

APPENDIX A

NOTICE OF PREPARATION AND COMMENTS



Notice of Preparation of an Environmental Impact Report and Notice of Environmental Scoping Meeting

TO: Responsible Agencies, Organizations, and Interested Parties

SUBJECT: Notice of Preparation of an Environmental Impact Report and Notice of a Scoping Meeting for the Stanford Wedge Housing Project

LEAD AGENCY Town of Portola Valley, Planning & Building Department

CONTACT: 765 Portola Road, Portola Valley, CA 94028
Attn: Laura C. Russell, Planning & Building Director
lrussell@portolavalley.net, 650-851-1700 Ext. 218

Stanford University has proposed a subdivision of 39 residential units on 7.4 acres of a 75.4-acre parcel located at 3530 Alpine Road in Portola Valley. The proposed residential units include 27 single-family homes and 12 affordable multifamily units in 3 additional buildings. The project proposal includes the removal of the existing horse ranch and numerous trees on the property. See reverse for a summary of project details.

As part of the Town's consideration of the Applicant's proposal, the Town will assess the potential for the proposed project to cause impacts on the environment. The Town will serve as the lead agency in the preparation of an Environmental Impact Report (EIR) for compliance with the California Environmental Quality Act (CEQA). The purpose of an EIR is to inform decision makers and the general public about the environmental effects of the proposed project. The EIR process is intended to provide public agencies with the environmental information required to evaluate a proposed project; to identify methods for reducing adverse environmental impacts; and to ensure that a range of alternatives is considered prior to consideration of approval of the proposed project.

The purpose of this Notice of Preparation (NOP) is to solicit comments about the project, specifically related to the scope and content of the environmental information and alternatives to be included in the EIR in accordance with CEQA. Comments may be submitted in writing during the review period and addressed to the lead agency contact listed above or presented orally during the scoping meeting detailed below. Due to the time limits mandated by State law, your response must be received not later than 30 days after January 17, 2020. The NOP comment period closes at 5:00 pm on February 17, 2020.

The environmental review process will include another opportunity for formal public comment regarding environmental effects once the analysis is completed and Draft EIR issued, which is expected to occur in summer 2020. (Another notice will be sent at that time.) A Final EIR including responses to comments will subsequently be issued, followed by noticed public hearings at which the public may again comment and the Town will make decisions regarding certification of the EIR and project approval or denial.

Scoping Meeting: A scoping meeting has been scheduled to introduce the project and receive oral comment on the scope of the EIR from the public and interested agencies, as follows: Thursday, January 30, 2020, at 7:00 pm in the Historic Schoolhouse at 765 Portola Road, Portola Valley, CA 94028.

Project Title: Stanford Wedge Housing Project

Project Location: 3530 Alpine Road in Portola Valley (Assessor's Parcel Number 077-281-020).

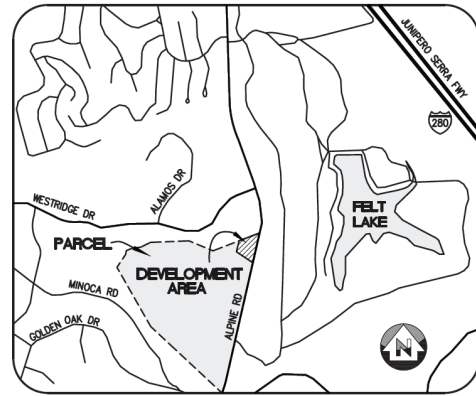
Project Summary: Development of 27 market-rate single-family residences and 12 affordable multifamily units (configured as 3 buildings with 4 units each) on a 7.4 acre portion of a 75.4-acre parcel, with the remaining parcel area preserved as open space.

By Signature: 
Name & Title: Laura Russell, Planning & Building Director

Date: 1/16/2020

Project Site and Project Description

The project site is located at 3530 Alpine Road on a 75.4-acre parcel (APN 077-281-020) that forms a triangular shape between Alpine Road, and developments along Westridge Drive and Minocca Road in Portola Valley, California. The site, known as the Stanford Wedge property, is mostly undeveloped and is covered with grasses, shrubs, and trees. The approximately 7.4-acre northeastern portion of the project site (10% of the total site area) is proposed for development. Alpine Rock Ranch, a horse boarding facility with stables, currently occupies this portion of the site and would be removed.



Project Location and Surroundings

The project would subdivide the development area into 30 residential lots, which would be developed with 27 market-rate single-family 2-story residences as part of a planned unit development and 12 affordable multifamily units (configured as 3 lots, each with a 2-story, 4-unit building). The 68-acre remainder of the property, not included as part of the development site, is sloped and heavily wooded; it would remain in University ownership and preserved as open space.

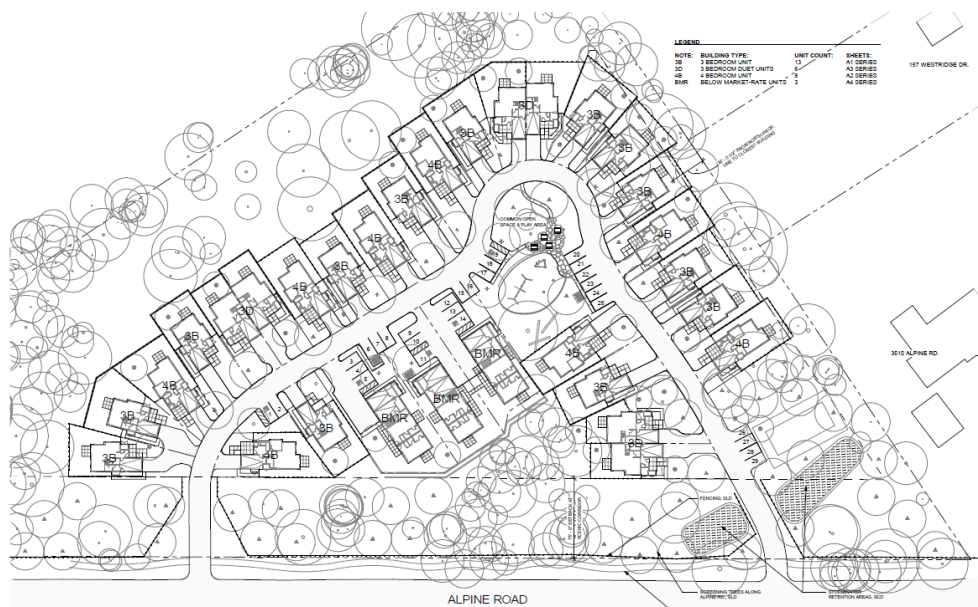
The project would also include common open space areas, including a picnic and play area; visual buffers; and wildfire fuel management areas. A new public recreational trail would be constructed along the western edge of the development area, connecting to the existing horse trail along the project site's Alpine Road frontage.

The Town of Portola Valley General Plan designates the project site as Conservation-Residential, and the site is zoned Residential Estate (R-E). The project site is subject to the 3.5A residential density combining district, the SD-2 slope-density combining district, and the D-R design review combining district. The Housing Element of the General Plan identifies the Stanford Wedge site (Site 40) as one that could accommodate a number of new homes, including affiliated affordable housing, and notes that such development would need to be clustered along Alpine Road given the site constraints. The proposed development is allowable under the State Affordable Density Housing Bonus Law due to the amount and type of affordable housing proposed.

The project would require the following approvals from the Town: Conditional Use Permit, Vesting Tentative Map, Site Development Permit, Architectural Review Permit, and may enter into an Affordable Housing and Development Agreement. The project would also require Local Agency Formation Commission (San Mateo LAFCo) approval of annexation into the West Bay Sanitary District for sewer service.

Proposed Environmental Analysis

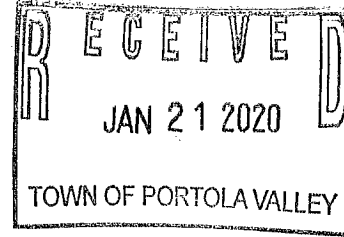
A full EIR will be prepared for the proposed project, with assessment in all CEQA topic areas. Technical analyses that will be performed as part of the EIR include those related to biological resources, cultural resources, geologic and hydrological considerations, wildfire risk, visual impacts, air quality and greenhouse gas emissions, construction noise, and traffic.



Project Site Plan



NATIVE AMERICAN HERITAGE COMMISSION



January 15, 2020

Laura C. Russell
Portola Valley, City of
765 Portola Road
Portola Valley, CA 94028

Re: 2020010203, Stanford Wedge Housing Project, San Mateo County

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NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Dear Ms. Russell:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

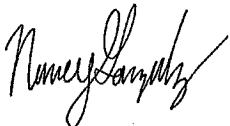
1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Nancy.Gonzalez-Lopez@nahc.ca.gov.

Sincerely,



Nancy Gonzalez-Lopez
Staff Services Analyst

cc: State Clearinghouse

From: Rob Bartoli <RBartoli@smcgov.org>
Sent: Friday, January 31, 2020 1:53 PM
To: Laura Russell
Cc: Phil Scott; Martha Poyatos
Subject: RE: Stanford Project - NOP
Attachments: LAFCo Comment Letter on Stanford Wedge Housing Project NOP.pdf

Hi Laura,

Please see the attached comment letter from LAFCo on the NOP for the Stanford Wedge Housing Project. A copy of the letter will be mailed to you today.

Thank you,

Rob

Rob Bartoli
Management Analyst



455 County Center, 2nd Floor
Redwood City, CA 94063
Direct Tel: (650) 363-1857
Email: rbartoli@smcgov.org

From: Rob Bartoli <RBartoli@smcgov.org>
Sent: Wednesday, January 15, 2020 1:46 PM
To: Laura Russell <russell@portolavalley.net>; Martha Poyatos <mpoyatos@smcgov.org>
Subject: RE: Stanford Project - NOP

Thank you very much Laura.

Rob

Rob Bartoli
Management Analyst



455 County Center, 2nd Floor
Redwood City, CA 94063
Direct Tel: (650) 363-1857
Email: rbartoli@smcgov.org

From: Laura Russell <russell@portolavalley.net>
Sent: Wednesday, January 15, 2020 1:33 PM

From: Bill Youstra <bill@youstra.com>
Sent: Thursday, January 23, 2020 6:31 PM
To: Laura Russell
Cc: Jeremy Dennis; djbullard@woodsidefire.org
Subject: Stanford Wedge Housing EIR Comment re Fire Fuel Risk

Hi,
I'm a Westridge resident on Cervantes Rd, above the location of the proposed development. My family is supportive of the goals and the proposal and we're grateful for the ongoing work of the volunteers and staff on this project. I'm sure it's difficult to make progress on any initiative with so many diverse viewpoints and priorities. Thanks for your work and care.

My only concern is regarding the wildfire fuel management of the overall wedge area. Though p2 of your notice suggests some treatment of perimeter area, our concerns are that the entire Stanford property and the community (and Stanford itself) could benefit from more proactive stewardship of that land, **particularly the upper part of the wedge**. The land is covered densely with the type of wildfire fuel that the fire dept advises us to reduce around our homes. The risk is multiplied by the shape and slope of the terrain. I've been denied home insurance explicitly because of the condition of that land.

I wanted to take a few photos but the undergrowth is just too thick. Here's a drone flyover video. Though it shows the fuel risk, it doesn't convey the steepness of the slope.

