive habitats could be significant. However, the SUMC Project's contribution to the cumulative impact would be less than cumulatively considerable.	LTS	None required.	N/A
BR-8. Cumulative Interference with the Movement of Any Native Resident or Migratory Fish or Wildlife Species or With Established Native Resident or Migratory Wildlife Corridors, or Use of Native Wildlife Nursery Sites. Cumulative interference with movement of resident or migratory species or with established migratory corridors could be significant. However, the SUMC Project's contribution to the cumulative impact would be less than cumulatively considerable.	LTS	None required.	N/A
BR-9. Cumulative Impacts on Protected Tree as defined by the City of Palo Alto's Tree Preservation Ordinance (Municipal Code Section 8.10). Cumulative impacts on Protected Trees would be significant. Because the SUMC Project would result in the loss of Protected Trees, the SUMC Project's contribution would cumulatively considerable.	S	MITIGATION MEASURES. Mitigation Measures BR-4.1 through BR-4.6 would reduce the SUMC Project's contribution to cumulative impacts on Protected Trees. However, removal of some Protected Trees, including those identified by the City as being biologically and aesthetically significant Protected Trees, would be unavoidable. As such, the contribution of the SUMC Project to cumulative Protected Tree removal would remain cumulatively considerable.	SU

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.10 Geology			
GS 1. Exposure to Seismic-Related Hazards. The SUMC Project would have a less-than-significant potential to expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure (including liquefaction), landslides, expansive soil, or major geologic hazards that cannot be mitigated through the use of standard engineering design and seismic safety techniques.	LTS	None required.	N/A
GS 2. Exposure to Other Geotechnical Hazards. The SUMC Project would have a less-than-significant potential to be located on geologic units or on soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	LTS	None required.	N/A
GS 3. Cause Substantial Erosion or Siltation. The SUMC Project would have a less-than-significant potential to cause substantial erosion or siltation.	LTS	None required.	N/A
GS-4. Cumulative Exposure to Substantial Erosion or Siltation. The SUMC Project, in combination with other foreseeable development in the San Francisquito Creek Watershed, would not substantially increase erosion or siltation because of State, federal, and local runoff and erosion prevention requirements. As a result, the cumulative impact would be less than significant.	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.11 Hydrology			
HW-1. Flood Risk and Flood Flows. The SUMC Project would have no impact on flood risk or flood flows.	NI	None required.	N/A
HW-2. Groundwater Recharge and Local Water Table. The SUMC Project would have a less-than-significant impact on groundwater recharge and the local groundwater table level.	LTS	None required.	N/A
HW-3. Groundwater Quality. The SUMC Project could have a significant impact on groundwater quality during construction.	S	MITIGATION MEASURE. Mitigation Measure HW-3.1, below, would reduce the SUMC Project's impact on groundwater quality to a less-than-significant level. *HW-3.1 Develop a Work Plan for any Unknown Contaminated Sites.* During construction, if suspected contaminated soil, undocumented underground tanks, hazardous materials pipelines, or other evidence of potential hazardous materials are discovered, construction activities shall cease and the SUMC Project sponsors shall prepare a workplan to determine the potential risk to human and ecological health. The workplan shall be prepared by a Registered Environmental Assessor and in compliance with the Department of Toxic Substances Control (DTSC) guidelines and the National Oil and Hazardous Substances Contingency Plan (the "National Contingency Plan" [NCP]). The SUMC Project sponsors, or their representative, shall be responsible for submitting the workplan for the DTSC's review and approval prior to implementing field activities. The workplan must include all information necessary for implementing field work. The workplan shall include a Site Safety Plan (SSP) and a Sampling Work Plan (SWP). The SSP must be submitted to the DTSC in conjunction with the submittal of the SWP. The objective of the SSP is to ensure protection of the investigative team as well as the general public during sampling activities. If risk to human or ecological health is identified, the SUMC	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		Project sponsors shall prepare and implement a Removal Action Workplan (SB 1706 Stats. 1994, Chapter 441) (non-emergency removal action or remedial action at a hazardous substance release site which is projected to cost less than $1,000,000) that is consistent with the NCP.	
HW-4. Stormwater Runoff and Erosion. The SUMC Project would have a less-than-significant impact on stormwater runoff and erosion.	LTS	None required.	N/A
HW-5. Flooding and Stormwater Conveyance Capacity. The SUMC Project would have a less-than-significant impact on flooding and stormwater conveyance capacity.	LTS	None required.	N/A
HW-6. Streambank Instability. The SUMC Project would have a less-than-significant impact on streambank instability.	LTS	None required.	N/A
HW-7. Degradation of Surface Water Quality. The SUMC Project would have a less-than-significant impact on degradation of surface water quality.	LTS	None required.	N/A
HW-8. Dam Failure Inundation. The SUMC Project would have a less-than-significant impact regarding dam failure inundation.	LTS	None required.	N/A
HW-9. Violation of Any Water Quality Standards or Waste Discharge Requirements (WDRs). The SUMC Project would have a less-than-significant impact regarding water quality standards or WDRs.	LTS	None required.	N/A
HW-10. Cumulative Groundwater Recharge and Local Water Table. The SUMC Project, in combination with reasonably foreseeable probable future development, would have a less-than-significant cumulative considerable impact on groundwater recharge and the local groundwater table.	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
HW-11. Cumulative Groundwater Quality Impacts. The SUMC Project, in combination with reasonably foreseeable probable future development, would have a less-than-significant cumulative impact on groundwater quality.	LTS	None required.	N/A
HW-12. Cumulative Stormwater Runoff and Erosion. The SUMC Project, in combination with reasonably foreseeable probable future development, would have a less-than-significant cumulative impact on stormwater runoff and erosion.	LTS	None required.	N/A
HW-13. Cumulative Flooding and Stormwater Conveyance. The SUMC Project, in combination with reasonably foreseeable probable future development, would have a less-than-significant cumulative impact on stormwater runoff and erosion.	LTS	None required.	N/A
HW-14. Streambank Instability. The SUMC Project, in combination with reasonably foreseeable probable future development, would have a less-than-significant cumulative impact on streambank instability.	LTS	None required.	N/A
HW-15. Degradation of Surface Water Quality. The SUMC Project, in combination with reasonably foreseeable probable future development, would have a less-than-significant cumulative impact on degradation of surface water quality.	LTS	None required.	N/A
HW-16. Dam Failure Inundation. The SUMC Project, in combination with reasonably foreseeable probable future development, would have a less-than-significant cumulative impact regarding dam failure inundation.	LTS	None required.	N/A
HW-17. Violation of Any Water Quality Standards or Waste Discharge Requirements (WDRs). The SUMC Project, in combination with reasonably foreseeable probable future development, would have a less-than-significant cumulative impact on violation of water quality standards and WDRs.	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.12 Hazardous Materials			
HM-1. Exposure from Hazardous Materials Use, Handling, and Disposal. The SUMC Project would not substantially increase exposure from hazardous materials use, handling, and disposal during operation.	LTS	None required.	N/A
HM-2. Demolition and Construction-Related Hazardous Materials Disturbance. The SUMC Project could release hazardous materials in existing buildings.	S	MITIGATION MEASURE. Implementation of the mitigation measure below would reduce impacts from exposure to asbestos containing materials to a less-than-significant level at the SUMC Sites by ensuring that all asbestos containing materials are identified and removed prior to structural modification and/or demolition. *HM-2.1* *Conduct Asbestos Survey at the SUMC Sites.* Prior to building renovation and/or demolition, an asbestos survey shall be performed on all areas of the building anticipated to be demolished and/or renovated. This survey shall be performed by a licensed asbestos abatement contractor. In the event that asbestos is identified in the buildings proposed to be demolished and/or renovated, all asbestos containing materials shall be removed and appropriately disposed of by a licensed asbestos abatement contractor. A site health and safety plan, to ensure worker safety, in compliance with OSHA requirements (8 CCR 5208) shall be developed by the SUMC Project sponsors and in place prior to commencing renovation or demolition work on portions of buildings containing asbestos.	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
HM-3. Exposure to Contaminated Soil and/or Groundwater During Construction. The SUMC Project could expose construction personnel and public to existing contaminated groundwater and/or soil.	S	MITIGATION MEASURES. With implementation of Mitigation Measure HM-3.1 through HM-3.4, below, the significant impact on construction personnel and the public due to exposure to contaminated soil and/or groundwater at the SUMC Sites would be reduced to less-than-significant levels. In addition, Mitigation Measure HW-3.1 in Section 3.11, Hydrology, would require the SUMC Project sponsors to develop a work plan for any unknown contaminated site, which would further reduce the impacts to less than significant. Mitigation Measure HM-3.4 would require specification of measures to prevent hazards from any remediation itself. As such, these would be less-than-significant impacts from any remediation. *HM-3.1* *Perform a Phase II ESA for the 701 Welch Site*. A Phase II ESA shall be performed at 701 Welsh Site Building B. The Phase II ESA shall include sampling and analysis of soil, groundwater, wastewater, and residues on surfaces such as laboratories countertops, fume hoods, sinks, sumps, floors, and drain lines. The County DEH and PAFD shall be notified by the Project sponsors if contamination is discovered. If contamination is discovered, the SUMC Project sponsors shall prepare a site remediation assessment that (a) specifies measures to protect workers and the public from exposure to potential site hazards and (b) certifies that the proposed remediation measures would clean up contaminants, dispose of the wastes, and protect public health in accordance with federal, State, and local requirements. Site excavation activities shall not proceed until the site remediation has been approved by the County DEH and implemented by the SUMC Project sponsors. Additionally, the Site Remediation Assessment shall be subject to review and approval by the San Francisco Bay RWQCB. All appropriate agencies shall be notified. *HM-3.2* *Excavate Contaminated Soil from the 703 Welch Site*. For the 4- to 9-square-foot area near every discharge point from the building, soil samples shall be performed and contaminated soil excavated, removed, and transported to an approved disposal	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		facility in compliance with OSHA requirements. The County DEH and the PAFD shall be notified by the SUMC Project sponsors if contamination is encountered during construction.	
		HM-3.3 *Conduct a Soil ~~Vapor~~ Excavation Program at the Hoover Pavilion Site*. A qualified consultant, under the SUMC Project sponsors' direction, shall undertake the following activities: • Remove all buried underground storage tanks from the property after sheds and storage buildings on the Hoover Pavilion site have been demolished; • To the extent necessary, additional soil sampling shall be collected to determine health risks and to develop disposal criteria; • If warranted based on soil sampling, contaminated soil shall be excavated, removed, and transported to an approved disposal facility in compliance with OSHA requirements; and • ~~If warranted based on soil sampling, a human health risk assessment shall be prepared and implemented to determine potential for impacts on construction workers as well as to develop measures to ensure it is safe to redevelop the Hoover Pavilion Site within engineering controls (e.g., SVE or vapor barriers); and~~ • To the extent required based upon the results of soil sampling and the results of a health risk assessment ~~(if applicable),~~ a Site Health and Safety Plan to ensure worker safety in compliance with OSHA requirements shall be developed by the SUMC Project sponsors, and in places prior to commencing work on any contaminated site. • The SUMC Project sponsors shall ~~cooperate with~~ submit documents to the County DEH to proceed with closure of the Hoover Pavilion Site.	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		HM-3.4 *Develop a Site Management Plan for the Hoover Pavilion Site.* The SUMC Project sponsors shall prepare a site remediation assessment that (a) specifies measures to protect workers and the public from exposure to potential site hazards, including hazards from remediation itself, and (b) certifies that the proposed remediation measures would clean up contaminants, dispose of the wastes, and protect public health in accordance with federal, State, and local requirements. Site excavation activities shall not proceed until the site remediation has been approved by the County DEH and implemented by the SUMC Project sponsors. Additionally, the Site Remediation Assessment shall be subject to review and approval by the San Francisco Bay RWQCB. All appropriate agencies shall be notified.	
HM-4. Hazardous Waste Generation and Disposal Resulting in Increased Exposure Risk. The SUMC Project would not substantially increase exposure risk related to hazardous waste generation.	LTS	None required.	N/A
HM-5. Emit Hazardous Emissions or Handle Hazardous Materials Within One-Quarter Mile of a School. The SUMC Project would not emit or handle hazardous materials within one-quarter mile of school.	LTS	None required.	N/A
HM-6. Construct a School on a Property that is Subject to Hazards from Hazardous Materials Contamination, Emissions or Accidental Release. The SUMC Project would not construct a school that is subject to hazards from hazardous materials contamination, emissions or accidental release.	NI	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
HM-7. Occur on a Site Included on the Cortese List, a List of Hazardous Materials Sites. The SUMC Project would result in construction of facilities on a site included on the Cortese List.	S	MITIGATION MEASURES. Implementation of Mitigation Measures HM-3.3 and HM-3.4, which involve the implementation of a soil vapor program and development of a site management plan, would reduce the potential for exposure to hazardous materials at the Hoover Pavilion Site to less-than-significant levels. Additionally, compliance with current federal, State and local regulations would help prevent any further exposure to hazardous materials.	LTS
HM-8. Wildland Fire Risk. The SUMC Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	NI	None required.	N/A
HM-9. Occur on a Site Located Within an Airport Land Use Plan or Within Two Miles of a Public Airport, and Result in a Safety Hazard. The SUMC Project would not be located within an Airport Land Use Plan or within 2 miles of a Public Airport.	NI	None required.	N/A
HM-10. Impairment of Emergency Plans. The SUMC Project could impair implementation or physically interfere with an adopted emergency response or evacuation plan.	S	MITIGATION MEASURES. Mitigation Measure HM-10.1 requires advance coordination with the City of Palo Alto on construction routes or roadway closures. This measure, together with Mitigation Measures TR-1.1, TR-1.4 through TR-1.6, and TR-1.8, which all involve construction-period traffic controls, would reduce the significant construction-period impacts to a less-than-significant level. Mitigation Measure TR-9.1, would involve the installation of emergency vehicle traffic signal priority (OptiCom) at all intersections significantly impacted by the SUMC Project. Mitigation Measure TR-9.1 would reduce impacts on emergency access during operation. Implementation of these measures would reduce the SUMC Project's impact to emergency evacuation and response plans to a less-than-significant level. *HM-10.1 Coordinate Construction Activities with the City of Palo Alto.* The SUMC Project sponsors shall provide to the City planned construction routes, roadway closures, and access and closures schedules. This information shall be provided to the City at least two weeks in advance of the planned access and closures. The	LTS

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		City shall coordinate this information among affected emergency service providers, including the City's Fire and Police Departments, and private ambulance services, so that alternative routes could be planned and announced prior to the scheduled access and closures, as deemed necessary by the City.	
HM-11. Cumulative Handling, Storage, Disposal, and Transport of Hazardous Materials. Cumulative development would increase handling, storage, disposal, and transport within the SUMC Sites and adjacent areas. However, cumulative development would be subject to applicable federal, State, and local regulations that would govern these activities. As a result, the cumulative impact would be less than significant.	LTS	None required.	N/A
HM-12. Cumulative Disturbance of Hazardous Materials from Construction. The SUMC Project and adjacent development could result in cumulative release of hazardous materials during construction, a significant cumulative impact. The SUMC Project's contribution to the cumulative impact would be considerable.	S	MITIGATION MEASURE. Mitigation Measure HM-2.1, involving measures to reduce exposure of persons to hazardous materials (such as asbestos), would reduce the SUMC Project's contribution to a less-than-significant level	LTS
HM-13. Cumulative Exposure to Contaminated Soil and/or Groundwater, and from Cortese List Sites. The SUMC Project and adjacent development could result in cumulative disturbance of contaminated soils, release of hazardous materials during construction, a significant cumulative impact. The SUMC Project's contribution to the cumulative impact would be considerable.	S	MITIGATION MEASURES. Mitigation Measure HM-3.2, which involves remediation of known site contamination at the 703 Welch Road site, would reduce the SUMC Project's contribution to the cumulative impact to less than considerable. Also, Mitigation Measures HM-3.1, HM-3.3, and HM-3.4, involving investigations at other SUMC areas and preparation of the Site Management Plan for remediation activities, would further ensure that any other risks associated with the SUMC Project would be less than cumulatively considerable.	LTS
HM-14. Cumulative Exposure of Schools to Hazardous Materials and Waste. The SUMC Project, in combination with reasonably foreseeable probable future development, would have a less than cumulatively considerable impact on exposure of schools to hazardous materials.	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
HM-15. Cumulative Impairment of Emergency Plans. Cumulative development could impair implementation or physically interfere with an adopted emergency response or evacuation plan. The SUMC Project's contribution to the cumulative impact would be considerable.	S	MITIGATION MEASURES. Mitigation Measures HM-10.1, above, and TR-1.1, TR-1.4 through TR-1.6, and TR-1.8 would reduce the SUMC Project's contribution to cumulative impacts on emergency evacuation and response plans to less than cumulatively considerable.	LTS
3.13 Population and Housing			
PH-1. Population Growth. The SUMC Project would increase on-site employment and visitors and thus indirectly induce housing demand and population growth; however, the percentage of regional housing demand resulting from the SUMC Project would be relatively small in comparison with projected housing growth in the region, and would comprise a less-than-significant environmental impact.	LTS	None required.	N/A
PH-2. Displacement of Existing Housing or Residents. The SUMC Project would not displace existing housing or residents because the SUMC Project would involve infill of currently developed sites that do not contain housing. Thus, the SUMC Project would result in no impact with respect to displacement of housing or residents.	NI	None required.	N/A
PH-3. Impacts on Jobs to Employed Residents Ratio. The SUMC Project would have an adverse impact on the City's jobs to employed residents ratio because it would exceed the existing Comprehensive Plan and zoning allowances for the SUMC Sites and thus require amendment to the Comprehensive Plan and rezoning, and it would increase the City's jobs to employed residents ratio by more than 0.01. However, this impact is not, itself, an environmental *impact*. This impact ~~will~~ would result in secondary environmental impacts relating to additional commute traffic, including the significant and unavoidable impacts on air quality ~~and climate change~~, as identified in Section~~s~~ 3.5 ~~and 3.6~~. The present analysis of impacts to the "jobs to employed residents" ratio is	N/A	MITIGATION MEASURE. Implementation of Mitigation Measure PH-3.1 would reduce the impact on the City's jobs to employed residents ratio; however, such implementation would not fully avoid the SUMC Project's impact on the jobs to employed residents ratio because (1) the measures would not guarantee provision of housing units to cover the demand from the 1,052 households (or 8 percent thereof), and (2) due to the various factors that people consider in choosing where to live, it cannot be ascertained that the 1,810 workers would choose to live in Palo Alto. Due to the high concentration of jobs in Palo Alto, it is possible that a strong affordable housing program would result in reduced traffic congestion, vehicle miles traveled, and greenhouse gas emissions.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
presented for informational purposes, and for the purpose of identifying additional mitigation measures for those identified impacts.		Implementation of Mitigation Measure PH-3.1 is not directly required in order to mitigate a significant environmental impact, but rather should be considered as possible additional mitigation for Impacts AQ-2, AQ-7, CC-1, and CC-2, as discussed in Section 3.5, Air Quality, and Section 3.6, Climate Change, of this EIR. However, it should be stressed that these measures are presented here only in conceptual terms, and the City may find that some or all of them are not feasible for various legal, practical, or other reasons. As such, Mitigation Measure PH-3.1 is presented for informational purposes, and to ensure that all possible options for mitigation of these impacts are adequately considered. *PH-3.1* *Reduce the Impacts on the Jobs to Employed Residents Ratio*. In order to reduce the SUMC Project's impacts on the City's jobs to employed residents ratio, one or more of the following measures shall be implemented by both the City and the SUMC Project sponsors: • The City shall explore amending the Zoning Code to permit more residential uses, particularly multifamily residential use; • The SUMC Project sponsors shall ensure that a specified number of housing units in the County shall be dedicated to SUMC employees; • The City shall amend the Zoning Code to remove the hospital exemption from payment of the affordable housing fee; • The City shall impose an additional ad hoc housing fee on development to ensure development of required affordable housing. The amount of the fee shall be based on the cost of the additional affordable housing units induced by the SUMC Project as well as the cost of the General Fund subsidy contribution to the existing housing impact fee; and/or	

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		• The City shall provide an inclusionary housing requirement in the newly created Hospital District. The requirement shall provide a number of options for development of additional housing with an emphasis on affordable housing.	
3.14 Public Services			
PS-1. Impacts Related to Fire Protection and Emergency Medical Facilities. The SUMC Project would require an increased level of fire and emergency services. However, the increased level of fire and emergency services would not be large enough to trigger the need for construction of new facilities, which could adversely affect the physical environment. Impacts would be less than significant.	LTS	None required.	N/A
PS-2. Impacts from Police Protection Facilities. The SUMC Project would require an increased level of police services. However, the increased level of police services would not be large enough to trigger the need for construction of new facilities, which could adversely affect the physical environment. Impacts would be less than significant.	LTS	None required.	N/A
PS-3. Impacts Related to School Facilities. An increase in students, which would require school expansions, would result as a tertiary impact of the SUMC Project, since increased employment from the SUMC Project could induce additional housing units within the City. Both the SUMC Project and induced housing projects would be subject to SB 50 School Impact Fees, which would mitigate impacts to less than significant.	LTS	None required.	N/A
PS-4. Impacts Related to Construction of New or Altered Parks and Recreation Facilities. The SUMC Project would not result in the construction or expansion of new parks or fields, which would in turn result in adverse environmental impacts. The SUMC Project would be required to pay a City	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
Community Facility Fee, which would be used to fund new parks or an alteration to an existing park, and would mitigate impacts to less than significant.			
PS-5. Deterioration of Park and Recreation Facilities. Increased recreational demand from SUMC Project employees could accelerate the physical deterioration of the City's parks and fields. The SUMC Project would be required to pay a City Community Facility Fee, which reduce or avoid any such deterioration, and would mitigate impacts to less than significant.	LTS	None required.	N/A
PS-6. Cumulative Fire Protection Demand and Emergency Medical Facilities. Cumulative growth would increase demand for fire protection and emergency response services within the PAFD's service area; however, no new PAFD facilities would need to be constructed. Cumulative impacts would be less than significant.	LTS	None required.	N/A
PS-7. Cumulative Police Protection Demand. Cumulative growth in the City could necessitate construction of new or expanded police facilities in order to meet increased demand for services. Construction of new or expanded police facilities could result in significant environmental impacts. As such, cumulative impacts related to police service could be significant. However the SUMC Project's contribution to the cumulative need for new or expanded police facilities would be less than cumulatively considerable.	LTS	None required.	N/A
PS-8. Cumulative School Demand. Cumulative development in the City can be expected to necessitate expansion of school facilities, which could have adverse physical environmental impacts. This cumulative impact is conservatively assumed to be significant, although the SUMC Project's contribution to this cumulative impact would be less than cumulatively considerable.	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
PS-9 Cumulative Demand for Parks and Recreation Facilities, and for New Parks. Cumulative impacts related to park deterioration would be less than significant due to the City's Community Facility Fee. Cumulative growth in the City would necessitate acquisition or development of new parklands, which could result in significant environmental impacts; however, the contribution of the SUMC Project to this cumulative impact would be less than cumulatively considerable.	LTS	None required.	N/A
3.15 Utilities			
UT-1. Water Demand. The SUMC Project would result in a less-than-significant water supply impact because it would not result in the need for new or expanded entitlements for water supplies, and would not require expansion or construction of water facilities.	LTS	None required.	N/A
UT-2. Wastewater Generation. The SUMC Project would result in a less-than-significant wastewater impact because it would not exceed treatment requirements of the RWQCB, would not significantly increase use of the wastewater disposal system, and would not require expansion or construction of wastewater collection or treatment facilities.	LTS	None required.	N/A
UT-3. Stormwater Generation. The SUMC Project would have a less-than-significant impact related to stormwater collection system capacity because it would not significantly increase use of the stormwater collection system, and would not require expansion or construction of new stormwater facilities.	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
UT-4. Solid Waste Generation. The SUMC Project would result in a less-than-significant solid waste impact because it would be served by landfills with sufficient capacity and, thus, would not contribute to the need to expand existing or construct new solid waste disposal facilities.	LTS	None required.	N/A
UT-5. Energy Demand. Although the SUMC Project is an urban infill project and would not require the expansion of natural gas facilities and would use existing utility facilities, it may require the installation of near-site electrical facilities and natural gas pipelines to accommodate the projected additional demand. However, this installation is included in the SUMC Project and no additional off-site construction relating to electrical and natural gas facilities would occur. Therefore, the SUMC Project would have a less-than-significant impact related to the construction of energy facilities.	LTS	None required.	N/A
UT-6. Cumulative Water Impacts. Since the City has sufficient water supply to accommodate water demands for cumulative development up to 2025, new or expanded entitlements for water supplies are not necessary. Therefore, cumulative development would have a less-than-significant cumulative impact related to water supply.	LTS	None required.	N/A
UT-7. Cumulative Wastewater Impacts. Since the RWQCP has sufficient capacity to accommodate wastewater generated by cumulative development up to 2025, implementation of major facility and infrastructure improvements would not be necessary. In addition, general replacement and maintenance of old wastewater facilities is expected and would comply with applicable environmental regulations. Therefore, cumulative development would not have a significant cumulative impact related to wastewater.	LTS	None required.	N/A

Table S-4
SUMC Project Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
UT-8. Cumulative Stormwater Generation. Cumulative development in the City of Palo Alto and at Stanford University could increase the amount of stormwater runoff. This increased level of runoff may trigger the need for the replacement or maintenance of storm drain facilities. However, general replacement and maintenance of storm drain facilities is included in City plans and would comply with applicable environmental regulations. Therefore, cumulative development would have a less-than-significant cumulative impact related to the capacity or deterioration of storm drain facilities.	LTS	None required.	N/A
UT-9. Cumulative Solid Waste Impacts. Cumulative development would generate solid waste within the permitted capacity of the SMART Station and Kirby Canyon Landfill. Cumulative development would not result in substantial deterioration of solid waste facilities. As such, cumulative impacts related to solid waste generation would be less than significant.	LTS	None required.	N/A
UT-10. Cumulative Energy Demand. Cumulative development in the City of Palo Alto would consume additional energy and, therefore, would increase the demand for energy. The City's electrical and natural gas facilities are projected to have adequate capacity to serve the City's increased demand for energy. The increased level of energy demand may trigger the need for the replacement or maintenance of energy facilities. However, general replacement and maintenance of energy facilities is expected and would comply with applicable environmental regulations. Therefore, cumulative development would not have a significant cumulative impact related to energy demand and energy facilities.	LTS	None required.	N/A

Draft EIR text on page S-93 first bullet of the significant and unavoidable impact list is deleted as follows:

- ~~Deterioration of intersection level of service during Peak Hour conditions at three two Menlo Park intersections (Middlefield Road and Willow Road, Bayfront Expressway and Willow Road. and University Avenue and Bayfront Expressway);~~

Draft EIR text on page S-93, fifth bullet, is deleted as follows:

- ~~Contribution to cumulative emissions of toxic air contaminants;~~

Draft EIR text on page S-93, sixth bullet, is deleted as follows:

- ~~Emission of greenhouse gases, which would contravene the City's ability to meet emission reduction goals in the Palo Alto Climate Protection Plan and which would have a cumulatively considerable contribution to global climate change;~~

The tenth bullet on page S-93, tenth bullet, has been revised as follows:

- Removal of up to ~~71~~ 74 Protected Trees, as defined in City of Palo Alto's Tree Protection and Management Regulations, which is a significant and unavoidable impact on both a project level and a cumulative level.

Selected Draft EIR text on page S-99 and S-102, from Table S-5, is revised as follows:

Table S-5
Assessment of SUMC Project Alternatives (Compared to the SUMC Project)

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Transportation								
Intersection LOS	~~S/SU~~ S/LTS	NI	NI	NI	~~S/SU~~ S/LTS	~~S/SU~~ S/LTS	~~S/SU~~ S/LTS	~~S/SU~~ S/LTS
Air Quality								
Cumulative Impacts	S/SU	~~S/SU~~ LTS	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU
Climate Change								
Consistency with Individual Polices of the Climate Protection Plan	S/~~SU~~ LTS	LTS	LTS	LTS	S/LTS	S/~~SU~~LTS	S/SU	S/~~SU~~LTS
Result in Significant Emissions of Greenhouse Gases	~~S/SU~~ LTS	LTS	LTS	LTS	~~S/~~LTS	~~S/SU~~LTS	S/SU	~~S/SU~~LTS

Table S-5
Assessment of SUMC Project Alternatives (Compared to the SUMC Project)

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Population and Housing								
Cumulative Impacts	~~S/SU~~ LTS	NI	NI	NI	LTS	LTS	LTS	LTS

6.3 CHANGES TO DRAFT EIR SECTION 2, PROJECT DESCRIPTION

Draft EIR text on page 2-2, the fourth sentence of first paragraph, is revised as follows:

> A 0.75-acre portion of the SoM area within the Main SUMC Site is located in unincorporated Santa Clara County, but within the City's Urban Service Area, and is proposed for annexation to the City of Palo Alto.

The following edits have been made to the third paragraph on page 2-12 of the Draft EIR:

> The approximately 56-acre Main SUMC Site is comprised of Assessor Parcel Numbers (APNs) 142-03-008, 142-03-037, 142-23-003, 142-23-004, 142-23-005, 142-23-006, 142-23-007, 142-23-010, 142-23-012, 142-23-016, 142-23-017, 142-23-018, 142-23-019, 142-23-024, 142-23-025. Properties within the approximately 9.9-acre Hoover Pavilion Site include APNs ~~142-04-012,~~ 142-04-011, and ~~142-04-10~~ 142-04-019.

Draft EIR text on page 2-23, second bullet, is revised as follows:

- Annexation to Palo Alto of a 0.75-acre property within Santa Clara County jurisdiction, but within the City's Urban Service Area, with a Major Institution/Special Facilities land use designation to be applied to this property.

The fourth bullet under the subheader "Other City Approvals" on page 2-28, extending to page 2-29 of the Draft EIR, has been revised as follows:

- Regulations in this district would include applicability, preservation, and exemptions for removal and replacement of Protected Trees. The Hospital District would create a procedure to permit the removal or relocation of ~~approximately 48~~ Protected Trees while preserving ~~approximately 23 Protected Trees~~ trees that are considered both biological~~ly~~ and aesthetic~~ally significant~~ tree resources.[23] The existing Protected Trees that are considered both biological~~ly~~ and aesthetic~~ally significant~~ tree resources are discussed in more detail in Section 3.9, Biological Resources, and Section 5, Alternatives. The Hospital District ordinance would include provisions for ~~an applicable timeline (development vs. non-development) and for~~ specific Protected Tree retention and preservation through development standards and regulations. Some Protected Trees that qualified for exemption to the regulations could be removed, providing that they are replaced per the City Tree

Technical Manual (TTM) standards (TTM, Section 3.00). In addition, the Hospital District ordinance would require a minor amendment to the Tree Ordinance (Palo Alto Municipal Code Section 8.10) to recognize and cross-reference with the Hospital District ordinance.[23]

Draft EIR text on page 2-63, last bullet, is revised as follows:

- Local Agency Formation Commission (LAFCO) ~~approval of annexation.~~, issuing and recording a Certificate of Completion for the annexation, providing the required documentation of the State Board of Equalization, and notifying the affected agencies and departments about the City's approval of the annexation.

6.4 CHANGES TO DRAFT EIR SECTION 3, ENVIRONMENTAL ANALYSIS

Section 3.2, Land Use

Draft EIR text on page 3.2-9, first bullet, is revised as follows:

- SoM proposes annexation of the 0.75-acre parcel within Santa Clara County jurisdiction but within the City's Urban Service Area. This area would be annexed under the Major Institution/Special Facilities land use designation. The proposed FIM 1 building would be consistent with this designation.

The following edits have been made to the second paragraph in the right-hand column on page 3.2-18 of the Draft EIR. However, it is important to note that although edits have been made, the conclusion that no conflict with Policy T-27 would occur remains the same.

> Generally, existing roadway capacity is improved by adding left and right turn lanes to the intersections. The SUMC Project would add a connection (Durand Way) between Sand Hill Road and Welch Road; however, this connection would extend through one block and would provide new access to the Main SUMC Site. The Durand Way extension would increase roadway capacity, but only to the extent that it would provide traffic relief to Pasteur Road and Sand Hill Road. This would enable traffic from El Camino Real to rely on Durand Way and traffic from I-280 to rely on Pasteur Drive. Although roadway capacity would increase, bicycle and pedestrian facilities would be included as part of the Durand Way extension, which would connect to the Class I bicycle path along San Francisquito Creek. This connection would help satisfy compliance with Policy T-27.
>
> In addition, Welch Road would be widened to three lanes ~~provide roadway capacity~~ in order to improve safety and to accommodate on-street bicycle lanes. ~~Neither of these improvements would enhance capacity for anticipated vehicle movement, including ambulance access.~~

The first paragraph under Policy N-14, under the header "SUMC Project Consistency" in Table 3.2-2, page 3.2-20, has been revised as follows:

> The SUMC Project would replace trees removed during construction and would supply new street trees. However, the SUMC Project would remove up to ~~71~~ 74 Protected Trees, which are

considered an important resource to the City. Mitigation Measures BR-4.1 through BR-4.5, provided in Section 3.9, Biological Resources, require the preparation of a Tree Preservation Report, a solar access study, a Tree Relocation Feasibility Plan, a Tree Preservation ~~Bond/Security Guarantee~~ Memorandum of Understanding, and minor site modifications to the current site plans. While complete preservation or relocation of Protected Trees would not occur, this mitigation would fulfill the City's responsibility to protect, revitalize, and expand Palo Alto's urban forest.

