Compiled Set of Written Comments on the Draft Environmental Impact Report for the Stanford Wedge Housing Project

This document contains the written comments submitted in response to the Draft Environmental Impact Report for the Stanford Wedge Housing Project during the public review period, which ran from 3/30/2022 through 5/13/2022.

Comments are presented in chronological order of receipt within three groups as listed below:
Letters/Email from Government Agencies
Letters/Email from Persons and Groups
Portola Valley Website Online Form Submissions

Letters/Email from Government Agencies

Rob Bartoli, San Mateo LAFCo, 5/12/2022

Melissa Ross, San Mateo County, 5/12/2022

Erin Chappell, California Department of Fish and Wildlife, 5/13/2022

Don Bullard, Woodside Fire Protection District, 5/13/2022

Letters/Email from Persons and Groups

Tom Hafkenschiel, 3/30/2022

David Cardinal and Lorrie Duval, 3/31/2022

MJ Lee, 4/9/2022

Amelia A. Meffert, 4/21/2022

Kurt Jaggers, 4/24/2022

Tony P. Vertongen, 4/24/2022

Ulrich Aldag and Helga Lewis, 4/24/2022

Yvette Michel, 4/25/2022

Thomas J. Buckholtz, 4/25/2022

Leslie Kraus, 4/25/2022

Bob Turcott, 4/26/2022

Eric Denys and Sonja Declercq, 4/28/2022

Thomas J. Buckholtz, 4/29/2022

Patricia McCrory, 5/3/2022

Teri and Dorian McKelvy, 5/3/2022

Mary Page Hufty, 5/4/2022

Susan Kritzik, 5/5/2022

Kristi Corley, 5/6/2022

Leslie Kriese, 5/9/2022

Valerie Baldwin, 5/9/2022

Valerie Wookey, 5/10/2022

Kathy Reback, 5/10/2022

Elizabeth Babb, 5/10/2022

Rusty Day, 5/11/2022

Mary Paine, 5/11/2022

Sylvia Thompson, 5/11/2022

Valerie Baldwin, 5/11/2022

Bob Boyle, 5/12/2022

Harry Turner, 5/12/2022

Evan A. Braun, 5/12/2022

Bob Turcott, 5/12/2022

Loverine Taylor, 5/13/2022

Susan and Gene Chaput, 5/13/2022

Judith Murphy, 5/13/2022

Robert and Mary Jack, 5/13/2022

Bob Turcott, 5/13/2022

Mary Page Hufty, 5/13/2022

Janet Davis, 5/13/2022

Rita Comes Whitney, 5/13/2022

Mary Page Hufty, 5/13/2022

Craig and Camilla Eckstein, 5/13/2022

Kristi Corley, 5/13/2022

Karen Slocum, 5/14/2022

Ward Vercruysse and Sofie Vandeputte, 5/14/2022

Kristi Corley, 5/16/2022

Mary Page Hufty, 5/16/2022

Lynda Brothers, 5/19/2022

Town Website Online Form Submissions

Chris Pouliot, 3/30/2022

Harry Yip, San Mateo County, 3/30/2022

Roy Johnson, 3/30/2022

William Kelly, 3/30/2022

Harry Turner, 4/4/2022

Delle Maxwell, 4/5/2022

Laura Birss, 4/7/2022

Eric Denys, 4/26/2022

Thomas Buckholtz, 4/28/2022

David Smernoff, 5/2/2022

Lynda L. Brothers, 5/4/2022

Leonie Walker, 5/5/2022

Susan Miller, 5/5/2022

Rebecca Pickart, 5/6/2022

John Brew, 5/6/2022

Maria Southgate, 5/6/2022

Wynn White, Ladera Community Association, 5/6/2022

Edward Holland, 5/6/2022

Nicole Amundsen, 5/10/2022

Sue and Gene Chaput, 5/10/2022

Christine Sherry, 5/10/2022

Janet Mountjoy, 5/10/2022

Rusty Day, 5/11/2022

Herbert Schilling, 5/11/2022

Ronald Eastman, 5/12/2022

Victor Anderson, 5/12/2022

Phillip Palmer, 5/12/2022

Anne Ashmead, 5/12/2022

Lisa Lovazzano, 5/12/2022

Nancy Bovee, 5/13/2022

Bruce Lovazzano, 5/13/2022

Frederick Hull, Mountain Lion Foundation, 5/13/2022

Peter Chargin, 5/13/2022

John Donaoe, Stanford University, 5/13/2022

Raymond Willias, 5/13/2022

Teresa Godfrey, 5/13/2022

Julia Shepardson, 5/13/2022

Jim Sansbury, 5/13/2022

Nan Shostak, 5/13/2022

Caroline Vertongen, 5/13/2022

Janet Davis, 5/13/2022

Mary Hufty, Westridge Architectural Supervising Committee, 5/13/2022

Rita Comes Whitney, 5/13/2022

Kenneth Reisman, 5/13/2022

Lital Levy, 5/13/2022

Jon Else, 5/13/2022

Edith Collin, 5/13/2022

Matthew Muffly, 5/13/2022

Gary Hanning, 5/13/2022

Trevor Oliver, 5/13/2022

Susanna Chenette, 5/13/2022

From: Rob Bartoli <RBartoli@smcgov.org>
Sent: Thursday, May 12, 2022 6:22 PM
To: stanfordeir <stanfordeir@portolavalley.net>; Laura Russell <lrussell@portolavalley.net>
Cc: Sergio Ramirez <SRamirez@westbaysanitary.org>
Subject: San Mateo LAFCo Comment Letter for Stanford Wedge Housing Project DEIR

Dear Ms. Russell,

Please see the attached comment letter from San Mateo LAFCo for the Stanford Wedge Housing Project DEIR.