<http://bit.ly/stanfordwedgfire>

If a fire jumps Alpine Rd between Ford Field and Zotts, the Stanford wedge will be how Portola Valley burns. So our request are:

- that the total fire risk be part of the environmental review
- that the town's development requirements dictate standards, resources and accountability to better manage the wildfire fuel across the **entire** Stanford wedge
- that the town (and fire district) urge Stanford to address this risk, regardless of the project outcome

Thanks again for your work.
-Bill

From: Onnolee Trapp <onnoleet@sbcglobal.net>
Sent: Monday, February 10, 2020 9:21 PM
To: Laura Russell
Subject: EIR Scoping for Stanford Wedge Project
Attachments: Comments on EIR Scoping for Stanford Wedge Housing Project

My comments are pasted and attached. Please let me know if you are unable to read them; in that case, I will deliver a paper copy to the Town Hall. Onnolee Trapp

Comments on EIR Scoping for Stanford Wedge Housing Project

I am submitting comments to be included in the EIR Scoping for the Stanford Wedge Housing Project. I will identify some possible impacts and mitigations that should be addressed in the Draft EIR for the proposed project.

- **Air Quality:** Measurements should be made of Air Quality before any construction is begun, with measurements taken at locations within the proposed project site, at several locations where housing will not be built as well as where there will be housing, at sites within 1000 feet and for properties on nearby Westridge Drive. These measurements should be made at different seasons of the year in order to account for variations in wind, precipitation and atmospheric pressure. The Draft EIR should describe measurement methods that will be employed during the period of construction as well as air quality measurements projected as a result of traffic generated when the homes are occupied and emissions from materials used and present in the new homes. Any decrease in Air Quality expected from the project must be mitigated through changes in building design, vegetation management, road design, and surface materials used for buildings and other structures, accounting for all types of pervious and impervious surfaces.
- **Transportation/Traffic:** A baseline should be established for traffic on Alpine Road during morning and evening commute hours, times when Alpine Road is heavily used for athletic events at Ford Field, and school dismissal times. Projections for traffic generated by the project must realistically reflect expected vehicles per hour at those times of the day. Traffic generated by the project must include resident trips as well as expected delivery services and construction related activities during site preparation and home building. Any increases over existing levels of traffic should be mitigated in order to prevent congestion delays and to assure access to the project site. Left turn lanes may help to reduce traffic backups, as on Alpine Road at several locations in Ladera and at Westridge Drive. The FAQs generated by Stanford state that Stanford will **not** extend its Marguerite shuttle program to the proposed development. The most effective mitigation of the increased vehicle traffic generated by the development would be Stanford's Marguerite. The bus service must be extended to serve not only the residents of the Stanford Wedge but also should be extended farther on Alpine to Portola Road and continue on Portola Road to Sand Hill, thus serving other Stanford staff living in Portola Valley and working at Jasper Ridge and SLAC. This is closely related to Air Quality issues.

- **Wildfire:** This is a major concern for residents of Portola Valley, who are now very much aware of the risks related to the wildland/urban interface. The observations included in the September 1, 2019 statement from the Woodside Fire Protection District set forth several of the hazards associated with the terrain and vegetation of the Stanford Wedge and some measures to be taken to at least partially mitigate the hazards. The subsequent analyses by Denise Enea and Don Bullard further detail the measures that Stanford must undertake on a continuing basis. It is critically important for the project area and for bordering residential properties for the WFPD to have space for access to the undeveloped portion of the Wedge property. I endorse the assessments of the WFPD. The building standards now required by Portola Valley will help mitigate some hazards. The best mitigations of wildfire hazards will be placement and types of introduced trees, shrubs, and ground cover to create defensible space. Stanford **must** provide a guarantee that these mitigations will be enforced and continued during the years ahead, and take **active financial responsibility in perpetuity** through the annual performance bond requested by the WFPD.
- **Hydrology/Water Quality:** The steep terrain above the parcel designated for development drains onto the parcel to be developed. Stormwater management requires effective diversion and absorption of runoff during rain and an adequate size connection to culverts along Alpine Road. Stanford must be required to develop a plan incorporating best practices for avoiding negative impacts on the area of the proposed development and possible spillover to Alpine Road. These mitigations are essential.
- **Public Services:** It is certain that the family housing planned for the proposed project will include children as residents; most of the younger children would logically attend the public schools in Portola Valley and the older ones would likely attend schools in the Sequoia Union High School District. Stanford is a tax-exempt organization that does not pay taxes to support schools or other public services such as roads although the owners of the homes built on the property will pay taxes on those homes. The additional expenses to the Town and school districts must be mitigated. How can the Town of Portola Valley and the school districts enter an arrangement with Stanford that will assure a continuing stream of revenue to support the services that will be vital for those living in the proposed project? Unlike payment for installation of sewer and water services, a one-time payment cannot accurately provide for future needs of public services. The main lines and the delivery lines for the electric service, phone lines, fiber optics and other utilities must be undergrounded.
- **Noise:** Noise associated with the proposed project will emanate from a variety of sources not presently existing on the property. The first major impact will be site preparation and construction. After this phase, there will be ongoing impacts caused by additional vehicle traffic and activities engaged in by residents. Current ambient noise levels must be measured at different times of the day on the site and at nearby neighborhood locations. The additional impacts must be calculated according to currently accepted decibel level standards for the types of noise created. The uneven steep terrain may cause noise anomalies that cannot be determined prior to development. Stanford must be required to accept the responsibility for increased noise levels above standards and provide for mitigation.
- **Hazards & Hazardous Materials:** While there may be no known hazardous materials on the site, a site assessment with cores must be done prior to any movement of soil or removal of vegetation. Historic records must be sought to determine whether there were prior uses that might have discovered or deposited any hazardous materials, including biological hazards.
- **Geology/Soils:** The steepness of the terrain and types of soil and rock in the portion of the Wedge that will not be built on must be assessed to determine propensity for landslides and presence of historic landslides. The geological survey must include the entire 75.4 acre site and must include borings for samples. The presence of possible earthquake traces must be determined. Unavoidable impacts must be mitigated so that homes will not be unduly threatened by earthquakes, landslides or liquefaction.

Submitted by

Onnolee Trapp

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501 Portola Road

Portola Valley

From: Angela Hey <amhey@heymash.com>
Sent: Wednesday, February 12, 2020 2:13 PM
To: Laura Russell
Cc: edward.holand1@btinternet.com
Subject: Comments on the Environmental Impact Report for the Stanford Wedge

Dear Laura,

I attended the scoping meeting on 1/30/2020 and have some comments on the potential site for Stanford Housing. I am responding as an individual citizen (4570 Alpine Road), rather than as a member of the Bicycle, Pedestrian and Safety Committee on which I serve. My observations are based on:

- walking across Alpine Road to take photographs of the horses
- frequent cycling and driving trips past the proposed development site on Alpine Road
- details from the town and Stanford websites about the project
- experience of living in Portola Valley for almost 30 years

As part of the planning process, I would urge Stanford and Portola Valley Planning Commission to look carefully at the layout in terms of safety of ingress and egress to the development, parking places and fire risk.

Traffic

1. Alpine Road is busy, with traffic going over the posted speed limit and the crosswalk at Westridge is not in an ideal place. The town could consider a better crossing place would be west of the most westerly entrance where there is a clear view. If residents are cycling to Stanford, which surely some will, it is useful to have a safe place for them to exit the development and cross Alpine Road. It is quite likely that there will be young families of academics – I have seen them with bicycles pulling trailers and children wobbling in the Alpine Road Shoulder. It must be easy for cycling families to access and use the paved trail on the other side of Alpine. There is no middle lane for turning cars. If cars are coming down Alpine and wanting to turn across the road into the development this could be awkward – I have seen many close calls and one actual rear-ended slight crash on Alpine Road because a car that is turning stops suddenly and the driver of the car behind is used to not stopping – so suddenly brakes.
2. Traffic waiting to get out of the development. It seems that the road to access the property would benefit by being one-way - possibly with a small roundabout at the exit. This would have the effect of making it easier for cars to get out and slow traffic on Alpine Road.
3. Parking – a quick poll at a Portola Valley Women’s Coffee morning on how many cars each household had, revealed to me that most residents had 3 or more vehicles. It is possible that there is not enough parking as the fire department intends to paint the roadway kerbs red to indicate no parking. Where will extra cars park for a party? Ford Field? In that case we will have people crossing Alpine Road, possibly at night. I would urge the planners to seriously consider a large car park at the back of the lot as part of a fire break.
4. Number of exits/entrances into Alpine. I remember from the Alpine Corridor from Ladera to Junipero Serra study and open meetings that it was mentioned that there was a Caltrans standard for number of exits per mile and that the Stanford Weekend Acres offered too many exits and entrances – I believe it was 7 entrances per mile. So counting – 2 Stanford roads, Westridge, Ladera Church entrance, Doctors office entrance, 3 shopping center driveways (2 one-way exit only), La Cuesta, La Mesa – it is possible we may have too many entrances (I haven’t measured an exact mile and whether it would include Webb Ranch road too) and would it be better to enter and exit the Stanford property on a different plan where there is a wider road with entrance and exit at the proposed western end of the

development. So the development just has one road in and out of it. It could possibly be a wider road with more parking spaces on it to accommodate guest parking.

Fire Risk

1. As long as there are trees on the Stanford Wedge with brush and high and low canopies there is a serious fire threat – regardless of whether houses can be built. It would be prudent of Stanford to get landscapers and professional lumber company to take out trees for a wide area and plant it with native grasses like we have on the Hawthorns and in Portola Valley Ranch. Before the houses are built, even though the slopes are steep, a lumber company that can clear cut a fire break could mitigate the fire risk, rather than getting an arborist-type firm who are used to removing just a few trees. A clear cut bordering the roads of the Wedge uphill from the development, as well as at the bottom of the wedge behind where the houses are going to be built would help reduce the fire risk. Even though the vegetation stabilizes the slope, I am not suggesting removing all the trees – but making some serious firebreaks.
2. The change from wooden to gypsum-based siding is a favorable move to reduce fire risk which is considerable for the entire wedge area.

So as part of the planning process we have options:

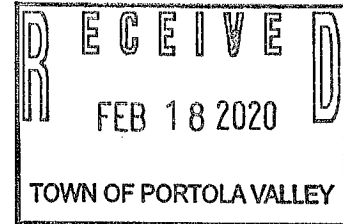
1. Get a new layout with only one entrance and exit that is wider
2. Ask Stanford to put in one of their roundabouts on Alpine at their west exit if there are still going to be 2 entrances and exit
3. Ask Stanford to put in some way for people to cross the road at the west end of their development where it is easier to see traffic
4. Develop an overflow parking strategy – would we need lights at Ford Field, for example, as it can be quite spooky – will we need blue lights for people to hit if they feel unsafe?
5. Decide how to mitigate fire risk which may have to be done more aggressively – houses or no houses.

Thank you for your consideration.

From the desk of Angela Hey
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February 12, 2020

Laura Russell
Planning and Building Director
Town of Portola Valley
765 Portola Road
Portola Valley, CA 94028



Re: Project No. PLN-ARCH0021-2019
High Density Housing Development Proposal, Alpine Canyon, 3530
Alpine Road, Portola Valley CA aka Stanford Wedge Housing Project

We are writing in response to your January 14, 2020 letter inviting the submission of comments by Portola Valley residents to the Town of Portola Valley on the scope of the environmental impact study to be performed for the above proposed project.

We preface our comments by noting that the highest priority of Town government and its employees should be the protection and promotion of the health and safety of Portola Valley's residents. While some representatives of Town government may wish to exploit the Town's unique and rapidly vanishing natural wildlands for political or commercial objectives, such objectives cannot trump the overriding responsibility of Town government to protect and promote the health and safety of its residents.