The following edits have been made to the first paragraph on page 3.2-29 of Section 3.2, Land Use. Please note that the last sentence in the text below is already underlines in the Draft EIR and so the additional text here is bolded and double underlined. In addition, the City has proposed to modify Policy L-8 as follows (underlined text would be added):

> Maintain a limit of 3,257,900 square feet of new non-residential development for the nine planning areas evaluated in the 1989 Citywide Land Use and Transportation Study, with the understanding that the City Council may make modifications for specific properties that allow modest additional growth. Such additional growth will count towards the 3,257,900 maximum. Stanford University Medical Center hospital, **clinic, and medical school** uses are not intended to be treated as "non-residential development" for the purposes of this policy; thus, additional growth in areas zoned "Hospital District" is exempt from this policy.

Draft EIR text on page 3.2-31, the first sentence of the last paragraph, is revised as follows:

> The SUMC Project would require the annexation of a small (approximately 0.75-acre) area, within the City's Urban Service Area, from Santa Clara County.

Section 3.3, Visual Quality

The last paragraph on page 3.3-5, continuing to page 3.3-6, has been revised as follows:

> Of the ~~176~~ 178 Protected Trees at the SUMC Sites, ~~60~~ 63 Protected Trees on the Main SUMC Site appear to be within or sufficiently close to new building footprint areas or paved areas associated with site reconfiguration such that they may be affected by SUMC Project construction. Out of these ~~60~~ 63 Protected Trees potentially to be removed at the Main SUMC Site, the City has designated approximately ~~23~~ 13 of these Protected Trees as ~~having~~ both biological and aesthetic tree resources ~~characteristics~~. In addition, there are five Protected Trees that have also been determined to be biological and aesthetic tree resources, but would be retained in place under the SUMC Project, for a total of 18 biological and aesthetic tree resources on the Main SUMC Site.[6] All Protected Trees are biological tree resources. A "Biological Tree Resource" is a protected category oak or redwood of a certain size as defined in the Palo Alto Municipal Code, Chapter 8.10, Tree Preservation and Management Regulations. Under the proposed Hospital District zoning, ~~A~~an "Aesthetic Tree Resource" is a Protected Tree that is deemed important to the SUMC ~~Project~~ Sites, as designated by the Department of Planning and Community Environment or the City Council, because it has one or more of the following qualities: functions as an important or prominent visual feature; contributes to a larger grove or landscape theme; and/or possesses unique character as defined in the designation of Heritage Trees (per Palo Alto Municipal Code Section

8.10.090). ~~The 23~~ Protected Trees that are both biological~~ly~~ and aesthetical~~ly significant~~ tree resources would require retention and preservation under the proposed Hospital District zoning ordinance for the SUMC Project.[~~6~~7] Section 3.9, Biological Resources, discusses biological~~ly~~ and aesthetic~~ally~~ ~~significant Protected Trees~~ tree resources in more detail; therefore, this topic will not be addressed further in this section.

[~~6~~] City of Palo Alto, SUMC Protected Tree Survey, July 20, 2010.

[~~6~~7] City of Palo Alto Department of Planning and Community Environment, Dave Dockter, Environmental Planner, "SUMC Environmental Impact Report Strategy: How the City will approach evaluation of the Tree Resources in the SUMC Project Area," memorandum, July 28, 2009.

The third full paragraph on page 3.3-6 has been revised as follows:

The majority of the Hoover Pavilion Site is covered by surface parking lots, although large trees and landscaped walks also surround the buildings within the Hoover Pavilion Site. Of the ~~176~~ 178 Protected Trees at the SUMC Sites, 11 Protected Trees at the Hoover Pavilion Site appear to be within or sufficiently close to new building footprint areas or paved areas associated with site reconfiguration such that they may be affected by project construction. However, the City has not deemed these trees to ~~have both biological and~~ be aesthetic tree resources as defined by the proposed Hospital District zoning ordinance ~~characteristics~~.

The following text has been added to the first bullet point after subheader "Section 18.40.130" on page 3.3-22 of the Draft EIR:

- Utilities (e.g., transformer cabinets, pads, fiber optic trenching and above ground cabinets, large water check valves) and underground utilities shall not be placed within required landscaped areas, except where they will not preclude appropriate planting of trees and will be predominantly screened from public view. These locations shall comply with City of Palo Alto Utilities Department (CPAU) Rules and Regulations, and the Utility Standards.

The third paragraph on page 3.3-34 has been revised as follows:

Landscaping. Overall, the SUMC Project would decrease landscaped area on the ground by about 1 acre, but would increase landscaped rooftops by about 6 acres. Approximately 1,562 trees, including native and non-native ornamental species have been identified in the SUMC Sites.[20] There would be removal of mature trees on both SUMC Sites, including up to a total ~~71~~ 74 Protected Trees, which is discussed in more detail in Section 3.9, Biological Resources. This Visual Quality section addresses changes in landscaping overall, and Section 3.9, Biological Resources, specifically addresses loss of Protected Trees.

Draft EIR text on page 3.3-39, Mitigation Measure VQ-2.1, has been revised as follows:

VQ-2.1 *Adhere to City's Architectural Review Process and Recommendations*. The SUMC Project sponsors shall submit final building and site plans to the ARB prior to issuance of any development permits. Architectural Review shall assess the appropriateness of proposed demolitions, proposed building heights and massing, siting of buildings and structures, architecture and façade treatments, landscaping, circulation plans, and parking. The ARB may ~~require~~ recommend alterations to any of the above project

features, or the ARB may suggest new features, such as new landscaping or public art, to improve the proposed SUMC Project design. Any ~~recommendations made by the ARB~~ conditions required by the City Council as a result of the Architectural Review Process with respect to the design of the SUMC Project shall be implemented by the SUMC Project sponsors.

Section 3.4, Transportation.

As shown in Table 6-1, below, several figures in Section 3.4 of the Draft EIR have been changed. Please see Staff-Initiated Change 2 in Section 3 of this document for the revised figures.

Table 6-1
List of Draft EIR Figure Changes in Section 3.4

Draft EIR Figure Number and Page	Figure Title	Changes	Transportation Impact Analysis Figure Number
3.4-1 Page 3.4-3	Transportation Analysis Study Area and Intersections	Added locations of five new study intersections (#67-#71). Revised Figure 3.4-1 replaces Figure 3.4-1 in the Draft EIR.	1-1
3.4-2 Page 3.4-20	Existing Bicycle Facilities in the vicinity of the SUMC Sites	Amended Class I bike facilities along Alpine Road. Revised Figure 3.4-2 replaces Figure 3.4-2 in the Draft EIR.	2.4
3.4-9 Page 3.4-48	SUMC Trip Distribution (Regional)	Moved the '21%' (from south of the SUMC Sites along US 101) from between Oregon Expressway and San Antonio Road to south of San Antonio Road. Revised Figure 3.4-9 replaces Figure 3.4-9 in the Draft EIR.	3-3

Source: AECOM, 2010.

As summarized in Table 6-2, below, several tables in Section 3.4 of the Draft EIR have been revised. Please see Staff-Initiated Change 2 in Section 3 of this document for the revised tables.

Table 6-2
List of Draft EIR Table Changes in Section 3.4

Draft EIR Table Number and Pages	Table Title	Changes	Transportation Impact Analysis Table Number
3.4-1 Pages 3.4-7 through 3.4-9	List of Study Intersections	Added information of five new study intersections (#67 through #71). Revised Table 3.4-1 replaces Table 3.4-1 in the Draft EIR.	1-1
3.4-6 Pages 3.4-14 through 3.4-16	Existing Peak Hour Intersection Level of Service	Revised LOS for intersections #1 through #8, #27, #30, and #31 due to presence of traffic-adaptive signal technology under existing conditions and revised LOS for intersections #1 and #49 due to updated geometry. Added LOS for five new study intersections (#67 through #71). Revised Table 3.4-6 replaces Table 3.4-6 in the Draft EIR.	2-4

Table 6-2
List of Draft EIR Table Changes in Section 3.4

Draft EIR Table Number and Pages	Table Title	Changes	Transportation Impact Analysis Table Number
3.4-8 Page 3.4-18	Freeway Segment Level of Service	Added information for the new study segment between Marsh Road and Woodside Road along US 101. Revised Table 3.4-8 replaces Table 3.4-8 in the Draft EIR. Additional text has been underlined.	2-6
3.4-12 Pages 3.4-35 through 3.4-37	LOS of Study Intersection for 2025 No Project	Revised LOS for intersections #1 through #8, #27, #30, and #31 due to presence of traffic-adaptive signal technology under 2025 No Project conditions and revised LOS for intersections #1 and #49 due to updated geometry and revised LOS for intersections #1 and #49 due to updated geometry. Added LOS for five new study intersections (#67 through #71). Revised Table 3.4-12 replaces Table 3.4-12 in the Draft EIR.	3-1
3.4-15 Page 3.4-39	2025 No Project Freeway LOS	Added 2025 information for the new study segment between Marsh Road and Woodside Road along US 101. Revised Table 3.4-15 replaces Table 3.4-15 in the Draft EIR. Additional text has been underlined.	3-6
3.4-17 Pages 3.4-51 through 3.4-53	LOS Comparison with SUMC Only in 2025 – SUMC Only Project Impact	Revised LOS for intersections #1-#8, #27, #30, and #31 due to presence of traffic-adaptive signal technology under 2025 No Project conditions and revised LOS for intersections #1 and #49 due to updated geometry. Added LOS for five new study intersections (#67 through #71). Revised Table 3.4-17 replaces Table 3.4-17 in the Draft EIR.	3-4
3.4-18 Pages 3.4-63 through 3.4-65	Intersection Improvements	Updated mitigation measures for intersections #18, #46, #52, and #53 based on City of Menlo Park's 2009 Transportation Impact Fee Study Report and removed mitigation measures for intersections #3 and #30 as they are no longer impacted by the SUMC Project. Revised Table 3.4-18 replaces Table 3.4-18 in the Draft EIR.	4-4
3.4-23 Page 3.4-74	2025 With SUMC Project Freeway Analysis	Added 2025 analysis results for the new study segment between Marsh Road and Woodside Road along US 101. Revised Table 3.4-23 replaces Table 3.4-23 in the Draft EIR. Additional text has been underlined.	3-7

Source: AECOM, 2010.

Draft EIR text on page 3.4-6, first paragraph under Study Area Intersections, is revised as follows:

> The traffic study analyzed a total of ~~66~~ 71 intersections.[3] Sixty-four of these intersections are signalized and the following ~~six~~ seven are unsignalized:
>
> - Galvez Street/Arboretum Road
> - Stanford Road/Bowdoin Street
> - I-280 Northbound Off-Ramp/Alpine Road
> - I-280 Southbound Off-Ramp/Alpine Road

- Page Mill/I-280 Northbound Off-Ramp
- Page Mill/I-280 Southbound Off-Ramp
- West Bayshore Road/Embarcadero Road

Draft EIR text on page 3.4-6 first sentence in the fifth paragraph under Study Area Intersections, is revised as follows:

> The Transportation Impact Analysis analyzed a total of ~~66~~ 71 intersections in the City of Palo Alto, City of Menlo Park, and City of East Palo Alto.

Footnote 3 on page 3.4-6 of the Draft EIR has been deleted as follows:

> ~~[3] The 66 intersections include five intersections that were split into two directions, including Junipero Serra Boulevard and Campus Drive, Marsh Road and US 101, Welch Road and Pasteur Drive, I 280 and Alpine Road, and I 280 and Page Mill Road.~~

Draft EIR text on page 3.4-9, Table 3.4-1, has been revised as follows:

Intersection #	Intersection	City / Jurisdiction	Source and Date of Count
62	I-280 NB Off-Ramp and Alpine Road	~~Palo Alto~~ San Mateo County	AECOM Transportation, October 2008
63	I-280 SB Off-Ramp and Alpine Road	~~Palo Alto~~ San Mateo County	AECOM Transportation, October 2008

Draft EIR text on page 3.4-10 first full paragraph is revised as follows:

> **Freeway Segments**. The following ~~six~~ seven freeway segments were analyzed:
>
> - US 101 north of Marsh Road
> - US 101 north of University Avenue
> - US 101 south of University Avenue
> - US 101 south of Embarcadero/Oregon Expressway
> - I-280 north of Sand Hill Road
> - I-280 south of Alpine Road
> - I-280 south of Page Mill Road

Draft EIR text on page 3.4-17 second paragraph is revised as follows:

> During the PM Peak Hour, the following ~~seven~~ eight intersections operate at unsatisfactory levels of service:
>
> - Junipero Serra Boulevard – Foothill Expressway/Page Mill Rd (LOS F) [intersection #23]
> - Galvez Street/Arboretum Road (LOS F) [intersection #37]
> - Willow Road/Bayfront Expressway (LOS E) [intersection #52]

- University Avenue/Bayfront Expressway (LOS E) [intersection #53]
- Bay Road/University Avenue (LOS E) [intersection #54]
- I-280 NB Off-Ramp/Alpine Road (LOS F) [intersection #62]
- Foothill Expressway/Arastradero Road (LOS E) [intersection #66]
- Middlefield Road/Oregon Expressway (LOS E) [intersection #67]

Draft EIR text on page 3.4-18 third sentence in the first paragraph under Freeway Segments is revised as follows:

> These include the segments of US 101 north of Marsh Road, north of University Avenue, south of University Avenue, and south of Embarcadero/Oregon Expressway.

Draft EIR text on page 3.4-33, third paragraph under Future Conditions, is revised as follows:

> **2025 No Project.** This scenario includes all of the growth in population and employment that is projected to occur between Existing Conditions and the year 2025. It also includes all of the highway and transit improvements that have dedicated sources of funding that are scheduled to be completed between Existing Conditions and 2025. Expected transit improvements include the proposed VTA BRT service between the Palo Alto Transit Center and the Eastridge Transit Center in San Jose. ~~It~~This scenario does not include the SUMC Project.

Draft EIR text on page 3.4-33, second and third sentence in the fifth paragraph, is revised as follows:

> During the AM Peak Hour, the following ~~11~~ 12 intersections would operate at unsatisfactory levels of service. Of these ~~11~~ 12 intersections, ~~six~~ seven would operate at LOS E and five would operate at LOS F in the AM Peak Hour.

Draft EIR text on page 3.4-34 after the sixth bullet in the first bulleted list is added as follows:

- Middlefield Road/Oregon Expressway (LOS E) [intersection # 67]

Draft EIR text page 3.4-34 first bullet in the second bulleted list is deleted and one more bullet is added as follows:

- ~~El Camino Real/Ravenswood Avenue (LOS E) [intersection #3]~~
- Middlefield Road/Oregon Expressway (LOS E) [intersection # 67]

The first sentence of second paragraph of TR-1 on page 3.4-40 is revised as follows:

> Figure 3.4-6 illustrates the proposed truck routes in the ~~near~~ vicinity of the SUMC Sites and Figure 3.4-7 illustrates the designated truck routes in the City of Menlo Park. The City of Menlo Park requires truck route permits for truck travel on Menlo Park streets.

The following text is added as the second paragraph on page 3.4-43 of the Draft EIR:

There would be known CP/GUP construction projects (by Stanford University) located near the SUMC Project during the years that the SUMC Project is under construction. CEQA requires mitigation of the SUMC Project's contribution to a significant cumulative impact, if the contribution would be cumulatively considerable. Under the CP/GUP, each time Stanford University commences construction of a CP/GUP project, it must submit a Construction Traffic Management Plan to the County that provides information on construction parking; pedestrian, bike, and transit circulation; notifications to Stanford Police and Palo Alto Fire Department; and truck routes.

Draft EIR text on pages 3.4-43 to 3.4-44 is revised as follows:

TR-1.4 *Restrict Construction Hours*. The SUMC Project sponsors shall be required to prohibit or limit the number of construction material deliveries from 7:00 a.m. to 9:00 a.m., and from 4:00 p.m. to 6:00 p.m. on weekdays. The SUMC Project sponsors shall be required to limit the number of construction employees based upon an approved construction management plan from arriving or departing the site from the hours of 7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:00 p.m. Although not needed to reduce the impact to a less-than-significant level, the SUMC Project sponsors also shall limit the number of construction employees from arriving at the site from 7:00 a.m. to 9:00 a.m., contingent upon the City's granting of an exception to its construction hours under its noise ordinance to allow construction to commence at 7:00 a.m.

Draft EIR text on page 3.4-44 is revised as follows:

TR-1.8 *Prepare and Implement Construction Impact Mitigation Plan*. In lieu of the above mitigation measures, the SUMC Project sponsors shall submit a detailed construction impact mitigation plan to the City of Palo Alto for approval by the Director of Public Works prior to commencing any construction activities with potential transportation impacts. This plan shall address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. Details such as the routing and scheduling of materials deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access shall be described and approved. Prior to its approval of the construction impact mitigation plan, the City of Palo Alto shall provide a copy of the construction impact plan to the City of Menlo Park for review and comment.

Draft EIR text on page 3.4-44, is revised as follows:

TR-1.9 *Conduct Additional Measures During Special Events*. During major athletic events or other special events which attract a substantial number of visitors to the campus, the SUMC Project sponsors shall implement a mechanism to prevent roadway construction activities from reducing roadway capacity ~~during major athletic events or other special~~

~~events which attract a substantial number of visitors to the campus~~ along those roadways that would be affected by the SUMC Project and that would provide access to the athletic or other special events. This measure may require a special supplemental permit to be approved by either Santa Clara County or the City of Palo Alto prior to hosting such events during significant construction phases.

Draft EIR text on page 3.4-49, last sentence of the fifth bullet is deleted as follow:

~~Local circulation could be improved with this roadway opening to all traffic as a public street.~~

Draft EIR text on page 3.4-50 first paragraph is revised as follows:

As seen in Table 3.4-17, a total of ~~five~~ four intersections would be significantly impacted by the SUMC Project during the AM Peak Hour:

Draft EIR text page 3.4-50 third bullet in the first bulleted list is deleted as follows:

- ~~Sand Hill Road/Santa Cruz Avenue [intersection #30] – LOS would change from LOS D to E and therefore this intersection would be significantly affected by the SUMC Project.~~

Draft EIR text on page 3.4-50 second paragraph is revised as follows:

A total of ~~12~~ 11 intersections would be significantly impacted by the SUMC Project during the PM Peak Hour:

Draft EIR text on page 3.4-50 first bullet in the second bulleted list is deleted as follows:

- ~~El Camino Real/Ravenswood Avenue [intersection #3] – LOS would remain at E but at least one critical movement for this State controlled, Menlo Park intersection exceeded 0.8 seconds. This intersection would be significantly affected by the SUMC Project.~~

Draft EIR text in the fourth paragraph on page 3.4-55 is revised as follows:

Traffic-Adaptive Signal Technology. Traffic-adaptive signal~~s~~ technology ~~were~~ was first implemented in Palo Alto along the Charleston-Arastradero corridor. It has also been installed at intersections along El Camino Real (between Encinal Avenue and Quarry Road), Sand Hill Road (at Oak Avenue – Vine Street, and Santa Cruz Avenue), and at Santa Cruz Avenue/Junipero Serra Boulevard/Alpine Road. This technology reduces overall intersection delay by sensing traffic movements as they approach the intersection and adjusting the signal indications to serve those vehicles. The City estimates that overall intersection delay can be reduced by up to 12 percent with the installation of traffic-adaptive signal technology. Mitigation Measure TR-2.1 requires Stanford University to make a fair-share financial contribution towards the implementation of traffic-adaptive signals at impacted intersections.

Draft EIR text on page 3.4-56, after third bullet in the first bulleted list, is added as follows:

In addition, the City of Menlo Park has identified the following intersections for implementation of a traffic-adaptive technology:

- Middlefield Road/Willow Road (intersection #18)
- Sand Circle/Sand Hill Road/I-280 (intersection #28)
- Sharon Park Drive/Sand Hill Road (intersection #29)
- Middlefield Road/Ringwood Avenue (intersection #45)
- Middlefield Road/Ravenswood Avenue (intersection #46)
- Marsh Road/Bay Road (intersection #48)
- Marsh Road/US 101 SB Off-Ramp (intersection #49)
- Marsh Road/US 101 NB Off-Ramp (intersection #50)
- Willow Road/Bay Road (intersection #51)
- Durham Street/Willow Road (intersection #68)
- Middlefield Road/Marsh Road (intersection #69)
- Newbridge Street/Willow Road (intersection #70)

Draft EIR text on page 3.4-56, second sentence in the first full paragraph, is added as follows:

However, the following ~~four~~ three intersections would remain significantly impacted.

Draft EIR text on page 3.4-56, second bullet in the second bulleted list, is deleted as follows:

- ~~Santa Cruz Avenue/Sand Hill Road [intersection #30]~~

Draft EIR text on page 3.4-56, second full paragraph, is revised as follows:

In the PM Peak Hour, implementation of traffic adaptive signal technology would alleviate impacts at the following ~~three~~ four intersections.

- ~~El Camino Real/Ravenswood Avenue [intersection #3]~~
- El Camino Real/Page Mill Road – Oregon Expressway [intersection #16]
- Middlefield Road/Willow Road [intersection #18]
- Middlefield Road/Lytton Avenue [intersection #19]
- Middlefield Road/Ravenswood Avenue [intersection #46]

Draft EIR text on page 3.4-56, third full paragraph, is revised as follows:

However, the following ~~nine~~ seven intersections would remain significantly impacted.

Draft EIR text on page 3.4-56, the fourth bulleted list, is revised as follows:

- El Camino Real/University Avenue-Palm Drive [intersection #10]
- ~~Middlefield Road/Willow Road [intersection #18]~~

- Junipero Serra Boulevard – Foothill Expressway/Page Mill Road [intersection #23]
- Junipero Serra Boulevard/Campus Drive West [intersection #26]
- Arboretum Road/Galvez Street [intersection #37]
- ~~Middlefield Road/Ravenswood Avenue [intersection #46]~~

Draft EIR text on page 3.4-58, second paragraph and the second bulleted list, are revised as follows:

In the PM Peak Hour, combining bicycle and pedestrian undercrossings with traffic-adaptive signal technology would not result in any change in the number of intersection adversely impacted by the SUMC Project. As with the implementation of traffic-adaptive signal technology by itself, implementation of the combination of traffic-adaptive signal technology and bicycle and pedestrian undercrossings would alleviate impacts at the following ~~three~~ four intersections:

- ~~El Camino Real/Ravenswood Avenue [intersection #3]~~
- El Camino Real/Page Mill Road – Oregon Expressway [intersection #16]
- Middlefield Road/Willow Road [intersection #18]
- Middlefield Road/Lytton Avenue [intersection #19]
- Middlefield Road/Ravenswood Avenue [intersection #46]

Draft EIR text on page 3.4-58, third paragraph and third bulleted list, is revised as follows:

The same ~~nine~~ seven intersections would remain significantly impacted even with implementation of both traffic-adaptive signal technology (Mitigation Measure TR-2.1) and bicycle and pedestrian undercrossings (Mitigation Measure TR-2.2):

- El Camino Real/University Avenue-Palm Drive [intersection #10]
- ~~Middlefield Road/Willow Road [intersection #18]~~
- Junipero Serra Boulevard – Foothill Expressway/Page Mill Road [intersection #23]
- Junipero Serra Boulevard/Campus Drive West [intersection #26]
- Arboretum Road/Galvez Street [intersection #37]
- ~~Middlefield Road/Ravenswood Avenue [intersection #46]~~

The bulleted list on page 3.4-60 of the Draft EIR has been revised as follows:

- Provide Caltrain GO Passes, or an equivalent TDM measure, to all eligible hospital employees and set target Caltrain mode share for hospital employees equal to 15.8 percent. If the GO Pass program is no longer available in its current form, then the SUMC Project sponsors shall contribute the amount of funding that they would have paid toward purchase of GO Passes, in an amount not to exceed $1.8 million per year, toward one or more similar programs to encourage use of transit by SUMC employees as mutually agreed upon

the SUMC Project Sponsors and the City's Director of Planning and Community Environment.

- ~~If Caltrain GO Passes would be provided to SUMC employees, arrangements would also be needed~~ Use all reasonable efforts to arrange with AC Transit to lease 75 spaces at the Ardenwood Park and Ride Lot, or an equivalent facility, ~~for those~~ to serve SUMC employees who commut~~ing~~e from the East Bay.

- ~~Expand bus service in support of the issuance of GO Passes.~~

- Expand the Marguerite shuttle bus service ~~and integrate it with the other City of Palo Alto shuttle bus service.~~ between the SUMC and PAITS as needed to accommodate increased ridership by hospital employees.

- Use all reasonable efforts to assure that the controlling transit agency maintains load factors less than 1.00 on the U Line.

- Maintain a load factor less than or equal to 1.25 on the Marguerite shuttle.

- Expand and improve the bicycle and pedestrian networks as specified by Project site plans.

- Provide a full-time on-site TDM coordinator by 2015 for the Hospital components. The coordinator would be responsible for organizing and disseminating TDM information primarily to Hospital employees and also to Hospital patients. A central location would be made available to provide information on alternative travel modes. Also, the SUMC or Hospitals' website would contain information on TDM programs.

- Provide a guaranteed ride home program for all employees who use transit and other transport alternatives like carpool and vanpool. The guarantee ride home shall allow~~s~~ employees with dependent children the ability to use alternative modes to travel to and from work but still be able to travel home mid-day in case of an emergency.

- Provide employees with shower facilities within the SUMC Sites to encourage bicycling to work. ~~B~~The SUMC Project sponsors shall also provide bicycle storage facilities ~~would also be required~~ on the SUMC Sites that would be conveniently located near the employee showers.

- Perform annual TDM monitoring and submit the report to the City of Palo Alto to ensure that the assumed modal split to alternative forms of travel and away from autos would be actually achieved. This report also shall be submitted to the City of Menlo Park for its review.

- Establish, in conjunction with the GO Pass implementation, a "Zip Car" (or other similar car-sharing program) with Zip Cars available at ~~the medical complex~~ the SUMC Sites.

- Within six (6) months of project approval, the SUMC Project sponsors shall submit to the City's Director of Planning and Community Environment, a Hospital TDM Program Report that documents the existing TDM programs offered to the Hospital employees, participation levels in the programs, and the current mode split of Hospital employees.

The report will include the level of staff support, educational efforts, and outreach strategies used for the program. This initial Hospital TDM Program Report will serve as the baseline conditions for measuring the future TDM Program effectiveness as program enhancements are implemented to reach the 35.1 percent target in 2025.

- Subsequent to preparing the Baseline TDM Report, the hospitals shall prepare an annual report in the spring of each year that will document the same information as the baseline report and provide a comparison with the previous year. The annual report shall be submitted to the City's Director of Planning and Community Environment.
- In addition to implementing the program enhancements described above, the hospitals and Stanford Parking & Transportation Services shall regularly consider other enhancements to the SUMC TDM Programs on an ongoing basis. Based on its experience in running TDM programs, Stanford's Parking & Transportation Services has found that adaptability and flexibility are two key factors when providing new services. For new or enhanced programs to be successful, the programs must evolve in consideration of employee preferences and desires, the availability of new services in the marketplace (such as zip cars), pilot programs, and ongoing research and data collection regarding the comparative effectiveness of various options. As necessary, the Hospitals shall regularly consider incorporating new services into their TDM Program, and shall meet with the City annually to exchange information about new innovations, research, and strategies.

Draft EIR text on page 3.4-61, the second sentence of the first paragraph, is revised as follows:

SUMC Project impacts at all ~~five~~ four previously affected intersections would be alleviated.

Draft EIR text on page 3.4-61, second paragraph and second bulleted, list is revised as follows:

In the PM Peak Hour, significant impacts at ~~eight~~ seven intersections would be alleviated. However, the following ~~four~~ three intersections would remain significantly impacted:

- ~~Middlefield Road/Willow Road [intersection #18]~~
- Arboretum Road/Galvez Street [intersection #37]
- Bayfront Expressway/Willow Road [intersection #52]
- University Avenue/Bayfront Expressway [intersection #53]

Draft EIR text on page 3.4-61, fifth paragraph and third bulleted list, is revised as follows:

Intersection improvements have been identified at the following ~~13~~ three intersections~~:~~. These intersections would remain impacted after implementing Priority 1 – 3 Mitigation Measures:

- ~~El Camino Real/Ravenswood Avenue [intersection #3]~~
- ~~El Camino Real/University Avenue – Palm Drive [intersection #10]~~
- ~~El Camino Real/Page Mill Road – Oregon Expressway [intersection #16]~~

Draft EIR text on page 3.4-62, the following bullets are deleted as follows:

- ~~Middlefield Road/Willow Road [intersection #18]~~
- ~~Middlefield Road/Lytton Avenue [intersection #19]~~
- ~~Junipero Serra Boulevard – Foothill Expressway/Page Mill Road [intersection #23]~~
- ~~Junipero Serra Boulevard/Campus Drive West [intersection #26]~~
- ~~Santa Cruz Avenue/Sand Hill Road [intersection #30]~~
- Arboretum Road/Galvez Street [intersection #37]
- ~~Middlefield Road/Ravenswood Avenue [#46]~~
- Bayfront Expressway/Willow Road [intersection #52]
- University Avenue/Bayfront Expressway [intersection #53]
- ~~Alpine Road/I-280 NB Off Ramp [intersection #62]~~

Draft EIR text on page 3.4-62, the second sentence of the second paragraph, is revised as follows:

The improvements to intersections in the City of Menlo Park are from the ~~City's~~ ~~General Plan~~ 2009 Menlo Park Traffic Impact Fee Report.

Draft EIR text page 3.4-65, first paragraph, is revised as follows

The three feasible intersection improvements in Table 3.4-18 were combined with the other three higher priority mitigation measures, to determine what the combined impact of all four mitigation measures would be. Implementation of the feasible improvements would be required under Mitigation Measure TR-2.4. ~~Mitigation Measure TR-2.5 requires the City of Palo Alto to work with other jurisdictions towards achieving feasibility for improvements that have been determined to be potentially feasible; subsequently, the SUMC Project sponsors would be required to pay their fair share towards those improvements determined to be feasible. However, since feasibility of those potentially feasible improvements is uncertain, then Mitigation Measure TR-2.5 is not counted towards post-mitigation conclusion for the SUMC Project.~~ If the following four mitigation measures:

- Traffic-adaptive signal technology (Mitigation Measure TR-2.1)
- Additional bicycle and pedestrian undercrossings (Mitigation Measure TR-2.2)
- Enhanced Transportation Demand Management (Mitigation Measure TR-2.3)
- Feasible intersection improvements (Mitigation Measure TR-2.4)

were to be implemented together, they would completely mitigate the SUMC Project's intersection impacts during both the AM and PM Peak Hours. SUMC Project impacts at all ~~five~~ previously affected intersections would be alleviated.

Draft EIR text on page 3.4-66, first paragraph, is deleted as follows:

~~In the PM Peak Hour, SUMC Project impacts at nine intersections would be alleviated. However, the following three intersections would remain significantly impacted:~~

- ~~Middlefield Road/Willow Road [intersection #18]~~
- ~~Bayfront Expressway/Willow Road [intersection #52]~~
- ~~University Avenue/Bayfront Expressway [intersection #53]~~

Draft EIR text on page 3.4-66, second paragraph, is revised as follows:

Summary. The results of the above sequential analysis are summarized in Table 3.4-19. Under ~~all~~ at least one combination~~s~~ of feasible mitigation measures, impacts of the ~~SIMC~~ SUMC Project on intersection LOS would ~~remain significant and unavoidable~~ be less than significant. Of all of the feasible combinations, the one that would have the largest reduction in impact, and that mitigates the greatest number of the intersection impacts, would be the combination of traffic-adaptive signal technology (Priority 1), additional bicycle and pedestrian undercrossings (Priority 2), enhanced ~~Travel~~ Transportation Demand Management program (Priority 3), and feasible intersection improvements (Priority 4). This combination of mitigation measures would reduce the SUMC Project impacts to a less-than-significant level at all of the impacted intersections during the AM and PM Peak Hours. ~~However, intersection impacts would remain significant and unavoidable in the PM Peak Hour at the following three intersections with mitigation.~~

- ~~Middlefield Road/Willow Road [intersection #18]~~
- ~~Bayfront Expressway/Willow Road [intersection #52]~~
- ~~University Avenue/Bayfront Expressway [intersection #53]~~

Draft EIR text on page 3.4-66, lines two through five of Table 3.4-19, is revised as follows:

Table 3.4-19
Summary of Mitigation of Intersection Impacts

Combination of Mitigation Measures	# of Remaining AM Peak Hour Intersections Impacted	# of Remaining PM Peak Hour Intersections Impacted	Significance Level with Mitigation
P1	~~4~~ 3	~~9~~ 7	SU
P1 + P2	~~3~~ 2	~~9~~ 7	SU
P1 + P2 + P3	0	~~4~~ 3	SU
P1 + P2 + P3 + P4	0	~~3~~ 0	~~SU~~LTS

Source: AECOM Transportation, 2010.
Note: SU = Significant and Unavoidable

Draft EIR text on pages 3.4-66 through 3.4-67, Mitigation Measure TR-2.1, is revised as follows:

TR-2.1 Install Traffic-Adaptive Signal Technology. The SUMC Project sponsors shall contribute to the Palo Alto Citywide Traffic Impact Fee program, for the installation of traffic-adaptive signals. ~~However, this fee is not structured to mitigate one hundred percent of project related impacts, and an additional fee could be imposed by the City on the SUMC Project sponsors to mitigate the remaining share of the SUMC Project impacts.~~ In Menlo Park, the SUMC Project sponsors shall contribute their fair share amount, which shall be tied to the amount of traffic added to analyzed intersections by the SUMC Project. The SUMC Project sponsors' contributions shall apply towards the installation of traffic-adaptive signals as listed below.