Comment 1: Inadequate Public Notice

We understand that the Woodside Fire Protection District sent the Town the enclosed September 1, 2019 letter explaining in detail the high fire risk posed by the proposed project to the Alpine canyon and all of the adjoining properties. As the Fire District told you, "even with regular fuel reduction attempts, the physical vegetative nature and steep topographical properties of the large remaining undeveloped portion of the parcel place a significant increased risk of rapid acceleration and increased intensity of any ignition in the natural landscape. These high fire risk characteristics pose a risk to any existing structures on the west, north and east ridges, i.e., Minoca, Pine Ridge Way [Cervantes] and Westridge as well as any new structures along the flat 6-acre area proposed for development."

In light of the high fire risk posed by the proposed project, the Fire District specifically warned Town planners that “[r]eliance on general Portola Valley guidelines and current fire dept and building/planning codes without sufficiently analyzing site-specific conditions or strategically implementing precautionary fire safety measures can lead to a false sense of wildfire safety and preparedness for the families who may unknowing[ly] occupy any of the proposed housing.”

Given our proximity to the San Andreas fault and the steep and heavily vegetated ravines and canyons that criss-cross and ring Portola Valley, the Town must confront and responsibly address the increasing risk of catastrophic wild-land fire. Since there is likely no greater risk to the health and safety of Portola Valley residents than wild-land fire, every development, including Stanford’s proposed development, should be subjected to the most rigorous and thorough-going scrutiny to ensure that it does not increase and preferably reduces the risk of wild-land fire.

Although your January 14 letter assures Town residents that information about the proposed project will be posted to the Town’s website as it becomes available, the September 1, 2019 letter of the Fire Marshall warning the Town about the high risk of fire posed by the proposed project has never been posted to the Town’s website or otherwise distributed or publicized by the Town. Today, the Almanac reports that Fire Marshall Don Bullard informed it that “The fire (district) doesn’t think that this is the best location to be putting high density housing because of the high fire severity zone. It is a very dangerous place for fire. We should look for other areas for development that would be better, and we’ve suggested that the town do that.”

Failure promptly to alert Portola Valley’s residents to the Fire Marshal’s stated concerns about the proposed project’s high fire risk deprives residents of the opportunity to respond to Stanford’s proposed project in an informed and timely manner, and calls into question the integrity, transparency and effectiveness of the Town’s review process for this project. Failure to inform Portola Valley’s residents that the Fire Marshall has asked the Town to look for other areas for such high-density development due to the fire danger presented by Stanford’s proposed project is intolerable and inexcusable.

Comment 2: Inadequate Town Coordination with Woodside Fire Protection District

On October 15, 2019 the Woodside Fire Protection District's plan check informed the Town that Stanford's proposed development should "[m]aintain defensible space of 100 feet from each side and from the front and rear of all structures" and that "[s]tructure spacing should be a minimum of 100 feet between structures."

A month later, the development plan Stanford submitted to the Town on November 25, 2019 proposed over 32 structures separated by **as little as 8 to 12 feet**. Indeed, as depicted on sheet A0.01A of Stanford's submittal, no structure appears to be separated by more than 31 feet from its closest neighboring structure. Nothing in the November 25 plan submitted by Stanford addresses or responds to the Fire District's requirement for a minimum of 100 feet of separation between structures.

If Stanford had adhered to the District's requirement of a minimum separation of 100 feet between structures, the proposed six-acre site would provide space for approximately six (6) separate structures. By ignoring the Fire District's requirement of a minimum separation of 100 feet between structures, Stanford has increased the number and density of proposed structures on the six-acre site from approximately 6 structures to 32 proposed residential structures. Such increased density, multiplication and concentration of potential fire ignition sources and activities in such a steeply vegetated and combustible ecosystem as the Alpine Canyon poses a highly increased risk of fire, particularly in light of the site's location within one mile of the San Andreas fault.

The Fire District's October 15 comments also required Stanford to complete and submit two District-approved, independent fire modelling studies of expected fire behavior for the development, and a comprehensive fire protection plan for the entire development, all in advance of any study of the environmental impact of Stanford's proposed project. Remarkably, Stanford's November 25, 2019 submission simply ignored these additional fire safety requirements and does not address them.

On January 10 the Fire District reiterated its requirement for a minimum 100-foot separation between structures, two District-approved modeling

studies and a comprehensive fire protection plan. While the Woodside Fire Protection District has the authority to require compliance with the fire code, we understand it does not have the authority to approve or disapprove a proposed development project. Thus, even though the District pointedly recommends against the construction of such high-density housing in such a high-risk fire area, it unfortunately does not have the authority to disapprove Stanford's proposed project.

The Town, however, does have the authority and the responsibility to approve or disapprove the proposed project based upon the serious fire risk it poses to its immediate neighbors and the Town as a whole.

As the Fire District expressly warned the Town in its September 1 letter, the construction of housing in such a combustible and dangerous setting as the southern mouth of the Alpine Canyon is a "root cause" of the catastrophic wild-land fires now plaguing California. Those hazards are greatly exacerbated by the construction of high-density housing in such settings, which increases significantly the number of potential sources for and risk of fire ignition and spread.

At the start of the January 30, 2020 public hearing of the Planning Commission on the scope of its review for this project, the Town's project leader listed all of the various committees and stakeholders with whom the Planning Commission planned to interact in conducting its environmental impact assessment. Notably, she did not mention the Fire Protection District. Shortly thereafter, the Chairman of the Planning Commission stated that the Commission had not previously seen or considered **any** of the Fire District's documented concerns and plan check requirements for this project, and saw no reason to address or resolve those stated concerns and requirements prior to the initiation of its environmental impact study for the project.

The fact that the Planning Commission claims ignorance of the Fire District's stated concerns with the proposed siting of the project and its stated requirements for structural separation months after those concerns and requirements were transmitted in writing to the Town is utterly inexplicable and unacceptable. And the fact that the Planning Commission sees no reason to address and resolve those concerns and requirements before proceeding with an environment assessment of the project as proposed is similarly inexplicable and unacceptable.

Why are the Town staff and Planning Commission ignoring the Fire District's stated minimal requirements for this project? Why has the Town staff not compelled Stanford to address and resolve in writing the Fire District's minimum requirement for structural separation? Why has the Town allowed Stanford to ignore the Fire District's requirement for two District-approved independent fire modeling studies and a fire protection plan before commencement of its environmental impact assessment?

The residents of Portola Valley depend and rely upon the Woodside Fire Protection District to protect and defend the safety and well-being of our families, homes and properties. It is incumbent upon the Town government to similarly demonstrate its trust and reliance upon the Fire District by respecting and promptly engaging with the District's stated concerns and requirements for this and any other development project.

Comment 3: The Woodside Fire Protection District Should Be Designated as Lead Agency for EIR Evaluation of Project's Fire Safety Risk

During the January 30 Planning Commission hearing, Town staff stated that it planned to pay its environmental impact consultant to retain yet another consultant to perform a fire modeling assessment for Stanford's proposed project. Why the duplication of effort? Why the retention of an unknown additional consultant? And why the use of some portion of the limited environmental impact budget to conduct a third fire modeling study when the Fire District has already required Stanford to submit and pay for two District-approved fire modeling studies conducted by independent professionals approved by the District?

Clearly, the Town and its staff do not have the competency or experience to evaluate and mitigate the risk of wild-land fire created by the proposed project, and it is evident the Town and its staff have not been transparent or candid with residents about the dangers this project presents. It is highly unlikely that the EIR consultant retained by the Town has either the competency, the experience or the independence to perform such assessments either. But the Woodside Fire Protection District has the experience, the professional competency and the requisite independence to conduct and/or supervise such studies and to evaluate such assessments independently and objectively.

The Town should designate the Woodside Fire Protection District as the lead governmental agency to assess and evaluate the fire safety risks created by this project and allocate an appropriate portion of the project's EIR budget to defer the District's costs in performing that role.

Comment 4: Commencement of an EIR is Premature Until Stanford Resolves the Fire District's Requirements

Before the Town or any of its residents can begin to assess the environmental and other impacts of a proposed housing development in the Alpine Canyon it is essential to resolve the differences between the Fire District's requirement for a minimum of 100 feet of separation between structures in the project and Stanford's proposal for as little as 8 feet of separation between structures.

What, exactly, will the EIR evaluate: a project with 30 residential structures on six acres separated by 8 feet as Stanford proposes, or a project with 6 residence structures on six acres separated by 100 feet as the Fire Protection District requires? The difference between those two conceptions of the project creates a world of difference in any evaluation of the environmental impact of the project. Resolving that difference before the EIR process is commenced is obviously critical. The difference between those two alternatives must be resolved now, before the Town and its citizens are asked to assess the impacts of a housing project in the Alpine Canyon.

Similarly, the Town has neglected to require Stanford to respond to the Fire District's requirement for two District-approved independent fire modeling studies and submission of a fire protection plan. As the Fire District clearly stated in its January 10 plan check report to the Town, the two District-approved independent fire modeling studies and the fire protection plan required by the District must both be completed before the environmental impact of the proposed project can be assessed: "EIR cannot be done prior to having a veg. management plan and veg. management plan is dependent the fire behavior evaluation."

In short, all three of the Fire District's requirements (100 foot separation between structures, two independent District-approved fire behavior studies, and a fire protection plan) should be addressed and included in a

revised plan prepared and submitted by Stanford before the Town commences its CEQA-mandated environmental assessment of the project. Until these requirements are resolved, it is not possible to know or evaluate either the scope or density of the proposed project or the claimed benefits or potential adverse CEQA effects of the proposed project.

Comment 5: Commencement of an EIR is Premature Until Stanford and the Town Disclose Their Proposed Enforcement Concessions For Stanford's Project

As proposed, Stanford's development project does not conform with the Town's General Plan, building and zoning ordinances or the Fire District's minimal safety requirements.

Stanford's 75-acre parcel in the Alpine Canyon is an important element of the Alpine Scenic Corridor under the Town's General Plan. Pursuant to the General Plan, "[t]he policy of the Town of Portola Valley has always been to maintain a tranquil, rural atmosphere, and to preserve a maximum of green open space. The Alpine Corridor should be developed in accord with this policy. The natural look and feeling of the land between the road and the creek should be maintained. Trees and natural growth should be preserved and increased." Points of access to Alpine Road should be limited to the maximum extent possible and building setback along Alpine Road should be increased to reduce the feeling of encroachment on the road. As to Stanford's property in particular, the land should be maintained as permanent open space if possible and "extreme care" should be exercised if lands are developed.

Stanford's parcel is zoned RE 3.5/SD 2 under the Town's zoning ordinance. Pursuant to section 18.12.010 of the ordinance, the RE 3.5 district requires minimum residential lot sizes of 3.5 acres which are "intended to promote and encourage the establishment and maintenance of a rural environment suitable for family living with parcels of adequate size to accommodate single-family dwellings and, where appropriate, accessory equestrian facilities." Stanford's proposed project does not conform to this requirement.

Pursuant to section 18.50.040, the SD 2 district requires an increase in the 3.5-acre minimum lot size based on the steep slopes of Stanford's 75-acre parcel. According to Stanford's website, the [m]ajority of the site has

slopes in excess of 20%.” The required increases range anywhere from a minimum of 103% to 870% per acre, resulting in increased minimum lot sizes/residential structure. Pursuant to section 18.50.050, the maximum total number of allowable single-family lots for the entire 75-acre parcel would appear to be no more than 11 single family lots and as few as 2 single family lots depending on the slope of the parcel. Stanford’s proposed project does not conform to this requirement.

Stanford asserts, but does not explain how, the RE 3.5/SD 2 provisions of the Town’s zoning ordinance yield “just over 20 lots for the site.” Nor does Stanford explain how anything in these provisions or any other provisions of the zoning ordinance would allow Stanford to reduce the minimum lot size per lot from 3.5 or more acres per lot to 3,000 to 4,000 feet as Stanford proposes.

Based on that apparently erroneous and inflated calculation of “just over 20 lots for the site,” Stanford then asserts that municipal code sections 17.20.215, 18.04055 and 18.44.060(H) allow it to increase the site’s allowed housing density to 18 single-family structures and 12 multifamily “affordable” units by allocating 15% of the proposed subdivision’s lots to “affordable” housing as defined by the Town’s zoning ordinance. The Town’s ordinance permits a density bonus of only 10%.

Rather than consistently apply the Town’s ordinance, Stanford instead turns to State law and claims a 35% density bonus under California’s density bonus law. But California’s density bonus law requires developers to commit 20% of total lots to low income housing in order to achieve a 35% (Government Code sections 65951-65918) and Stanford has committed only three lots (15%) to low income housing, not the four lots (20%) State law would require. Under State law Stanford’s allocation of three lots to low income housing is entitled to a bonus of only 27.5%, not 35%.

But more importantly, the baseline number of allowable lots on which Stanford’s bonus calculation is based appears to be erroneously inflated. Under the Town’s zoning ordinance, the allowable number of lots for Stanford’s 75-acre parcel is a maximum of 11 lots and likely much less, perhaps as little as 4 or 5 lots. Assuming the allowable number of lots is as high as 11, Stanford would need to allocate 20% of those lots to low income housing in order to qualify for a 35% bonus, and the total number

of single family residences Stanford would then be permitted to develop on the property would total 11 or 12 lots, not the 27 Stanford proposes. Under California's density bonus law, Stanford may obtain up to two (2) concessions in the Town's enforcement of the General Plan and municipal ordinances in exchange for Stanford's commitment to devote 20% of total units to affordable housing. (Government Code section 65915 (d)(2)(B))

Neither Stanford nor the Town has disclosed what specific enforcement concessions Stanford is seeking or the Town is offering. Before the residents of Portola Valley are asked to assess the environmental impact of the proposed project, Stanford and the Town must disclose the full scope of specific concessions that Stanford and/or the Town are proposing to make in the enforcement of the Town's General Plan and ordinances.

Until Stanford and/or the Town disclose the specific enforcement concessions proposed for Stanford's project, it is not possible to know or evaluate the claimed benefits or potential adverse CEQA effects of the proposed project.

Comment 6: Commencement of an EIR is Premature Until Stanford and the Town Disclose the Legally Enforceable Mechanisms By Which the Project's Affordable Housing Will Be Provided to Low Income Residents

If the *quid pro quo* for relaxed enforcement of the Town's General Plan and/or municipal code is Stanford's promise to provide affordable housing for low income residents of Portola Valley, the Town must also ensure that the promised benefit of suitable affordable housing that is designed and scaled to meet the needs of low income families in and around Portola Valleys is in fact delivered, equitably allocated and properly maintained over time.

The simplest means to achieve that goal is to provide such units as rental properties maintained and leased by Stanford in perpetuity. That approach enables the Town to hold Stanford accountable as landlord for the long-term equitable provision of low-income housing as well as the long-term responsibility to maintain the quality and safety of the development it seeks to build. After all, at least 90% of the residents of this development will be Stanford faculty.

Until the Town discloses the specific terms and enforceable nature of the mechanisms by which the Town proposes to allocate and maintain over time low income access to the proposed low income housing, it is not possible to know or evaluate the claimed benefits or potential adverse CEQA effects of the proposed project.

- How will the Town determine what candidates are eligible and qualified to purchase the low-income residences?
- How will the Town allocate the promised low-income residences among qualified candidates?
- By what legally enforceable mechanisms will the Town sustain equitable, fair public access to that housing over time?
- By what mechanisms will the Town ensure that the promised low-income housing will be properly managed and maintained for by access by future low-income residents?

Comment 7: The EIR Should Disclose All Concessions for Relaxed Enforcement of the Town's General Plan and Ordinances, the Difference in Unit Numbers and Density of Housing Such Concessions Would Allow, and the Differential Risk of Fire Created By Such Enforcement Concessions

As proposed, Stanford's development project does not conform with the Town's General Plan, building and zoning ordinances or the Fire District's minimal safety requirements. See Comment 5 above.

The EIR should disclose all concessions sought by Stanford and/or proposed by the Town in enforcement of the Town's General Plan and ordinances or the Fire District's regulations and requirements, and assess

- (a) the differential effect such concessions would have on the siting, number of housing units, and the structural separation between and/or density of such units in the development; and

- (b) the increased risk of fire ignition and propagation created over the expected life of the development as a result of such enforcement concessions.

Comment 8: The EIR Should Include a Fire Safety Component that Evaluates and Compares the Differential Fire Risk Created by Alternative Housing Unit Numbers and Densities at the Proposed Site With and Without Such Enforcement Concessions

The unit numbers per acre and structural density of Stanford's proposed project far exceeds the maximum unit numbers and density specified by the Fire District and the Town's zoning ordinance. It is far greater than the density of housing anywhere in Portola Valley. Siting such dense development amidst such steep and heavily vegetated habitat will heighten the risk of wild-land fire, and pose a threat to neighboring families and properties. This would seem to be especially true given the site's close proximity to the San Andreas fault.

The EIR should evaluate and disclose the differential risk of fire ignition and propagation if structures on the project's proposed 6-acre site adhere to

- (a) the Town's General Plan and ordinances before any concessions;
- (b) the Fire District's requirement of a minimum 100 feet of separation between structures; or
- (c) Stanford's proposed separation between residences of a minimum of 8 feet.

Will a reduction in the number and density of structures on the site from 32 residential structures to a total of 6 structures reduce the risk of fire ignition and propagation and, if so, to what extent? Will a reduction in the proposed population of the development reduce the risk of fire ignition and propagation and, if so, to what extent? Apart from structural density, how would such a reduction in the density of human habitation and activity at the proposed site alter and affect the risks of fire ignition and spread? Will a reduction in the expected population of children and/or teenagers living in the proposed development affect the risk of fire ignition and spread? Will a

reduction in the number of vehicles accessing and using the site alter and affect the risk of fire ignition and spread?

Comment 9: The EIR Should Include a Fire Safety Component that Evaluates and Compares the Differential Risks Posed To Town Evacuation Routes Under Alternative Project Development Unit Numbers and Densities in the Proposed Project With and Without Such Enforcement Concessions

The residents of Portola Valley have limited and increasingly congested escape routes from town in the event of earthquake, fire or other natural disaster. Those escape routes are heavily dependent on unobstructed passage along Alpine Road and Westridge Drive. Obstruction or closure of one or both of those routes would have considerable impact on the safety and well-being of residents. Those impacts will likely vary greatly depending on each fleeing resident's particular location and circumstances. But the fundamental question is whether a reduction in the structural density, population and/or vehicle numbers associated with the proposed development from 32 residential structures to a total of 6 structures would enhance the safety and ability of Town residents to access and utilize escape routes from Portola Valley?

To address that fundamental question, the EIR should evaluate and disclose the differential risk of closure or obstruction due to fire or congestion of each of Alpine Road, Cervantes, Minoca and Westridge if the proposed project adheres to

- (a) the Town's General Plan and ordinances before any concessions;
- (b) the Fire District's requirement of 100 feet of separation between structures; or
- (c) the structural density proposed by Stanford with as little as 8 feet of separation between structures.

Comment 10: The EIR Should Evaluate and Compare the Differential Risk of Fire Over Time if Housing in the Project is Managed and Leased by Stanford Rather Than Sold as Stanford Proposes

What legally enforceable and continuously funded institutions will have the responsibility, competency and financial resources needed to implement and maintain District-mandated fire prevention and protection programs for the project?

Stanford's proposed project appears to call for Stanford's future sale and transfer of title to some portion or all of the 75-acre parcel to future residents of the project. By selling rather than renting the housing Stanford proposes to build, is Stanford also proposing to transfer the on-going responsibility to mitigate and prevent the fire risk created by its project?

The fact that Stanford has proposed to provide the housing it wishes to build as "for sale" and not "rental" properties means that Stanford is not only seeking to accelerate its return on investment in the proposed project, but that it is also seeking to shed responsibility for the long term management and safety of the project, even though 90% or more of the proposed project's residents have to be Stanford faculty.

The EIR should evaluate and disclose the differential risk of fire and cost of fire prevention and suppression created by the project over the next 30 to 50 years if housing in the project is managed and leased by Stanford, or sold as Stanford proposes. In particular, the EIR should evaluate whether allowing Stanford to sell the project's low-income units rather than requiring Stanford to lease them on an on-going basis will benefit the Town and its residents, not just Stanford. The sale of such housing not only allows Stanford to accelerate its return and shed future responsibility for the project, but it also will shift unending administrative burdens onto the Town and create unwanted incentives and potential opportunities to steer benefits or gains to favored recipients.

Comment 11: The EIR Should Include a Traffic Component that Evaluates and Compares the Different Rates Throughout the Day and Over Time of Construction Traffic Flow and Automobile Traffic Flow on Alpine Road, Westridge Drive and Arastradero Road Under Alternative Housing Unit Numbers and Densities

Site preparation and construction of the proposed project at 3350 Alpine Road will result in substantially increased truck traffic to, from and around the site, as well as daily disruption to traffic flows on Alpine Road and each of its arterial connections, including most significantly Westridge Drive, Golden Oak Drive and Arastradero Road. Once completed, Stanford's proposed project will include 39 new residences along with on-site parking for 89 vehicles.

The proposed construction and increases in residential population, visitors and vehicular traffic will likely have adverse long-term impacts on road quality and conditions as well as traffic flow and safety. The EIR should include a Traffic Component that evaluates and compares the difference in volumes and rates throughout the day and week of construction traffic, automobile traffic and flow on Alpine Road, Westridge Drive and Arastradero Road under three alternative housing unit numbers and densities:

- (a) no development;
- (b) Stanford's development as proposed;
- (c) Stanford's development modified to conform with Town's ordinances without concessions.

Comment 12: The EIR Should Include a Safety Component that Evaluates and Compares the Different Rates Over Time of Automobile, Pedestrian, Bicycle, Equestrian and Wildlife Accidents along Alpine Road, Westridge Drive and Arastradero Road Under Alternative Housing Unit Numbers and Densities

The proposed construction and increases in residential population, visitors and vehicular traffic will likely result in increased accidents involving

pedestrians, cyclists, automobiles and wildlife. The EIR should include a Safety Component that evaluates and compares the difference in volumes and rates of accidents resulting from increases in construction and post construction traffic on Alpine Road, Westridge Drive and Arastradero Road under three alternative housing unit numbers and densities:

- (a) no development;
- (b) Stanford's development as proposed;
- (c) Stanford's development modified to conform with Town's ordinances without concessions.