- Sand Hill Road (Oak Creek to Shopping Center) - 4 3 signals
- Arboretum Road (Shopping Center to Palm Drive) - 3 signals
- Embarcadero Road (Bryant to Saint Francis) - 7 signals
- University Avenue (Palm to Lincoln) - 13 signals
- Lytton Avenue (Alma to Middlefield) - 10 signals
- Hamilton Avenue (Alma to Middlefield) - 10 signals
- Middlefield Road (San Antonio to Homer) - 9 signals
- Charleston Road (Alma to Middlefield) - 2 signals
- El Camino Real (northern city limits of ~~Menlo Park~~ Palo Alto to southern city limits of Palo Alto) – signals would require approval of Caltrans

In addition, the SUMC Project sponsors shall pay a fair share contribution towards installation of traffic-adaptive signals at the below significantly-impacted intersections in Menlo Park. These intersections are among those at which Menlo Park anticipates installing traffic-adaptive signals:

- Middlefield Road/Willow Road (intersection #18)
- Middlefield Road/Ravenswood Avenue (intersection #46)

Draft EIR text on pages 3.4-67 to 3.4-69, Mitigation Measure TR-2.3, is revised as follows:

TR-2.3 Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program. The SUMC Project sponsors shall enhance the currently-implemented TDM program in order to achieve 35.1 percent usage of alternative transportation modes (i.e., carpool, vanpool, bus, Caltrain, bicycle, and walk) by ~~SUMC~~ Hospital employees. The initial enhancements to the SUMC TDM program shall include the following:

- Provide Caltrain GO Passes, or an equivalent TDM measure, to all eligible hospital employees and set target Caltrain mode share for hospital employees equal to 15.8

percent. If the GO Pass program is no longer available in its current form, then the SUMC Project sponsors shall contribute the amount of funding that they would have paid toward purchase of GO Passes, in an amount not to exceed $1.8 million per year, toward one or more similar programs to encourage use of transit by SUMC employees as mutually agreed upon the SUMC Project Sponsors and the City's Director of Planning and Community Environment.

- ~~If Caltrain GO Passes would be provided to SUMC employees, make arrangements~~ Use all reasonable efforts to arrange with AC Transit to lease 75 spaces at the Ardenwood Park & Ride Lot, or an equivalent facility, to serve SUMC employees who commute from the East Bay.

- ~~Expand bus service in support of the issuance of GO Passes.~~

- Expand the Marguerite shuttle bus service ~~and integrate it with the other City of Palo Alto shuttle bus service.~~ between the SUMC and PAITS as needed to accommodate increased ridership by hospital employees.

- ~~Maintain~~ Use all reasonable efforts to assure that the controlling transit agency maintains load factors less than ~~or equal to~~ 1.00 on the U Line ~~and~~.

- Maintain a load factor less than or equal to 1.25 on the Marguerite shuttle.

- Expand and improve the bicycle and pedestrian networks as specified by Project site plans.

- Provide a full-time on-site TDM coordinator by 2015 for the Hospital components. The coordinator would be responsible for organizing and disseminating TDM information primarily to Hospital employees and also to Hospital patients. A central location would be made available to provide information on alternative travel modes. Also, the SUMC or Hospitals' website would contain information on TDM programs.

- Provide a guaranteed ride home program for all employees who use transit and other transport alternatives like carpool and vanpool. The guarantee ride home shall allow employees with dependent children the ability to use alternative modes to travel to and from work but still be able to travel home mid-day in case of an emergency.

- Provide employees with shower facilities within the SUMC Sites to encourage bicycling to work. The SUMC Project sponsors shall also provide bicycle storage facilities on the SUMC Sites that would be conveniently located near the employee showers.

- Establish, in conjunction with the GO Pass implementation, a "Zip Car" (or other similar car-sharing program) with Zip Cars available at the medical complex.

- Perform annual TDM monitoring and submit the report to the City of Palo Alto to ensure that the assumed modal split to alternative forms of travel and away from

autos would be actually achieved. This report also shall be submitted to the City of Menlo Park for its review.

- Within six (6) months of project approval, the SUMC Project sponsors shall submit to the City's Director of Planning and Community Environment, a Hospital TDM Program Report that documents the existing TDM programs offered to the Hospital employees, participation levels in the programs, and the current mode split of Hospital employees. The report will include the level of staff support, educational efforts, and outreach strategies used for the program. This initial Hospital TDM Program Report will serve as the baseline conditions for measuring the future TDM Program effectiveness as program enhancements are implemented to reach the 35.1 percent target in 2025.
- Subsequent to preparing the Baseline TDM Report, the hospitals shall prepare an annual report in the spring of each year that will document the same information as the baseline report and provide a comparison with the previous year. The annual report shall be submitted to the City's Director of Planning and Community Environment.
- In addition to implementing the program enhancements described above, the Hospitals and Stanford Parking & Transportation Services shall regularly consider other enhancements to the SUMC TDM Programs on an ongoing basis. Based on its experience in running TDM programs, Stanford's Parking & Transportation Services has found that adaptability and flexibility are two key factors when providing new services. For new or enhanced programs to be successful, the programs must evolve in consideration of employee preferences and desires, the availability of new services in the marketplace (such as zip cars), pilot programs, and ongoing research and data collection regarding the comparative effectiveness of various options. As necessary, the Hospitals shall regularly consider incorporating new services into their TDM Program, and shall meet with the City annually to exchange information about new innovations, research, and strategies.

These enhancements may not immediately change the mode split for ~~SUMC~~ Hospital employees, because many employees would be unable to change long standing commute patterns overnight. However, with the passage of a mutually agreed amount of time, it is expected that the enhanced TDM program would gradually result in a shift in the mode split of ~~SUMC~~ Hospital employees. ~~If this proves not to be the case, then a second round of improvements to the TDM program shall be implemented. Examples of additional measures could be to increase the parking permit charges while increasing the incentives to those who carpool or do not drive. If, by the year 2025, at least 35.1 percent of SUMC employees are not using alternative transportation modes, then a second round of improvements to the TDM shall be implemented. Examples of additional measures could be to increase the parking permit charges while increasing the incentives to those who carpool or do not drive. Thereafter, SUMC Project sponsors shall monitor/survey employee use of alternative modes of transportation on~~

~~an at least bi-annual basis, and shall continue to improve its TDM program, until it is confirmed to the satisfaction of the City that the target of 35.1 percent usage has been met.~~ The following interim targets in Table 3.4-19A shall be used to measure the progress toward meeting the desired mode split in 2025. These interim targets assume that in the early phases of implementation, there may be larger shifts to alternative modes than the shifts that may occur in later phases of the TDM program enhancement. New programs, such as the implementation of the Caltrain GO Pass, would generate a large shift once it is offered; however, other program enhancements may generate more modest shifts in mode choice.

Table 3.4-19A
Shift in SUMC Employee Mode Split

Target Year	Alternative Mode Share	Percent Change
EIR Baseline (2006)	22.9 %	NA
Project Approval Baseline (2011)		
2018	30 %	7.1%
2021	33 %	+3 %
2025	35.1 %	+2.1 %

For each of the interim target years, following submission of the Hospitals TDM Annual Report, the City shall determine if the interim year target has been met. If the Hospitals have not met the interim target, the Hospitals and the City shall meet to review the TDM Program and to identify possible additional TDM Program enhancements that the Hospitals should consider incorporating into their TDM Program in order to increase the Program's effectiveness.

If the Hospitals do not meet the applicable interim targets for any two consecutive years prior to 2025, the Hospitals shall provide alternative transportation funding to the City of Palo Alto in the amount of $175,000 per year until the Hospitals achieve the applicable interim mode split target. The alternative transportation funding shall be used by the City of Palo Alto for local projects and programs that encourage citywide use of alternative transportation mode uses.

If by 2025, the Hospitals have not demonstrated substantial compliance with the 35.1 modal split for alternative transportation modes, the following measure shall be required:

- The Hospitals shall make a lump sum payment of $4.0 million to the City of Palo Alto for local projects and programs that encourage and improve citywide use of alternative transportation mode uses. The City of Palo Alto shall identify capital projects and program enhancements for which the funds may be applied. Sample projects may include contributions towards regional transportation projects of interest to the City of Palo Alto and that are identified within the Valley Transportation Authority – Valley Transportation Plan or other local planning documents.

Impact TR-2.4 on page 3.4-69 is revised as follows:

TR-2.4 Fund or Implement those Intersection Improvements that Have Been Determined to be Feasible. The SUMC Project sponsors shall implement the following measures:

- ~~For the intersection of El Camino Real/Page Mill Road – Oregon Expressway, the SUMC Project sponsors shall pay a fair share towards (1) provision of exclusive right turn lane for westbound Oregon Expressway, in addition to the two through lanes, (2) increasing the cycle length to 160 seconds. Improvements to the westbound right turn lane would require right of way from the VTA park and ride lot.~~

- At the intersection of Arboretum Road/Galvez Street, the SUMC Project sponsors shall install a traffic signal.

- At the intersection of Bayfront Expressway/Willow Road, the SUMC Project sponsors shall pay a fair share towards providing one more right-turn lane for eastbound Willow Road.

- At the intersection of Bayfront Expressway/University Avenue, the SUMC Project sponsors shall pay a fair share towards widening southbound Bayfront Expressway to include an additional through lane and re-stripe the exclusive right turn lane to a shared through right turn lane. As a result, two additional receiving lanes in the southbound direction on Bayfront Expressway would be needed.

Draft EIR text on pages 3.4-69 through 3.4-70, Mitigation Measure TR-2.5, is deleted as follows:

~~*TR-2.5 Coordinate with Other Jurisdictions for Potentially Feasible Roadway Improvements.* The City of Palo Alto shall work with other jurisdictions to try to achieve feasibility for the following roadway improvements or adjustments. In the event that one or more of the below improvements would then be determined to be feasible, the SUMC Project sponsors shall pay their fair share towards implementation of the improvements, if a fair share contribution would apply.~~

- ~~Alpine Road/I-280 Northbound Off Ramp – Signalize this intersection. The City shall coordinate with Caltrans regarding feasibility of these improvements.~~

- ~~El Camino Real/Ravenswood Avenue – Re-stripe the exclusive right turn lane on southbound El Camino Real to a shared through/right lane. Also, provide an additional through lane for northbound El Camino Real by removing the right turn slip island. Also, provide an exclusive right turn lane for eastbound Menlo Avenue. The City shall coordinate with the City of Menlo Park and Caltrans regarding feasibility of these improvements.~~

- ~~Bayfront Expressway/Willow Road – Provide one more right-turn lane for eastbound Willow Road and make the right-turn movement for southbound Bayfront Expressway "overlap" with the left-turn of eastbound Willow Road. The intersection has signals for the right-turn movement for southbound Bayfront~~

~~Expressway, but the "overlap" phase is not implemented. The City shall coordinate with the City of Menlo Park regarding feasibility of these improvements.~~

- ~~Middlefield Road/Ravenswood Avenue – Provide an additional exclusive left-turn lane for northbound Middlefield Road. The City shall coordinate with the City of Menlo Park regarding feasibility of this improvement.~~
- ~~Junipero Serra Boulevard/Campus Drive West – Request that Santa Clara County change the signal cycle length at this intersection to 90 seconds. The City shall coordinate with the County of Santa Clara regarding feasibility of this adjustment.~~

Draft EIR text on page 3.4-72, fourth paragraph, is revised as follow:

MITIGATION MEASURES. ~~Mitigation Measure TR-4.1, involving funding and implementation of a traffic impact study, and~~ Mitigation Measure TR-4.2, involving re-striping of Durand Way, would reduce the SUMC Project's impact to a less-than-significant level. (LTS)

Draft EIR text on page 3.4-73, first paragraph is deleted as follow:

~~*TR-4.1 Fund Traffic Impact Study*. Upon construction of the SHC and LPCH hospital components, the SUMC Project sponsors shall fund an independent traffic evaluation, commissioned by the City, based on actual travel patterns, volumes and emergency access, with an emphasis on ease of circulation around and through the medical complex to determine if the private street connection between Roth Way and Pasteur Drive should be operated as a public street. If the independent traffic study demonstrates that the connection between Roth Way and Pasteur Drive as a public street would improve circulation, then the connection shall be designated as a public street for all vehicular, bicycle, pedestrian, and transit traffic.~~

The fourth bullet on page 3.4-76 of the Draft EIR and the second and third bullets on page 3.4-77 have been revised as follows:

- ~~Provide an enhanced pedestrian crossing at Quarry Road/El Camino Real to establish a strong connection between the SUMC Project and Downtown Palo Alto. The pedestrian crossing shall be 12 feet wide, have contrasting pavement, countdown signal heads, and high visibility markings. Even though the intersection of Quarry Road and El Camino Real is projected to operate at acceptable levels of service, added vehicular traffic through the intersection and bicycle and pedestrian volumes across the~~ intersection ~~would potentially create safety hazards which would be mitigated by the proposed enhanced crossings.~~
- ~~Provide a bicycle and pedestrian trail through the Arboretum Drive as part of future campus planning in the SUMC area. This trail shall improve access to the SUMC Project. To support this off-street path, bicycle and pedestrian crossings at Arboretum Road and Palo Road shall be enhanced to provide safe crossing of these streets. The crosswalks shall~~

~~be properly signed, marked, and lighted with enhanced pavement markings and imbedded crosswalk lights. Signalization of this crossing may ultimately be required.~~

- Incorporate into the Quarry Road corridor, from El Camino Real to Welch Road, ~~continuous sidewalks according to the SUMC Project's Design Guidelines. The extension of Quarry Road west of Welch Road shall continue the pedestrian facilities into the SUMC Project~~ improvements to and within the public right-of-way to enhance the pedestrian and bicycle connection, including urban design elements and way finding, wider bicycle lanes, as necessary, on Quarry Road, enhanced transit nodes for bus and/or shuttle stops, and prominent bicycle facilities.

Draft EIR text on page 3.4-77, Impact TR-7, is revised as follows:

TR-7. Transit Impacts. ~~*Implementation of the SUMC Project could impede the operation of the transit system as a result of increased ridership, and result in a significant impact. (S)*~~ *The SUMC Project would not adversely impact either AM or PM Peak Hour bus service in Palo Alto or Caltrain service. Nonetheless, mitigation to provide enhanced bus stops and shuttle service is identified here. (LTS)*

Draft EIR text on page 3.4-78, first paragraph, is revised as follows:

The SUMC Project would increase on-site employment by 2,242 full-time equivalent employees and would also increase visitorship, and result in increased ridership. ~~The resulting increase in ridership could exceed capacity in the various transit services to and from the SUMC Sites. As such, the SUMC Project could result in a significant impact on transit.~~ However, as discussed in Staff-Initiated Change 1 of the Responses to Comments document, transit capacity can accommodate the SUMC Project, with or without the GO Pass mitigation measure.

Draft EIR text on pages 3.4-79 through 3.4-80 in Section 3.4, Transportation, starting at the third paragraph on page 3.4-79, is revised as follows:

Enhanced Bus Stops ~~**Transit Centers.**~~ The projected increase in transit ridership would require the provision ~~addition~~ of enhanced bus stops ~~mini transit centers~~ at the SUMC. These ~~transit centers~~ bus stops would be located at Hoover Pavilion and at SHC and would be on ~~off~~-street facilities. The ~~transit centers~~ enhanced bus stops would accommodate ~~three to four~~ two buses simultaneously, have shelters, seating, lighting, signs, maps, bus schedules, and bicycle parking. On-street bus stops along Welch Road and Quarry Road would also be provided, but the ~~transit centers~~ enhanced bus stops would accommodate the majority of transit riders and would be located to maximize the convenience of employees, patients and visitors. One ~~transit center~~ enhanced bus stop in the vicinity of Welch Road and Pasteur Drive to serve SHC and another near the entrance to Hoover Pavilion would provide the focal point for transit use for SUMC. The SUMC Project sponsors shall revise their SUMC site plan to incorporate two ~~transit hubs~~ enhanced bus stops as noted above to reduce the impacts to transit service caused by the proposed expansion.

Expand Transit Service. The Marguerite~~, Crosstown and Menlo Park Shuttle services~~ and the ~~VTA Community~~ U Line Bus service ~~would~~ may need to be expanded to meet the projected increase in demand. In some cases, additional capacity would need to be provided, in the form of new routes, or additional buses and higher frequencies on existing routes.

- **Marguerite Shuttle.** The SUMC Project sponsors shall ~~expand~~ fund expansion of the Stanford University Marguerite shuttle service to PAITS as necessary to support additional ridership created by issuing GO Passes to all SUMC employees ~~into Palo Alto. Specifically, Marguerite shuttles shall connect the SUMC to downtown Palo Alto and the areas surrounding the downtown. Currently, Marguerite shuttle routes A and B do not extend into downtown Palo Alto. While the Marguerite shuttle DT and M routes do extend into downtown areas, they do not operate during the majority of the day. This expanded shuttle service could follow new routes or an extension of existing routes. Current headways on existing routes shall be maintained with the expansion.~~
- **U-Line.** ~~Arrangements with AC Transit shall be made to increase U Line service (such as decreasing headways) to meet the increase in demand attributable to the SUMC Project, and ensure that~~ The SUMC Project sponsors shall use reasonable efforts to assure that the controlling transit agency maintains a load factor ~~remain~~ below 1.0 on the U-Line.
- ~~**Crosstown Shuttle.** The City of Palo Alto currently operates the Crosstown Shuttle. More efficient transit service may be provided by providing this service as a part of the Marguerite Shuttle. SUMC should participate in operating the Palo Alto Crosstown Shuttle service.~~
- ~~**VTA Community Bus Service.** In 2007, the VTA adopted a new Bus Service Operating Plan which made major modifications to the current bus transit network. The plan introduced Community Bus Service throughout Santa Clara County, which features smaller vehicles with an identity tied to the individual communities served. As part of that plan, local communities are required to cover 25 percent of the cost if they want to have the service free of charge to the riders.~~
- ~~**Menlo Park Shuttle Bus.** SUMC should contribute to additional shuttle bus service to Menlo Park, as a means of mitigating the increase in daily traffic on minor arterials and collector streets in the City.~~

Draft EIR text on pages 3.4-80 through 3.4-81, Mitigation Measure TR-7.1 and TR-7.2, are revised as follows:

Mitigation Measure TR-7.1 involves the addition of ~~transit centers~~ enhanced bus stops to the SUMC Project's site plans, and Mitigation Measure TR-7.2 involves financial contributions towards the expansion of transit service. Implementation of these measures would ~~reduce~~ ensure that the SUMC Project's transit impacts to a less-than-significant level. (LTS)

TR-7.1 *Incorporate ~~Transit Centers~~ Enhanced Bus Stops Into Site Plans*. The SUMC Project sponsors shall revise their SUMC Project site plan to incorporate two ~~transit centers~~ enhanced bus stops to reduce the impacts to transit service caused by the SUMC

Project. These ~~transit centers~~ enhanced bus stops shall be located at Hoover Pavilion and at SHC, and shall be on ~~off~~-street facilities. The ~~transit centers~~ enhanced bus stops shall accommodate ~~three to four~~ two buses simultaneously, and shall have shelters, seating, lighting, signs, maps, bus schedules, and bicycle parking. On-street bus stops along Welch Road and Quarry Road shall also be provided, but the ~~transit centers~~ enhanced bus stops shall accommodate the majority of transit riders and shall be located to maximize the convenience of employees, patients and visitors. One ~~transit center~~ enhanced bus stop shall be located in the vicinity of Welch Road and Pasteur Drive to serve SHC. The other ~~transit center~~ enhanced bus stop shall be located near the entrance to Hoover Pavilion. Both of these ~~transit centers~~ enhanced bus stops shall provide the focal point for transit use for the SUMC.

TR-7.2 *Provide Expanded Transit Service*. The SUMC Project sponsors shall fund expansion of the Marguerite shuttle service between the SUMC and PAITS, and shall make a fair share financial contribution to the cost of expanding ~~existing bus service of the Marguerite,~~ U-Line bus service ~~Crosstown, and Menlo Park Shuttle bus services, and to the VTA Community Bus Service~~.

- **Marguerite Shuttle.** The SUMC project sponsors shall ~~make a financial contribution to expand~~ fund expansion of the Marguerite shuttle service into Palo Alto between SUMC and PAITS.
- **U-Line.** The SUMC project sponsors shall ~~make a financial contribution towards the operation of the U-Line~~ use reasonable efforts to assure that the controlling transit agency maintains ~~. Arrangements with AC Transit shall be made to increase U-Line service (such as decreasing headways) to meet the increase in demand attributable to the SUMC Project, and ensure that~~ load factors ~~remain below~~ of less than 1.0 on the U-Line.
- ~~**VTA Community Bus Service.** The SUMC project sponsors shall contribute to fund the project's fair share of Palo Alto's share of expanded VTA Community Bus Service.~~
- ~~**Menlo Park Shuttle Bus.** The SUMC Project Sponsors shall pay into the City of Menlo Park shuttle fee at $0.105 per square foot of new development annually or a percentage agreed between Menlo Park and SUMC Project sponsors. In Menlo Park, the contribution shall be tied to the amount of project traffic added to analyzed roadway segments and intersections.~~

The following text is added as paragraph three on page 3.4-86 of the Draft EIR:

There would be known CP/GUP construction projects (by Stanford University) located near the SUMC Project during the years that the SUMC Project is under construction. CEQA requires mitigation of the SUMC Project's contribution to a significant cumulative impact, if the contribution would be cumulatively considerable. Under the CP/GUP, each time Stanford University commences construction of a CP/GUP project, it must submit a Construction Traffic

Management Plan to the County that provides information on construction parking; pedestrian, bike, and transit circulation; notifications to Stanford Police and Palo Alto Fire Department; and truck routes.

Section 3.5, Air Quality

Draft EIR text on page 3.5-26, fourth paragraph, has been revised as follows:

AQ-8. *Cumulative Construction and Operational TAC and Fine Particulate Matter Emissions. SUMC Project TAC and fine particulate matter emissions ~~could contribute considerably to the health risk of sensitive receptors on and near the SUMC Project site and, thus, have a significant cumulative impact.~~ , and TAC and fine particulate matter emissions from other sources within a 1,000-foot zone of influence of the Main SUMC Site, would have a less-than-significant cumulative impact on public health. (~~S~~LTS)*

Draft EIR text starting on page 3.5-26, last paragraph, and continuing on page 3.5-27 has been revised as follows:

~~Under the Community Air Risk Evaluation (CARE) program, the BAAQMD identified communities in the Bay Area subject to high TAC emissions, with sensitive populations that could be affected by them. During Phase I of CARE, the BAAQMD developed a preliminary Bay Area-wide TAC emissions inventory (for the Year 2000) and compiled demographic and health statistics data to identify sensitive populations. Five TACs (i.e., DPM, 1,3 butadiene, benzene, hexavalent chromium, and formaldehyde) were estimated to be responsible for about 97 percent of the Bay Area's cumulative cancer risk, with DPM alone accounting for about 80 percent of this risk. The major sources of DPM were identified as on-road and off-road heavy-duty diesel trucks and construction equipment. BAAQMD risk modeling studies indicate that exposure to DPM results in a Bay Area average cancer risk of 500-700 in a million. However, the Bay Area's highest DPM emissions were found to occur in the urban core areas of eastern San Francisco, western Alameda, central Santa Clara, and eastern San MateoCounties (the latter including Redwood City and East Palo Alto), where cancer risks were found to be substantially higher than the regional average.~~

~~The Health Risk Assessment conducted for the SUMC Project found that DPM from project construction equipment would be the main TAC emitted. But it also evaluated operational DPM emissions from the facility's emergency generators and delivery trucks and determined health risks from both source categories. The health risks from both the SUMC Project's construction and operational sources were found to be less than the BAAQMD's TAC exposure significance threshold (i.e., 10 chances in a million of contracting cancer over a lifetime exposure). However, the SUMC Sites are adjacent to a BAAQMD-identified CARE "Priority Community," where the background DPM cancer risk is likely substantially greater than the Bay Area average 500 to 700 in a million. Although reduction in DPM from diesel engines has been given priority by federal, State, and local agencies, and regulations are in place to bring about substantial reduction of DPM from diesel engines over time, there is still no regional modeling study that predicts when remediation can be expected of the Bay Area's elevated DPM health risk identified in the CARE studies. Furthermore, the SUMC Project is the largest project compared to the list of cumulative projects expected to be developed in the~~

~~City of Palo Alto (see Appendix B). Consequently, SUMC Project TAC emissions must be considered cumulatively considerable even though the health risk they pose to the local population is relatively small (i.e., 10 in a million) in comparison to the background TAC risk (i.e., greater than 700 in a million) that affects Palo Alto and environs.~~

~~MITIGATION MEASURE. Mitigation Measure AQ-1.2 (Implement Equipment Exhaust Emission Reduction Measures) has been identified primarily to reduce construction-phase criteria pollutant emissions, but it would also reduce DPM emissions. However, the emissions of criteria and DPM emissions from project construction sources were based on current best estimates of the type, number, and duration of use of the SUMC Project construction equipment. While some additional reductions of TACs would be expected with Mitigation Measure AQ-1.2, where their implementation is feasible, their potential additional reductions were not included in the SUMC Project's DPM estimates that were the basis of the Health Risk Assessment. However, it is not likely that the additional reductions in SUMC Project TAC emissions resulting from their implementation would reduce the SUMC Project health risk to the point where it would not be cumulatively considerable in the context of Palo Alto's high TAC background levels. Thus, SUMC Project TAC emissions would remain cumulatively significant even after the implementation of all feasible TAC reduction measures. (SU)~~

The 2010 BAAQMD CEQA Guidelines methodology recommends evaluation of cumulative TAC and fine particulate matter impacts at sensitive receptors within a "zone of influence" extending 1,000 feet from the property line of a development project site and including the effects of all substantial TAC and fine particulate matter sources within this zone of influence. The SUMC Project cumulative analysis estimated excess the lifetime cancer risks, the non-cancer hazard indices (HIs), and the $PM_{2.5}$ concentrations at sensitive receptor locations that are attributable to mobile sources (i.e., surface streets with traffic exceeding 10,000 vehicles per day, including El Camino Real, Sand Hill Road, Quarry Road, Campus Drive, and Welch Road) and stationary sources (i.e., existing and proposed diesel generators, truck loading docks, the Cardinal Cogen power plant, and two gas-dispensing facilities) within the zone of influence around the SUMC Sites. Such risk and hazard estimates were obtained using air dispersion models approved by the EPA and recommended by the BAAQMD (i.e., CAL3QHCR for mobile sources, and AERMOD for stationary sources). Consistent with the BAAQMD's definition of a sensitive receptor, cumulative impacts were evaluated for patients at the new SHC and LPCH hospital buildings, and at the location of the maximally exposed off-site residential receptor (MEIR) identified in the Health Risk Assessment for the SUMC Project. The results of the cumulative analysis were compared with the following cumulative significance thresholds identified in the 2010 BAAQMD CEQA Guidelines:

- An excess lifetime cancer risk of more than 100 in one million;
- A chronic non-cancer HI greater than 10.0; and
- An incremental increase in the annual average $PM_{2.5}$ of 0.8 $\mu g/m^3$ or greater.

Estimates for project-level construction and operational TAC impacts are available from the SUMC Project Health Risk Assessment where their significance was assessed according to the following significance thresholds:

- An excess lifetime cancer risk of more than 10 in one million; and
- A chronic non-cancer HI greater than 1.0.

As presented in Table 3.5-9, project-level cancer and non-cancer TAC impacts were found to be less than significant for maximally exposed on-site patient and worker receptors, and for off-site residential and other sensitive receptors.

The results of the cumulative analysis are listed separately by source and then totaled for all operational sources in Table 3.5-11. Construction TAC emissions were not found to be individually significant (per Impact AQ-4) and, if added to operational emissions, would not contribute to cumulative TAC levels exceeding BAAQMD thresholds. All cumulative estimates for cancer risk, chronic non-cancer HI and annual average $PM_{2.5}$ concentration would be below the 2010 BAAQMD CEQA Guidelines cumulative significance thresholds for on-site patient receptors and maximally exposed off-site residential receptors within the zone of influence. Thus, the SUMC Project would have a less-than-significant cumulative impact related to TACs and fine particulate matter BAAQMD 2010 CEQA Guidelines. (LTS)

Table 3.5-11 is a new table, which has been inserted as follows after the revised text on page 3.5-27 of the Draft EIR:

Table 3.5-11
Cumulative Impacts from the SUMC Project Sources and Other Sources within the Project Site Zone of Influence

	Cancer Risk (per million)			Chronic Hazard Index			$PM_{2.5}$ Concentration (ug/m3)		
Modeled Source	**SHC Patient**	**LPCH Patient**	**Offsite Resident**	**SHC Patient**	**LPCH Patient**	**Offsite Resident**	**SHC Patient**	**LPCH Patient**	**Offsite Resident**
Project Diesel Generators	0.6	0.06	1.4[a]	0.005	0.0001	0.0005[a]	0.03	0.0007	0.0025
Project Loading Docks	0.007	0.015		0.00006	0.00004		0.0003	0.0002	
Existing Point Sources[b]	0.2	0.0	2.6	0.002	0.002	0.001	0.008	0.006	0.005
Existing Loading Docks	0.1	0.2	7.1	0.0008	0.0006	0.003	0.004	0.003	0.01
Traffic	0.2	0.6	14.3	0.002	0.002	0.006	0.06	0.05	0.15
Gas Dispensing Facility	0.1	0.3	2.0	0.002	0.002	0.002	0	0	0
Total Cumulative Sources	**1.2**	**1.1**	**27.0**	**0.01**	**0.006**	**0.01**	**0.1**	**0.1**	**0.2**
BAAQMD Cumulative CEQA Threshold		**100**			**10**			**0.8**	
Cumulative Impact?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**

Source: Environ, January 2011.

Note:

a. Only total risk, HI and $PM_{2.5}$ exposures from combined generator and loading dock sources were determined, not the individual contributions from each source type.

b. Modeled sources include onsite and offsite diesel generators and the cogeneration power plant.

Section 3.6, Climate Change

The text on page 3.6-7, Table 3.6-2, of the Draft EIR is revised as follows:

Table 3.6-2
California Greenhouse Gas Reductions Targets

Year[a]	Estimated California Population	Reduction Goal	Greenhouse Gas Target (Tg CO_2e)[b]
1990	29,828,000	N/A	427.0
2000	34,105,437	N/A	452.3
2010	39,135,676	GHG emissions at or below 2000 levels[~~b~~c]	452.3
2020	44,135,923	GHG emissions at or below 1990 levels	427.0
2050	59,507,876	GHG emissions 80 percent below 1990 levels	~~341.6~~ 85.4[~~c~~d]

Source: Population data are from California Department of Finance, 2007; greenhouse gas targets are derived from CARB, 2007. Greenhouse Gas Emissions Inventory Summary [1990 - 2004].

Notes:

a. Target years specified in Executive Order S-3-05 and/or AB 32. 1990 and 2000 data are provided as a baseline.

b. Tg CO_2e stands for teragrams of carbon dioxide equivalents.

~~b~~c. Based on 2004 estimate.

~~c~~ d. Calculated by multiplying 427.0 x ~~8~~ 20 percent.

Draft EIR text on page 3.6-9, third bullet, has been revised as follows:

- *Vehicular Emissions, Non-Fleet Vehicles*. The inventory includes quantification of the emissions associated with employee, patient, and visitor vehicles based on an estimate of the Vehicle Miles Traveled (VMT) to and from the SUMC Sites. The VMT was calculated by AECOM Transportation[30] based on the commuting patterns of existing employees and patients (see Appendix ~~E~~ W of the Final EIR). The VMT calculations assume that 60 percent of the daily trips are made by patients and 40 percent made by employees. Using employee and patient-origin data (zip codes) provided in the project application, distances from these origins to the SUMC Sites were estimated. An average trip length was applied to the trip generation factors in the Transportation Impact Analysis. CO_2 emissions associated with existing VMT were calculated using CARB's URBEMIS 2007 model, while N_2O and CH_4 were calculated using CCAR fuel emissions factors. Because patient and visitor trips would be expected to occur somewhere in the region or global environment whether or not SUMC facilities are expanded, this component of the vehicular emissions is not included in the comparison to a BAU scenario.

Table 3.6-3 on page 3.6-11 of the Draft EIR has been revised as follows:

Table 3.6-3
Existing Annual Greenhouse Gas Emissions, SHC, LPCH, and SoM

	Units Consumed			Emissions (MT CO_2e)		
Source of Emissions	**SHC and LPCH**	**SoM**	**Total**	**SHC and LPCH**	**SoM**	**Total**
Natural Gas (therms)	331,429	0	331,429	1,759	0	1,759
Diesel Generators (gallons)	13,707	0	13,707	139	0	139
Medical Nitrous Oxide (cubic feet)	8,815	0	8,815	137	0	137
Fleet Vehicle Fuels (gallons)	41,864	0	41,864	356	0	356
Helicopter Fuel (gallons)	75,297	0	75,297	721	0	721
Electricity (MWh) [a]	63,365	12,223	75,588	14,979	2,889	17,869
Steam and Chilled Water (MBtu)	N/A	131,765	131,765	28,050	11,991	40,041
Non-fleet Employee Vehicular Emissions (VMT)[b]	N/A	N/A	~~600,246~~ 182,431	N/A	N/A	~~102,619~~ 31,189
Solid Waste (tons)[c]	N/A	N/A	3,700	N/A	N/A	1,324
Subtotal for BAU Comparison						**93,533[d]**
Non-fleet Patient and Visitor Vehicular Emissions (VMT)[b, e]	N/A	N/A	417,815	N/A	N/A	71,430
Total SUMC Project Emissions						**164,964[d]**

Source: Mazzetti and Associates Consultants and Engineers, 2008, Stanford University Medical Center 2007 Greenhouse Gas Inventory. Additional data provided by PBS&J, 2010.