Comment 13: The EIR Should Evaluate and Compare the Impacts Over Time on Wildlife Variety, Numbers, Habitat and Migration in and Between the Alpine Canyon, Jasper Ridge Biological Preserve and the Neighboring Valleys, Canyons and Creeks Under Alternative Numbers and Densities of Development Units

The proposed construction and increases in residential population, visitors and vehicular traffic will likely result in destruction of wildlife habitat and significant interruption or impairment of wildlife migration in and between Alpine Canyon, Jasper Ridge Biological Preserve and the neighboring valleys, canyons and creeks. The EIR should include a Wildlife Component that catalogues the species of birds, animals and reptiles that inhabit these spaces and the impact of the proposed earth movement, building construction, human habitation and increased traffic, light and noise effects of the development on each of these species. In particular, the EIR should evaluate and compare the difference in all such effects resulting from the project under three alternative housing unit numbers and densities:

- (a) no development;
- (b) Stanford's development as proposed;
- (c) Stanford's development modified to conform with Town's ordinances without concessions.

Comment 14: The EIR Should Investigate and Assess the Impact of Stanford's Proposed Mix of Studio, One Bedroom and Two Bedroom Below Market Units on the Local Population of Low-Income Families

If the justification for relaxed enforcement of the Town's General Plan and ordinances, increased housing and population density, increased fire risk, increased traffic and congestion, increased schools population and destruction or disruption of open space wild lands and animal habitat is affordable housing for low income families, the EIR must objectively assess and disclose whether and how the proposed below market housing will serve the needs of the population of low income families in and around Portola Valley. It serves no public interest to provide the concessions Stanford seeks or to increase the risk of fire to the Town and its residents if the project Stanford proposes fails to match the actual local demand and need for affordable low-income housing over the long-term.

Stanford's November 25 submission proposes the development of six 425 square foot studio units, three 600 square foot one-bedroom units, and three 975 square foot two-bedroom units. Stanford's development plan does not explain why 50% of the below market units are 425 square foot studio apartments designed for single individuals, or why none of the proposed units are designed for occupancy by families with more than three individuals. Why does Stanford propose to offer six units as studio apartments, and only three units as two-bedroom apartments? Is the local population of low-income families seeking housing restricted to families with three or less members? Is 50% of the local population of low-income Portola Valley families seeking affordable housing designed for single individuals only?

None of the 27 faculty houses proposed by Stanford is designed or scaled for occupancy by single individuals only. The smallest faculty housing unit proposed by Stanford is a three-bedroom, two-story house with slightly more than 2,200 square feet of living space. Stanford proposes to build 21 three-bedroom houses, and 6 four-bedroom houses with 2,350 square feet of space. Why is the largest below market two-bedroom unit proposed by Stanford less than half as large as the smallest faculty house? Why are half of the below market units restricted to much smaller studio apartments for single individuals? And why is Stanford building three- and four-

bedroom houses for faculty families, but one-, two- and three-person apartments for low-income families?

Perhaps the reasons stem from Stanford's financial interests. Based on whether the low-income units are leased or sold, California's density bonus law places different restrictions on the prices at which such housing can be sold or leased by Stanford.

Units that are sold must be sold to the initial buyer at an affordable housing cost, which includes mortgage loan payments, mortgage insurance payments, property taxes, reasonable utilities assessment, etc. Housing costs for low income units may not exceed 30% x 70% of the area's median income for a household size appropriate to the unit. If the unit is a studio, the household size is one person. If it is a one-bedroom unit, the household size is two people. If it is a two-bedroom unit, the household size is 3 people.

If the units are leased, rents must include the cost of utilities and may not exceed 30% x 60% of the area's median income for a household size appropriate to the unit.

In San Mateo County the 2019 multifamily average median income limits were \$112,900 for one person, \$129,000 for two people, and \$145,100 for three people. Applying these limits, the maximum rent Stanford would be permitted to charge for a studio unit would appear to be 30% x 60% x \$112,900 = \$20,322 or \$1,693.50/month. The maximum rent Stanford would be permitted to charge for a one-bedroom unit would be 30% x 60% x \$129,000 = \$23,220 or \$1,935/month. The maximum rent Stanford would be permitted to charge for a two-bedroom unit would be 30% x 60% x \$145,100 = \$26,118 or \$2,176.50/month.

Each studio apartment, comprising 425 square feet of housing, could rent for a maximum annual revenue of \$20,322, or \$47.82/square foot of space/year. Each two-bedroom apartment, comprising 925 square feet of housing, could rent for a maximum annual revenue of \$26,118, or \$28.24/square foot of space/year.

By building six 425 square foot studio apartments, requiring a total of 2,525 square feet of building for all six units, Stanford can obtain revenue of \$121,932 (6 x \$20,322 = \$121,932). By building three 975 square foot two-

bedroom apartments, requiring a total of 2,925 square feet of building (or 16% more space and cost) Stanford would obtain earn \$78,354 (3 x \$26,118 = \$78,354) in total annual rent, or \$43,578 less in annual rent for 3 two-bedroom apartments as compared with 6 studio apartments. In short, Stanford would make 35% less revenue at 16% greater cost by building two-bedroom apartments. Is that why Stanford is proposing to build six studio apartments and only three units as large as two-bedrooms?

In considering whether the touted benefit of affordable housing for low income families is real or illusory, the residents of Portola Valley deserve to know how Stanford's proposed mix of low-income housing would or would not serve the actual needs of the local population of very low income and low-income individuals and families in need of housing support.

The EIR should evaluate, disclose and assess:

- (a) the composition (age, family size, income level, career) of the low and very low-income individuals and families who would qualify to purchase or rent affordable housing in and around Portola Valley; and
- (b) the proportion of that population of qualifying low-income families who are seeking each of the types of below market housing Stanford proposes to build and sell; and
 - six 425 square foot one studio units;
 - three 600 square foot one-bedroom units;
 - three 975 square foot two-bedroom units; and
- (c) how the type and size of housing Stanford is proposing to build compares with the composition and needs of the local population of low-income individuals and families.

Comment 15: The EIR Should Include an Investigation and Assessment of the Impact of Stanford's Proposed Sale, or Alternatively the Rental by Stanford, of the Project's Below Market Units on the Local Population of Low-Income Families

In light of the difference in cost of and cost of rental for the proposed below market housing, the EIR should evaluate, compare and disclose:

- (a) the composition (age, family size, income level, career, gender) of the local population (working and /or living in and around Portola Valley) of low and very low-income individuals and families who would qualify to purchase the low-income housing Stanford proposes to build;
- (b) the composition of the local population of low and very low-income individuals and families who would qualify to rent the low-income housing Stanford proposes to build; and
- (c) the difference if any between the population of low income families who would qualify to purchase the proposed below market housing and the population of families who would qualify to rent such housing.

Sincerely,

The Undersigned Residents of Portola Valley

cc: Portola Valley Town Council
Portola Valley Planning Commission
Woodside Fire Protection District
John Donahoe, Stanford University Director, Planning and Entitlement

I have read and reviewed the attached letter to Laura Russell regarding the scope of the EIR for Stanford's proposed high-density housing development in the Alpine canyon in Portola Valley. I agree to include my name and address as a signatory of the letter, and to have the letter sent to the Town of Portola Valley and local media on my behalf.

Ulrich Aldag
909 Westridge Drive

Nancy Kruberg
175 Meadowood Drive

Tom and Helen Buckholz
157 Westridge Drive

Delle Maxwell
40 Minoca Road

Kristi Corley
15 Golden Oak Drive

William and Amelia Meffert
406 Minoca Road

Kristin and Rusty Day
178 Pinon Drive

Matthew and Lori Muffley
187 Westridge Drive

Waltraud Finch
800 Westridge Drive

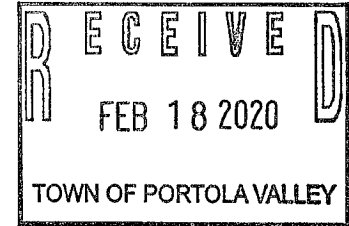
Michael Rissi
30 Minoca Road

Mary Hufty
257 Mapache Drive

Sylvia and Andrew Thompson
840 Westridge Drive

February 12, 2020

Town Council
Town of Portola Valley
765 Portola Road
Portola Valley, CA 94028



Re: Project No. PLN-ARCH0021-2019
High Density Housing Development Proposal, Alpine Canyon, 3530
Alpine Road, Portola Valley CA aka Stanford Wedge Housing Project

The highest priority of Town government and its employees should be the protection and promotion of the health and safety of Portola Valley's residents.

Given our proximity to the San Andreas fault amidst the steep and heavily vegetated ravines and canyons that criss-cross and ring Portola Valley, the Town must confront and responsibly address the increasing risk of catastrophic wild-land fire. Since there is likely no greater risk to the health and safety of Portola Valley residents than wild-land fire, every development, including Stanford's proposed housing development in the Alpine canyon, should be subjected to the most rigorous, professional scrutiny to ensure that it does not increase and preferably reduces the risk of wild-land fire.

We believe the Town and its staff need to take the risk of wild-land fire that would be created by Stanford's proposed high density housing project in the Alpine Canyon far more seriously than the Town or its staff have manifested to date. The Town and its staff need to demonstrate their respect for and support of the Woodside Fire Protection District's professional, independent assessment of the increased fire risk Stanford's proposed project poses to its immediate neighbors and our entire community, and they need to do so by compelling Stanford to address and satisfy the Fire District's documented concerns and requirements.

We understand that the Woodside Fire Protection District sent the Town the enclosed September 1, 2019 letter explaining in detail the high fire risk posed by the proposed project to the Alpine canyon and all of the adjoining properties. As the Fire District wrote, "even with regular fuel reduction attempts, the physical vegetative nature and steep topographical properties

of the large remaining undeveloped portion of the parcel place a significant increased risk of rapid acceleration and increased intensity of any ignition in the natural landscape. These high fire risk characteristics pose a risk to any existing structures on the west, north and east ridges, i.e., Minoca, Pine Ridge Way and Westridge as well as any new structures along the flat 6-acre area proposed for development.”

In light of the high fire risk posed by the proposed project, the Fire District specifically warned Town planners that “[r]eliance on general Portola Valley guidelines and current fire dept and building/planning codes without sufficiently analyzing site-specific conditions or strategically implementing precautionary fire safety measures can lead to a false sense of wildfire safety and preparedness for the families who may unknowing[ly] occupy any of the proposed housing.”

Although the Town has assured its residents that all relevant information about the proposed project will be posted to the Town’s website as it becomes available, the September 1, 2019 letter of the Fire Marshall warning the Town about the high risk of fire posed by the proposed project has never been posted to the Town’s website or otherwise distributed or publicized by the Town. Failure promptly to alert Portola Valley’s residents to the Fire Marshal’s stated concerns about the proposed project’s high fire risk deprives residents of the opportunity to respond to Stanford’s proposed project in an informed and timely manner, and calls into question the integrity, transparency and effectiveness of the Town’s review process for this project.

On October 15, 2019 the Woodside Fire Protection District’s plan check informed the Town that Stanford’s proposed development should “[m]aintain defensible space of 100 feet from each side and from the front and rear of all structures” and that “[s]tructure spacing should be a minimum of 100 feet between structures.” A month later, the development plan Stanford submitted to the Town on November 25, 2019 proposed 30 structures separated by **as little as 8 to 12 feet**. Indeed, as depicted on sheet A0.01A of Stanford’s submittal, no structure appears to be separated by more than 31 feet from its closest neighboring structure. Nothing in the November 25 plan submitted by Stanford addresses or responds to the Fire District’s requirement for a minimum of 100 feet of separation between structures. If Stanford had adhered to the Town’s zoning ordinance and the District’s requirement for a minimum separation of 100 feet between

structures, the proposed six-acre site would provide space for as few as six to seven separate structures.

The Fire District's October 15 comments also required Stanford to complete and submit two District-approved, independent fire modelling studies of expected fire behavior for the development, and a comprehensive fire protection plan for the entire development, all in advance of any study of the environmental impact of Stanford's proposed project. Remarkably, Stanford's November 25, 2019 submission simply ignored these additional fire safety requirements and does not address them.

As the Fire District expressly warned the Town in its September 1 letter, the construction of housing in such a combustible and dangerous setting as the southern mouth of the Alpine Canyon is a "root cause" of the catastrophic wild-land fires now plaguing California. Those hazards are greatly exacerbated by the construction of high-density housing in such settings, which increases significantly the number of potential sources for and risk of fire ignition and spread. Incredibly, as recently as this week, Fire Marshall Don Bullard told the Almanac, "The fire (district) doesn't think that this is the best location to be putting high density housing because of the high fire severity zone. It is a very dangerous place for fire. We should look for other areas for development that would be better, and we've suggested that the town do that."

At the start of the January 30, 2020 public hearing of the Planning Commission on the scope of its review for this project, the Town's project leader listed all of the various committees and stakeholders with whom the Planning Commission planned to interact in conducting its environmental impact assessment. Notably, she did not mention the Fire Protection District. Shortly thereafter, the Chairman of the Planning Commission stated that the Commission had not previously seen or considered **any** of the Fire District's documented concerns and plan check requirements for this project, and saw no reason to address or resolve those stated concerns and requirements prior to the initiation of its environmental impact study for the project. Nor did he inform the public that the Fire District recommended against high density housing on Stanford's property and had asked the Town to look for other less dangerous areas for development.

The fact that the Planning Commission claims ignorance of the Fire District's stated concerns with the proposed siting of the project and its stated requirements for structural separation months after those concerns and requirements were transmitted in writing to the Town is utterly inexplicable and unacceptable. And the fact that the Planning Commission sees no reason to address and resolve those critical concerns and requirements before proceeding with an environmental assessment of the project as proposed is similarly disturbing and unacceptable.

Why are the Town staff and Planning Commission ignoring the Fire District's stated minimal requirements for this project? Why has the Town staff not compelled Stanford to address and resolve in writing the Fire District's minimum requirement for structural separation? Why has the Town allowed Stanford to ignore the Fire District's requirement for two District-approved independent fire modeling studies and a fire protection plan before commencement of its environmental impact assessment? What General Plan and zoning concessions is the Town proposing to allow Stanford?

The residents of Portola Valley depend and rely upon the Woodside Fire Protection District to protect and defend the safety and well-being of our families, homes and properties. It is incumbent upon the Town government to similarly demonstrate its trust and reliance upon the Fire District by respecting and promptly engaging with the Fire District's stated concerns and requirements for this and any other development project.

The Town should designate the Woodside Fire Protection District as the lead governmental agency to assess and evaluate the fire safety risks created by this project and allocate an appropriate portion of the project's EIR budget to defer the District's costs in performing that role.

Before the Town or any of its residents can begin to assess the environmental and other impacts of a proposed housing development in the Alpine Canyon it is essential to resolve the differences between our zoning ordinance, the Fire District's requirement for a minimum of 100 feet of separation between structures in the project, and Stanford's proposal for as little as 8 feet of separation between structures. What, exactly, will the EIR evaluate: a project with 30 residential structures on six acres separated by as little as 8 feet as Stanford proposes, or a project with 7-10 structures on

six acres separated by a minimum of 100 feet as the Fire Protection District requires?

Similarly, the Town has neglected to require Stanford to respond to the Fire District's requirement for two District-approved independent fire modeling studies and submission of a fire protection plan. As the Fire District clearly stated in its January 10 plan check report to the Town, the two District-approved independent fire modeling studies and the fire protection plan required by the District must both be completed before the environmental impact of the proposed project can be assessed: "EIR cannot be done prior to having a veg. management plan and veg. management plan is dependent the fire behavior evaluation."

In short, all three of the Fire District's requirements (100 foot separation between structures, two independent District-approved fire behavior studies, and a fire protection plan) should be addressed and included in a revised plan prepared and submitted by Stanford before the Town commences its CEQA-mandated environmental assessment of the project. Until these requirements are resolved, it is not possible to know or evaluate either the scope or density of the proposed project or the claimed benefits or potential adverse CEQA effects of the proposed project.

Sincerely,

The Undersigned Residents of Portola Valley

cc: Portola Valley Planning Commission
Fire Marshall, Woodside Fire Protection District
Laura Russell, Portola Valley Planning and Building Director
John Donahoe, Stanford University Director, Planning and Entitlement

The following residents have reviewed the above letter to the Portola Valley Town Council regarding Stanford's proposal to construct a high-density housing development in the Alpine canyon at 3305 Alpine Road in Portola Valley and agreed to include their names and addresses as a signatory of this letter, and to have the letter sent to the Town of Portola Valley and local media on their behalf:

Ulrich Aldag
909 Westridge Drive

Jason and Sara Donahue
123 Pinon Drive

Craig Barratt
388 Westridge Drive

Waltraud Finch
800 Westridge Drive

Denise and Clay Bullwinkel
70 Bear Gulch Drive

Tobias Freccia and Lisa Giblin
380 Escobar Road

Tom and Helen Buckholz
157 Westridge Drive

Mark Geenen
255 Golden Oak Drive

Laura Martin Carballo
264 La Cuesta Drive

Stephen and Aisha Gillett
479 Westridge Drive

Cathy Carlson
180 Crescent Avenue

Karen Giordano
300 Wayside Drive

James Christensen
300 Alamos Road

Teresa Godfrey
20 Tynan Way

Lorrie Clemens
275 Escobar Road

Mary Hufty and Daniel Algeria
257 Mapache Drive

Kristi Corley
15 Golden Oak

Rob and Mary Jack
938 Westridge Drive

Kristin and Rusty Day
178 Pinon Drive

Nancy Kruberg
175 Meadowood Drive

Michael Deggelman
100 Wyndham Drive

Jacqueline Kubicka
51 Hillbrook Drive

Taryn Lamm
240 Golden Oak Drive

Linda Lange
390 Escobar Road

Walter N. Leclerc, Jr.
250 Golden Oak Drive

Jan and Art Manzo
174 Vista Verde Way

Delle Maxwell
40 Minoca Road

Patricia McCrory
195 Crescent Avenue

Robert Morgan
20 Bear Gulch Drive

Matthew and Lori Muffley
187 Westridge Drive

Christine Mumford
405 Golden Oak Drive

John D. and Katie Mumford
130 Ramoso Road

John B. Mumford
191 Ramoso Road

Samuel Quezada
15 Sausal Drive

James Raitt
188 Meadowood Drive

Kathryn Reavis and Dave Strohm
267 Mapache Drive

Michael Rissi
36 Minoca Road

Gordon Russell
257 Mapache Drive

Mark and Carol Sontag
280 Golden Oak Drive

Loverine Taylor
35 Naranja Way

Ravi Thomas
425 Golden Oak Drive

Sylvia and Andrew Thompson
840 Westridge Drive

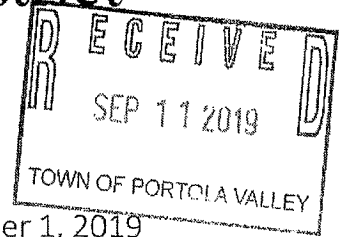
Dave Toole
240 Alamos Road

John G. Vedder
285 Golden Oak Drive

Jim and Ellen Vernazza
120 Nathorst Avenue

Woodside Fire Protection District

Prevention Division



Stanford Wedge Housing
Pre-application review APN 077281020

September 1, 2019

The current 75-acre parcel has a south exposure aspect and contains steep canyons and ravines with an abundance of dead and live vertical as well as horizontal herbaceous and woody vegetation. A large percentage of the canyons and ravines within the parcel are too steep for mechanical fuel treatments and goat grazing has not reduced the amount of live or dead woody material. The west and east boundary of the parcel is surrounded by many midcentury ranch homes, some with wood shake roofs and a scattering of newly remodeled homes perched on ridge tops overlooking the entire 75-acre parcel. The majority of trees include oaks and buckeyes with an overabundance of dusky footed wood rat nests which hamper fuel reduction mitigation measures. Native chaparral is well established, and a profusion of poison oak is contiguous throughout the steep canyons and tangled in the trees creating a multitude of ladder fuels leading into the canopies. The flatter areas have very dense growing oak trees, some which have been limbed up. However, the density configuration enables mature and immature canopy to overlap which is conducive to a more rapid spread of fire within the canopy. Recent fuel mitigation has reduced significantly the amount of underbrush within the 200 ft zone of Alpine Rd. Nevertheless, even with regular fuel reduction attempts, the physical vegetative nature and steep topographical properties of the proposed large remaining undeveloped portion of the parcel, place a significant increased risk of rapid acceleration and increased intensity of any ignition in the natural landscape. These high fire risk characteristics pose a risk to any existing structures on the west, north and east ridges i.e. Minoca, Pine Ridge Way and Westridge as well as any new structures along the flat 6-acre area proposed for development.

Don Bullard
Deputy Fire Marshal
djbullard@woodsidefire.org

Denise Enea
Fire Marshal
denea@woodsidefire.org

www.woodsidefire.org

Tel 650 851-1594

808 Portola Rd. Portola Valley, CA 94028

Woodside Fire Protection District

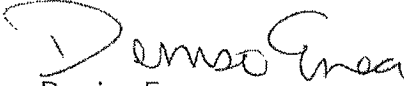
Prevention Division



"The arrangement and location of structures strongly affects their susceptibility to being destroyed in a wildfire". (*Mell WE, Manzello SL, Marandhides A, Butry DT, Rehm RG 2010, The wildland- urban interface fire problem*). "Past land-use decision-making has allowed homes to be constructed in highly flammable areas, and this may be one of the roots of the fire problem". (*Pincetl S, Rundel PW, DeBlasio JC, Silver D, Scott T et al. 2008, It's the Land use, not the fuels Real Estate Rev 37: 25-43*). Small housing clusters, historically fair the worst in the wildland-urban interface. Dense structure arrangement contributes to structure to structure fire spread depending on each structure's flammability.

Because hazardous fuels mitigation is a critical life safety element for high wildfire risk areas such as this parcel, required annual hazardous fuel reduction provisions for the 6-acre parcel as well as for the larger undeveloped hill side parcel will need to be mandated with the approved development document. WFPD recommends the establishment of a planned unit development document that includes annual fuel modification elements for the large undeveloped parcel as well as for the developed sites. Strict defensible space around structures, native plant only vegetation and strict perimeter clearances will all need to be enforced. Reliance on general Portola Valley guidelines and current fire dept and building/planning codes without sufficiently analyzing site-specific conditions or strategically implementing precautionary fire safety measures can lead to a false sense of wildfire safety and preparedness for the families who may unknowing occupy any of the proposed housing.

WFPD appreciates the opportunity to preface all the above comments and we apologize for the lengthy delay in submitting this preliminary review.