Notes:

N/A = No data available.

a. The Mazzetti and Associates inventory (sourced for this table) used an electricity emission factor of 263.62 lbs CO_2/MWh, cited to CPAU. However, the City has indicated that this emissions factor does not apply to the development on the SUMC Sites and requested that the inventory be revised using CO_2 emissions factor of 520 lbs CO_2/MWh based on the City's energy purchasing records, and CCAR's standard emissions factors for N_2O and CH_4 (0.0037 lbs N_2O/MWh and 0.0067 lbs CH_4/MWh). The electricity emissions in this table represent the use of the revised emission factors. The emissions for electricity include the emissions from actual electrical consumption as well as the consumption of electricity to treat and transport wastewater. Therefore, the emissions numbers are slightly higher than the emissions from actual electrical consumption alone.

b. Calculated using VMT assumptions reported by AECOM Transportation, (Appendix X ~~E~~). Emissions were modeled using the VMT assumptions from AECOM in the URBEMIS 2007 software.

c. SUMC solid waste emissions were determined based on total citywide emissions. Existing SUMC solid waste generation is 5 percent of citywide waste generation. Therefore, emissions attributed to SUMC generation was determined to be 5 percent of total citywide waste emissions.

d. Numbers may not add exactly due to rounding.

e. Patient and visitor trips are not included in BAU calculations since these trips would occur whether or not the SUMC facilities are expanded.

Draft EIR text on page 3.6-24, fourth paragraph, first sentence, has been revised as follows:

The non-Hospital portions (medical office buildings) of the SUMC Project are subject to the Title 24 standards; however due to the nature of hospital operations, the Hospital facilities are not. Hospital buildings are subject to distinct building code requirements administered by the Office of Statewide Health Planning and Development (OSHPD).

Draft EIR text on page 3.6-24, fifth paragraph, has been revised as follows:

On June 2, 2008, the Palo Alto City Council adopted Ordinance 5006, a mandatory Green Building Ordinance that is applicable to residential and non-residential private development projects subject to the City's building codes. The ordinance became effective on July 3, 2008 and is retroactive for commercial projects for which planning applications were submitted after December 3, 2007, the date the City Council adopted the Climate Protection Plan. Because hospital buildings are not subject to the City's building codes, the City's Green Building Ordinance is not applicable to the Hospital components of the SUMC Project.~~; however, it would be~~ In addition, because the application for the SUMC Project was submitted prior to December 3, 2007, the City's Green Building Ordinance would also not be applicable to the clinic, medical office, SoM FIM, and research buildings that require City building permits.

Draft EIR text on page 3.6-26, third full paragraph, has been revised as follows:

CC-1. Furthering Individual Policies ~~Goals and Policies~~ of the Palo Alto Climate Protection Plan. The proposed Emissions Reduction Program would minimize greenhouse gas emission increases associated with the proposed development program. However, the proposed Emissions Reduction Program would not be sufficient to further ~~the goals~~ some of the individual policies of the City's Climate Protection Plan. (S)

Draft EIR text on page 3.6-27, second full paragraph starting at the third sentence, has been revised as follows:

As part of the SUMC Project, SHC and LPCH have committed to design their new facilities such that they will use 35 percent less energy than typical hospitals (based on a comparison to the ~~Department of Energy's Commercial Buildings Energy Consumption Survey~~ hospital energy consumption database used by the Environmental Protection Agency) and 20 percent less energy than a hospital designed to meet ASHRAE 90.1 standards. The SoM has committed to design its new facilities such that they will meet Stanford University's 2008 Building Performance Guidelines, which set a target energy efficiency in new buildings of 30 percent below California Title 24 ~~(2006 standards)~~/ASHRAE 90.1 (2004 standards), or 15 percent below the current (2008) Title 24 Standards that are in place as of October 2010.

Draft EIR text on pages 3.6-28 to 3.6-29, fifth bullet, has been revised as follows:

- *Non-fleet Vehicle Trips.* The SUMC Project inventory includes quantification of the emissions associated with employee, patient, and visitor vehicles traveling to and from the SUMC Sites, based on VMT to and from the SUMC facilities. SUMC Project VMT was

calculated using similar methods to those reported in the Existing Conditions subsection, except that trip generation was scaled according to the increase in square footage and activity. While there is an acknowledged trend in the increase in the use of alternative fueled vehicles (hybrid, electric, hydrogen) and that trend is anticipated to continue between 2010 and 2025 the ratio of alternative-fueled vehicles to gasoline fueled vehicles at that time is unknown. Therefore, the analysis conservatively assumes that the entire fleet is gasoline fueled for all analysis years. Further, in order to compare conditions to a BAU scenario, fleet vehicle emissions are first calculated based on regulations in effect in 2004 (BAU) and then compared to a scenario that accounts for regulations adopted since that date.

It is important to recognize that the SHC and LPCH are not meeting all of the existing demand for hospital facilities; therefore, some of the trips associated with the SUMC Project are trips that already are occurring in the region as patients seek healthcare elsewhere and medical employees meet those needs at other hospitals~~. Also, a substantial portion of the emissions in this category could occur whether or not the SUMC Project is approved. This is because people are likely to seek the type of medical services provided by the SHC and LPCH whether those services are offered at SHC and LPCH or at some other hospital. However, it is uncertain what percentage of the projected trips would occur if the SUMC Project were not implemented.~~ Ultimately, patients and visitors are a function of need rather than a function of the SUMC Project. Even if the SUMC Project is not implemented the patients and visitors would need to go to another facility. The emissions from the travel of patients and visitors would occur with or without the SUMC Project and therefore are not included in non-fleet vehicle emissions calculations for purposes of the BAU comparison. All emissions associated with the projected SUMC Project VMT are conservatively reported in the SUMC Project inventory.

Draft EIR text on page 3.6-29, fourth full paragraph, has been revised as follows:

Estimated greenhouse gas emissions associated with the SUMC Project are summarized in Table 3.6-4. As discussed in the Existing Conditions subsection, the existing SUMC facilities are assumed to produce approximately 164,964 MT CO_2e of greenhouse gases annually. Including non-fleet patient and visitor VMT, ~~The~~ SUMC Project operations would result in a net annual emissions increase of up to ~~74,803~~63,298 MT of CO_2e, which is a ~~31~~38 percent increase over the existing emissions generated at the SUMC Sites. However, as stated above, for the purposes of defining the BAU scenario and comparing SUMC Project emissions to BAU emissions, non-fleet patient and visitor VMT is excluded since non-fleet patient and visitor trips would occur whether or not the SUMC facilities are expanded. Without non-fleet patient and visitor VMT, the BAU scenario emissions for the SUMC Project would be 46,085 MT of CO_2e.

Draft EIR Table 3.6-4 on page 3.6-30 has been revised as follows:

Table 3.6-4
Net Business as Usual SUMC Project Greenhouse Gas Emissions, 2025

Source of Emissions	Units Consumed, Net Increase	Net Emissions (metric tons CO_2e)
Natural Gas (therms)	5,137	27
Diesel Generators (gallons)	2,232	23
Medical Nitrous Oxide (cubic feet)	6,127	99
Fleet Vehicle Fuels (gallons)	13,845	100
Helicopter Fuel (gallons)	21,083	201
Electricity (MWh) [a]	54,640	12,914
Steam and Chilled Water (million Btu)	10,995	19,542
Non-fleet Employee Vehicular Emissions (VMT)[b]	~~275,566~~ 83,834	~~41,257~~ 12,539
Solid Waste (tons)[c]	1,792	640
Subtotal for BAU Comparison		**46,085**
Non-fleet Patient and Visitor Vehicular Emissions (VMT)[b, d]	191,732	17,213
Total Net SUMC Project Emissions		**~~74,803~~63,298**

Source: Mazzetti and Associates Consultants and Engineers, 2008, Stanford University Medical Center 2007 Greenhouse Gas Inventory. Additional data provided by PBS&J, 2010 (Appendix V~~H~~).

Notes:

a. The Mazzetti and Associates inventory (sourced for this table) used an electricity emission factor of 263.62 lbs CO_2/MWh, cited to CPAU. However, the City has indicated that this emissions factor does not apply to the development on the SUMC Sites and requested that the inventory be revised using CO_2 emissions factor of 520 lbs CO_2/MWh based on the City's energy purchasing records, and CCAR's standard emissions factors for N_2O and CH_4 (0.0037 lbs N_2O/MWh and 0.0067 lbs CH_4/MWh). The electricity emissions in this table represent the use of the revised emission factors

b. Calculated using VMT assumptions reported in AECOM Transportation (Appendix W~~E~~). Emissions were modeled using the VMT assumptions from AECOM in the URBEMIS 2007 software. The numbers vary slightly from the VMT in the AECOM memo due to rounding purposes for the URBEMIS model. ~~Based on VMT of 275,566, which varies slightly from the VMT in the AECOM memo (275,837 VMT) due to rounding purposes for the URBEMIS model.~~

c. SUMC solid waste emissions were determined based on total City wide emissions. Existing SUMC solid waste generation is 5 percent of City wide waste generation therefore emissions attributed to SUMC generation was determined to be 5 percent of total City wide waste emissions.

d. Patient and visitor trips are not included in BAU calculations since these trips would occur whether or not the SUMC facilities are expanded.

Draft EIR Table 3.6-5 on pages 3.6-31 to 3.6-33 is revised as follows:

Table 3.6-5
Comparison of SUMC Project Emissions,
Reduction Program to Climate Protection Plan Policies

Action/Goal	SUMC Measure	Compliant with Climate Protection Plan Policies?
	Utilities	
Reduce Electricity and natural gas use through conservation and energy efficiency.	Proposed Emissions Reduction Programs: • *Enhanced Energy Efficiency – School of Medicine*. As part of the SUMC Project, the new SoM buildings would meet Stanford University's 2008 Building Performance Guidelines, which set a target energy efficiency in new buildings of 30 percent below California Title 24/ASHRAE 90.1 (2004), which equates to 15 percent below current (2008 – in effect as of October 2010) Title 24 standards. These measures would be consistent with the City's Climate Protection Plan Policies. However, an audit would be necessary to verify compliance with the City's Climate Protection Plan Policies	~~No~~ Yes
	Mitigation Measure: *Commissioning and Retro-Commissioning of Energy Systems for New Buildings*. New construction ~~and existing buildings altered by construction of~~ for the SUMC Project shall undergo commissioning of energy and HVAC systems ~~during construction and on an annual basis during the first five years of operation~~ within one year following building occupancy. The commissioning process shall follow the standards of the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Guideline 0-2005 or the International Performance Measurement and Verification Protocol (MVP). The SUMC Project sponsors shall provide the City of Palo Alto with commissioning verification data within 12 months of OSHPD (or City) certificate of occupancy for each new SUMC Project building component (parking structures excluded). These components are: SHC Hospital (Phase 1), SHC Hospital (Phase 2), LPCH Hospital Expansion, Hoover Medical Office Building, School of Medicine (FIM 1, FIM 2 and FIM 3) and 429,000 SF of clinic space for SHC. The commissioning of the new SHC and LPCH Expansion Hospitals will be conducted as part of LEED Enhanced Commissioning in compliance with the ASHRAE Guideline 0-2005. During years two to five after completion of the entire SUMC Project, SUMC will annually provide the City of Palo Alto with an EPA Energy Star Statement of Energy Performance report for each new building component. This report is generated using the EPA Energy Star Portfolio Manager system. Building profiles and consumption details entered in the Portfolio Manager system and a resulting energy efficiency rating is provided based on similar facilities (i.e., academic teaching facility, community hospital, free-standing surgery center, etc.) This process would ensure that new and existing energy systems would perform	Yes

Table 3.6-5
Comparison of SUMC Project Emissions,
Reduction Program to Climate Protection Plan Policies

Action/Goal	SUMC Measure	Compliant with Climate Protection Plan Policies?
	interactively according to construction documents, the SUMC Project design intent and the owner's operational needs.	
Expand use of renewable energy installed or purchased directly by customers. Reduce carbon intensity of energy supply.	**Existing Emissions Reduction Program (with proposed expansion):** *Purchase of Electricity and Natural Gas from City*. The SUMC Project sponsors would obtain electricity and natural gas from the City of Palo Alto Utilities Department. The City has adopted a 10-year energy efficiency plan; one of the plan's goals is to meet up to 33 percent of the City's electricity needs through renewable sources of power, such as wind, landfill gas, and solar, by the year 2015. However, the SHC, LPCH and SoM have not committed to expanding renewable energy facilities on the SUMC Sites. Given the extent to which the facilities on the SUMC Sites contribute to the City's overall energy demand, the lack of definite commitments to ~~directly install new~~ participate in a program to expand use of renewable energy ~~facilities~~ installed or purchased by CPAU customers would be inconsistent with the Climate Protection Plan.	**No**
	Mitigation Measures: Participation in a renewable energy program. The SHC and LPCH Project sponsors shall participate in a renewable energy program approved by the City to partially offset electricity emissions; develop new renewable generation sources in collaboration with the CPAU; incorporate a renewable energy source (such as photovoltaic) into the SUMC Project, and/or otherwise promote expansion of the use of renewable energy by CPAU customers. ("Renewable Energy Program"). The Renewable Energy Program need not directly reduce the emissions from the SUMC Project facilities, and may be designed to promote expansion of the use of renewable energy by CPAU customers, either by providing a new source of renewable energy, educating the public about use of renewable energy, or contributing to research and development of renewable energy sources. ~~Palo Alto Green Energy Program. Under the PaloAltoGreen program, residential, business and industrial customers purchase renewable energy equivalent to their electricity needs at an additional cost of 1.5 cents per kilowatt hour (kWh) above standard electric rates. The SHC and LPCH facilities shall participate in this program to offset electricity emissions, or alternatively, develop new renewable generation sources in collaboration with the CPAU.~~	Yes

Draft EIR Table 3.6-5 on page 3.6-45 has been revised as follows:

Table 3.6-5
Comparison of SUMC Project Emissions,
Reduction Program to Climate Protection Plan Policies

Action/Goal	SUMC Measure	Compliant with Climate Protection Plan Policies?
	Zero Waste	
Expand implementation of Zero Waste programs.	The SUMC Project includes a number of waste reduction programs described throughout this table. However, an audit would be necessary to verify compliance with the City's Climate Protection Plan Policies.	~~No~~ Yes
	Mitigation Measure *Preparation of a Waste Reduction Audit*. The SUMC Project sponsors shall perform a waste reduction audit of waste management practices at the ~~h~~Hospitals prior to construction of new facilities and after completion of the SUMC Project to determine post-project diversions. ~~This audit shall be repeated annually, and with the results being made available to the public or to City of Palo Alto staff.~~	Yes

Draft EIR text on page 3.6-50, second paragraph, has been revised as follows:

Quantification of Emissions with Proposed Emissions Reduction Program and Regulations adopted since CARB Scoping Plan. This section employs a quantitative analysis of the proposed Emissions Reduction Program in order to assess whether the SUMC Project complies with the City's long term numeric reduction goals in its Climate Protection Plan. This section also addresses the State emission reduction measures adopted in the AB 32 Scoping Plan. As discussed above, to account for full project build out, this analysis uses the 30 percent BAU emissions target reduction for 2020 as the criteria for assessing compliance with the goals of the Climate Protection Plan. As the proposed Emissions Reduction Program's design features, together with adopted State regulations, by ~~itself~~ themselves would ~~not reach the emission reduction~~ ensure compliance with the numeric goals of the Climate Protection Plan, additional mitigation measures are not required to achieve a 30 percent below BAU standard. ~~are suggested and evaluated here.~~

Draft EIR text on page 3.6-51, third sentence, and Table 3.6-6, have been revised as follows:

As shown, with the proposed Emissions Reduction Program and regulations adopted after the CARB Scoping Plan, the greenhouse gas emissions would be reduced from ~~74,803~~63,298 MT CO_2e to approximately ~~70,355~~ 46,666 MT CO_2e (including emissions from non-fleet patient and visitor trips). The greenhouse gas emissions for comparison to a BAU scenario, which does not include emissions from patient and visitor trips, would be reduced from 46,085 MT CO_2e to approximately 29,453 MT CO_2e.

Table 3.6-6
SUMC Project Greenhouse Gas Emissions, With and Without Proposed Emissions Reduction Program and Post-2004 Regulations

	With Proposed Emissions Reduction Program and Post-2004 Regulations		Without Proposed Emissions Reduction Program and Post-2004 Regulations (BAU)	
Source of Emissions	**Units Consumed**	**Net Emissions (MT CO_2e)**	**Units Consumed**	**Net Emissions (MT CO_2e)**
Natural Gas (therms)	~~4,110~~ 3,323	~~22~~ 17	5,137	27
Diesel Generators (gallons)	2,232	23	2,232	23
Medical Nitrous Oxide (cubic feet)	6,127	99	6,127	99
Fleet Vehicle Fuels (gallons)	13,845	100	13,845	100
Helicopter Fuel (gallons)	21,083	201	21,083	201
Electricity (MWh) [a]	~~54,640~~ 32,147	~~8,632~~ 6,569	54,630	12,914
Steam and Chilled Water (MBtu)	~~10,995~~ 7,696	~~19,542~~ 13,679	10,995	19,542
Non-fleet Employee Vehicular Emissions (VMT)[b]	~~275,566~~ 83,834	~~41,257~~ 8,285	~~275,566~~ 83,834	~~41,257~~ 12,539
Solid Waste (tons)[c]	1,792	480	1,792	640
Subtotal for BAU Comparison		**29,453**		**46,085**
Non-fleet Patient and Visitor Vehicular Emissions (VMT)[b,d]	191,732	17,213[e]	191,732	17,213
Total SUMC Project Emissions		**~~70,355~~46,666**		**~~74,803~~63,298**

Source: Emissions provided by Mazetti & Associates and adjusted by PBS&J, 2011~~0~~ (Appendix V~~H~~) and reductions provided by PBS&J and AECOM, 2011~~0~~ (Appendix V~~G~~).

Notes:

a. The Mazzetti and Associates inventory used an electricity emission factor of 263.62 lbs CO_2/megawatt hour (MWh) provided by CPAU. The City has indicated that this emissions factor does not apply to the development on the SUMC Sites and requested that the inventory be revised using CO_2 emissions factor of 499.32 lbs CO_2/MWh based on the City's energy purchasing records; and CCAR's standard emissions factors for N_2O and CH_4 (0.0037 lbs N_2O/MWh and 0.0067 lbs CH_4/MWh). The electricity emissions in this table represent the use of the revised emission factors with the incorporation of the appropriate reductions.

b. Calculated using VMT assumptions reported in AECOM Transportation, January, 2011~~February, 2010~~. Emissions were modeled using the VMT assumptions from AECOM in the URBEMIS 2007 software. The numbers vary slightly from the VMT in the AECOM memo due to rounding purposes for the URBEMIS model. AECOM Transportation, January 20, 2011~~February 11, 2010~~ Memorandum to Trixie Martelino, Revised VMT Calculations for SUMC Project.

c. SUMC solid waste emissions were determined based on total City wide emissions. Existing SUMC solid waste generation is 5 percent of City wide waste generation therefore emissions attributed to SUMC generation was determined to be 5 percent of total City wide waste emissions.

d. Patient and visitor trips are not included in BAU calculations since these trips would occur whether or not the SUMC facilities are expanded.

e. While the transit orientation of the SUMC Project and shuttles may help to reduce visitor trips, the SUMC Project cannot dictate how patients or visitors reach the Hospitals. Particular to patent trips, health and safety issues are a priority over trip reductions. Therefore, the reduction in vehicle trips with implementation of TDM are assumed to be reductions in employee trips for purposes of calculating greenhouse gas emissions.

Draft EIR text on page 3.6-51, first bullet, has been revised as follows:

- The design of all ~~non SoM buildings have an energy efficiency rating that is at least 20 percent greater than current Title 24 requirements~~ Hospital facilities would reduce energy usage by 35 percent (as compared to the hospital energy consumption database used by the Environmental Protection Agency), which conservatively is estimated to reduce electricity and natural gas demand by ~~20~~ 30 percent;

Draft EIR text on page 3.6-52, first bullet, has been revised as follows:

- The design of the SoM buildings have an energy efficiency rating that is at least 15 ~~30~~ percent greater than current Title 24–energy efficiency requirements (2008 standards in effect as of October 2010), which would reduce electricity and natural gas demand by 30 percent from BAU. ~~Note that natural gas consumed within the SoM buildings is from consumption by the boilers/steam plant and would not be affected by the energy efficiency of the building, but rather by the efficiency of the boiler/steam plant. Therefore, boiler/steam plant natural gas consumption would not be reduced based upon the energy rating of the building.~~

Draft EIR text on page 3.6-52, first full paragraph, second sentence, has been revised as follows:

Therefore, BAU would include ~~current Title 24 energy efficiency standards~~, the current water supply system, and the current transit opportunities into and from the SUMC Sites, but would not take into account current Title 24 energy efficiency standards, other regulations adopted since preparation of the CARB Scoping Plan, SUMC Project design features that increase energy efficiency beyond 2004 Title 24 standards for all non-Hospital buildings, or energy efficiency increases for Hospital facilities, SUMC Project improvements to transit, or other design features that reduce emissions.

Draft EIR text on page 3.6-52, full first paragraph, last three sentences, has been revised as follows:

As shown in Table 3.6-7, with the proposed Emissions Reduction Program, the SUMC Project would have ~~5.95~~ 36.09 percent less emissions than the BAU scenario. As discussed above, this analysis uses the 30 percent BAU emissions target reduction for 2020 as the criteria for assessing a quantitative compliance with the numeric goals of the Climate Protection Plan. However, w~~W~~ithout the implementation of additional mitigation measures, the SUMC Project ~~would be more than 24 percent short of meeting this reduction goal~~ would fail to further the some of the individual policies of the Climate Protection Plan.

Draft EIR Table 3.6-7 on page 3.6-52, has been revised as follows:

Table 3.6-7
Comparison of SUMC Project Greenhouse Emissions with Business As Usual Emissions

	MT CO_2e	
Net Emissions	**Net 2025 BAU**	**SUMC Project Emissions with Proposed Emissions Reduction Program and Post-2004 Regulations**
Total BAU Emissions	*~~74,802~~ 46,085*	*~~70,355~~ 29,453*
% reduction from BAU	-	~~5.95~~ 36.09
AB 32 BAU Reduction %	-	30
Significant?		~~Yes~~ No

Source: PBS&J, 2010 (Appendix V~~H~~).

Draft EIR text on page 3.6-53, first paragraph, has been revised as follows:

Summary. As shown in Table 3.6-7, the proposed Emissions Reduction Program together with regulations adopted since preparation of the CARB Scoping Plan ~~alone~~ would be ~~in~~sufficient for the SUMC Project to ~~further the goals and policies established in the City's Climate Protection Plan~~. ~~Additionally, without additional mitigation measures, the SUMC Project with its proposed Emissions Reduction Program would~~ reduce emissions compared to the BAU scenario by more than 30 percent. ~~by 5.95 percent, substantially less than the 30 percent reduction per CARB's *Climate Change Scoping Plan*. As such, w~~ However, without additional mitigation measures, the SUMC Project ~~would have a cumulatively considerable contribution to cumulative greenhouse gas emissions, and~~ would not ~~be sufficient to~~ further ~~the goals~~some of the individual policies of the City's Climate Protection Plan and would therefore have a cumulatively considerable contribution to the City's climate change impacts.

Draft EIR page 3.6-53, second paragraph, has been revised as follows:

MITIGATION MEASURES. The following discussion addresses additional feasible mitigation measures that could be implemented by the SUMC Project in order to ~~further reduce impacts related to greenhouse gas emissions~~ meet all of the individual policies of the City's Climate Protection Plan. ~~For example, non-fleet vehicular emissions represent over half of the total emissions associated with the SUMC Project,[73] and programs proposed by the SUMC Project sponsors do not employ all feasible strategies for reducing such emissions. Moreover, the SHC, LPCH, and SoM do not participate in the City's Palo Alto Green renewable energy program or share emissions inventories with City departments.~~

~~[73] According to the conservative assumptions used to prepare the inventory; see discussion of these assumptions on page 3.6-29.~~

Draft EIR text on page 3.6-53, last sentence of third paragraph, has been revised as follows:

> Inclusion of the Caltrain GO Pass program, or equivalent TDM Measure, is anticipated to reduce non-fleet employee vehicle emissions by about ~~13.5~~ 44.5 percent.

Draft EIR text on pages 3.6-53 through 3.6-54, starting at the second sentence of the fifth paragraph, has been revised as follows:

> Mitigation Measures CC-1.1, ~~CC-1.2, and~~ CC-1.3, and CC-1.4 below, would serve a similar purpose as the City's municipal monitoring program in ensuring that the emission reduction features proposed under the SUMC Project and the continuation of existing programs would further the City's Climate Protection Plan ~~goals~~ individual policies.

Draft EIR text on page 3.6-54, first full paragraph, has been revised as follows:

> Finally, ~~because the SHC and LPCH account for a large percentage of future CPAU energy demand,~~ to further the policy to expand use of renewable energy installed or purchased by CPAU customers, the Hospitals' participation in a ~~the City's~~ renewable energy program~~, Palo Alto Green, an equivalent renewable program, or combination thereof, must be required to make~~would support the determination that the SUMC Project would be consistent with all of the energy policies of the Climate Protection Plan. ~~Participation in Palo Alto Green is expected to result in an approximately 17 percent reduction from BAU and an approximately 12 percent reduction from emissions with the proposed Emissions Reduction Program.[74] Inclusion in the Palo Alto Green program is identified as Mitigation Measure CC-1.2.[75]~~
>
> ~~[74] The approximately 17 percent reduction from BAU was determined by the following equation: (74,803 – 61,889)/74,803. Where 74,803 is equal to the total annual BAU emissions (in MT CO_2e), and 61,889 is equally to the annual BAU emissions (in MT CO_2e) minus the 12,914 MT CO_2e from electrical usage offset by the mitigation measure. Similarly, the approximately 12 percent reduction from emissions with the incorporation of design features was determined by (70,335 – 61,723)/70,335. Where 70,335 is the total annual emissions in MT CO_2e after incorporation of the project design features and 61,723 is the total annual emissions in MT CO_2e minus the 8,632 MT CO_2e from electrical usage that is offset by the mitigation measure. Note that the emissions offset with design features incorporated is less because the design features reduce the amount of emissions emitted per MWh used.~~
>
> ~~[75] Per Karl Van Orsdol, Energy Risk Manager, City of Palo Alto. Personal communication with Randi Adair, PBS&J, January 20, 2009.~~

Draft EIR text under Mitigation Measure CC-1.1 on page 3.6-54 has been revised as follows:

> *CC-1.1* *Commission and Retro-Commission Energy Systems for New Buildings*. New construction ~~and existing buildings altered by construction of~~ for the SUMC Project shall undergo commissioning[76] of energy and HVAC systems within one year following building occupancy ~~during construction and on an annual basis during the first five years of operation~~. The commissioning process shall follow the standards of the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Guideline 0-2005 or the International Performance Measurement and Verification Protocol (MVP). The SUMC Project sponsors shall provide the City

of Palo Alto with commissioning verification data within 12 months of OSHPD (or City) certificate of occupancy for each new SUMC Project building component (parking structures excluded). These components shall include: SHC Hospital (Phase 1), SHC Hospital (Phase 2), LPCH Hospital Expansion, Hoover Medical Office Building, School of Medicine (FIM 1, FIM 2 and FIM 3) and 429,000 square feet of clinic space for SHC. The commissioning of the new SHC and LPCH Expansion Hospitals shall be conducted as part of LEED Enhanced Commissioning in compliance with the ASHRAE Guideline 0-2005. During years two to five after completion of the entire SUMC Project, the SUMC Project sponsors shall annually provide the City of Palo Alto with an EPA Energy Star Statement of Energy Performance report for each new building component. This report shall be generated using the EPA Energy Star Portfolio Manager system. Building profiles and consumption details entered in the Portfolio Manager system and a resulting energy efficiency rating is provided based on similar facilities (i.e., academic teaching facility, community hospital, free-standing surgery center, etc.) This process would ensure that new and existing energy systems would perform interactively according to construction documents, the SUMC Project design intent and the owner's operational needs.

Draft EIR text on page 3.6-55, first paragraph, has been revised as follows:

CC-1.2 *Participate in ~~Palo Alto Green Energy Program, Other Equivalent Renewable Energy Program, or combination thereof.~~ a Renewable Energy Program.* ~~Under the Palo Alto Green program, residential, business and industrial customers purchase renewable energy equivalent to their electricity needs at an additional cost of 1.5 cents per kWh above standard electric rates.~~ The SHC and LPCH Project sponsors ~~facilities~~ shall participate in a renewable energy ~~this~~ program approved by the City to partially offset electricity emissions; develop new renewable generation sources in collaboration with the CPAU; incorporate a renewable energy source (such as photovoltaics) into the SUMC Project, and/or otherwise promote expansion of the use of renewable energy by CPAU customers ("Renewable Energy Program"). The Renewable Energy Program shall be approved by the City and need not directly reduce the emissions from the SUMC Project facilities, and may be designed to promote expansion of the use of renewable energy by CPAU customers, either by providing a new source of renewable energy, educating the public about use of renewable energy, or contributing to research and development of renewable energy sources ~~or a combination thereof, such that a minimum of 54,640 MWh of electricity usage is offset annually~~.

Draft EIR text on page 3.6-55, third paragraph, has been revised as follows:

> *CC-1.4* *Prepare Waste Reduction Audit*. The SUMC Project sponsors shall perform a waste reduction audit of waste management practices at the hospitals prior to construction of new facilities and after completion of the SUMC Project to determine post-project diversions. ~~This audit shall be repeated annually, and with the results being made available to the public or to City of Palo Alto staff.~~

Draft EIR text on page 3.6-55, Post Mitigation Quantification, has been revised as follows:

> **Post-Mitigation Quantification.** Table 3.6-8 shows the anticipated reduction from the incorporation of ~~the above mitigation measures~~ Mitigation Measure TR-2.3 (involving enhanced an TDM program) in addition to the proposed Emissions Reduction Program. As shown in Table 3.6-8, ~~the above mitigation measures~~ Mitigation Measure TR-2.3 would reduce the SUMC Project's greenhouse gas emissions from ~~70,355~~ 46,666 MT CO_2e to ~~56,190~~ 42,989 MT CO_2e. The greenhouse gas emissions for comparison to a BAU scenario, which does not include emissions from patient and visitor trips, would be reduced from 29,453 MT CO_2e to approximately 25,766 MT CO_2e.

Draft EIR text on page 3.6-55, last paragraph, has been revised as follows:

> With the ~~above mitigation measures~~ Mitigation Measure TR-2.3, greenhouse gas emissions would be ~~56,190~~ 42,989 MT CO_2e per year, an approximately ~~7~~ 3.24 percent increase in emissions from the 2005 baseline for the community of Palo Alto of greenhouse gases. When the City Council established reduction goals for the City and community, it set as its goal a 15 percent decrease in 2005 baseline emissions by 2020, or a reduction in emissions of approximately 119,000 MT. With mitigation, the SUMC Project would ~~still contravene the City's and the community's ability to meet the City Council goals in greenhouse gas reductions as it would require the City to reduce greenhouse gas emissions by 219,905 MT per year in 2025 through other actions.~~ comply with, and further the goals of the City Council in reducing greenhouse gas emissions. This reduction would constitute a ~~25.9~~ 44.09 percent reduction in greenhouse gas emissions from ~~the 2005 baseline~~ BAU estimates in the year 2025. As shown by Table 3.6-9, with mitigation the SUMC Project would meet the AB 32 reduction goal of 30 percent below BAU and would comply with the goals and policies in the City of Palo Alto's Climate Protection Plan.

Draft EIR Table 3.6-8 on page 3.6-56 has been revised as follows:

Table 3.6-8
Net Mitigated SUMC Project Greenhouse Gas Emissions

Source of Emissions	SUMC Project with Proposed Emissions Reduction Program and Post-2004 Regulations		SUMC Project with Proposed Emissions Reduction Program, Post-2004 Regulations, and ~~+~~ Mitigation Measure TR-2.3	
	Units Consumed	Net Emissions (MT CO_2e)	Units Consumed	Net Emissions (MT CO_2e)
Natural Gas (therms)	~~4,110~~ 3,323	~~22~~ 17	~~4,110~~ 3,323	~~22~~ 17
Diesel Generators (gallons)	2,232	23	2,232	23
Medical Nitrous Oxide (cubic feet)	6,127	99	6,127	99
Fleet Vehicle Fuels (gallons)	13,845	100	13,845	100
Helicopter Fuel (gallons)	21,083	201	21,083	201
Electricity (MWh) [a]	~~54,640~~ 32,147	~~8,632~~ 6,569	~~54,640~~ 32,147	~~0~~ 6,569
Steam and Chilled Water (MBtu)	~~10,995~~ 7,696	~~19,542~~ 13,679	~~10,995~~ 7,696	~~19,542~~ 13,679
Non-fleet Employee Vehicular Emissions (VMT)[b]	~~275,566~~ 83,834	~~41,257~~ 8,285	~~238,355~~ 46,516	~~35,724~~ 4,597
Solid Waste (tons)[c]	1,792	480	1,792	480
Subtotal for BAU Comparison		**29,453**		**25,766**
Non-fleet Patient and Visitor Vehicular Emissions (VMT)[b]	191,732	17,213	191,732	17,213
Total Net SUMC Project Emissions		**~~70,355~~46,666**		**~~56,190~~ 42,989**

Source: Reductions provided by PBS&J, 2010 (Appendix V~~H~~), and AECOM 2010 (Appendix V~~G~~).