Denise Enea
Fire Marshal

Don Bullard
Deputy Fire Marshal
djbullard@woodsidefire.org

Denise Enea
Fire Marshal
denea@woodsidefire.org

www.woodsidefire.org

Tel 650 851-1594

808 Portola Rd. Portola Valley, CA 94028

WOODSIDE FIRE PROTECTION DISTRICT

Prevention Division

808 Portola Rd. Portola Valley, CA ~ www.woodsidefire.org ~ Fire Marshal Denise Enea 650-851-6206
 ALL CONDITIONS MUST MEET WFPD SPECIFICATIONS - go to www.woodsidefire.org for more info

BDLG & SPRINKLER PLAN CHECK AND INSPECTIONS

PROJECT LOCATION: Alpine Rd.		Jurisdiction: PV	
Owner/Architect/Project Manager: Stanford University		Permit#: Pre-Application	
PROJECT DESCRIPTION: New Residence			
Fees Paid: <input checked="" type="checkbox"/> \$YES <input type="checkbox"/> See Fee Comments Date:			
Fee Comments: \$450.00 paid 7/29/19 Planning ck # 2171777			
<p>BUILDING PLAN CHECK COMMENTS/CONDITIONS: THE FOLLOWING WERE IDENTIFIED AS BEING REQUIRED DURING A PRE-APPLICATION REVIEW PROCESS. DURING THE REVIEW OF FINAL BUILDING PLAN DOCUMENTS ADDITIONAL ITEMS MAY BE REQUIRED.</p> <ol style="list-style-type: none"> 1. Loop driveway will require pullouts every 350 ft. (see www.woodsidefire.org) for pull out std dimensions. 2. Loop roadway shall be a minimum of 20 ft. 3. Three fire hydrants, capable of a minimum of 1000 gpm, along loop road with a maximum separation of 400 ft. Between each hydrant. Hydrants shall be installed prior to any framing of structures. 4. 200ft of defensible space from remaining Stanford parcel to all proposed parcels to be developed will be required prior to start of concrete foundation work and maintained in perpetuity. 5. 30 ft' perimeter property line defensible space per WFPD ordinance 304.1.2.A will be required prior to start of concrete foundation work and maintained in perpetuity. 6. NFPA 13D or 13R Fire Sprinkler System to be installed based on occupancy type. 7. Addressing required on each structure and each individual R2 rental unit. Numbers shall be visible from the loop road, be of contrasting color from background, illuminated and a minimum of 4-inch stroke. 8. FDC and PIV shall be placed in a location approved by WFPD 9. Vegetative screening around all structures must meet government code 51182 at all times. 10. R2 state mandated annual fire inspections (fee TBD) 			
Reviewed by: D. Enea		Date: 9/1/19	
<input checked="" type="checkbox"/> Resubmit		<input type="checkbox"/> Approved with Conditions	
<input type="checkbox"/> Approved without conditions			
Sprinkler Plans Approved: NO		Date:	Fees Paid: <input type="checkbox"/> \$390 <input type="checkbox"/> See Fee Comments
As Built Submitted: -----		Date:	As Builts Approved Date:
Fee Comments:			
Rough/Hydro Sprinkler Inspection By: -----		Date:	
Sprinkler Inspection Comments:			
Final Bldg and/or Sprinkler Insp By: -----		Date:	
Comments:			

From: Thomas <thomas.j.buckholtz@gmail.com>
Sent: Friday, February 14, 2020 6:55 AM
To: Laura Russell
Cc: Town Center; Town Center; Jeff Aalfs; MaryannMoise-DG; Craig Hughes; JohnRichards-DG; Ann Wengert; 'Don Bullard'
Subject: comments re EIR project re proposed Stanford Wedge Housing Project

Planning and Building Director Laura Russell:

Thank you for, per your year-2020 letters of January 14 and January 16, inviting comments regarding an Environmental Impact Report effort regarding a Stanford University proposal regarding 3530 Alpine Road. This email letter responds to those invitations and provides comments.

Please let me know that you received this communication.

This email letter addresses the following topics.

1. Content and scope of any Environmental Impact Report effort regarding the currently proposed Stanford Wedge Housing Project and regarding any future proposals regarding 3530 Alpine Road.
2. Processes regarding such Environmental Impact Report efforts.
3. Possible Town government actions regarding alternative housing.

Regarding topics 01 and 02, this letter contains numerous details. I request that and assume that Town staff will diligently find and work with the details. Perhaps it is appropriate to note that (a) information I present herein evolved from a list of concerns that I submitted via email on May 19, 2019 to relevant Stanford people and (b) it may be that Stanford's proposal fails to address adequately (specifically regarding an EIR effort and generally regarding overall plans) many items that I listed in the attachment to that email.

This letter makes the following recommendations.

1. Do not commission or continue to pursue an environmental impact study until there is an adequate "basis" for conducting the study.
 - 1.1. Ensure that the public has adequate opportunity to review, before the commissioning or continuing of a study, all "basis" material upon which the study will be based. (For example, see items a. through f. below.)
 - 1.2. Ensure that the public has an adequate opportunity, before the commissioning or continuing of a study, to submit comments and recommendations regarding the content and scope of the EIR study.
 - 1.3. Ensure that bases for the study, resources deployed to conduct the study, the study, and the resulting report(s) do not reflect biases or influences of elected officials, employed officials, volunteer officials, or the applicant. Ensure that entities, including consultants conducting the study, have adequate perspective and experience regarding rural environments. Ensure that the selection of consulting services is transparent and appropriately competitive.
2. To the extent that any environmental impact study continues or becomes commissioned, include in the study the topics and aspects that this letter mentions.

Relevant impacts of the proposed development cannot be determined from just a site map and architectural sketches. The following examples point to possible lacks of "basis" material. Other lacks may exist.

- a. Without a firm definition of proposed modifications to Alpine Road, it may be impossible for the study to address adequately some of the following "environmental resource factors": 1, 9, 11, 13, 14, 15, 17, 19, 20, and 21. (An appendix [Appendix A.] to this letter lists the resource factors.)
- b. Without a firm definition of administrative relationships between Stanford and the Town, it may be impossible for the study to address adequately – with respect to the 12 not-for-faculty-family units – some of the following environmental resource factors: 5, 11, 14, 15, 17, 19, 20, and 21. For example, what are the Town's goals and needs? To what extent will the Town need to set up and pay for administrative mechanisms? And so forth.

- c. Without a firm description and guarantee of something like a permanent open space easement on the remainder of the property, it might be impossible for the study to address adequately the following environmental resource factors: 1, 2, 4, 9, 10, 11, 13, 14, 15, 16, 17, 19, 20, and 21.
- d. Without binding statements by the applicant regarding the extent to which the applicant will fully mitigate – now and in perpetuity – each and every adverse impact, it might be impossible for the study to address adequately the following environmental resource factors: 1, 4, 7, 8, 9, 10, 11, 14, 15, 16, 17, 19, 20, and 21.
- e. A presenter at the January 30, 2020 Planning Commission meeting seems to have alluded to agreements – for example, roughly stated as “development agreement” and “below market rate agreement” – between the Town and the applicant. To the extent those agreements exist, possibly they were not available for public inspection in a manner conducive to support informed public comment about the scope and content of the EIR study.
- f. Possibly, the Town failed to transmit to the applicant or to post (at least before February 2, 2020) to a relevant webpage (<https://www.portolavalley.net/building-planning/stanford>) a letter – dated September 1, 2019; titled “Stanford Wedge Housing, Pre-application review APN 077281020”; and stamped “Received Sep 11, 2019 Town of Portola Valley” – from the Woodside Fire Protection District.

Possibly, an attempt to resolve such (and some other) matters during the conduct of an EIR study constitutes, in effect, modifying the applicant’s proposal and constitutes grounds to do the following: [a] Void the extant proposal and extant work toward an EIR and/or [b] Restart the approval process at a step before the step of asking the public for comments regarding the content and scope of the new EIR study.

Regarding the scope and content of any study, I request that the study thoroughly explore and report on the following.

- i. Each topic or aspect that Appendix D (to this letter) lists.
- ii. Any and all potential “substantial adverse effects on human beings, either directly or indirectly.” (See items 21.b and 21.c. in Appendix A [to this letter].)

Given remarks at the January 30, 2020 Planning Commission meeting, it appears that item ii. above is both relevant to any Environmental Impact Report study and of concern to Portola Valley residents. For example, the following topics pertain and any study should produce and report qualitative and quantitative results regarding effects throughout at least Portola Valley.

- 1. Increased costs of homeowner’s insurance or renter’s insurance.
- 2. Lack of ability to get homeowner’s or renter’s insurance.
- 3. Loss of property value.
- 4. Decreased ability to sell property (for example, to buyers whose purchases would involve mortgages that require obtaining homeowner’s insurance).
- 5. Loss of property-tax-based and other revenue – for the Town, schools, and so forth.

This letter includes, via appendices, the following.

- A. A list of environmental resource factors that California state law apparently mandates for study.
- B. A list of some entities that seem to fall within those resource factors.
- C. A list of some types of impact that seem to fall within those resource factors.
- D. A list of seemingly unresolved issues that seemingly need resolution before the study can adequately address relevant combinations of entities and types of impact (such as combinations that entities that Appendix B. lists and types of impacts that Appendix C. lists).
- E. A list of other notes that might pertain regarding topics that people mention regarding housing.

Please acknowledge that you received this letter. Please indicate the extent to which the Town plans to consider and act on this letter.

With appreciation.

- Tom

Thomas J. Buckholtz
 Thomas.J.Buckholtz@gmail.com

Appendix A. Environmental Resource Factors

(Based on “2019 CEQA California Environmental Quality Act Statute & Guidelines” – http://resources.ca.gov/ceqa/docs/2019_CEQA_Statutes_and_Guidelines.pdf – pages 313 - 327.)

1. Aesthetics
2. Agriculture and forestry resources
3. Air quality
4. Biological resources
5. Cultural resources
6. Energy
7. Geology and soils
8. Greenhouse gas emissions
9. Hazards and hazardous materials
10. Hydrology and water quality
11. Land use and planning
12. Mineral resources
13. Noise
14. Population and housing
15. Public services
16. Recreation
17. Transportation and traffic
18. Tribal cultural resources
19. Utilities and service systems
20. Wildfire
21. Mandatory findings of significance
 - a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
 - b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
 - c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Appendix B. Entities (some)

Users of roads and trails – walkers, runners, bicyclists, motorists, passengers, drivers and users of public transportation, fire-fighters, emergency services providers, police, utilities (energy, communications, trash collection), construction workers, delivery services, visitors, people with malicious intents, other

Residential property owners and residents – in the would-be development, throughout the Town, near the Town

Business owners, employees, and customers – throughout the Town, near the Town

Wildlife – roaming animals (e.g., deer, turkeys), other animals, native plants, endangered species, invasive species, other

Governmental entities – Town of Portola Valley, Woodside Fire Protection District, schools, policing agencies, other

Other

Appendix C. Types of Impact (some)

Effectiveness at conducting and enjoying aspects of people’s lives and work

Risks and impacts of untoward events – fire (on site, spreading from the site, or spreading to the site), emergency evacuation (of the site, of the Town, or of a region that includes the Town)

Financial impacts (for various entities) – insurance (e.g., fire insurance) availability and cost, property values, taxes

Public services, utilities, and related systems

Results of administrative goals and processes related to the site – Town, Stanford, others

Other

Appendix D. Issues (some)

1.1. Fire hazard

- 1.1.1. Fire hazard on the property. For example, the proposed development ...
 - 1.1.1.1. Does not meet a Woodside Fire Protection District statement about 100 feet of defensible space around each structure.
 - 1.1.1.2. Presents difficulties regarding containing fires on steep hillsides.
 - 1.1.1.3. Provides unrestricted access, for resident children and possibly for the general public, to combustible vegetation.
- 1.1.2. Fire hazard beyond the property. For example, ...
 - 1.1.2.1. Fire might spread (up the canyon) and via embers to (ultimately) much of Portola Valley.
- 1.1.3. Fire modeling. The proposal is (apparently) incomplete. For example, ...
 - 1.1.3.1. Modeling, including modeling specified and supervised by the Woodside Fire Protection District, has (apparently) yet to occur.

1.2. Safety regarding emergencies. For example, the proposed development ...

- 1.2.1. Would add as many as 39 families to the load that Alpine Road would need to carry during an evacuation.

1.3. Alpine Road

- 1.3.1. Changes. For example, the project ...
 - 1.3.1.1. Might result in needs for four pairs of left-turn lanes – with each pair facilitating each of entering and exiting Alpine Road. (Additional pairs would be two for the development and one for Glenoaks Equestrian Center. One pair exists at Westridge.)
 - 1.3.1.2. Might result in needs for pedestrian crossing lights at (at least) two places – Westridge and one of the driveways into the Stanford property.
 - 1.3.1.3. Might require additional capacity to handle school-related bus stops – related to children getting to schools and regarding parents keeping children in cars until buses arrive.
- 1.3.2. Impact of changes.
 - 1.3.2.1. Changes might impact setbacks regarding the development and, thereby, point to needs to alter, move, or shrink aspects of the development.
- 1.3.3. Administration / enforcement
 - 1.3.3.1. Regarding parking along the side of the road.
 - 1.3.3.2. Regarding parking trucks in middle-of-road areas.

1.4. Town character

- 1.4.1. Appearance. The proposed development ...
 - 1.4.1.1. Would be the only dense housing visible from a major road.
 - 1.4.1.2. Would be quite visible to people using Alpine Road or the trails on either side of Alpine Road.
 - 1.4.1.3. Could be the only visible major source of light at night (and would have impact regarding neighbors).
- 1.4.2. Precedents. The proposed development ...
 - 1.4.2.1. Might lead to precedent-setting changes to town vision, plans, zoning, and so forth.
 - 1.4.2.2. Might lead to precedent-setting regarding Stanford's developing west of I-280.
- 1.4.3. Enduring impact. Studying this aspects seems to require ...
 - 1.4.3.1. A thorough, independent (integrated) study of impacts on all aspects of the Town – public schools, transportation, parking, trails, open space, wildlife, quality of life for existing and future residents, possible increases in insurance costs, possible diminishment of property values (and property-tax income for the Town), and so forth.

1.5. Wildlife impact on people, pets, and so forth. Aspects include ...

- 1.5.1. The extent to which fleeing wildlife (and traffic accidents that might ensue) might disrupt evacuations via Alpine Road or the mobility of emergency services.
- 1.5.2. Risks to people and pets on the property.

1.6. Alternative housing. Aspects include ...

- 1.6.1. The extent to which the development would contribute in each category such as “affordable” and “below market rate.”

- 1.7. Networks of trails.
 - 1.7.1. To what extent would development compromise the Town's network of trails?
 - 1.7.2. To what extent would development compromise the region's network of trails?
- 1.8. Stanford responsibilities. Aspects might include ...
 - 1.8.1. Possibilities regarding possible previous underpayment (by Stanford and/or concession holders) of taxes for land (already in use or targeted for use) for commercial (or, other non-educational) use.
 - 1.8.2. Possible compensation (to, e.g., schools and Town) regarding additional burdens because of increased population.
 - 1.8.3. Possible mandated contributions to civic programs (such as foundations that support schools).
- 1.9. Administrative policies and practices (Stanford and the Town). Aspects include ...
 - 1.9.1. How will Stanford and the Town perform administrative activities to guarantee that non-Stanford people have a fair opportunity to live in "non-faculty" housing units? (Also, what are the "Town's objectives" regarding this matter? Possibly, consider that state law may prohibit not having a category of [in effect] "all other" regarding people eligible for the housing. Possibly, note that Stanford might be able to maintain an "all other" list of people and use that list to populate units, based on [for example] practices that do not advertise [to the public or Town] availability of units.)
 - 1.9.2. To what extent will the Town (or other non-Stanford entities) incur or risk administrative costs or other liabilities?
 - 1.9.3. To what extent will the Town have jurisdiction or responsibilities regarding common-use areas of the development?
 - 1.9.4. To what extent will the Town have jurisdiction or responsibilities regarding nominally unused areas of the overall property?
- 1.10. Maintenance policies and practices (Stanford and the Town). Aspects include ...
 - 1.10.1. To what extent will the Town need to maintain roads, firebreaks, trails, and other infrastructure?
- 1.11. Conservation easement. Aspects include ...
 - 1.11.1. To what extent will any "deal" guarantee that the rest of this part of Stanford's property will remain undeveloped? (Possibly, a permanent open space easement has been a requirement regarding each one of some other developments in the Town.)
- 1.12. Shuttle buses and carpooling. Aspects include ...
 - 1.12.1. To what extent will Stanford face restrictions on the use of shuttle buses?
 - 1.12.2. To what extent will Stanford people not living at the development site have access to Stanford shuttle buses? (And, where will they park their cars or bicycles?)
 - 1.12.3. To what extent will the non-Stanford public have access to Stanford shuttle buses?
 - 1.12.4. To what extent will Stanford and/or the Town encourage or limit "park and ride activities" (whether or not related to shuttle buses; and, with respect to the parking lot at Ford Field)?
- 1.13. General impacts (initial and continuing). Impacts include impacts ...
 - 1.13.1. On local institutions and infrastructure, including (for example) costs regarding public schools, Town administration, County administration, policing services, roadways, nominal water services, fire-fighting water services and fire-fighting equipment access, and so forth.
 - 1.13.2. On safety on and near Alpine Road for people, pets, vehicles, and wildlife.
- 1.14. Ecological impact. Impacts include ...
 - 1.14.1. On wildlife, water, and so forth.
- 1.15. Impact beyond Portola Valley. Aspects include ...
 - 1.15.1. Evacuation needs regarding Ladera and parts of Palo Alto and Woodside.
 - 1.15.2. Load regarding Ladera – parking at the shopping area; abilities for Ladera residents (and their cars and bicycles) to turn north onto Alpine Road.
- 1.16. Impacts during construction. Aspects include ...
 - 1.16.1. Possible uses of Ford Field parking, bicycle lanes for parking, and so forth.
- 1.17. Neighborhood impacts. Aspects include ...
 - 1.17.1. Possible problems regarding phone-line capacity, weak cellular service, and weak over-the-air television.
- 1.18. Project design (possible issues). Aspects include ...
 - 1.18.1. Setbacks from neighbors, trails, wetlands, undeveloped land, (widened) roads.
 - 1.18.2. Security, privacy.
 - 1.18.3. Adequacy of resident and visitor parking. (With consideration that the Woodside Fire Protection District may mandate extensive "no parking" zones.)
 - 1.18.4. Fencing. (With consideration that fencing near or between buildings may limit access by fire-fighting personnel.)
 - 1.18.5. Aesthetics and fire safety, for example regarding vegetation and matters of views of the development from all points (along Alpine Road and two trails that parallel Alpine Road) to the east of the development.
 - 1.18.6. Locations of utility infrastructure (including for the provision of service [possibly underground] and for routing or shutting off service [possibly above ground]).
- 1.19. Other

Appendix E. Notes (some)

1.1. Alternative housing. Aspects might include ...

- 1.1.1. Apparently, there is no need (compared to state mandates) to do something now.
- 1.1.2. Mandates and laws may be in flux. (People seem to recognize that the current set is not working.)
- 1.1.3. The Town could work to prevent mandates and lessen impacts of mandates.
- 1.1.4. Aspects could and perhaps should wait until announcement of the 2022-2030 RHNA (Regional Housing Needs Assessment).
- 1.1.5. Adding housing soon may invite a “you can do even more” response from the state or regional entities.
- 1.1.6. Portola Valley may not be sizable enough to make (by just adding housing units) a significant contribution toward the region’s housing needs. (How about the Town’s finding other ways to help?)

1.2. Other

From: Michael Lozeau <michael@lozeaudrury.com>
Sent: Friday, February 14, 2020 6:07 PM
To: Laura Russell
Cc: Mary Page Hufty
Subject: Scoping Comments: Stanford Wedge Housing Project (SCH No. 2020010203)
Attachments: 2020.2.14 Lozeau Drury Scoping Comments re Stanford Wedge Housing Project - Final.pdf

Dear Laura,

Attached please find scoping comments on the Stanford Wedge Housing Project submitted on behalf of Portola Valley Neighbors United.

Thank you for considering these comments.

Sincerely,

Mike Lozeau

--

Michael R. Lozeau
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, California 94612
(510) 836-4200
(510) 836-4205 (fax)
michael@lozeaudrury.com

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail Michael@lozeaudrury.com, and delete the message.

From: Valerie Baldwin <valbaldwin@gmail.com>
Sent: Saturday, February 15, 2020 4:17 PM
To: Laura Russell
Subject: Stanford Wedge comment

I am opposed to the high density building on the Stanford Wedge. The letter from the Woodside fire Dept should be enough to stop the development. To trust Stanford to keep the vegetation trimmed back year after year seems iffy to me

Living West of that property on Echo Lane also is scary to add around 100 extra vehicles trying to escape an emergency along Alpine Rd. It would be bad and this would make it worse.

Finally, those exiting Westridge during commute hours have demanded a signal light along Alpine Rd. That would make life miserable for the rest of us. Wouldn't these new residents demand the same? Even stop signs would snarl traffic like the Alpine/Portola Rd intersection.

Valerie Baldwin
243 Echo Ln

To: Martha Poyatos <mpoyatos@smcgov.org>; Rob Bartoli <RBartoli@smcgov.org>

Subject: Stanford Project - NOP

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Hi Martha and Rob,

The Town is providing official notice to agencies that we are preparing an Environmental Impact Report for a housing project proposed by Stanford University. Please find the NOP attached.

Thanks
Laura

Laura C. Russell, AICP
Planning & Building Director



Town of Portola Valley
650-851-1700 Ext. 218
www.portolavalley.net

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PHIL SCOTT
District Manager

In reply, please refer to our
File No. 077-281-020

February 17, 2020

VIA EMAIL: Laura C. Russell lrussell@portolavalley.net

VIA MAIL:

Laura C. Russell, Planning & Building Director
Town of Portola Valley
Planning & Building Department
765 Portola Road
Portola Valley, CA 94028

RE: STANFORD WEDGE HOUSING PROJECT EIR

Dear Ms. Russell:

District staff has reviewed the proposed project and has the following comments regarding the mentioned project:

- The development must comply with all current District Regulations and Standards (www.westbaysanitary.org).
- This parcel is not yet annexed into the West Bay Sanitary District, and thus not yet entitled to receive all available services from the District.
- The need for improvements to downstream District's facilities may be required. Subject to further review.
- EIR shall address all sewer improvements and annexations.
- Any new District sewer mains not within the Right-of-Way (ROW) will require a dedicated easement conforming to District Standards.
- A separate and independent building sewer shall be provided for every building to the main. Each lateral shall have a conforming property-line-clean-out within 5-FT of the ROW or easement.
- The District reserves the right to provide additional comments in response to subsequent submittals.

If you have any questions, please call me at 650-321-0384.

Very truly yours,

WEST BAY SANITARY DISTRICT



Jonathan Werness
Engineering Technician

cc: BHK, GDS, HMC, SXR, TMR

W:\Public Data\Jonathan Werness\Plan Review\Stanford University\Portola Valley Faculty Housing\Stanford Housing NOP EIR District Comments.docx

SERVING AREAS IN MENLO PARK, ATHERTON, PORTOLA VALLEY, EAST PALO ALTO, REDWOOD CITY, WOODSIDE AND
UNINCORPORATED SAN MATEO AND SANTA CLARA COUNTIES