Notes:

a. The Mazzetti and Associates inventory used an electricity emission factor of 263.62 lbs CO_2/MWh provided by CPAU. The City has indicated that this emissions factor does not apply to the development on the SUMC Sites and requested that the inventory be revised using CO_2 emissions factor of 499.32 lbs CO_2/MWh based on the City's energy purchasing records; and CCAR's standard emissions factors for N_2O and CH_4 (0.0037 lbs N_2O/MWh and 0.0067 lbs CH_4/MWh). The electricity emissions in this table represent the use of the revised emission factors with the incorporation of the appropriate reductions.

b. Calculated using VMT assumptions reported by AECOM Transportation, January, 2011~~February 11, 2010~~ Memorandum to Trixie Martelino, Revised VMT Calculations for SUMC Project. Emissions were modeled using the VMT assumptions from AECOM in the URBEMIS 2007 software. The numbers vary slightly from the VMT in the AECOM memo due to rounding purposes for the URBEMIS model.

c. SUMC solid waste emissions were determined based on total citywide emissions. Existing SUMC solid waste generation is 5 percent of citywide waste generation therefore emissions attributed to SUMC generation was determined to be 5 percent of total citywide waste emissions.

Draft EIR text on page 3.6-56, last paragraph, has been deleted as follows:

~~The additional 54,640 MWh of load requires the City to purchase an additional 18,213 MWh of renewable power to meet State requirements. The City is required to make this expenditure, without which the City would not be able to meet its renewable portfolio standards. State laws are currently being proposed which would impose considerable fines should the City not meet the goal. The City would need to purchase additional renewable power to meet the City Council mandated renewable portfolio standard of 33 percent by 2012 and beyond. Renewable energy resource~~

~~development is lagging behind regulatory driven demand, and the City would find it increasingly difficult to locate renewable power sources to cover the additional requirements. Therefore, it may not be feasible to achieve the reduction in emissions from electricity usage shown in Table 3.6-9.~~

Draft EIR Table 3.6-9, on page 3.6-57, has been revised as follows:

Table 3.6-9
Annual SUMC Project Greenhouse Gas Emissions Reduction from Business as Usual Emissions, Without and With Mitigation

	MT CO_2e		
Net Emissions	**Net 2025 BAU**	**Net 2025 Project Design**	**Net 2025 Project Design + Mitigation**
Total Emissions	~~74,802~~ 46,085	~~70,355~~ 29,453	~~56,189~~ 25,766
% reduction from BAU	-	~~5.95~~ 36.09	~~24.88~~ 44.09
AB 32 BAU reduction %	-	30	30
City Target BAU Reduction %	-	**30**	**30**
Significant?	-	~~**Yes**~~ **No**	~~**Yes**~~ **No**

Source: PBS&J, 2010 (Appendix V~~H~~).

Draft EIR text on page 3.6-57, first paragraph, has been deleted as follows:

~~As shown in Table 3.6-8,over half percent of the SUMC Project's emissions come from "non-fleet vehicular emissions," which are emissions from VMT. Of these trips, an estimated 40 percent are from employee trips and 60 percent are from patient trips. An analysis of potential measures to reduce VMT is included in Section 3.4, Transportation, particularly under the discussion of Impact TR-2, and in Section 3.5, Air Quality, particularly under the discussion of Impact AQ-2. As discussed in those sections, implementation of Mitigation Measure TR-2.3 is expected to reduce VMT by 13.5 percent, and that reduction is reflected in Table 3.6-9. In addition, the discussion of Impact PH-3 in Section 3.13, Population and Housing, includes additional potential mitigation measures that could further reduce VMT by improving the City's Jobs to Employed Residents Ratio. The City will need to consider the feasibility of implementing some or all of the measures identified under Mitigation Measure PH-3.1, but even full implementation of these measures is not expected to fully mitigate this impact.~~

Draft EIR text on page 3.6-57, second paragraph, has been revised as follows:

Table 3.6-9 shows the reduction from the BAU emissions with the implementation of the proposed Emissions Reduction Program and mitigation measures. As shown in Table 3.6-9, the resulting greenhouse gas emissions reduction from the SUMC Project would be ~~24.88~~ 44.09 percent less than the BAU emissions. This reduction ~~is still below~~ exceeds the 30 percent reduction specified under CARB's *Climate Change Scoping Plan,* and applied in the City of Palo Alto's Climate Protection Plan. Therefore, ~~even~~ with Mitigation Measures CC-1.1 through CC-1.4, and TR-2.3,

the SUMC Project's contribution to global climate change would be ~~cumulatively considerable. (SU)~~ less than cumulatively considerable. (LTS)

Draft EIR page 3.6-58, paragraph fragment before table and Table 3.6-10, has been revised as follows:

…generated during the 12-year construction period would be approximately ~~6,214~~ 36,573 MT CO_2e, of which 1,050 MT CO_2e (~~17~~ 2.87 percent) would be attributable to the equipment used during the construction of the LPCH, 767 MT CO_2e (~~12~~ 2.12 percent) would be attributable to the Hoover Pavilion Site facilities, 1,191 MT CO_2e (~~19~~ 3.26 percent) would be attributable to the SoM facilities, ~~and~~ 3,205 MT CO_2e (~~52~~ 8.76 percent) would be attributable to the SHC facilities, and 30,359 MT CO_2e (83.01 percent) would result from worker commutes during construction activities.

Table 3.6-10
Construction Greenhouse Gas Emissions, SHC, LPCH, and SoM (MT CO_2e)

Phase	MT CO_2e	Subtotal	% by Category
	LPCH Facilities		
LPCH Parking	469.75		
LPCH Expansion	580.56	1,050.32	~~16.90~~ 2.87%
	SCH Facilities		
SHC Parking	771.01		
Parking Structure 3 Demo	42.94		
SHC Replacement Hospital	879.25		
Core Expansion/Demo	232.83		
SHC Clinics Parking	708.58		
SHC Clinics	570.85	3,205.45	~~51.59~~ 8.76%
	Hoover Pavilion		
Hoover Pavilion Parking	701.14		
Hoover Pavilion MOB	66.16	767.30	~~12.35~~ 2.10%
	SoM Facilities		
FIM #1	349.59		
Edwards Demo	46.84		
FIM #2	346.49		
Lane Alway Demo	56.08		
FIM #3	335.79		
Grant Demo	56.06	1,190.85	~~19.16~~ 3.26%
	Worker Commute		
Phase 1 Emissions	26,963.84		
Phase 2 Emissions	3,395.47	30,359.31	83.01%
	Total CO_2e Emissions	~~**6,213.91**~~ **36,573.23**	**100.00%**

Source: PBS&J, 2010. Based on calculations provided in Appendix V~~H~~.

Draft EIR text on page 3.6-59, under Impact CC-2, has been revised as follows:

CC-2 *Emit Significant Greenhouse Gas Emissions. The proposed Emissions Reduction Program would minimize the greenhouse gas emission increases associated with the proposed development program, ~~although~~ and the proposed Emissions Reduction Program along with regulations adopted after the CARB Scoping Plan would ~~not~~ reduce emissions to ~~30~~ 36.09 percent below BAU (excluding emissions from patients and visitor trips). Therefore the SUMC project would not result in ~~have~~ a cumulatively considerable contribution to global climate change. (~~S~~ LTS)*

Draft EIR on page 3.6-59, third paragraph, has been revised as follows:

A quantitative emissions inventory for the SUMC Project was detailed in Impact CC-1, above. As shown in the above analysis, the anticipated emissions would ~~be above~~ exceed both the City of Palo Alto's Climate Protection Plan and the CARB's reduction emission goals of 30 percent below BAU emissions, without mitigation. SUMC Project's contribution to global climate change would not be cumulatively considerable.

Draft EIR on page 3.6-59 through 3.6-60, starting on the fourth paragraph, has been deleted as follows:

~~MITIGATION MEASURE. Mitigation Measures CC 1.1 through CC 1.5, and TR 2.3 in Section 3.4, Transportation, would reduce greenhouse gas emissions. In addition, to further reduce impacts related to greenhouse gas emissions, the City shall consider the feasibility of Mitigation Measure PH 3.1, as identified and discussed in further detail in Section 3.13, Population and Housing. The mitigation measures include:~~

- ~~TR 2.3: Enhance Stanford University Travel Demand Management (TDM) Program~~
- ~~CC 1.1: Commissioning and Retro Commissioning of Energy Systems for New and Existing Buildings.~~
- ~~CC 1.2: Participation in Palo Alto Green Energy Program.~~
- ~~CC 1.3: Annual Greenhouse Gas Reporting~~
- ~~CC 1.4: Preparation of a Waste Reduction Audit~~
- ~~CC 1.5: BAAQMD Construction Emission Reduction Measures.~~
- ~~PH 3.1: Reduce the Impacts on the Jobs to Employed Residents Ratio~~

~~However, as demonstrated in Table 3.6-9, even with the implementation of all feasible mitigation measures, the anticipated emissions would remain above both the City of Palo Alto's Climate Protection Plan and the CARB's reduction emission goals of 30 percent below BAU emissions. Because these reduction levels cannot be achieved, the SUMC Project would emit significant amounts of GHGs and would have a cumulatively considerable contribution to global climate change. (SU)~~

Section 3.8, Cultural Resources

The following text has been revised starting in fourth sentence of the last full paragraph on page 3.8-5 of the Draft EIR:

> The City of Palo Alto in Santa Clara County was ~~founded in 1892~~ incorporated in 1894 and lies on the historic land grants *Rancho Rincón de la San Francisquito*, *Rancho de la Arroyo de San Francisquito*, and *Rancho San Francisquito*. The southern portion of present-day Palo Alto used to be part of the Town of Mayfield, which continued to develop as a separate town until its annexation to Palo Alto in 1925.[14]

[14] City of Palo Alto, Palo Alto Comprehensive Plan, Land Use and Community Design, 1998.

Section 3.9, Biological Resources

The first and second full paragraph on page 3.9-12 of the Draft EIR has been revised as follows:

> Based on the City listing, there are no Heritage Trees on the SUMC Sites. (Heritage Trees are defined under Applicable Plans and Regulations.) However, of the trees described above, ~~176~~ 178 coast live oaks and coast redwoods on the SUMC Sites could qualify for protection under the City of Palo Alto's Tree Protection and Management Regulations (see Regulated Trees below). Of these, ~~60~~ 63 Protected Trees on the Main SUMC Site and 11 Protected Trees at the Hoover Pavilion Site, for a sum of ~~71~~ 74 total Protected Trees, appear to be within or sufficiently close to new building footprint areas or paved areas associated with site reconfiguration such that they may be at risk and affected by SUMC Project construction. Among these Protected Trees are large and highly visible oak specimens in prominent locations. The shrub and ground cover species observed in the Project Vicinity included mock orange (*Pittosporum tobira*), rose (*Rosa* sp.), and pink knotweed (*Polygonum capitatum*).
>
> Of the ~~71~~ 74 Protected Trees that may be at risk and affected by the SUMC Project, approximately ~~23~~ 13 trees have been determined by the City to be aesthetic tree resources. ~~characteristics~~ There are five additional trees that have also been determined to be aesthetic tree resources, but would be retained in place under the SUMC Project, for a total of 18 aesthetic tree resources at the Main SUMC Site.[4] All Protected Trees are biological tree resources. A "Biological Tree Resource" is a protected category oak or redwood of a certain size as defined in the Palo Alto Municipal Code, Chapter 8.10, Tree Preservation and Management Regulations. Under the proposed Hospital District zoning ordinance, an "Aesthetic Tree Resource" is a Protected Tree that is deemed important relative to the SUMC Sites, as designated by the Department of Planning and Community Environment or the City Council, because it has one or more of the following qualities: functions as an important or prominent visual feature; contributes to a larger grove or landscape theme; and/or possesses unique character as defined in the designation of Heritage Trees (per Municipal Code Section 8.10.090).[5] ~~These 23~~ Protected Trees that are both biological~~ly~~ and aesthetic~~ally significant~~ tree resources would require retention and preservation under the proposed

Hospital District zoning ordinance for the SUMC Project.[46] A breakdown of the locations of the Protected Trees that are aesthetic tree resources is as follows:

- *Kaplan Lawn*. Kaplan Lawn is the undeveloped area located between the two barrels of Pasteur Drive to the west and east, Blake-Wilbur Drive to the north, and the SUMC Promenade and fountain to the south. Within Kaplan Lawn are two existing groves that consist of nine oak trees. Some of these Protected Trees are over a century old, with many pre-dating the original hospital and are a remnant of the native oak grassland and agricultural use of the area. The north grove on the Kaplan Lawn functions as a prominent left-side component of the Pasture Drive gateway. There are currently nine Protected Trees that are aesthetic tree resources located in Kaplan Lawn (Trees 33 to 41).
- *FIM 1 Grove*. The FIM 1 Grove is located on the parcel of land that would house the proposed SoM FIM 1 building under the SUMC Project. These oak trees function as the right side component of the Pasteur Drive gateway, the canopy of which arches over the road towards the trees in the Kaplan Lawn area. There are currently seven Protected Trees that are aesthetic tree resources in the FIM 1 Grove. (Trees 317, 318, 319, 320, 322, 323, and 324).
- *Adjacent to Welch Road*. A century-old solitary oak is growing at the edge of the Main SUMC Site, between Welch Road to the north and the Blake-Wilbur Clinic building to the south. This existing Protected Tree is unique in character and prominently visible from Welch Road and the proposed Durand Way. The oak (tree 608) is located next to one of the original Governor's Lane eucalyptus trees and has a significant canopy spread. In addition, a mature and healthy Protected oak tree (tree 996) is located to the east of the proposed LPCH hospital building, along Welch Road.

[4] City of Palo Alto, SUMC Protected Tree Survey, July 20, 2010.

[45] City of Palo Alto Department of Planning and Community Environment, Dave Dockter, Environmental Planner, "SUMC Environmental Impact Report Strategy: How the City will approach evaluation of the Tree Resources in the SUMC Project Area," memorandum, July 28, 2009.

[6] City of Palo Alto, SUMC Protected Tree Survey, July 20, 2010.

The text on pages 3.9-24 through 3.9-25 of the Draft EIR, starting at the second paragraph under Impact BR-4, has been revised as follows:

Based on the City listing, there are no Heritage Trees on the SUMC Sites. However, there are ~~176~~ 178 native oaks and redwoods on the SUMC Sites that are large enough to be designated as Protected Trees under the City of Palo Alto's Tree Preservation and Management Regulations. Protected Trees potentially subject to removal during implementation of the SUMC Project include ~~60~~ 63 Protected Trees on the Main SUMC Site and 11 Protected Trees at the Hoover Pavilion Site.[~~10~~] These locations appear to be within or sufficiently close to new building footprint areas or areas associated with the site reconfiguration. As final designs and construction logistics for the SUMC Project buildings are completed, it is possible that additional Protected Trees may be identified for removal. However, many of the Protected Trees initially identified as potentially subject to removal will be relocated on site, rather than removed. As a result, the total number of

Protected Trees removed (and not relocated) is not expected to exceed 74 Protected Trees. Thus, it is foreseeable that the loss of up to ~~71~~ 74 Protected Trees out of a total of ~~176~~ 178 Protected Trees present on the SUMC Sites may occur.[10] Implementation of the SUMC Project could impact Protected Trees during preparation for building construction, or could result in the loss of Protected Trees due to damage sustained during the construction phase of the SUMC Project.

As part of the SUMC Project, the SUMC Project sponsors propose the creation of a new zoning district that could be applied by the City to land uses specifically for hospitals, associated medical research, medical office, and support uses. The new zoning district would have its own name, such as "Hospital District," and would include development standards that accommodate hospital-related uses like the SUMC Project. As described in Section 2, Project Description, regulations in this district pertaining to Protected Trees would include applicability, preservation, and exemptions for removal and replacement of trees.[11]

City staff has developed proposed zoning ordinance provisions that would require preservation of some of the trees that would have been removed under the SUMC Project. The Hospital District zoning requirements would create a procedure to permit the removal or relocation of ~~approximately~~ ~~48~~ Protected Trees while preserving ~~approximately 23 Protected Trees~~ trees that are considered both biological~~ly~~ and aesthetic~~ally significant~~ tree resources, as defined under Existing Conditions. Trees that are determined not to be aesthetic tree resources would be candidates for an exemption to the City's Tree Ordinance, ~~and required~~ but would be subject to replacement according to the City Tree Technical Manual (TTM) standards. Although the new Hospital District regulations would seek to avoid the removal of ~~23~~ Protected Trees that are both biological~~ly~~ and aesthetic~~ally significant~~ tree resources at the SUMC Sites, ~~48~~ Protected Trees could still be removed or relocated as a result of the SUMC Project. Municipal Code Section 8.10.050 prohibits removal of a Protected Tree unless it has been determined by the Director of Planning and Community Environment, on the basis of a certified arborist and other relevant information, that the Protected Tree is dead, hazardous, or a detriment to or crowding an adjacent Protected Tree. The Municipal Code protects these trees because they give the City a unique visual character, enhance property values, and provide beneficial environmental services. Under existing code provisions, ~~T~~the ~~48~~ Protected Trees that could be removed would not qualify for exemption to the regulations (that is, the trees are neither dead, hazardous, nor a detriment to or crowding an adjacent Protected Tree). Therefore, the SUMC Project would result in a significant impact due to removal of Protected Trees.[12,13]

Based on the biological and aesthetic tree resource category designations, as defined under the proposed new Hospital District Zoning ordinance, the ~~23~~ Protected Trees that would be required to be retained under the new Hospital District regulations include: nine Protected Trees in Kaplan Lawn (located between Pasteur Drive barrels), ~~12~~ seven Protected Trees in the area of the proposed SoM FIM 1 building, one Protected Tree located between the site of the Blake-Wilbur Clinic building and Welch Road, and one Protected Tree east of the new LPCH hospital building, along Welch Road.[~~13~~14,15] The SUMC Project would result in the retention and removal of the following Protected Trees that are aesthetic tree resources:

- *Kaplan Lawn:* All nine Protected Trees that are aesthetic tree resources at the Kaplan Lawn would be removed;

- *FIM 1 Grove:* Two Protected Trees that are aesthetic tree resources would be removed and five would be retained;
- *Adjacent to Welch Road:* The century-old solitary oak that is located between Welch Road to the north and the Blake-Wilbur Clinic building to the south would be removed. The mature Protected oak tree located to the east of the proposed LPCH hospital building, along Welch Road, would also be removed.

As explained below in Mitigation Measure BR-4.6, minor SUMC Project site plan adjustments could be made to avoid removal of ~~several~~ one Protected Tree~~s in the area of the proposed FIM 1 building and along Welch Road (a total of 14 nine Protected Trees).~~ (608) and to retain a second Protected Tree (319), while relocating two additional Protected Trees (323 and 324) at FIM 1 that are aesthetic tree resources. However, under the SUMC Project, the Protected Trees in the Kaplan Lawn area (nine trees) would not be able to be avoided with minor site plan modifications. As such, the SUMC Project would result in significant impacts to biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources in Kaplan Lawn.

[10] ~~Zach Pozner, Stanford University Medical Center, electronic communication to Whitney McNair, subject: "Protected Trees – Stanford," February 8, 2010.~~ City of Palo Alto, SUMC Protected Tree Survey, July 20, 2010.

[11] Dave Dockter, Environmental Planner, City of Palo Alto Department of Planning and Community Environment, SUMC Environmental Impact Report Strategy: How the City will approach evaluation of the Tree Resources in the SUMC Project Area, memorandum, July 28, 2009.

[12] Dave Dockter, Environmental Planner, City of Palo Alto Department of Planning and Community Environment, SUMC Environmental Impact Report Strategy: How the City will approach evaluation of the Tree Resources in the SUMC Project Area, memorandum, July 28, 2009.

[13] City of Palo Alto, SUMC Protected Tree Survey, July 20, 2010.

[~~13~~14] Dave Dockter, Environmental Planner, City of Palo Alto Department of Planning and Community Environment, SUMC Environmental Impact Report Strategy: How the City will approach evaluation of the Tree Resources in the SUMC Project Area, memorandum, July 28, 2009.

[15] City of Palo Alto, SUMC Protected Tree Survey, July 20, 2010.

The Draft EIR text on pages 3.9-26 through 3.9-28 has been revised as follows:

MITIGATION MEASURES. Mitigation Measures BR-4.1 through BR-4.5, below, to be implemented by the SUMC Project sponsors, would reduce the SUMC Project's impact on Protected Trees. In addition, Mitigation Measure BR-4.6 would require minor SUMC Project site plan adjustments to avoid removal of some biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources. However, ~~the new Hospital District under the SUMC Project would allow the removal of up to 48 Protected Trees that are protected under the Municipal Code~~ up to 61 Protected Trees that are not aesthetic tree resources could be removed under the SUMC Project. In addition, minor modifications to the SUMC Project site plans would not be able to avoid the nine biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources in the Kaplan Lawn area. Therefore, the SUMC Project would result in a significant and unavoidable impact to Protected Trees. (SU)

BR-4.1 *Prepare a Tree Preservation Report for all Trees to be Retained.* An updated tree survey and tree preservation report (TPR) prepared by a certified arborist shall be submitted for review ~~and acceptance by~~ and approval by the Director of Planning and Community Environment in consultation with the City ~~Urban Forester~~ Arborist. For

reference clarity, the tree survey shall include (list and field tag) all existing trees within the SUMC Sites, including adjacent trees overhanging the SUMC Sites. The approved TPR shall be implemented in full, including mandatory inspections and monthly reporting to City ~~Urban Forester~~ Arborist. The TPR shall be based on latest SUMC plans and amended as needed to address activity ~~or~~ within the dripline area of any existing Protected ~~t~~Tree to be preserved, including incidental work (utilities trenching, street work, lighting, irrigation, etc.) that may affect the health of a preserved Protected ~~t~~Tree. ~~The SUMC Project shall be modified to address recommendations identified to reduce impacts to existing ordinance regulated trees.~~ The TPR shall be consistent with the criteria set forth in the Tree Preservation Ordinance, Palo Alto Municipal Code Section 8.10.030, and the City Tree Technical Manual, Section 3.00, 4.00 and 6.30. To avoid improvements that may be detrimental to the health of ~~regulated~~ Protected ~~t~~Trees, the ~~TPR~~ Director of Planning and Community Environment, in consultation with the City Arborist, shall review the SUMC Project sponsors' landscape plan to ensure the new landscape is consistent with Tree Technical Manual, Section 5.45 and Appendix L, Landscaping under Native Oaks.

BR-4.2 *Prepare a Solar Access Study (SAS) of Short and Long Term Effects on Protected Oaks.* The SUMC Project sponsors shall prepare a SAS of Short and Long Term Effects on Protected Oaks that are Aesthetic Tree Resources for review and approval by the Director of Planning and Community Environment in consultation with the City Arborist. The SAS shall be prepared by a qualified expert team (horticulturalist, architect designer, consulting arborist) capable of determining effects, if any, to foliage, health, disease susceptibility and also prognosis for longevity. The SAS shall ~~provide alternative massing scenarios to provide sufficient solar access and reduce shading detriment at different thresholds of tree health/decline, as provided for in the SAS. The SAS adequacy shall be subject to peer review as determined necessary by the City. The SAS design alternatives shall be the subject of specific discussion at all levels of ARB, Planning Commission, City Council, and public review in conjunction with the SUMC Project sponsors, the City Urban Forester, and Director of the Planning and Community Environment Department, until a final design is approved.~~ contain the same information as the SAS for FIM 1 trees that are Aesthetic Tree Resources submitted September 23, 2010. If the Director of Planning and Community Environment, in consultation with the City Arborist, determines that the SUMC Project would have an adverse effect on solar access to a Protected Tree that is an Aesthetic Tree Resource such that the tree is unlikely to survive, then the SUMC Project sponsors shall relocate the Protected Tree to a site with sufficient solar access, as determined by the Direct of Planning and Community Environment, in consultation with the City Arborist. The SAS has been completed and accepted by the City for trees #608, Kaplan Lawn (trees #33 through 41), and FIM (trees #317 through 320 and #322).

BR-4.3 *Prepare a Tree Relocation Feasibility Plan for Any Protected Tree Proposed for Relocation and Retention*. Relocation of Protected Trees with the SUMC Sites shall be allowed only upon issuance of a Protected Tree relocation permit from the Director of Planning and Community Environment in consultation with the City Arborist. Because of inherent mortality associated with the process of moving mature trees, the SUMC Project sponsors shall prepare a Tree Relocation and Maintenance Plan (TRMP) ~~shall be prepared subject to Urban Forester's approval~~ to be reviewed in connection with the Protected Tree relocation permit. ~~The SUMC Project sponsors shall submit a~~ The TRMP ~~to determine~~ shall evaluate the feasibility of moving the Protected Trees to an appropriate location on site. Feasibility shall consider current site and tree conditions, a tree's ability to tolerate moving, relocation measures, optimum needs for the new location, aftercare, irrigation, and other long-term needs.

The tree relocation permit shall specify that if the relocated trees do not survive after a period of five years, the ~~tree canopy~~ relocated tree or trees shall be replaced with ~~a tree of equivalent size or security deposit value~~ trees or a combination of trees and Tree Value Standards consistent with Section 3.20, Table 3-1 Tree Canopy Replacement, of the Tree Technical Manual. The TRMP shall be inclusive of the following minimum information: appropriate irrigation, monitoring inspections, post relocation tree maintenance, and for an annual arborist report of the condition of the relocated trees. If a tree is disfigured, leaning with supports needed, in decline with a dead top or dieback of more than 25 percent, the tree shall be considered a total loss and replaced ~~in kind and size~~ as described above. ~~The final annual arborist report shall serve as the basis for return of the Tree Security Deposit (see Mitigation Measure BR-4.4, below, for a discussion of the Tree Security Deposit).~~

BR-4.4A ~~*Provide a Tree Preservation Bond/Security Guarantee*~~ *Enter into a Memorandum of Understanding for Tree Maintenance*. ~~The natural tree resources on the SUMC Site include significant Protected Trees and those that provide neighborhood screening, including two trees proposed for relocation. Prior to building permit submittal, the Tree Security Deposit for the total value of the relocated trees, as referenced in the Tree Technical Manual, Section 3.26, Security Deposits, shall be posted to the City Revenue Collections in a form acceptable by the City Attorney.~~ As a security measure, the SUMC Project sponsors shall be subject to a Memorandum of Understanding (MOU) between the City of Palo Alto and the SUMC Project sponsors describing a tree retention amount, the list of trees to be retained, an appraised value for each listed tree, a five-year tree growth and establishment, ~~criteria and~~ timeline for return of security, and conditions of approval related to Protected Trees, as cited in the ~~Record of Land Use Action~~ Conditional Use Permit for the SUMC Project. The SUMC Project sponsors and SUMC Project arborist~~, to be retained by the SUMC Project sponsors,~~ shall coordinate with the City ~~Urban Forester~~ Arborist to determine ~~the amount of bonding~~ conditions required to guarantee the protection and/or replacement of the regulated trees on the site during construction and within five years after occupancy. ~~The SUMC Project sponsors shall bond for 150 percent of the value for~~

~~the relocated trees, and 50 percent of the value of the remaining trees to be protected during construction (as identified in the revised and final approved Tree Protection Report).~~ The SUMC Project sponsors shall also ~~provide an appraisal of the trees with the proposed level of bonding in a tree value table to be reviewed and accepted by the Director of Planning and Community Environment with the description of each tree by number, value, and total combined value of all the trees to be retained. A return of the guarantee shall be subject to an annual followed by a final tree assessment report on all the relocated and retained trees from the SUMC Project arborist, as approved by the City Urban Forester, five years following final inspection for occupancy, to the satisfaction of the Director of the Planning and Community Environment Department.~~ provide a security guarantee for the trees, as determined by the Director of Planning and Community Environment, in consultation with the City Arborist, in an amount consistent with the City of Palo Alto Tree Technical Manual.

BR 4.4B *Replace Protected Trees in Accordance with the Tree Technical Manual.* Removal of Protected Trees shall be allowed only upon issuance of a Protected Tree removal permit from the Director of Planning and Community Environment, in consultation with the City Arborist. Protected Trees that are removed without being relocated shall be replaced in accordance with the ratios set forth in Table 3-1 of the City of Palo Alto Tree Technical Manual in the following way, in order to maintain the appropriate landscape approach at the SUMC Sites, which has limited opportunities to plant the required replacement of trees:

- The Protected Tree removal permit issued shall stipulate the tree replacement requirements for the removed tree, including number of trees, location, and irrigation;
- The number and size of trees required for replacement would be calculated in accordance with Table 3-1; and
- The difference between the required tree replacement and the number of trees planted at the SUMC Sites would be mitigated through contribution to the Forestry Fund in the City of Palo Alto. Payment to the Forestry Fund would be in the amount representing the value of the replacement trees that would be required under the TTM standard.

Draft EIR text for Mitigation Measure BR-4.6 on page 3.9-28 has been revised as follows:

BR-4.6 *Implement Minor Site Modifications to Preserve Biologically~~y~~ and Aesthetic~~ally~~ ~~Significant Protected Trees~~ Tree Resources.* The SUMC Project sponsors shall design and implement modifications to building design, hardscape, and landscape to incorporate the below and above ground area needed to preserve ~~as many biologically and aesthetically significant Protected Trees as possible~~ the following trees that are both biological and aesthetic tree resources:

- FIM 1 Grove. Retain one Protected Tree that is an aesthetic tree resources (#319) and relocate two Protected Trees that are aesthetic tree resources (#323 and 324) in the FIM 1 Grove.
- Adjacent to Welch Road. Retain the century-old solitary oak located between Welch Road to the north and the Blake-Wilbur Clinic building to the south (#608). In addition, relocate the mature Protected oak tree located to the east of the proposed LPCH hospital building (#996).

The following text edit has been made to fifth sentence of the discussion under Impact BR-5 on page 3.9-29 of Section 3.9, Biological Resources:

> In September 2006, Stanford University initiated the development of the Stanford University HCP with USFWS and NOAA Fisheries. However, because the Stanford University HCP is currently out for public review and has not been adopted, it is not a currently applicable Habitat Conservation Plan or Natural Community Conservation Plan (NCCP). Until such time that the HCP is adopted, there is no requirement to comply with its provisions. In addition, ~~T~~the Santa Clara Valley HCP/NCCP ~~is the nearest adopted HCP/NCCP in the region but~~ is also in development and has not yet been adopted. Nonetheless, the SUMC Sites are not included within ~~it's~~ the boundaries of the Santa Clara Valley HCP/NCCP and it would not apply to the SUMC Project. Because no applicable adopted HCP or NCCP currently exists for the SUMC Sites, and no habitat for special-status plant or wildlife species occurs in the SUMC Sites, the SUMC Project would have no impact on any applicable HCP or NCCP.

The second paragraph under Impact BR-9 on page 3.9-32 has been revised as follows:

> The SUMC Project would result in the loss of potentially approximately ~~48~~ 74 Protected Trees. Moreover, the Protected Trees that would be lost include those identified by the City as being biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources. Therefore, although the SUMC Project would include mitigation that would require preservation of some of the Protected Trees and replacement of Protected Trees that are removed, the SUMC Project's contribution to the cumulative loss of Protected Trees would be cumulatively considerable.

Section 3.11, Hydrology

The following text has been added as the third sentence of the first paragraph on page 3.11-34 of the Draft EIR:

> *Groundwater Recharge*. During construction, the balance between pervious and impervious land surfaces[101] would repeatedly change. Consequently, there is a potential for a temporary increase in impervious land surfaces and therefore, temporary reduction in groundwater recharge. Impervious land surfaces, including green roof areas, would prevent the downward percolation of rainfall and groundwater recharge.

Page 3.11-40, last partial paragraph, and continuing on to page 3.11-41, first partial paragraph of the Draft EIR:

> The SUMC Site surface is currently about 27 percent pervious land surfaces (refer footnote 101 on page 3.11-34) with about 3 percent of green roofs for a total of 70 percent impervious surfaces that could contribute to stormwater runoff. Both pervious land surfaces and other pervious surfaces, such as green roofs, would allow for percolation and storage of rainfall and reduce runoff by effectively reducing the amount of impervious surfaces that could contribute to stormwater runoff. Implementation of the SUMC Project would replace existing buildings and surface parking lots with new buildings, underground parking, and a new parking structure, and ultimately ~~create~~ result in about 26 percent pervious land surfaces and about 11 percent of green roofs for a total of 63 percent impervious surfaces that could contribute to stormwater runoff.[106] Green roofs can detain 60 to 100 percent of precipitation, depending upon the substrate and size of storm event.[107] The ~~increased~~ reduced amount of impervious surfaces that could contribute to stormwater runoff (~~land surface plus green roof area; a~~ (7 percent total ~~increase~~ reduction in effective impervious surfaces) would reduce the amount of stormwater runoff from the SUMC Project compared to existing conditions. Because there would be no net-increase in directly-connected impervious surfaces and the SUMC Sites are within an area designated as exempt from HM controls on the County HM map, the SUMC Project would be exempt from the HM stormwater controls requirements; a no-net-increase-indirectly-connected-impervious-area condition is considered to be sufficient to determine that there would be no increase in runoff rates, volume, or flow duration (maintenance of the preexisting hydrograph) for the small (less than two-year) to medium (10-year) storm events. Because the pre-development hydrograph would be maintained, post-construction conditions under the SUMC Project would not substantially increase off-site bed or bank erosion or sedimentation in San Francisquito Creek.

Section 3.12, Hazardous Materials

The following text has been added after the first partial paragraph on page 3.12-20 of the Draft EIR:

> *Additional Studies at the Hoover Pavilion Site*. From October 2008 through September 2010, the SUMC Project sponsors prepared and provided to the SCCDEH the following documentation which summarizes the environmental condition and the investigations and remediation that have been conducted at the Hoover Pavilion Site since 1986 to date in consideration of case closure:
>
> - October 31, 2008: Request for Site Closure by AMEC Geomatrix, which discusses site closure for the two closed in-place 2,200 gallon diesel underground storage tanks and the results of a soil vapor survey to evaluate whether volatile constituents are present in the subsurface.
> - March 26, 2009: an additional soil vapor survey was performed by AMEC Geomatrix and documented in the Additional Investigation Report for Delineation of PCE in the vicinity of Soil Boring SV-9.
> - May 25, 2010: A Site Management Plan by AMEC was developed that established guidelines and health and safety requirements during construction for the following

activities: notifications, air monitoring, soil excavation, soil stockpiling, on-site reuse of soil, off-site soil disposal or reuse, dust control, and groundwater management.

- September 15, 2010: Technical Summary by AMEC was prepared to discuss the regulatory status and closure activities, site information, previous investigations and results, summary of remedial measures and closure criteria.

The above AMEC reports concluded that residual petroleum is present in soil, particularly in the area of two 2,200 gallon, closed-in-place USTs that formerly contained fuel oil and diesel. Testing confirms that no petroleum constituents are present in soil vapor. Note that the presence of chlorinated volatile organic compounds (CVOCs) were also evaluated as part of the Hoover Pavilion Site (in soil) and found to be limited in concentration, area and depth, and presents no impacts to human health or the environment. The impacted area would be excavated as part of the SUMC Project parking garage excavation. Thus, all of the residual CVOCs and most of the petroleum impacted soil whose areal extent has been defined will be removed as part of the SUMC Project.

With respect to groundwater, the studies show no dissolved-phased constituents are present above environmental screening levels and the lateral extent of the plume is confined to the property. In two monitoring wells immediately adjacent to the USTs, 1/8 to 1/4 inch of product composed of a mixture of degraded viscous fuel oil (heavy fuel oil number 6) and degraded diesel has been measured; remediation of this product has been completed to the fullest extent practicable. CVOCs testing in groundwater are below the MCLs. Therefore, the Hoover Pavilion Site has been thoroughly investigated and the cleanup meets the State's standards and poses no threat to human health or the environment.

Draft EIR text under Mitigation Measures HM-3.3, starting on page 3.12-41 of the Draft EIR, is revised as follows:

HM-3.3 *Conduct a Soil ~~Vapor~~ Excavation Program at the Hoover Pavilion Site.* A qualified consultant, under the SUMC Project sponsors' direction, shall undertake the following activities:

- Remove all buried underground storage tanks from the property after sheds and storage buildings on the Hoover Pavilion site have been demolished;
- To the extent necessary, additional soil sampling shall be collected to determine health risks and to develop disposal criteria;
- If warranted based on soil sampling, contaminated soil shall be excavated, removed, and transported to an approved disposal facility in compliance with OSHA requirements; and
- ~~If warranted based on soil sampling, a human health risk assessment shall be prepared and implemented to determine potential for impacts on construction workers as well as to develop measures to ensure it is safe to redevelop the Hoover Pavilion Site within engineering controls (e.g., SVE or vapor barriers); and~~

- To the extent required based upon the results of soil sampling and the results of a health risk assessment ~~(if applicable),~~ a Site Health and Safety Plan to ensure worker safety in compliance with OSHA requirements shall be developed by the SUMC Project sponsors, and in places prior to commencing work on any contaminated site.
- The SUMC Project sponsors shall ~~cooperate with~~ submit documents to the County DEH to proceed with closure of the Hoover Pavilion Site.

The text under Impact HM-5, starting on pages 3.12-46 to 3.12-47 of the Draft EIR, is revised as follows:

The SUMC Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. ~~No existing K-12 schools are located within one-quarter mile of the SUMC Sites.~~ Two school facilities, including a child care center, are located within one-quarter mile of the SUMC Sites: the LPCH school, located within in the LPCH, and the Stanford Arboretum Children's Center, located on 215 Quarry Road at the Hoover Pavilion Site. The closest off-site schools to the SUMC Sites are Palo Alto High School, approximately 0.7 mile east of the SUMC Sites, and Addison Elementary School, approximately 1.2 miles northeast. The nearest private schools are Castilleja School, 1.1 miles northeast, and Montessori School, approximately 1.0 mile northeast.

~~The LPCH includes an on-site school within the facility. This is an existing school within one-quarter mile of the SUMC Sites.~~ As discussed above, implementation of the SUMC Project would increase the amount of hazardous materials used on the SUMC Sites and hazardous waste generated at the SUMC Sites. Regulations and operational practices that minimize hazard risks to this existing facility would continue to ensure that associated risks are not substantially increased. As such, impacts associated with ~~a~~ school facilities within one-quarter mile of the SUMC Sites would be less than significant.

Section 3.13, Population and Housing

Table 3.13-8 on pages 3.13-12 through 3.13-13 of the Draft EIR has been updated as follows:

Table 3.13-8
SUMC Project 2025 Indirect Housing Demand by County/ City Based on Existing SUMC Employee Zip Code Distribution

	Residential Location of ~~Palo Alto~~ SUMC Employees[a]	ABAG Projected Household Growth 2005-2025[b]	SUMC Project Housing Demand in 2025	SUMC Project Housing Demand as Percent of Household Growth 2005-2025
Santa Clara County				
Palo Alto	8.0%	6,030	104	1.7%
Stanford University Campus	1.1%	3,022[c]	14	0.5%
Mountain View	5.9%	6,220	77	1.2%
Los Altos and Los Altos Hills	1.5%	590	20	3.4%
Sunnyvale, Santa Clara, Cupertino	11.0%	~~17,780~~ 17,960	143	0.8%
San Jose	15.5%	83,780	202	0.2%

Table 3.13-8
SUMC Project 2025 Indirect Housing Demand by County/ City Based on Existing SUMC Employee Zip Code Distribution

	Residential Location of ~~Palo Alto~~ SUMC Employees[a]	ABAG Projected Household Growth 2005-2025[b]	SUMC Project Housing Demand in 2025	SUMC Project Housing Demand as Percent of Household Growth 2005-2025
Milpitas	2.1%	5,950	27	0.5%
Campbell, Los Gatos, Saratoga, (+Monte Sereno, Alum Rock)	2.3%	~2,920	30	1.0%
Gilroy, San Martin, Morgan Hill	0.7%	~6,104	9	0.2%
Subtotal	*45.9%*	*~~132,396~~ 132,576*	*626*	*0.5%*
San Mateo County				
Menlo Park (+W. Menlo Park)	4.1%	1,910	53	2.8%
East Palo Alto	1.8%	2,710	24	0.9%
Atherton, Woodside, Portola Valley, Emerald Hills	0.9%	~850	12	1.4%
Redwood City	5.5%	~~~5,140~~ ~6,130	72	~~1.4%~~1.2%
Belmont, San Mateo, San Carlos, and Foster City	6.2%	~~~9,060~~ ~10,870	81	~~0.9%~~0.7%
Hillsborough, Burlingame, Millbrae	1.1%	~~2,200~~ 2,240	14	0.6%
South San Francisco, Brisbane, Daly City, Colma, San Bruno	2.9%	~~10,070~~ 10,350	38	0.4%
Half Moon Bay and Coastal (Pacifica, Montara, El Granada, La Honda, Pescadero, Loma Mar, Moss Beach)	1.7%	~3,930	22	0.6%
Subtotal	*24.2%*	*~~35,870~~ 38,990*	*316*	*~~0.9%~~ 0.8%*
Alameda County				
Fremont and Hayward	8.9%	-18,120	116	0.6%
Newark, Union City, San Leandro, Castro Valley, San Lorenzo	6.1%	~~~14,410~~ ~14,040	79	0.6%
Oakland, Berkeley, Alameda, Emeryville, Albany, Piedmont	1.0%	~~46,640~~ 42,190	13	~~0.02%~~ 0.03%
Dublin, Pleasanton, Livermore, Sunol, and Mountain House	1.3%	~~~26,757~~ ~28,106	17	0.06%
Subtotal	*19.3%*	*~~105,907~~ 102,456*	*225*	*0.2%*
San Francisco County	4.0%	44,950	52	0.1%
Contra Costa County	1.3%	71,450	17	0.02%
Marin, Napa, and Sonoma Counties	0.6%	45,300	8	0.02%
TOTAL IN BAY AREA REGION	**95.2%[d]**	**~~435,873~~ 477,360**	**1,241[d]**	**~~0.28%~~ 0.26%**
Outside the Bay Area Region	4.8%	-	62	-
TOTAL	**100%[d]**		**1,303[d]**	

Sources:

a. Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Table 5-5. See Appendix L.

b. ABAG, *Projections 2005*, December 2004.

c. Stanford University Community Plan/General Use Permit Draft Environmental Impact Report, Table 2-1, June 2000.

Note:

d. Individual percentages and numbers of units may not sum to the totals due to rounding.

The text on page 3.13-13 of the Draft EIR has been revised as follows:

> As demonstrated in 3.13-8 the indirect housing demand from the SUMC Project would represent a small percentage of the ABAG projected housing growth for all jurisdictions in the Bay Area region. As shown in Table 3.13-8, above, ABAG projects that the number of households would grow from 2005 to 2025 by 18.5 percent in the Bay Area region, 21.8 percent in Santa Clara County, and 20.4 percent in Palo Alto. The indirect housing demand generated by the SUMC Project would be ~~0.28~~ 0.26 percent of the projected household growth in the Bay Area region, 0.5 percent of household growth in Santa Clara County, ~~0.9~~ 0.8 percent of household growth in San Mateo County, 1.7 percent of the projected household growth within the City of Palo Alto, and 2.8 percent of housing growth in Menlo Park, from 2005 to 2025. At most, the indirect housing demand from the SUMC Project would comprise 3.4 percent of projected growth (within Los Altos and Los Altos Hills). Therefore, the SUMC Project would not significantly impact the 2025 forecasted household growth within the City and other jurisdictions within the region, and the demand for housing as a result of the SUMC Project would be less than significant.

Impact PH-3, on page 3.13-15 of the Draft EIR, is revised as follows:

> *PH-3. Impacts on Jobs to Employed Residents Ratio. The SUMC Project would have an adverse impact on the City's jobs to employed residents ratio because it would exceed the existing zoning allowances for the SUMC Sites and thus require rezoning, and it would increase the City's jobs to employed residents ratio by more than 0.01. However, this impact is not, itself, an environmental impact. This impact would result in secondary environmental impacts relating to additional commute traffic, including the significant and unavoidable impacts on air quality ~~and climate change~~, as identified in Section~~s~~ 3.5 ~~and 3.6~~. The present analysis of impacts to the "jobs to employed residents" ratio is presented for informational purposes, and for the purpose of identifying additional mitigation measures for this identified impact.*

The third paragraph under Impact PH-3, on pages 3.13-15 through 3.13-16 of the Draft EIR, is revised as follows:

> Section~~s~~ 3.5 ~~and 3.6~~ identif~~y~~ies significant and unavoidable impacts relating to air quality ~~and climate change~~, and the additional commute-related traffic resulting from the imbalance between jobs and employed residents ~~is~~ can be a significant contributor to this impact. For example, Tables 3.5-6 and 3.5-7, in Section 3.5, Air Quality, demonstrate that a majority of the SUMC Project's emissions are from mobile sources, and the section further explains that 40 percent of these mobile emissions are from employee trips. These emissions result in a significant and unavoidable impact on air quality (see Impacts AQ-2 and AQ-7). ~~Likewise, Tables 3.6-4 and 3.6-6, in Section 3.6, Climate Change, demonstrate that the majority of the SUMC Project's greenhouse gas emissions result from these same mobile sources (listed in the tables under the category of "Non-fleet Vehicular Emissions (VMT)"), which result in an identified significant and unavoidable impact on climate change (see Impacts CC-1 and CC-2). Finally, the SUMC Project's impact on the jobs to employed residents ratio may also~~

~~play a contributing role to the SUMC Project's significant and unavoidable impacts on traffic circulation (see Impacts TR-2 and TR-3 in Section 3.4, Transportation).~~

The text on page 3.13-17, third sentence of second paragraph, is revised as follows:

Table 3.13-11 converts the jobs to housing ratio to a jobs to employed residents per household ratio and shows that the SUMC Project would result in a total demand of approximately 1,303 new households in the region and ~~1.052~~ 1,052 households above the 0.01 threshold.

Section 3.14, Public Services

The third full paragraph on page 3.14-10, which continues to the beginning of page 3.14-11, has been revised, as shown below. These changes do not affect the analysis or the impact conclusions regarding park and open space facilities.

Approximately ~~30~~ 38 percent[54] (~~4,763~~ 6,372 acres) of the City's land area consists of open space preserves.[~~54~~55,56] Open space preserves provide opportunities for hiking, biking, fishing, picnicking, camping, nature study, and non-motorized boating. They also have significant ecological and aesthetic value, providing important habitat for wildlife and scenic areas.[~~55~~57] These major ~~foothill~~ open spaces that are owned and operated by the City include: the 1,940-acre ~~John Fletcher Byxbee Recreational Area~~ Baylands Nature Preserve; the 1,400-acre Foothills Park; the ~~622~~ 610-acre Pearson-Arastradero Preserve; and the 22-acre Esther Clark ~~Park~~ Nature Preserve~~;~~. [58,59] ~~the 12.4-acre Timothy Hopkins Creekside Park;~~ In addition, the open space preserves that are within City lands, but are operated by the Mid-Peninsula Open Space District, include the 2,200 acres of Montebello Open Space Preserve~~;~~ and the 200-acre Los Trancos Open Space Preserve.[60] ~~The Byxbee, Foothill, Arastradero, Clark, and Hopkins Parks are owned and operated by the City, while Montebello and Los Trancos are operated by the Mid-Peninsula Open Space District.~~[~~56~~]

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54 ~~Greg Betts, Director of Community Services, City of Palo Alto Community Service. Electronic communication, October 25, 2007.~~ 6,372 acres of open space preserves/16,627 acres of land within the City of Palo Alto = 38.3 percent = ~ 38 percent

55 City of Palo Alto, Palo Alto Comprehensive Plan, Land Use and Community Design, 1998.

56 City of Palo Alto, Palo Alto Comprehensive Plan, Natural Environment, 1998.

~~55~~57 City of Palo Alto. 1997. *Palo Alto Comprehensive Plan EIR*, Natural Environment, September.

~~56 Greg Betts, Director of Community Services, City of Palo Alto Community Service. Electronic communication, October 25, 2007.~~

58 City of Palo Alto, Palo Alto Comprehensive Plan, Natural Environment, 1998.

59 City of Palo Alto, "Open Space & Parks, Preserves and Open Space," accessed on August 25, 2010 at: http://www.cityofpaloalto.org/depts/csd/parks and open space/preserves and open spaces/default.asp.

60 City of Palo Alto, Palo Alto Comprehensive Plan, Natural Environment, 1998.

6.5 CHANGES TO THE DRAFT EIR SECTION 4, OTHER CEQA CONSIDERATIONS

Draft EIR text on page 4-1, first bullet of the significant and unavoidable impact list is deleted as follows:

- ~~Deterioration of intersection level of service during Peak Hour conditions at three Menlo Park intersections (Middlefield Road and Willow Road, Bayfront Expressway and Willow Road. and University Avenue and Bayfront Expressway);~~

Draft EIR text on page 4-1, fifth bullet, is deleted as follows:

- ~~Contribution to cumulative emissions of toxic air contaminants;~~

Draft EIR text on page 4-1, sixth bullet, is deleted as follows:

- ~~Emission of greenhouse gases, which would contravene the City's ability to meet emission reduction goals in the Palo Alto Climate Protection Plan and which would have a cumulatively considerable contribution to global climate change;~~

The tenth bullet on page 4-1 is revised as follows:

- Removal of up to ~~71~~ 74 Protected Trees, as defined in City of Palo Alto's Tree Protection and Management Regulations, which is a significant and unavoidable impact on both a project level and a cumulative level.

6.6 CHANGES TO THE DRAFT EIR SECTION 5, ALTERNATIVES

Draft EIR text on page 5-2 first bullet of the significant and unavoidable impact list is deleted as follows:

- ~~Deterioration of intersection level of service during Peak Hour conditions at three Menlo Park intersections (Middlefield Road and Willow Road, Bayfront Expressway and Willow Road. and University Avenue and Bayfront Expressway);~~

Draft EIR text on page 5-2, fifth bullet, is deleted as follows:

- ~~Contribution to cumulative emissions of toxic air contaminants;~~

Draft EIR text on page 5-2, sixth bullet, is deleted as follows:

- ~~Emission of greenhouse gases, which would contravene the City's ability to meet emission reduction goals in the Palo Alto Climate Protection Plan and which would have a cumulatively considerable contribution to global climate change;~~

The tenth bullet on page 5-2 is revised as follows:

- Removal of up to ~~71~~ 74 Protected Trees, as defined in City of Palo Alto's Tree Protection and Management Regulations, which is a significant and unavoidable impact on both a project level and a cumulative level.

The text on pages 5-15 through 5-17, starting at the first paragraph under the subheader "Tree Preservation Alternative," has been revised as follows. Please note that Figure 5-1 in the Draft EIR has been replaced with new figures (Figures 5-1a through 5-1d). These figures depict the biological and aesthetic tree resources that would be removed, retained, and relocated. However, unlike Figure 5-1 in the Draft EIR, Figures 5-1a through 5-1d compares tree removal, retention, and relocation under the Tree Preservation Alternative with the SUMC Project. Please refer to Staff-Initiated Change 6 in Section 3 of this document for Figures 5-1a to 5-1d.

The Tree Preservation Alternative was designed to reduce the SUMC Project's impact on Protected Trees. The Tree Preservation Alternative would seek to preserve the majority of the ~~aesthetically and~~ biological~~ly significant Protected Trees~~ and aesthetic tree resources at Kaplan Lawn, the FIM 1 Grove, and along Welch Road. Under this alternative, Kaplan Lawn would not be developed, and no Protected Trees would be removed at that location. In addition, the FIM 1 building would be redesigned to save ~~as many Protected Trees as possible in this area~~ a higher priority Protected Tree. The same number of trees will be retained in place. Lastly, one Protected oak tree~~s~~ along Welch Road would be retained in place. The site plan for this alternative would avoid ~~13~~ 10 biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources that would be affected by the SUMC Project. Further, this alternative would seek to relocate three more Protected Trees that are aesthetic tree resources that would otherwise be affected under the SUMC Project (before mitigation). Under the Tree Preservation Alternative, no trees that are aesthetic tree resources would be removed. Figure 5-1 shows the Protected Trees that would be preserved through the Tree Preservation Alternative~~, and the potential zones for planting of relocated trees~~. This alternative is described in more detail below.

Under the Tree Preservation Alternative (as well as the SUMC Project), a new zoning district would be created for land uses specifically for hospitals, associated medical research, medical office, and support uses. As described in Section 2, Project Description, regulations in this district would include applicability, preservation, and exemptions for removal and replacement of Protected Trees. The Hospital District would create a procedure to permit the removal or relocation of approximately ~~48~~ 62 Protected Trees at the SUMC Sites (59 removed plus 3 relocated) while preserving approximately ~~23~~ 18 Protected Trees that are considered both biological~~ly~~ and aesthetic~~ally~~ ~~significant~~ tree resources, as defined in Section 3.9, Biological Resources. The approximately ~~23~~ 18 Protected Trees that would be required to be retained are located in ~~the following areas:~~ the Kaplan Lawn, the FIM 1 Grove, and adjacent to Welch Road, as described in more detail in Section 3.9, Biological Resources.

- ~~*Kaplan Lawn*. Kaplan Lawn is the undeveloped area located between the two barrels of Pasteur Drive to the west and east, Blake Wilbur Drive to the north, and the SUMC Promenade and fountain to the south. Within Kaplan Lawn are two existing groves that~~

~~consist of nine oak trees. Some of these Protected Trees are over a century old, with many pre-dating the original hospital and are a remnant of the native oak grassland and agricultural use of the area. The north grove on the Kaplan Lawn functions as a prominent left side component of the Pasture Drive gateway.~~

- ~~*FIM 1 Grove*. The FIM 1 Grove is located on the parcel of land that would house the proposed SoM FIM 1 building under the SUMC Project. Within the FIM 1 Grove are a total of 12 seven Protected Trees that would be removed under the SUMC Project. These oak trees function as the right side component of the Pasteur Drive gateway, the canopy of which arches over the road towards the trees in the Kaplan Lawn area.~~
- ~~*Adjacent to Welch Road*. A century old solitary oak is growing at the edge of the Main SUMC Site, between Welch Road to the north and the Blake Wilbur Clinic building to the south. This existing Protected Tree is unique in character and prominently visible from Welch Road and the proposed Durand Way. The oak is located next to one of the original Governor's Lane eucalyptus trees and has a significant canopy spread. In addition, a mature and healthy Protected oak tree is located to the east of the proposed LPCH hospital building, along Welch Road.~~

The SUMC Project would remove up to ~~71~~ 74 Protected Trees as defined in City of Palo Alto's Tree Protection and Management Regulations. While Mitigation Measures BR-4.1 through BR-4.6 would strive to avoid, relocate, or replace affected Protected Trees, the measures would not fully reduce the impacts to all Protected Trees, resulting in a significant and unavoidable impact (see Section 3.9, Biological Resources). As discussed in Section 3.9, Biological Resources, the SUMC Project would result in the removal of several of the Protected Trees defined as biological~~ly~~ and aesthetic~~ally significant~~ tree resources. However, the Tree Preservation Alternative would seek to preserve the biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources at Kaplan Lawn, the FIM 1 Grove, and along Welch Road. Under the SUMC Project, a 64-foot-tall SHC Hospital module ("Hospital Module Six") is proposed to be constructed on the Kaplan Lawn, which would result in the removal of nine Protected Trees. The main difference under the Tree Preservation Alternative is that the square footage and programmatic functions planned for Hospital Module Six would be incorporated into the remaining five SHC Hospital modules. This new modular plan of the SHC Hospital building would be "tightened" somewhat through the use of a smaller structural grid and a reconfigured ambulance route. As such, Kaplan Lawn would not be developed, and no Protected Trees would be removed at that location. In addition, the FIM 1 building would be redesigned to save as many Protected Trees as possible in this area~~.~~, as required in Mitigation Measure BR-4.6.

Figure 5-1 depicts the footprints of the Tree Preservation Alternative, including the alternative designs for the new SHC Hospital building and the FIM 1 building. ~~Table~~ Figure 5-1 shows the Protected Trees that would be preserved through the Tree Preservation Alternative~~, and the potential zones for planting of relocated trees.~~ As shown in Table 5-5, the Tree Preservation Alternative would have the same development program as the proposed SUMC Project.

The third bullet on page 5-21 has been revised as follows:

SoM Site

The Tree Preservation Alternative would also include a redesign of the FIM 1 building to save as many Protected Trees as possible in this area. The proposed building size and height would be the same as the SUMC Project; however, the footprint of the building would be altered to save Protected Trees that are aesthetic tree resources at the northeast corner of the building (as required in Mitigation Measure BR-4.6). Due to the requirements of the building program, and the location of the Protected Trees on the site, not all of the Protected Trees at the FIM 1 Site would be preserved with this alternative. ~~Out of the 12 seven Protected Trees at the FIM 1 Site that would be removed under the SUMC Project, approximately~~ Similar to the SUMC Project, ~~three~~ five biological and aesthetic tree resources would be retained; however, two would be relocated under the Tree Preservation Alternative. No aesthetic tree resources at the FIM 1 site would be removed, without being relocated.

The first full paragraph on page 5-22 has been revised as follows:

As proposed under the SUMC Project, the Tree Preservation Alternative would require the demolition of the 1959 Hospital Building complex. In its place, the Tree Preservation Alternative would construct the replacement SHC clinic/medical office building and SoM FIM Buildings 2 and 3 in the same locations as under the SUMC Project (for the changes to FIM Building 1, see above). In addition, under the Tree Preservation Alternative, the site plans at the LPCH and the Hoover Pavilion would be the same as under the SUMC Project. Therefore, the ~~21~~ 27 Protected Trees at the LPCH Site and the ~~six~~ 11 Protected Trees at the Hoover Pavilion Site would still be removed and potentially relocated under this Alternative. As shown in Table 5-5, the Tree Preservation Alternative would have the same development program as the proposed SUMC Project. The Tree Preservation Alternative would necessitate the same Comprehensive Plan amendments, zoning changes, and annexation as the proposed SUMC Project.

The following edit has been made to the last sentence of the last bullet on page 5-25:

The parking lots proposed under the SUMC Project that would be constructed under the Historic Preservation Alternative would include the SHC parking structure as proposed under the Tree Preservation Alternative (with three levels underground and four levels aboveground) at the corner of Welch Road and Pasteur Drive, the underground LPCH parking structure at the corner of Welch Road and Quarry Road, and the Hoover Pavilion parking structure. However, the underground parking lot proposed at the site of the new SHC clinics would have to be constructed elsewhere since it would be located under the 1959 Hospital Building complex. This parking would instead be accommodated elsewhere at the Main SUMC Site, including potentially ~~expanding the existing Pasteur Drive garage and/or~~ increasing the size of the proposed SHC parking structure at the Welch Road/Pasteur Drive intersection.

The following text has been revised in the fourth paragraph on page 5-30:

The Quarry Road/Arboretum Drive site is zoned as A1-20S, ~~Academic Reserve and Open Space~~ A1 with Combining District, per the ~~approved Stanford Community Plan/General Use Permit~~ Santa Clara County Zoning Atlas.[10] Zone A1-20S is ~~defined as lands outside of the core campus area that currently have an open space character or use, or low intensity academic use~~ a slope density combining district with the same allowed uses as the A1 Zoning District, General Use. ~~These lands are identified as important for their scenic beauty, visual relief, grazing, and wildlife values, as well as their academic potential.~~ Permitted uses in the A1 Zoning District include, but are not limited to, agricultural uses, single-family residences, parks and playgrounds, home occupations, and accessory buildings to permitted uses. University uses are conditionally permitted uses. The 20S refers to the 20S Slope-Density Combining District, which regulates density of development through provisions that determine the maximum number of lots and dwelling units permitted through subdivision based on the average slope of the lot.[~~10~~11] This site is within unincorporated Santa Clara County, and any changes to the previously approved housing therein would require County approval.

In addition to the zoning, the Stanford Community Plan/General Use Permit has assigned the Quarry Road/Arboretum Drive Site with the land use designation of "Academic Campus." According to Policy LU-1 of the Stanford Community Plan, "the Academic Campus designation applies to lands in current or intended academic use." These academic uses support the academic activity of the University, including, but not limited to, student housing and administrative offices.[12] In addition, the Stanford General Use Permit places the sites in the Quarry Development District.[13]

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[10] County of Santa Clara, Santa Clara County Zoning Atlas, Map 16, August 2007.

[~~10~~11] County of Santa Clara, Stanford University Draft Community Plan and General Use Permit Application, Final Environmental Impact Report, Certified by the Santa Clara County Board of Supervisors, December 2000.

[12] Santa Clara County Planning Office, *Stanford University Community Plan*, adopted by the Santa Clara County Board of Supervisors December 12, 2000.

[13] County of Santa Clara, Stanford University 2000 General Use Permit, approved December 12, 2000.

The following text has been revised in the first sentence on page 5-32 of the Draft EIR:

The Quarry Road/El Camino Real site is also zoned as A1-20S, ~~Academic Reserve and Open Space~~ A1 with Combining District, per the ~~approved Stanford Community Plan/General Use Permit~~ Santa Clara County Zoning Atlas[14] and has a land use designation of Academic Campus per the Community Plan.[~~11~~15]

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[14] County of Santa Clara, Santa Clara County Zoning Atlas, Map 16, August 2007.

[~~11~~15] ~~County of Santa Clara, *Stanford University Draft Community Plan and General Use Permit Application, Final Environmental Impact Report*, Certified by the Santa Clara County Board of Supervisors, December 2000.~~ County of Santa Clara, Stanford University Community Plan, approved December 12, 2000.

The second paragraph under the bullet titled "Pasteur Drive/Sand Hill Road Site" on page 5-32 of the Draft EIR has been revised as follows:

> This site consists of 2.5 acres and is located on the southeast corner of Pasteur Drive and Sand Hill Road. The site is just north of the Main SUMC Site, and Sand Hill Fields is located across Pasteur Drive, to the east of the site. Currently, this site is open space and no buildings are located on the property. This site is within City of Palo Alto jurisdiction and is zoned ~~PF, Public Facilities. A zone change to~~ RM-40,[12] which allows multiple-family residential units at a maximum residential density of 40 dwelling units/acre.[13] ~~would be required for this site.~~

The following sentence is added as the last sentence to the first bullet on page 5-33 of the Draft EIR:

> These two sites were approved in December 2000[16] to provide a total of 420 units (350 units plus a 20 percent overage of 70 units[17]) for postgraduates and/or hospital residents. More specifically, these sites are designated for postdoctoral fellows and medical residents.

The following sentence is added as the last sentence of the third paragraph on page 5-35 of the Draft EIR:

> Figures 5-4 and 5-5 show the sequence of public spaces and connections. All modifications within the El Camino Real right-of-way would require Caltrans approval.

The following text is added to the last sentence to the last bullet on page 5-35 of the Draft EIR:

- Evaluate ~~of~~ the adequacy of bicycle and pedestrian signal crossing times, and if deficient (greater than 4 feet per second crossing speed), increase time (decrease walking speed to 3.5 to 4 feet per second) and evaluate impact on peak hour intersection LOS and vehicle delay~~;~~. Changes in crossing times within the El Camino Real right-of-way would require Caltrans approval;

The following revisions have been made to the first paragraph on page 5-49 of the Draft EIR:

> **Project Sponsors Objectives.** The Village Concept Alternative would meet ~~all~~ most of the objectives of the SUMC Project sponsors because this alternative would include the SUMC Project as proposed. Development of the Village Concept Alternative would construct new hospital and medical office buildings, allowing each hospital to meet SB 1953's criteria and to maintain its position as a leading provider of health care. Under this alternative, SHC and LPCH would provide sufficient beds and other facilities to meet projected future growth in demand. All regional needs for emergency and disaster preparedness would be met through maintenance of SHC and LPCH. In addition, the existing SoM buildings would be replaced by the new FIM buildings; therefore, this alternative would achieve the objective of replacing outmoded research facilities with state-of-the-art research facilities to support contemporary translational research. The Village Concept Alternative also would provide sufficient faculty offices, research laboratories, and administrative support space to meet the SoM's projected needs would maintain the opportunity to provide responsible and sustainable design for the SoM's operating systems, water systems, and use of physical materials. ~~In addition, t~~The alternative could allow sufficient design and entitlement flexibility to be able to adapt to changes in medical research needs and changes in

technology. ~~As such, the Village Concept Alternative would attain all of the SUMC Project sponsors objectives.~~ In addition to meeting the objectives at the SHC, LPCH, and SoM, the Village Concept Alternative would also include pedestrian linkages, which would enhance the bicycle and pedestrian connections between the SUMC Sites, the Stanford Shopping Center, PAITS, and nearby open space areas. These linkages would further the SUMC Project sponsors' objectives of providing efficient access to the SUMC Sites for healthcare providers and staff.

However, the Village Concept Alternative would not meet the SUMC Project sponsors' cost objective. Due to the housing unit component of this alternative, the cost of construction would be higher than proposed under the SUMC Project. The Village Concept Alternative would meet the majority of the SUMC Project sponsors' objectives, but would not minimize the initial cost to the greatest extent feasible.

Selected rows from Table 5-8 starting on page 5-51 have been revised as follows:

Table 5-8
Assessment of SUMC Project Alternatives (Compared to the SUMC Project)

Impact	SUMC Project	No Project Alternative A	No Project Alternative B	Reduced Intensity Alternative A	Reduced Intensity Alternative B	Tree Preservation Alternative	Historic Preservation Alternative	Village Concept Alternative
Transportation								
Intersection LOS	~~S/SU~~ S/LTS	NI	NI	NI	~~S/SU~~ S/LTS	~~S/SU~~ S/LTS	~~S/SU~~ S/LTS	~~S/SU~~ S/LTS
Air Quality								
Cumulative Impacts	S/SU	~~S/SU~~ LTS	S/SU	S/SU	S/SU	S/SU	S/SU	S/SU
Climate Change								
Consistency with Individual Policies of the Climate Protection Plan	S/~~SU~~ LTS	LTS	LTS	LTS	S/LTS	S/~~SU~~LTS	S/SU	S/~~SU~~LTS
Result in Significant Emissions of Greenhouse Gases	~~S/SU~~ LTS	LTS	LTS	LTS	~~S/~~LTS	~~S/SU~~LTS	S/SU	~~S/SU~~LTS
Population and Housing								
Cumulative Impacts	~~S/SU~~ LTS	NI	NI	NI	LTS	LTS	LTS	LTS

Draft EIR text on page 5-58, third paragraph, for No Project Alternative A, has been revised as follows:

Cumulative Impacts. ~~The SUMC Project's emissions of NOx during construction and of TACs during construction and operation were determined to have a cumulatively considerable contributions to significant cumulative impacts.~~ Under No Project Alternative A, emissions of NOx during construction would likely not exceed the Bay Area Air Quality Management District's (BAAQMD's) 80 lbs/day threshold ~~However, the TACs emitted during construction, though likely posing a lesser heath risk than those of the SUMC Project, would still make a cumulatively considerable contribution to the high TAC background levels of the area in which the SUMC Sites are located. Consequently, this alternative's cumulative TAC impacts would be cumulatively significant. Mitigation Measure AQ-1.2 would help reduce TAC emissions from this alternative, but not to a less than considerable level. Consequently~~ Therefore, this alternative's construction NOx emissions ~~cumulative TAC~~ impacts would be less than cumulatively significant. The TACs and fine particulate matter emitted during construction and operation, in combination with TACs and fine particulate matter emitted within the zone of influence for the SUMC Sites, would likely not exceed the cumulative significance thresholds of the 2010 BAAQMD CEQA Guidelines. (~~S/SU~~LTS)

The last paragraph on page 5-62, and the first five bullets on page 5-63, for No Project Alternative A, has been revised as follows:

Impacts on Protected Trees. There are ~~71~~ 74 Protected Trees that would be removed under the SUMC Project. No Project Alternative A would involve renovations and retrofits and would not expand existing facilities. While current biological conditions would generally remain the same, ground disturbance to reroute or extend utility lines to compliant and non-compliant structure would occur, thus potentially impacting Protected Trees. The removal of Protected Trees would result in a significant impact, although to a significantly lesser extent that the SUMC Project since this alternative would not construct new buildings at Kaplan Lawn and the FIM 1 grove. The following mitigation measures, as identified for the SUMC Project, would reduce this alternative's impact on Protected Trees. However, these mitigation measures would not be able to avoid and preserve all Protected Trees; therefore, No Project Alternative A would result in a significant and unavoidable impact, as with the SUMC Project. (S/SU)

- BR-4.1: Prepare a Tree Preservation Report for all Trees to be Retained
- BR-4.2: Prepare a Solar Access Study (SAS) of Short and Long Term Effects on Protected Oaks
- BR-4.3: Prepare a Tree Relocation Feasibility Plan for Any Protected Tree Proposed for Relocation and Retention
- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual
- BR-4.5: Provide Optimum Tree Replacement for Loss of Publicly-Owned Trees Regulated Tree Category.

The twelfth bullet under the first full paragraph on page 5-71 of the Draft EIR, for No Project Alternative B, has been revised as follows. In addition, a bullet has been added after the twelfth bullet, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

Draft EIR text on page 5-76, first paragraph, for No Project Alternative B, has been revised as follows:

Cumulative Impacts. ~~The SUMC Project's emissions of NOx during construction and of TACs during construction and operation were identified as making cumulatively considerable contributions to significant cumulative impacts.~~ Under No Project Alternative B, emissions of NOx during construction would also potentially exceed the BAAQMD's 80 lbs/day threshold, and could contribute to significant cumulative impacts. The TACs and fine particulate matter emitted during construction and operation, ~~though likely posing a lesser heath risk than those of the SUMC Project, would also make a cumulatively considerable contribution to the high TAC background levels of the area in which the SUMC Sites are located.~~ in combination with TACs and fine particulate matter emitted within the zone of influence for the SUMC Sites, would likely not exceed the cumulative significance thresholds of the 2010 BAAQMD CEQA Guidelines. Consequently, this alternative's cumulative TAC and fine particulate matter impacts would be less than cumulatively significant. ~~The same construction period mitigation measure mentioned above would help reduce TAC emission from this alternative, but not to a less than considerable level. Consequently~~ Therefore, only this alternative's construction NOx emissions ~~and cumulative TAC impacts~~ would be cumulatively significant. (S/SU)

The fourth bullet under the second full paragraph on page 5-80, for No Project Alternative B, has been revised as follows. In addition, a bullet has been added after the fourth bullet, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

The ninth bullet on page 5-91 of the Draft EIR, for Reduced Intensity Alternative A, has been revised as follows. In addition, a bullet has been added after the ninth bullet, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

Draft EIR text on page 5-95, second full paragraph, for Reduced Intensity Alternative A, has been revised as follows:

Cumulative Impacts. ~~The SUMC Project's emissions of NOx during construction and of TACs during construction and operation were identified as making cumulatively considerable contributions to significant cumulative impacts.~~ Under Reduced Intensity Alternative A, emissions

of NOx during construction would also potentially exceed the BAAQMD's 80 lbs/day threshold, and could contribute to significant cumulative impacts. The TACs and fine particulate matter emitted during construction and operation, ~~though likely posing a lesser heath risk than those of the SUMC Project, would also make a cumulatively considerable contribution to the high TAC background levels of the area in which the SUMC Sites are located.~~ in combination with TACs and fine particulate matter emitted within the zone of influence for the SUMC Sites, would likely not exceed the cumulative significance thresholds of the 2010 BAAQMD CEQA Guidelines. Consequently, this alternative's cumulative TAC and fine particulate matter impacts would be less than cumulatively significant. ~~The same construction period Mitigation Measure AQ-1.2, mentioned above, would help reduce TAC emission from this alternative, but not to a less than considerable level. Consequently~~ Therefore, only this alternative's construction NOx emissions ~~and cumulative TAC impacts~~ would be cumulatively significant. (S/SU)

The fourth bullet under the last paragraph on page 5-99, for Reduced Intensity Alternative A, has been revised as follows. In addition, a bullet has been added after the fourth bullet, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

The tenth bullet on page 5-110 of the Draft EIR, for Reduced Intensity Alternative B, has been revised as follows. In addition, a bullet has been added after the tenth bullet, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

Draft EIR text on page 5-113, second full paragraph is revised as follows:

Intersection LOS. Trip generation for the AM and PM Peak Hours for this alternative are approximately equivalent to 60 percent of the 2025 Buildout scenario of the SUMC Project. This alternative would result in a net increase of 486 vehicle trips in the AM Peak Hour and 469 vehicle trips in the PM Peak Hour. These trips result in significant impacts at ~~four~~ three intersections during AM Peak Hour and ~~10~~ nine intersections during the PM Peak Hour. Comparatively, the SUMC Project would significantly impact ~~five~~ four intersections in the AM Peak Hour and ~~12~~ 11 intersections in the PM Peak Hour. The intersection impacted by the SUMC Project but not by Reduced Intensity Alternative B in the AM Peak Hour is Galvez Street / Arboretum Road (intersection #37). The intersections impacted by the SUMC Project but not by Reduced Intensity Alternative B in the PM Peak Hour are El Camino Real / Page Mill Road – Oregon Expressway (intersection #16) and Junipero Serra Boulevard/Campus Drive West (intersection #26).

Draft EIR text on page 5-114, third and fifth bullet after the first paragraph, are revised as follows:

- TR-2.3: Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program.
- ~~TR-2.5: Coordinate with Other Jurisdictions for Potentially Feasible Roadway Improvements~~

Draft EIR text on page 5-114, second paragraph, is revised as follows:

After implementation of the most effective combination of these measures, including ~~T~~traffic-~~A~~adaptive ~~S~~signal technology, additional bicycle and pedestrian undercrossings, ~~and~~ an enhanced Stanford University TDM program, and feasible intersection improvements, there would no longer be any adversely impacted intersections in the AM and PM Peak Hours. ~~However, there would still be two adversely impacted intersections in the PM Peak Hour. Therefore, even with the implementation of these measures, there would still be a significant and unavoidable impact on intersection LOS, although to a lesser extent than with SUMC Project. (S/SU)~~ (LTS)

The second bullet under the fourth paragraph on page 5-114 of the Draft EIR has been revised as follows:

- TR-2.3: Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program.

Draft EIR text on page 5-115, second paragraph, is deleted as follow:

~~The safety hazard on Welch Road can be mitigated by requiring the SUMC Project sponsors to fund an independent traffic study to determine whether the private street connection between Roth Way and Pasteur Drive should be operated as a public street. The purpose of this study will be to analyze circulation patterns around and through the medical complex to determine if the private street connection between Roth Way and Pasteur Drive should be operated as a public street for all vehicular, bicycle, pedestrian and transit traffic.~~

Draft EIR text on page 5-115, seventh paragraph, under Reduced Intensity Alternative B, is revised as follows:

Transit Impacts. Just as with the SUMC Project, Reduced Intensity Alternative B ~~would increase on site employment and visitoriship, and this increase would in turn result in increased ridership on the routes serving the SUMC Sites. The resulting increase in ridership could exceed the capacity of the various transit services to and from the SUMC Sites. As such, the Reduced Intensity Alternative B could result in a significant impact on transit.~~ would not adversely impact either AM or PM Peak Hour bus service in Palo Alto or Caltrain service, with or without to GO Pass mitigation measure. Nonetheless, mitigation to provide enhanced bus stops and shuttle service is identified here.

Draft EIR text on page 5-116, second paragraph, under Reduced Intensity Alternative B, is revised as follows:

> ~~However, the success of the TDM program would also mean increased transit ridership. This increased ridership could push load factors above 1.0, indicating overcrowding on the buses. Impacts to transit service are considered a significant impact according to City of Palo Alto criteria.~~

Draft EIR text on page 5-116 Section 5, third paragraph, under Reduced Intensity Alternative B, is revised as follow:

> Therefore, with implementation of the following mitigation measures involving the addition of two ~~transit centers~~ enhanced bus stops at ~~LPCH and~~ SHC and Hoover Pavilion, and the expansion of transit service, this alternative would have a less-than-significant transit impact, like the SUMC Project. (S/LTS)
>
> - TR-7.1: Incorporate ~~Transit Centers~~ Enhanced Bus Stops into Site Plans
> - TR-7.2: Provide Expanded ~~Public~~ Transit Service

Draft EIR text on page 5-118, last paragraph, for Reduced Intensity Alternative B, has been revised as follows:

> **Cumulative Impacts**. ~~The SUMC Project's emissions of NOx during construction and of TACs during construction and operation were identified as making cumulatively considerable contributions to significant cumulative impacts.~~ Under Reduced Intensity Alternative B, emissions of NOx during construction would also potentially exceed the BAAQMD's 80 lbs/day threshold, and could contribute to significant cumulative impacts. The TACs and fine particulate matter emitted during construction and operation, ~~though likely posing a lesser heath risk than those of the SUMC Project, would also make a cumulatively considerable contribution to the high TAC background levels of the area in which the SUMC Sites are located.~~ in combination with TACs and fine particulate matter emitted within the zone of influence for the SUMC Sites, would likely not exceed the cumulative significance thresholds of the 2010 BAAQMD CEQA Guidelines. Consequently, this alternative's cumulative TAC and fine particulate matter impacts would be less than cumulatively significant. ~~The same construction period Mitigation Measure AQ-1.2, mentioned above, would help reduce TAC emission from this alternative, but not to a less than considerable level Consequently~~ Therefore, only this alternative's construction NOx emissions ~~and cumulative TAC impacts~~ would be cumulatively significant. (S/SU)

Draft EIR text on page 5-119, first full paragraph, has been revised as follows:

> **Consistency with the Climate Protection Plan.** Reduced Intensity Alternative B is assumed to include the Emissions Reduction Program proposed under the SUMC Project. However, the Emissions Reduction Program would not ensure that Reduced Intensity Alternative B would further some of the individual policies of the Climate Protection Plan.

Draft EIR text on page 5-119, last paragraph, fourth sentence, has been revised as follows:

> This alternative is anticipated to result in approximately ~~75~~ 83 percent of the emissions anticipated with the proposed SUMC Project or approximately ~~56,296~~ 38,250 metric tons CO_2e per year, which is a ~~25~~ 29 percent increase from existing emissions. This alternative, including the Emissions Reduction Program, would reduce greenhouse gas emissions by approximately ~~9~~ 34 percent compared with BAU emissions for this alternative (calculations are provided in Appendix V of the Responses to Comments document). ~~Therefore, Reduced Alternative B must employ additional mitigation measures to further reduce emission impacts.~~ This analysis uses the 30 percent BAU emissions target reduction for 2020 as the criterion for assessing a quantitative compliance with the goals of the Climate Protection Plan. However, without mitigation measures similar to those proposed for the SUMC Project the Emissions Reduction Program would not ensure that Reduced Intensity Alternative B would further some of the individual policies of the Climate Protection Plan.

Draft EIR text on page 5-120, third bullet, has been revised as follows:

- CC-1.2: Participation in a Renewable ~~Palo Alto Green~~ Energy Program.

Draft EIR text on page 5-120, second paragraph, has been revised as follows:

> Incorporation of design features and mitigation measures would reduce emissions from Reduced Intensity Alternative B to ~~38,107~~ 21,403 metric tons CO_2e per year, a reduction of ~~32.18~~ 16.93 percent from the SUMC Project and ~~32.31~~ 44.04 percent from BAU emissions for this alternative (see Appendix V of the Responses to Comments document for calculations). This reduction exceeds the 30 percent reduction from BAU emissions and furthers the goals of the City's Climate Protection Plan. However, without mitigation measures similar to those proposed for the SUMC Project, the Emissions Reduction Program would not ensure that Reduced Intensity Alternative B would further some of the individual policies of the Climate Protection Plan. Therefore, with incorporation of Mitigation Measures CC-1.1 through CC-1.4, and TR-2.3, ~~and possibly PH 3.1,~~ Reduced Intensity Alternative B's contribution to global climate change would be less than cumulatively considerable. (S/LTS)

The second bullet on page 5-124, for Reduced Intensity Alternative B, has been revised as follows. In addition, a bullet has been added after the second bullet, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

Draft EIR text on page 5-128, second bullet, is revised as follows:

- HM-3.3: Conduct a Soil ~~Vapor~~ Excavation Program at the Hoover Pavilion Site

The last paragraph on page 5-130 is revised as follows:

> **Jobs to Employed Residents Ratio.** As discussed in Section 3.13, Population and Housing, the jobs to employed residents ratio impact is not, by itself, considered an environmental impact;

however, it is analyzed because this impact would result in secondary environmental impacts on air quality ~~and climate change~~. Specifically, as with the SUMC Project, Reduced Intensity Alternative B's impact on the jobs to employed residents ratio would result in increased commute traffic, which is a significant contributor to this alternative's significant and unavoidable impacts on air quality ~~and climate change~~. As such, the analysis below identifies additional mitigation measures relating to the jobs to employed residents ratio~~, with additional measures~~ that the City can consider as a means for further mitigating those significant environmental impacts identified for air quality ~~and climate change~~.

The second sentence of the second paragraph on page 5-131 is revised as follows:

Instead, this mitigation measure shall be considered as possible additional mitigation for impacts identified under air quality ~~and climate change~~.

The tenth bullet on page 5-136 of the Draft EIR, for the Tree Preservation Alternative, has been revised as follows. In addition, a bullet has been added after the tenth bullet, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

Draft EIR text on page 5-141, first paragraph under Intersection LOS, is revised as follows:

Intersection LOS. Trip generation for the AM Peak Hour and the PM Peak Hour for the Tree Preservation Alternative would be the same as the SUMC Project. There would be a net increase of 766 vehicle trips in the AM Peak Hour and 746 vehicle trips in the PM Peak Hour. These trips result in significant impacts at ~~five~~ four intersections during the AM Peak Hour and ~~12~~ 11 intersections during the PM Peak Hour.

Draft EIR text on pages 5-141 through 5-142, starting on the last paragraph under Intersection LOS, is revised as follows:

A more viable approach to mitigation involves the implementation of several more feasible measures, each of which would contribute to a partial reduction in this alternative's impacts. These measures include the installation of traffic-adaptive signal technology in selected corridors, the construction of two additional bicycle and pedestrian undercrossings in Palo Alto and Menlo Park, the provision of an enhanced TDM program, and implementation of intersection improvements that are considered to be feasible. These measures may be combined as described in Section 3.4, Transportation. ~~However, as~~ As indicated in Section 3.4, Transportation, ~~even~~ with the most effective combination of mitigation measures, the SUMC Project as well as this alternative would have ~~significant and unavoidable~~ a less-than-significant impact on ~~three~~ study intersections. ~~Therefore, the Tree Preservation Alternative would have significant and unavoidable impacts on intersection LOS, like the SUMC Project. (S/SU)~~ (LTS)

- TR-2.1: Install Traffic-Adaptive Signal Technology
- TR-2.2: Fund Additional Bicycle and Pedestrian Undercrossings

- TR-2.3: Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program
- TR-2.4: Fund or Implement those Intersection Improvements that Have Been Determined to be Feasible
- ~~TR-2.5: Coordinate with Other Jurisdictions for Potentially Feasible Roadway Improvements~~

The second bullet under the second full paragraph on page 5-142 of the Draft EIR has been revised as follows:

- TR-2.3: Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program.

Draft EIR text on page 5-142, first sentence of paragraph five, is deleted as follow:

~~The safety hazard on Welch Road can be mitigated by requiring the SUMC Project sponsors to fund an independent traffic study to determine whether the private street connection between Roth Way and Pasteur Drive should be operated as a public street.~~

Draft EIR text on page 5-142, the first bullet of paragraph five, is deleted as follow:

- ~~TR-4.1: Fund Traffic Impact Study~~

Draft EIR text on page 5-143, under the Tree Preservation Alternative, has been revised as follow:

With implementation of the following mitigation measures involving the modification of project design to include the addition of two ~~transit centers~~ enhanced bus stops, and the expansion of public transit service, this alternative would have a less-than-significant transit impact, like the SUMC Project. (S/LTS)

- TR-7.1: Incorporate ~~Transit Centers~~ Enhanced Bus Stops into Site Plans
- TR-7.2: Provide Expanded ~~Public~~ Transit Service

Draft EIR text on page 5-143, third and fifth paragraphs under the Tree Preservation Alternative, is revised as follows:

Transit Impacts. Just as with the SUMC Project, the Tree Preservation Alternative ~~would increase on site employment, and this increase would in turn result in increased ridership on the routes serving the SUMC Sites. The resulting increase in ridership could exceed the capacity of the various transit services to and from the SUMC Sites. As such, the Tree Preservation Alternative could result in a significant impact on transit.~~ would not adversely impact either AM or PM Peak Hour bus service in Palo Alto or Caltrain service, with or without to GO Pass mitigation measure. Nonetheless, mitigation to provide enhanced bus stops and shuttle service is identified here.

~~The success of the TDM program under Mitigation Measure TR-2.3 would also mean increased transit ridership. This increased ridership could push load factors above 1.0, indicating~~

~~overcrowding on buses. Impacts to transit service in the Study Area are considered a significant impact according to City of Palo Alto criteria.~~

Draft EIR text on page 5-146, second full paragraph, for the Tree Preservation Alternative, has been revised as follows. Please note that Table 5-11A, as provided below, is new and not included in the Draft EIR.

Cumulative Impacts. ~~The SUMC Project's emissions of NOx during construction and of TACs during construction and operation were identified as making cumulatively considerable contributions to significant cumulative impacts.~~ Under the Tree Preservation Alternative, emissions of NOx during construction would ~~not~~ potentially exceed the BAAQMD's 80 lbs/day threshold, ~~but~~ and could ~~still~~ contribute to significant cumulative impacts on future regional ozone levels. ~~Similar to the SUMC Project, t~~The TACs and fine particulate matter emitted during construction ~~of the Tree Preservation Alternative would also make a cumulatively considerable contribution to the high TAC background levels of the area in which the SUMC Sites are located.~~ and operation, in combination with TACs and fine particulate matter emitted within the zone of influence for the SUMC Sites, would not exceed the cumulative significance thresholds of the 2010 BAAQMD CEQA Guidelines, as demonstrated by the cumulative risk assessment shown in Table 5-11A. Consequently, this alternative's cumulative TAC and fine particulate matter impacts would be less than cumulatively significant. ~~Mitigation Measure AQ-1.2 would help reduce TAC emission from this alternative, but not to a less than considerable level. Consequently~~ Therefore, only this alternative's construction NOx emissions ~~and cumulative TAC impacts~~ would be cumulatively significant. (S/SU)

- ~~AQ-1.2: Implement Diesel Emission Reduction Measures~~

Table 5-11A
Cumulative Impacts from the Tree Preservation Alternative and Other Sources within the Project Site Zone of Influence

	Cancer Risk (per million)			Chronic Hazard Index			$PM_{2.5}$ Concentration (ug/m3)		
Modeled Source	**SHC Patient**	**LPCH Patient**	**Offsite Resident**	**SHC Patient**	**LPCH Patient**	**Offsite Resident**	**SHC Patient**	**LPCH Patient**	**Offsite Resident**
Project Diesel Generators	0.06	0.07	1.0[a]	0.0006	0.0002	0.0004[a]	0.003	0.0009	0.002
Project Loading Docks	0.007	0.02		0.0	0.0		0.0	0.0	
Existing Point Sources[b]	0.2	0.4	2.8	0.002	0.002	0.0	0.008	0.006	0.005
Existing Loading Docks	0.1	0.2	7.0	0.0008	0.0006	0.003	0.004	0.003	0.01
Traffic	0.3	0.6	17.5	0.00	0.00	0.01	0.1	0.1	0.18
Gas Dispensing Facility	0.1	0.3	2.0	0.002	0.002	0.002	0	0	0
Total Cumulative Sources	**0.8**	**1.6**	**30.0**	**0.01**	**0.006**	**0.01**	**0.1**	**0.07**	**0.2**
BAAQMD Cumulative CEQA Threshold		**100**			**10**			**0.8**	
Cumulative Impact?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**

Source: Environ, January 2011.

Note:

a. Only total risk, HI and $PM_{2.5}$ exposures from combined generator and loading dock sources were determined, not the individual contributions from each source type.

b. Modeled sources include onsite and offsite diesel generators and the cogeneration power plant.

Draft EIR text on page 5-147, second paragraph, has been revised as follows:

For the new and expanded ~~h~~Hospital facilities, the Tree Preservation Alternative would include an Emissions Reduction Program for minimizing greenhouse gas emissions associated with new building construction and operation, similar to the SUMC Project. The programs implemented at the facilities would minimize greenhouse gas at those facilities similarly to the proposed SUMC Project's reduction of approximately ~~6~~ 36.09 percent, compared to BAU emissions, without mitigation. ~~AB 32, the CARB's Scoping Plan, incorporates a 30 percent reduction target from 2020 BAU emissions limits. The City's Climate Protection Plan's incorporates this BAU approach to quantify emissions from significant, new project which were not included in the City's existing inventory. As such, this analysis applies the 2020 reduction goal (equivalent to 30 percent below BAU) as a target threshold for compliance with the City Climate Protection Plan. Like the SUMC Project, this alternative would not meet the standards of reducing emissions by 30 percent compared to BAU emissions. Therefore, the Tree Preservation Alternative must employ additional mitigation measures to further reduce emissions impacts.~~ This analysis uses the 30 percent BAU emissions target reduction for 2020 as the criterion for assessing a quantitative compliance with the goals of the Climate Protection Plan. However, without mitigation measures similar to those proposed for the SUMC Project, the Emissions Reduction Program would not ensure that the Tree Preservation Alternative would further some of the individual policies of the Climate Protection Plan.

Draft EIR text on page 5-147, third bullet, has been revised as follows:

- CC-1.2: Participation in a Renewable ~~Palo Alto Green~~ Energy Program.

Draft EIR text on page 5-147, fourth paragraph, has been revised as follows:

~~Notwithstanding all of these features that satisfy individual policies set forth in the Climate Change Plan, as with the SUMC Project, the Tree Preservation Alternative would still result in a significant overall increase in greenhouse gas emissions within the City, in contravention of the overall goals of the Climate Protection Plan. As emissions from the Tree Preservation Alternative would be similar to the SUMC Project, it is anticipated that, as with the SUMC Project, the reductions afforded by the proposed mitigation would not reduce emissions to a level 30 percent below BAU. Therefore, emissions from the proposed Tree Preservation Alternative are considered significant and unavoidable. (S/SU)~~ With Mitigation Measure TR 2.3, greenhouse gas emissions would be reduced by 44.09 percent from the BAU estimates in the year 2025. Further, with the implementation of the mitigation measures the Tree Preservation Alternative would comply with the individual policies in the City of Palo Alto's Climate Protection Plan. Therefore, emissions from the proposed Tree Preservation Alternative are considered less than cumulatively considerable. (S/LTS)

Draft EIR text on page 5-147 through 5-148, starting at the fifth paragraph, has been revised as follows:

Result in Significant Emissions of Greenhouse Gases. ~~Even with the implementation of all feasible mitigation measures, it~~ It is anticipated that emissions reductions afforded the Tree Preservation Alternative would ~~not~~ achieve ~~either~~ both the City of Palo Alto's Climate Protection Plan and the CARB's reduction emission goal of 30 percent below BAU. Because these reduction levels ~~cannot~~ are ~~be~~ achieved, the Tree Preservation Alternative would not emit significant amounts of greenhouse gases and would have a less than cumulatively considerable contribution to global climate change. (S/~~SU~~ LTS)

Draft EIR text on page 5-149, second bullet, subsection (a), has been revised as follows:

a. Require construction contractors to use noise-reducing pile driving techniques, including pre-drilling pile holes (if feasible, based on soils) to the maximum feasible depth, ~~installing~~ verify that manufacturer-provided intake and exhaust mufflers on pile driving equipment are present, vibrating piles into place when feasible, and installing shrouds around the pile driving hammer where feasible.

The text on pages 5-152 through 5-153, starting at the last paragraph on page 5-152 under the subheader "Impacts on Protected Trees," has been revised as follows:

Impacts on Protected Trees. The Tree Preservation Alternative would seek to retain as many Protected Trees as feasible. The SUMC Project would result in the removal of up to ~~71~~ 74 Protected Trees, ~~23~~ 13 of which are considered to be biological~~ly~~ and aesthetic~~ally significant~~ tree resources, as discussed in more detail in Section 3.9, Biological Resources. Additionally, the SUMC Project would retain five trees that have been identified as biological and aesthetic tree

resources, for a total of 18 of these Protected Trees. The Tree Preservation Alternative would reduce the impact to Protected Trees, particularly the trees that are considered to be biological~~ly~~ and aesthetical~~ly significant~~ tree resources as compared to the SUMC Project. However, this alternative would still result in the removal of up to ~~48~~ 59 Protected Trees that do not fall under biological~~ly~~ and aesthetic~~ally significant~~ tree resource distinction and the ~~removal or~~ relocation of an additional ~~10~~ three biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources. Therefore, although to a lesser extent than the SUMC Project, the Tree Preservation Alternative would still result in a significant impact to Protected Trees.

The Tree Preservation Alternative focuses on protecting the biological~~ly~~ and aesthetic~~ally significant trees~~ tree resources located in the Kaplan Lawn, the FIM 1 Grove, and along Welch Road. Although the site plans for the SHC Hospital building, FIM 1, and circulation have been modified to retain and avoid as many biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources as possible, some would still need to be relocated~~ or removed~~, as shown in Figure 5-1 and explained in more detail below:

- *Kaplan Lawn*. All nine existing Protected Trees in Kaplan Lawn would be retained in place and protected under this alternative.
- *FIM 1 Grove*. There are currently ~~12~~ seven Protected Trees that are aesthetic tree resources in the FIM 1 Grove. Under the Tree Preservation Alternative, ~~three~~ five trees that are aesthetic tree resources would be retained and two trees that are aesthetic tree resources would be relocated to a different location in the vicinity of the Main SUMC Site. ~~The other seven biologically and aesthetically significant Protected Trees at the FIM 1 Grove would be removed.~~
- *Adjacent to Welch Road*. The century-old solitary oak located between Welch Road to the north and the Blake-Wilbur Clinic building to the south would be retained in place under this alternative. The mature and healthy Protected oak tree located to the east of the proposed LPCH hospital building, along Welch Road would be relocated to another area in the vicinity of the Main SUMC Site.

Overall, under the Tree Preservation Alternative, a total of up to ~~58~~ 62 Protected Trees could be removed or relocated. Of these Protected Trees, ~~48~~ 59 Protected Trees that are not considered ~~biologically and aesthetically significant~~ aesthetic tree resources would be removed~~,~~. Under the SUMC Project, 61 Protected Trees that are not aesthetic tree resources would be removed; however, the Tree Preservation Alternative would retain two of these trees located at the corner of Welch Road and Pasteur Drive. These two Protected Trees would not be removed under the Tree Preservation Alternative since the footprint of the parking structure would be reduced by constructing three levels of underground parking and four levels of aboveground parking. Additionally, under the SUMC Project, up to 13 Protected Trees that are aesthetic tree resources would be potentially subject to removal. No Protected Tree that is an aesthetic tree resource would be removed under the Tree Preservation Alternative. ~~seven biologically and aesthetically significant Protected Trees would be removed, and~~ In addition to the 59 Protected Trees to be removed under the Tree Preservation Alternative that are not aesthetic tree resources, three biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources would be relocated. ~~While~~

~~the Tree Preservation Alternative would seek to preserve these three of the Protected Trees through relocation, the survival of these trees is not guaranteed; therefore, for the purposes of this analysis the trees are considered to be removed.~~ As such, the removal of up to ~~58~~ 59 Protected Trees would be a significant impact, although to a lesser extent than the SUMC Project, which would remove up to ~~71~~ 74 Protected Trees. The following mitigation measures, as identified for the SUMC Project, would reduce the Tree Preservation Alternative's impact on Protected Trees to be retained and relocated. Unlike the SUMC Project, the Tree Preservation Alternative would not require Mitigation Measure BR-4.6, involving site plan modifications, since such modifications are already incorporated into this alternative. However, these measures would not be able to avoid the removal of up to ~~58~~ 59 Protected Trees and therefore, even with the implementation of the below mitigation measures, the Tree Preservation Alternative would result in a significant and unavoidable impact. (S/SU)

- BR-4.1: Prepare a Tree Preservation Report for all Trees to be Retained
- BR-4.2: Prepare a Solar Access Study (SAS) of Short and Long Term Effects on Protected Oaks
- BR-4.3: Prepare a Tree Relocation Feasibility Plan for Any Protected Tree Proposed for Relocation and Retention
- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual
- BR-4.5: Provide Optimum Tree Replacement for Loss of Publicly-Owned Trees Regulated Tree Category.

Draft EIR text on page 5-159, after the second full paragraph, third bullet, is revised as follows:

- HM-3.3: Conduct a Soil ~~Vapor~~ Excavation Program at the Hoover Pavilion Site

The last paragraph on page 5-161, continuing to page 5-162 of the Draft EIR, is revised as follows:

Jobs to Employed Residents Ratio. As discussed in Section 3.13, Population and Housing, the jobs to employed residents ratio impact is not, by itself, considered an environmental impact; however, it is analyzed because this impact would result in secondary environmental impacts on air quality ~~and climate change~~. Specifically, as with the SUMC Project, the Tree Preservation Alternative's impact on the jobs to employed residents ratio would result in increased commute traffic, which is a significant contributor to this alternative's significant and unavoidable impacts on air quality ~~and climate change~~. As such, the analysis below identifies additional mitigation measures relating to the jobs to employed residents ratio~~, with additional measures~~ that the City can consider as a means for further mitigating those significant environmental impacts identified for air quality ~~and climate change~~.

The second sentence of the third full paragraph on page 5-162 of the Draft EIR is revised as follows:

Instead, this mitigation measure shall be considered as possible additional mitigation for impacts identified under air quality ~~and climate change~~.

The tenth bullet on page 5-167 of the Draft EIR, for the Historic Preservation Alternative, has been revised as follows. In addition, a bullet has been added after the tenth bullet, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

Draft EIR text on pages 5-170 through 5-171, starting at the third paragraph under Intersection LOS, is revised as follows:

Intersection LOS. Trip generation for the AM Peak Hour and the PM Peak Hour for the Historic Preservation Alternative would be the same as the SUMC Project: a net increase of 766 vehicle trips in the AM Peak Hour and 746 vehicle trips in the PM Peak Hour. These trips result in significant impacts at ~~five~~ four intersections during the AM Peak Hour and ~~12~~ 11 intersections during the PM Peak Hour.

The same intersection improvements listed for the ~~2025 Full Buildout scenario~~ SUMC Project in Section 3.4, Transportation, would mitigate all of the significantly affected intersections under this alternative. ~~However, several of these roadway capacity improvements are considered to be infeasible.~~

A more viable approach to mitigation involves the implementation of several more feasible measures, each of which would contribute to a partial reduction in the project's impacts. These measures include the installation of traffic-adaptive signal technology in selected corridors, the construction of two additional bicycle and pedestrian undercrossings in Palo Alto and Menlo Park, the provision of an enhanced TDM program, and implementation of intersection improvements that are considered to be feasible. ~~However, as~~ As with the SUMC Project, ~~even~~ with the implementation of these mitigation measures, there would ~~still~~ not be a significant and unavoidable impact on any intersections LOS under the Historic Preservation Alternative. Therefore, the Historic Preservation Alternative would have less-than-significant ~~and unavoidable~~ impacts on intersection LOS, like the SUMC Project. ~~(S/SU)~~ (LTS)

- TR-2.1: Install Traffic-Adaptive Signal Technology
- TR-2.2: Fund Additional Bicycle and Pedestrian Undercrossings
- TR-2.3: Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program
- TR-2.4: Fund or Implement those Intersection Improvements that Have Been Determined to be Feasible
- ~~TR-2.5: Coordinate with Other Jurisdictions for Potentially Feasible Roadway Improvements~~

The second bullet after the third paragraph on page 5-171 of the Draft EIR has been revised as follows:

- TR-2.3: Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program.

Draft EIR text on page 5-172, fourth paragraph, under Historic Preservation Alternative, is revised as follows:

> *Transit Impacts*. Just as with the SUMC Project, the Historic Preservation Alternative~~ would increase on-site employment and visitoriship, and this increase would in turn result in increased ridership on the routes serving the SUMC Sites. The resulting increase in ridership could exceed the capacity of the various transit services to and from the SUMC Sites. As such, the Reduced Intensity Alternative B could result in a significant impact on transit.~~ would not adversely impact either AM or PM Peak Hour bus service in Palo Alto or Caltrain service, with or without to GO Pass mitigation measure. Nonetheless, mitigation to provide enhanced bus stops and shuttle service is identified here.

Draft EIR text on page 5-173, first paragraph, under Historic Preservation Alternative, is revised as follows:

> ~~However, the success of the TDM program would also mean increased transit ridership. This increased ridership could push load factors above 1.0, indicating overcrowding on the buses. Impacts to transit service are considered a significant impact according to City of Palo Alto criteria.~~

Draft EIR Section 5, Alternatives, page 5-173, under the Historic Preservation Alternative, has been revised as follow:

> Therefore, with implementation of the following mitigation measures involving the modification of the SUMC Project's design to include the addition of two ~~transit centers~~ enhanced bus stops, and the expansion of public transit service, this alternative would have a less-than-significant transit impact, like the SUMC Project. (S/LTS)
>
> - TR-7.1: Incorporate ~~Transit Centers~~ Enhanced Bus Stops into Site Plans
> - TR-7.2: Provide Expanded ~~Public~~ Transit Service

Draft EIR text on page 5-175, for the Historic Preservation Alternative, first full paragraph, has been revised as follows:

> **Cumulative Impacts.** ~~The SUMC Project's emissions of NOx during construction and of TACs during construction and operation were identified as making cumulatively considerable contributions to significant cumulative impacts.~~ Under the Historic Preservation Alternative, emissions of NOx during construction would also potentially exceed the BAAQMD's 80 lbs/day threshold, and could contribute to significant cumulative impacts. The TACs and fine particulate matter emitted during construction,~~ though likely posing a lesser heath risk than those of the SUMC Project, would also make a cumulatively considerable contribution to the high TAC background levels of the area in which the SUMC Sites are located.~~ in combination with TACs and fine particulate matter emitted within the zone of influence for the SUMC Sites, would likely not exceed the cumulative significance thresholds of the 2010 BAAQMD CEQA Guidelines. Consequently, this alternative's cumulative TAC and fine particulate matter impacts would be less than cumulatively significant.~~ The same construction period Mitigation Measure AQ-1.2,~~

~~mentioned above, would help reduce TAC emission from this alternative, but not to a less than considerable level. Consequently~~ Therefore, only this alternative's construction NOx emissions ~~and cumulative TAC impacts~~ would be cumulatively significant. (S/SU)

Draft EIR text on page 5-175, second full paragraph, has been revised as follows:

Consistency with the Climate Protection Plan. The Historic Preservation Alternative is assumed to include the Emissions Reduction Program proposed under the SUMC Project. However, the Emissions Reduction Program would not ensure that the Historic Preservation Alternative would further some of the individual policies and the numeric goals of the Climate Protection Plan.

Draft EIR text on page 5-176, first full paragraph, has been revised as follows:

~~AB 32, the CARB's Scoping Plan, incorporates a 30 percent reduction target from 2020 BAU emissions limits. The City's Climate Protection Plan's incorporates this BAU approach to quantify emissions from significant, new project which were not included in the City's existing inventory. As such, this analysis applies the 2020 reduction goal (equivalent to 30 percent below BAU) as a target threshold for compliance with the City Climate Protection Plan. As it is anticipated that the Historic Preservation Alternative may result in increased emissions from and therefore less of a reduction than the approximately 6 percent anticipated with the proposed SUMC Project, the Historic Preservation Alternative must employ additional mitigation measures to further reduce emission impacts.~~ For the new Hospital facilities, the Historic Preservation Alternative is assumed to include an Emissions Reduction Program for minimizing greenhouse gas emissions associated with new building operation, similar to the SUMC Project. The programs would minimize greenhouse gas at those facilities; however, the energy efficiencies of the preserved buildings would remain as they are. This would result in a potential increase in emissions beyond what is presented for the SUMC Project and potentially would result in an emission reduction of less than 30 percent from BAU. This analysis uses the 30 percent BAU emissions target reduction for 2020 as the criterion for assessing a quantitative compliance with the numeric goals of the Climate Protection Plan.

Draft EIR text on page 5-176, third bullet, has been revised as follows:

- CC-1.2: Participation in a Renewable ~~Palo Alto Green~~ Energy Program.

Draft EIR text on page 5-176, third full paragraph, has been revised as follows:

~~Notwithstanding all of these features that satisfy individual policies set forth in the Climate Change Plan, as with the SUMC Project, the HistoricPreservation Alternative would still result in a significant overall increase in greenhouse gas emissions within the City, in contravention of the overall goals of the Climate Protection Plan. As emissions from the Tree Preservation Alternative would be similar to the SUMC Project, it is anticipated that, as with the SUMC Project, the reductions afforded by the proposed mitigation would not reduce emissions to a level 30 percent below BAU. Therefore, emissions from the proposed Tree Preservation Alternative are considered significant and unavoidable.~~ With the implementation of the mitigation measures, the Historic Preservation Alternative would comply with the individual policies in the City of Palo Alto's

Climate Protection Plan. However, the energy efficiencies of the preserved buildings would remain as they are. This would result in a potential increase in emissions beyond what is presented for the SUMC Project and potentially would result in an emission reduction of less than 30 percent from BAU. Therefore, emissions from the Historic Preservation Alternative are considered significant and unavoidable. (S/SU)

Draft EIR page 5-176, fourth paragraph, has been revised as follows:

Result in Significant Emissions of Greenhouse Gases. ~~Even w~~ With the implementation of all feasible mitigation measures, it is anticipated that emissions reductions afforded the Historic Preservation Alternative would not necessarily achieve either the City of Palo Alto's Climate Protection Plan or the CARB's reduction emission goal of 30 percent below BAU emissions. Because the higher energy consuming buildings would be maintained with limited upgrades or new construction, the reductions afforded building efficiency would only be attributable to the upgrades and new buildings. Because the~~se~~ 30 percent below BAU reduction levels is dependent on the replacement of older buildings with new, higher efficiency buildings, attainment of this level of reduction cannot be anticipated. ~~achieved,~~ Therefore, the Historic Preservation Alternative would potentially emit significant amounts of greenhouse gases and would have a cumulatively considerable contribution to global climate change. (S/SU)

The text on page 5-182 of the Draft EIR, starting at the second paragraph, has been revised as follows:

Impacts on Protected Trees. The Historic Preservation Alternative would result in the removal of several trees, although to a lesser extent than the SUMC Project. As discussed in Section 3.9, Biological Resources, the SUMC Project would result in the removal of up to ~~71~~ 74 Protected Trees, ~~23~~ 13 of which are considered to be biological~~ly~~ and aesthetic~~ally significant~~ tree resources. Although the Historic Preservation Alternative would attempt to protect these biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources, this alternative would still result in the removal of several Protected Trees at the SUMC Sites that do not fall under this distinction. Therefore, the Historic Preservation Alternative would still result in a significant impact to Protected Trees.

However, unlike the SUMC Project, the Historic Preservation Alternative would retain or relocate all of the designated biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources. There are nine of these Protected Trees located in Kaplan Lawn, and since a hospital module six would not be constructed under this alternative in the Kaplan Lawn, all Protected Trees in Kaplan Lawn would be retained. In addition, since the 1959 Hospital Building complex would remain, the FIM 1 building would not be constructed in the FIM 1 grove. As such, all ~~12~~ seven biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources in the FIM 1 grove would be retained in place. Additionally, the two biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources adjacent to Welch Road would either be retained or relocated.

The second bullet on page 5-183, for the Historic Preservation Alternative, has been revised as follows. In addition, a bullet under the fourth bullet has been added, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

Draft EIR text on page 5-188, third bullet, is revised as follows:

- HM-3.3: Conduct a Soil ~~Vapor~~ Excavation Program at the Hoover Pavilion Site

The fourth paragraph on page 5-190 of the Draft EIR is revised as follows:

> **Jobs to Employed Residents Ratio.** As discussed in Section 3.13, Population and Housing, the jobs to employed residents ratio impact is not, by itself, considered an environmental impact; however, it is analyzed because this impact would result in secondary environmental impacts on air quality ~~and climate change~~. Specifically, as with the SUMC Project, the Historic Preservation Alternative's impact on the jobs to employed residents ratio would result in increased commute traffic, which is a significant contributor to this alternative's significant and unavoidable impacts on air quality ~~and climate change~~. As such, the analysis below identifies additional mitigation measures relating to the jobs to employed residents ratio, ~~with additional measures~~ that the City can consider as a means for further mitigating those significant environmental impacts identified for air quality ~~and climate change~~.

The first sentence of the last paragraph on page 5-190 of the Draft EIR is revised as follows:

> The ~~Village Concept~~ Historic Preservation Alternative would result in the same increase in employment as the SUMC Project. As with the SUMC Project, the Historic Preservation Alternative would be constructed and operational by 2025.

The second sentence of the first full paragraph on page 5-191 of the Draft EIR is revised as follows:

> Implementation of Mitigation Measure PH-3.1, as proposed for the SUMC Project, is not directly required in order to mitigate a significant environmental impact under the Historic Preservation Alternative. Instead, this mitigation measure shall be considered as possible additional mitigation for impacts identified under air quality ~~and climate change~~.

The second bullet on page 5-196 of the Draft EIR, for the Village Concept Alternative, has been revised as follows. In addition, a bullet has been added after the second bullet, as follows:

- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance
- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual

Draft EIR text on page 5-200, second and third paragraphs, is revised as follows:

> Vehicle trip generation for the AM Peak Hour for this alternative would be approximately three percent higher than for the SUMC Project and vehicle trip generation for the PM Peak Hours for

this alternative would be approximately ~~two to~~ ~~five~~ seven percent lower than for the SUMC Project. This alternative would result in a net ~~decrease~~ increase from the SUMC Project of ~~14~~ 25 vehicle trips in the AM Peak Hour and a net decrease of ~~37~~ 49 vehicle trips in the PM Peak Hour.

The vehicle trips from this alternative would result in significant impacts at ~~six~~ five intersections during the AM Peak Hour and ~~12~~ 11 intersections during the PM Peak Hour. Comparatively, the SUMC Project would significantly impact ~~five~~ four intersections in the AM Peak Hour and ~~12~~ 11 intersections in the PM Peak Hour. Therefore, this alternative would result in one additional intersection (Alpine Road / I-280 southbound off-ramp) being impacted in the AM Peak Hour, than with the SUMC Project. This increase is largely due to the different assumptions regarding the residents of the three housing sites on Quarry and Sand Hill Roads~~.~~ ~~That is, the~~ The SUMC employees are assumed to have spouses and children (average family size of 2.2 persons per unit). Even though the member of the family that is working at the SUMC Sites may be walking to work, the other adult family members may also be working (at someplace other than the SUMC Sites), and would contribute vehicle trips to the surrounding roadway network and intersections.

Draft EIR text on page 5-201, second sentence of first paragraphs, is revised as follows:

Therefore, the pedestrian enhancements mentioned above that are part of the Village Concept Alternative could increase the number of adversely impacted intersections above ~~six~~ five in the AM Peak Hour, and ~~12~~ 11 in the PM Peak Hour.

Draft EIR text on page 5-201, third paragraph, is revised as follows:

A more viable approach to mitigation involves the implementation of several more feasible measures, each of which would contribute to a partial reduction in the Village Concept Alternative's impacts. These measures include the installation of traffic-adaptive signal technology in selected corridors, the construction of two additional bicycle and pedestrian undercrossings in Palo Alto and Menlo Park, and the provision of an enhanced TDM program~~, and implementation of intersection improvements that are considered to be feasible~~.

Draft EIR text on page 5-201, fifth bullet of third paragraphs, for Mitigation Measure TR-2.5 is deleted as follows:

- TR-2.3: Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program.
- ~~TR-2.4: Fund or Implement those Intersection Improvements that Have Benn Determined to be Feasible~~
- ~~TR-2.5: Coordinate with Other Jurisdictions for Potentially Feasible Roadway Improvements~~

Draft EIR text on page 5-201, fourth paragraph, is revised as follows:

After implementation of these measures, there would no longer be any ~~adversely~~ significantly impacted intersections in the AM Peak Hour and PM Peak Hour. (S/LTS) ~~However, there would still be four adversely impacted intersections in the PM Peak Hour. Therefore, even with the~~

~~implementation of these measures, there would still be a significant and unavoidable impact on intersection LOS, and the Village Concept Alternative would have a significant and unavoidable impact on intersection LOS, like the SUMC Project. (S/SU)~~

The second bullet after the first paragraph on page 5-202 of the Draft EIR has been revised as follows:

- TR-2.3: Enhance Stanford University ~~Travel~~ Transportation Demand Management (TDM) Program.

Draft EIR text on page 5-202, first sentence of paragraph four is deleted as follow:

~~The safety hazard on Welch Road can be mitigated by requiring the SUMC Project sponsors to fund an independent traffic study to determine whether the private street connection between Roth Way and Pasteur Drive should be operated as a public street.~~

Draft EIR text on page 5-202, the first bullet of paragraph four, is deleted as follow:

- ~~TR-4.1: Fund Traffic Impact Study~~

Draft EIR text on page 5-203, second and fifth paragraphs under the Village Concept Alternative, is revised as follows:

Transit Impacts. ~~The transit-oriented design of the Village Concept Alternative, combined with the increase in employment and activity at the SUMC Sites, could result higher ridership on the transit routes serving the SUMC Sites and the larger Village Concept Study Area. The resulting increase in ridership could exceed the capacity of the various transit services to and from the SUMC Sites and the larger Village Concept Study Area. As such, the Village Concept Alternative could result in a significant impact on transit.~~ Just as with the SUMC Project, the Village Concpet Alternative would not adversely impact either AM or PM Peak Hour bus service in Palo Alto or Caltrain service, with or without to GO Pass mitigation measure. Nonetheless, mitigation to provide enhanced bus stops and shuttle service is identified here.

~~However, the combination of the enhanced TDM program and the transit-oriented focus of this alternative would translate into increased transit ridership. This increased ridership could push load factors on many of the local shuttles to above 1.0, indicating overcrowding on the buses. Impacts to transit service in the Study Area are considered a significant impact according to City of Palo Alto criteria.~~

Draft EIR text on page 5-203, seventh paragraph, under the Village Concept Alternative, is revised as follow:

- TR-7.1: Incorporate ~~Transit Centers~~ Enhanced Bus Stops into Site Plans
- TR-7.2: Provide Expanded Transit Service

The following revisions have been made to the text on page 5-205, first paragraph, and Table 5-12 of the Draft EIR:

Operational Criteria Air Pollutant Emissions. The new structures would contain the same new stationary pollutant sources and would require the same amounts of chilled water/steam from the Central Energy Facility with the same associated air pollutant emissions as the SUMC Project. However, the development of housing on three nearby sites with preferential occupancy by SUMC employees would ~~slightly~~ not lessen the additional new motor vehicle trips and air pollutant emissions associated with hospital and medical offices. In fact, vehicle trips and VMT would increase because of the trips added by 1) household members who cohabit with SUMC employees living in the housing built on the three sites, but are not SUMC employees themselves; and 2) Stanford University graduate students and faculty who would have lived in the housing built on the three sites, but have been displaced by SUMC employees and now must commute to the area from more distant residential sites. ~~, a~~As shown in Table 5-12, ~~. T~~ the Village Concept Alternative's ROG, NO_x, and PM_{10} emissions would all remain significant, just as they were for the SUMC Project~~; daily ROG emissions would also remain significant, but annual ROG would fall just below the BAAQMD significance threshold~~. Although the new residents at the three housing sites would add slightly to traffic on local streets, CO modeling for the SUMC Project shows that CO concentrations there are so far below the air quality standards that there is no potential for violations. This alternative would have a less-than-significant impact associated with localized concentrations of CO.

Table 5-12
Village Concept Alternative Daily Operational Stationary and Mobile Source Emissions (with Mitigation Involving an Enhanced TDM Program)

	Emissions (Pounds per Day/Tons per Year)					
Emission Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Stationary (On-Site)	5.67/ 1.04	5.86/ 1.07	6.45/ 1.18	0.00/ 0.00	0.02/ 0.00	0.02/ 0.00
Central Energy Facility	----	110/ 20.08	37/ 6.75	----	----	----
Mobile	~~78.28/ 13.81~~ 83.62/ 14.75	~~94.70/ 16.13~~ 101.03/ 17.21	~~886.77/ 162.61~~ 947.02/ 173.93	~~2.07/ 0.39~~ 2.56/ 0.42	~~404.29/ 73.79~~ 430.67/ 78.59	~~75.98/ 13.86~~ 80.94/ 14.77
Total Emissions	**~~83.95/ 14.85~~ 89.29/ 15.79**	**~~210.56/ 37.28~~ 216.89/ 38.35**	**~~930.22/ 170.54~~ 990.47/ 181.86**	**~~2.07/ 0.39~~ 2.93/ 0.48**	**~~404.31/ 73.79~~ 430.69/ 78.58**	**~~76.00/ 13.86~~ 80.96/ 14.77**
BAAQMD Thresholds	**80/15**	**80/15**	**NT**	**NT**	**80/15**	**NT**
Significant Impact?	**Yes/~~No~~Yes**	**Yes/Yes**	**NT**	**NT**	**Yes/Yes**	**NT**

Source: PBS&J, ~~2010~~ 2011. Based on year 2025 emission factors.

Notes:

NT = No threshold.

Estimates are results of modeling using the CARB URBEMIS 2007 version 9.2.4.

Draft EIR text on page 5-206, first full paragraph, for the Village Concept Alternative, has been revised as follows:

Cumulative Impacts. ~~The SUMC Project's emissions of NOx during construction and of TACs during construction and operation were identified as making cumulatively considerable contributions to significant cumulative impacts.~~ Under the Village Concept Alternative, emissions of NOx during construction would also exceed the BAAQMD's 80 lbs/day threshold, and could contribute to significant cumulative impacts. ~~and t~~The TACs and fine particulate matter emitted during construction and operation, ~~being the same as for the SUMC project, would make a cumulatively considerable contribution to the high TAC background levels of the area in which the SUMC Sites are located. The same construction period Mitigation Measure AQ 1.2, mentioned above, would help reduce TAC emission from this alternative, but not to a less than considerable level. Consequently,~~ in combination with TACs and fine particulate matter emitted within the zone of influence for the SUMC Sites, would likely not exceed the cumulative significance thresholds of the 2010 BAAQMD CEQA Guidelines. Consequently, this alternative's cumulative TAC and fine particulate matter impacts would be less than cumulatively significant. Therefore, only this alternative's construction NOx emissions ~~and cumulative TAC impacts~~ would be cumulatively significant. (S/SU)

Draft EIR page 5-206, second full paragraph, last sentence has been revised as follows:

As determined by AECOM Transportation,[89,90,~~91~~] VMT was calculated as shown in Table (see the Revised VMT calculations memorandum and the revised Alternatives Analysis by AECOM, provided as Appendix ~~R~~ W and Appendix X, respectively, of this document).

~~[89] AECOM Transportation, *Stanford EIR Alternative Analysis – Village Concept VMT* Memo to Trixie Martelino, dated February 11, 2010.~~

~~[90] AECOM Transportation, *Stanford EIR – Revised VMT Calculations for SUMC* Memo to Trixie Martelino, dated February 11, 2010.~~

~~[91] AECOM Transportation, *VCA VMT with Enhanced TDM – Correction*, electronic communication with Trixie Martelino, dated March 30, 2010.~~

[89] AECOM Transportation, *Stanford EIR Transportation Impact Analysis Alternative Analysis – Appendix K VMT Calculation for Village Concept*, dated January, 2011.

[90] AECOM Transportation, *Stanford EIR – Revised VMT Calculations for SUMC* Memo to Trixie Martelino, dated January 20, 2011.

Draft EIR Table 5-13 on page 5-206 has been revised as follows:

Table 5-13
Comparison of Vehicle Miles Traveled for SUMC Project and Village Concept Alternative

	SUMC Project VMT[a,b]	**Village Concept Alternative VMT[a,b]**
~~Without mitigation measure TR-2.3 (employee, patient and spouse trips)~~	~~306,098~~	~~280,235~~
Without ~~m~~Mitigation ~~m~~Measure TR-2.3 ~~(employee and patient trips only)~~	275,837~~566~~	~~265,682~~289,156
With ~~m~~Mitigation ~~m~~Measure TR-2.3 ~~(employee and patient trips only)~~	238,519~~355~~	~~236,245~~251,837

Source: URBEMIS 2007

Notes:

a. Calculated using VMT assumptions reported by AECOM Transportation, (Appendices W and X). Emissions were modeled using the VMT assumptions from AECOM in the URBEMIS 2007 software. The VMT numbers vary slightly from the VMT in the AECOM memos due to rounding in the URBEMIS model.

b. In this table, the SUMC Project VMT includes both employee and patient/visitor trips, the Village Concept Alternative VMT includes employee, visitor/patient, and housing trips. Table 5-14 and 5-15 separate VMT emissions from patient/visitor trips.

Draft EIR text on page 5-207, second paragraph, has been revised as follows:

Construction Greenhouse Gas Emissions. Construction emissions with this alternative would ~~slightly~~ increase from the ~~6,213.91~~ 36,573 MT CO2e greenhouse gas emissions estimated from the SUMC Project.

Draft EIR text on page 5-207, third paragraph, third sentence and Table 5-14, have been revised as follows:

> As shown in Table 5-14, the vehicle miles traveled associated with the Village Concept Alternative are anticipated to ~~decrease~~increase with the implementation of the Village Concept Alternative, which would result in an overall ~~decrease~~increase in emissions from the SUMC Project of 2.8 percent.

Table 5-14
Village Concept Alternative Greenhouse Gas Emissions (Compared to SUMC Project)

Source of Emissions	Village Concept Alternative Without TDM (~~265,682~~ 289,156 VMT) (MT CO_2e)	SUMC Project Without TDM (~~275,566~~ 275,837 VMT) (MT CO_2e)
Natural Gas (therms)	~~22~~ 17	~~22~~ 17
Diesel Generators (gallons)	23	23
Medical Nitrous Oxide (cubic feet)	99	99
Fleet Vehicle Fuels (gallons)	100	100
Helicopter Fuel (gallons)	201	201
Electricity (MWh)	6,569	6,569
Steam and Chilled water (MBtu)	~~19,542~~ 13,679	~~19,542~~ 13,679
Non-fleet Employee and Housing Vehicular Emissions (VMT)[a]	~~39,773~~ 9,680	~~41,257~~8,285
Solid Waste (tons)	480	480
Subtotal for BAU Comparison	**30,849**	**29,453**
Non-fleet Patient and Visitor Vehicular Emissions (VMT)[a]	17,133	17,213
Total Emissions	**~~60,240~~ 47,982**	**~~63,035~~ 46,666**

Source: Reductions provided by PBS&J, 2011~~0~~ (Appendix V~~E~~), and AECOM, 2011~~0~~ (Appendix W and X~~P~~).

Notes:

Calculated using VMT assumptions reported in AECOM Transportation, January 2011~~February and March, 2010~~. Emissions modeled using the VMT Assumptions from AECOM in the URBEMIS 2007 software. The numbers vary slightly from the VMT in the AECOM memos due to rounding purposes for the URBEMIS model. AECOM Transportation, January 20, 2011~~February, 11, 2010~~ Memorandum to Trixie Martelino, Revised VMT Calculations for SUMC Project. AECOM Transportation Stanford University Medical Center Draft Environmental Impact Report Transportation Impact Analysis Alternatives Analysis, March 2010, AECOM, revised January 2011.

Draft EIR text on page 5-208, first paragraph, is deleted as follows:

> ~~Table 5-14 considers just the VMT reduction from SUMC employees occupying the housing sites; it does not account for spousal trips to transit or separate jobs. If those spousal trips are accounted for, then VMT from the Village Concept Alternative would increase compared to the SUMC Project, as discussed later in this section.~~

Draft EIR text on page 5-208, second paragraph, fourth sentence, has been revised as follows:

> Based on Table 5-14, this alternative is anticipated to result in up to a ~~2.45~~ 2.8 percent ~~decrease~~increase in emissions from the proposed SUMC Project. This is a ~~27~~ 25 percent increase from existing conditions. ~~The reduced vehicle trips coupled with~~ This alternative, including the reductions from the Emissions Reduction Program, would minimize greenhouse gas emissions by approximately ~~18~~ 36 percent compared with the BAU emissions for this alternative, without mitigation (calculations are provided in Appendix V of the Responses to Comments document). ~~Therefore, the Village Concept Alternative must employ additional mitigation measures to further reduce emission impacts.~~ This analysis uses the 30 percent BAU emissions target reduction for 2020 as the criteria for assessing a quantitative compliance with the goals of the Climate Protection Plan. However, without mitigation measures similar to those proposed for the SUMC Project the Emissions Reduction Program alone would not ensure that the Village Concept Alternative would further the goals of the Climate Protection Plan.

Draft EIR text on page 5-208, third bullet, has been revised as follows:

- CC-1.2: Participation in a Renewable ~~Palo Alto Green~~ Energy Program.

Draft EIR text on page 5-208, fourth paragraph, has been revised as follows:

> Incorporation of ~~the mitigation measures~~ Mitigation Measure TR-2.3 would reduce emissions from the Village Concept Alternative to ~~55,863~~ 44,294 metric tons CO_2e per year (Table 5-15), a ~~decrease~~increase of ~~0.59~~ 3 percent from the SUMC Project ~~but~~ and an increase of ~~25~~ 24.8 percent over existing emissions. As shown in ~~Table 5-14~~ Table 5-15, the resulting greenhouse gas emissions reduction from the Village Concept Alternative would be ~~23.81~~ 43.65 percent less than the BAU emissions for this alternative (see also Appendix V for calculations). ~~This reduction would be below the 30 percent reduction from BAU emissions. Therefore, even with Mitigation Measure CC-1.1 through CC-1.4, TR-2.3, and possibly PH-3.1, the Village Concept Alternative's contribution to global climate change would be cumulatively considerable and would contravene the goals of the Climate Protection Plan. (S/SU)~~ With the implementation of the mitigation measures, the Village Concept Alternative would exceed the 30 percent reduction from BAU target and would comply with the individual policies in the City of Palo Alto's Climate Protection Plan. Therefore, emissions from the proposed The Village Concept Alternative would be less than cumulatively considerable after mitigation. (S/LTS)

Draft EIR text on page 5-208, fifth paragraph, has been revised as follows:

> ~~Although this alternative provides preferential housing for employees of the SUMC facilities, there may be other members of the household that have to drive to work. With the inclusion of spousal trips, there would be an increase in VMT for both the SUMC Project and the Village Concept Alternative. Table 5-16 shows the Increase in VMT and the resulting emissions from the inclusion of the spousal trips.~~

Draft EIR text on page 5-209, first paragraph, and Tables 5-15 and Table 5-16 have been revised as follows:

Result in Significant Emissions of Greenhouse Gases. ~~Even with the implementation of all feasible mitigation measures, emissions reductions afforded the Village Concept Alternative would not achieve either the City of Palo Alto's Climate Protection Plan or the CARB's reduction emission goals of 30 percent below BAU emissions. Because these reduction levels cannot be achieved, the Village Concept Alternative would emit significant amounts of greenhouse gas and would have a cumulatively considerable contribution to global climate change. (S/SU)~~ With the implementation of all feasible mitigation measures, it is anticipated that emissions reductions afforded the Village Concept Alternative would achieve both the individual policies of the City of Palo Alto's Climate Protection Plan and the CARB's reduction emission goal of 30 percent below BAU. Therefore, the Village Concept Alternative would not emit significant amounts of greenhouse gas and would have a less than cumulatively considerable contribution to global climate change. (LTS)

Table 5-15
~~Mitigated~~ Village Concept Alternative Greenhouse Gas Emissions With TDM (Compared to SUMC Project With TDM)

Source of Emissions	Village Concept Alternative ~~With TDM (236,422~~ 251,837 VMT) (MT CO_2e)	SUMC Project ~~With TDM (238,355~~ 238,519 VMT) (MT CO_2e)
Natural Gas (therms)	~~22~~ 17	~~22~~ 17
Diesel Generators (gallons)	23	23
Medical Nitrous Oxide (cubic feet)	99	99
Fleet Vehicle Fuels (gallons)	100	100
Helicopter Fuel (gallons)	201	201
Electricity (MWh)	6,569	6,569
Steam and Chilled water (MBtu)	~~19,542~~ 13,679	~~19,542~~ 13,679
Non-fleet Employee and Housing Vehicular Emissions (VMT)[a]	~~35,390~~ 5,993	~~35,724~~ 4,597
Solid Waste (tons)	480	480
Subtotal for BAU Comparison	**27,161**	**25,766**
Non-fleet Patient and Visitor Vehicular Emissions (VMT)[a]	17,133	17,213
Total Emissions	**~~55,863~~44,294**	**~~56,190~~ 42,989**

Source: Reductions provided by PBS&J, 2011~~0~~ (Appendix V~~E~~), and AECOM, 2011~~0~~ (Appendix X~~P~~).

Notes:

Calculated using VMT assumptions reported in AECOM Transportation, January 2011~~February and March, 2010~~. Emissions modeled using the VMT Assumptions from AECOM in the URBEMIS 2007 software. The numbers vary slightly from the VMT in the AECOM memos due to rounding purposes for the URBEMIS model. AECOM Transportation, January 20, 2011~~February, 11, 2010~~ Memorandum to Trixie Martelino, Revised VMT Calculations for SUMC Project. AECOM Transportation Stanford University Medical Center Draft Environmental Impact Report Transportation Impact Analysis Alternatives Analysis, March 2010. AECOM, revised January 2011.

~~**Table 5-16**~~
~~**Comparison of Greenhouse Gas Emissions with Inclusion of Spousal Trips**~~

	~~**MT CO_2e**~~	
~~**Net Emissions**~~	~~**Village Concept Alternative Without TDM**~~	~~**SUMC Project Without TDM**~~
~~Vehicle miles traveled~~	~~280, 235~~	~~306,098~~
~~**Total Emissions**~~	~~**62,504**~~	~~**75,013**~~

~~*Source:* PBS&J 2010 (Appendix E), AECOM, February 11, 2010, AECOM, March 2010.~~

~~*Notes*~~

~~a. Calculated using VMT assumptions reported in AECOM Transportation, February and March, 2010. Emissions were modeled using the VMT assumptions from AECOM in the URBEMIS 2007 software. The numbers vary slightly from the VMT in the AECOM memos due to rounding purposes for the URBEMIS model. AECOM Transportation, February 11, 2010 Memorandum to Trixie Martelino, Revised VMT Calculations for SUMC Project. AECOM Transportation Stanford University Medical Center Draft Environmental Impact Report Transportation Impact Analysis Alternatives Analysis, March 2010.~~

The text on page 5-213 of the Draft EIR, first paragraph, has been revised as follows:

Impacts on Protected Trees. While the pedestrian enhancements would not affect Protected Trees, the Village Concept Alternative would have the same impact on Protected Trees as the SUMC Project. As described in Section 3.9, Biological Resources, the SUMC Project would result in the removal of up to ~~71~~ 74 Protected Trees, which would also apply to the Village Concept Alternative. The proposed new Hospital District zoning ordinance for the SUMC Project as modified by the Tree Preservation Alternative would create a procedure to permit the removal or relocation of approximately ~~48~~ 62 Protected Trees while attempting to preserve approximately ~~23~~ 18 Protected Trees that are considered both biological~~ly~~ and aesthetic~~ally significant~~ tree resources (13 of which would be removed under the SUMC Project). Trees that are determined not to be aesthetic tree resources would be candidates for an exemption to the existing Tree Ordinance, ~~and~~ but would be subject to required replacement according to the City Tree Technical Manual (TTM) standards. Although the new Hospital District zoning regulations would seek to avoid the removal of ~~23~~ 18 Protected Trees that are both biological~~ly~~ and aesthetic~~ally significant~~ tree resources at the SUMC Sites, ~~48~~ 62 Protected Trees could still be removed as a result of the SUMC Project. In addition, as discussed in Section 3.9, not all of the biological~~ly~~ and aesthetic~~ally significant Protected Trees~~ tree resources would be retained or relocated (13 would be removed) under the SUMC Project. As such, even with the implementation of the mitigation measures below, which would serve to protect the trees to be retained and relocated, the Village Concept Alternative, like the SUMC Project, would result in significant and unavoidable impacts to Protected Trees. (S/SU)

- BR-4.1: Prepare a Tree Preservation Report for all Trees to be Retained
- BR-4.2: Prepare a Solar Access Study (SAS) of Short and Long Term Effects on Protected Oaks
- BR-4.3: Prepare a Tree Relocation Feasibility Plan for Any Protected Tree Proposed for Relocation and Retention
- BR-4.4A: ~~Provide a Tree Preservation Bond/Security Guarantee~~ Enter into a Memorandum of Understanding for Tree Maintenance

- BR 4.4B: Replace Protected Trees in Accordance with the Tree Technical Manual
- BR-4.5: Provide Optimum Tree Replacement for Loss of Publicly-Owned Trees Regulated Tree Category.

Draft EIR text on page 5-218, second bullet, is revised as follows:

- HM-3.3: Conduct a Soil ~~Vapor~~ Excavation Program at the Hoover Pavilion Site

The fifth paragraph on page 5-221 of the Draft EIR is revised as follows:

Jobs to Employed Residents Ratio. As discussed in Section 3.13, Population and Housing, the jobs to employed residents ratio impact is not, by itself, considered an environmental impact; however, it is analyzed because this impact would result in secondary environmental impacts on air quality ~~and climate change~~. Specifically, as with the SUMC Project, the Village Concept Alternative's impact on the jobs to employed residents ratio would result in increased commute traffic, which is a significant contributor to this alternative's significant and unavoidable impacts on air quality ~~and climate change~~. As such, the analysis below identifies additional mitigation measures relating to the jobs to employed residents ratio, ~~with additional measures~~ that the City can consider as a means for further mitigating those significant environmental impacts identified for air quality ~~and climate change~~.

The last sentence on page 5-221 of the Draft EIR is deleted as follows:

~~This is a significant impact under the City's significance criteria.~~

The third sentence on page 5-222 of the Draft EIR is revised as follows:

Dedication of the 490 housing units to SUMC Project employees would ~~reduce~~ increase criteria pollutant and greenhouse gas emissions (associated with VMT) from the SUMC Project~~, as explained under Air Quality and Climate Change~~.

The first and second sentences of the first paragraph on page 5-223 are revised as follows:

Implementation of Mitigation Measure PH-3.1, as proposed for the SUMC Project, is not directly required in order to mitigate a significant environmental impact under the ~~Tree Preservation~~ Village Concept Alternative. Instead, this mitigation measure shall be considered as possible additional mitigation for impacts identified under air quality ~~and climate change~~.