Thank you,

Rob

Rob Bartoli
Executive Officer
San Mateo LAFCo
455 County Center, 2nd Floor
Redwood City, CA 94063
Direct Tel: (650) 363-1857
Email: rbartoli@smcgov.orgSan Mateo Lafco

County of San Mateo
Dept of Fish and Wildlife

SAN MATEO
LAFCo
LOCAL AGENCY FORMATION COMMISSION
455 COUNTY CENTER, 2ND FLOOR • REDWOOD CITY, CA 94063-1663 • PHONE (650) 363-4224 • FAX (650) 363-4849

May 12, 2022

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

Subject: Draft Environmental Impact Report for the Stanford Wedge Housing Project

Dear Ms. Russell,

Thank you for you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Stanford Wedge Housing Project.

The Local Agency Formation Commission (LAFCo) is a state mandated local agency established in every county to oversee the boundaries of cities and special districts. San Mateo LAFCo has jurisdiction over the boundaries of the 20 cities, 22 independent special districts, and many of the 33 active county and city governed special districts serving San Mateo County.

The DEIR for the Stanford Wedge Housing Project (Project) identifies a proposed subdivision of 30 residential lots on 7.4 acres of a 75.4-acre parcel located at 3530 Alpine Road in Portola Valley (APN 077-281-020). The proposed residential units include 27 single-family homes and 12 affordable multifamily units in 3 additional buildings. The Project site is proposed to be served by West Bay Sanitary District (WBSD) for sewer service.

The DEIR correctly states that the Project site is currently not in the service area of WBSD. As noted, the property is in the adopted Sphere of Influence of WBSD and is eligible for annexation to WBSD (Page 17-2). LAFCo approval of an annexation of the Project area to WBSD will be required prior to connection the sewer system. LAFCo will serve as a Responsible Agency under California Environmental Act (CEQA) (CEQA Guidelines 21069).

Before action can be taken by LAFCo as Responsible Agency under CEQA, an approved EIR that includes analysis of the potential impacts of the Project, including the extension of sewer lines and the adequacy of wastewater transmission and treatment capacity, must be certified by the Town of Portola Valley.

The DEIR identifies that the Project proposes to connect to an existing WBSD sewer line in Alpine Road. The DEIR states that the development of the Project would "result in an

incremental increase in wastewater treatment demand; however, that increase would not exceed existing treatment capacity or require the construction of new or expanded treatment facilities. WBSD has confirmed, based on existing flows, that there is sufficient capacity within the existing main to support the Project. Impacts of the Project on wastewater collection and treatment would be considered less than significant" (Page 17-7). The WBSD wastewater collection and treatment system is also described in the DEIR (Page 17-2).

The LAFCo application process is initiated either by a petition of the property owners or registered voters of the proposed territory or by a resolution of application by a public agency, such as the West Bay Sanitary District. Other application materials include a property owner prepared application and fees, map, and legal description, and the certified EIR.

San Mateo LAFCo does have not have additional comments on the DEIR and looks forward to reviewing all future documents related to the Project.

Sincerely,

Rob Bartoli

Rob Bartoli
Executive Officer

cc: Sergio Ramirez, General Manager, West Bay Sanitary District

From: Melissa Ross <mross@smcgov.org>
Sent: Thursday, May 12, 2022 7:24 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Stanford Wedge Housing

Hello,

Please see the attached Stanford Wedge Project DEIR comment letter on behalf of San Mateo County.

Thanks,
Melissa

Melissa Ross (she/her), Planning Services Manager
Planning & Building Department
455 County Center, 2nd Floor
Redwood City, CA 94063
Office (650) 599-1559
planning.smcgov.org

COUNTY OF SAN MATEO
PLANNING AND BUILDING

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May 13, 2022

Via Email
Laura Russell, Planning and Building Director
Town of Portola Valley
Planning and Building Department
765 Portola Road
Portola Valley, CA 94028
stanfordeir@portolavalley.net

Dear Ms. Russell:

SUBJECT: Comments on the Draft Environmental Impact Report for the Stanford Wedge Housing Project (SCH# 2020010203)

The San Mateo County Planning and Building Department and Department of Public Works appreciate the opportunity to submit the following comments on the Stanford Wedge Housing Project Draft Environmental Impact Report (DEIR). Project related comments are also included in this letter.

DEIR Related Comments

Transportation

1. The DEIR references OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018) and identifies the use of city Vehicle Miles Travelled (VMT) per capita as opposed to regional VMT for Project threshold analysis (DEIR p.16-6). Based on OPR's guidance, the DEIR is correct in identifying a lead agency's discretion in selecting Regional versus City VMT; however, the selection of City VMT must be accompanied by a Sustainable Community Strategies (SCS) consistency analysis ensuring development does *not cumulatively exceed the population or number of units specified in the SCS for that city because greater-than-planned amounts of development in areas above the region-based threshold would undermine the VMT containment needed to achieve regional targets under SB 735* (OPR Technical Advisory, December 2018, p.15). Neither the DEIR nor Traffic Impact Analysis (DEIR Appendix I) provide this discussion. The Regional VMT threshold should be applied absent the consistency analysis.

2. In reviewing Table 16.2: Project VMT (DEIR, p.16-8) the County has concerns regarding the methodology. The DEIR establishes a Daily VMT per Capita for Stanford

Faculty of 9.5 roundtrip miles, the distance from the Project to the Stanford Campus, or "home-based work VMT" where only VMT due to commute trips originating from home are calculated. There is a concern that this metric underestimates VMT because it excludes non-work-related trips.

Additionally, Daily VMT per Capita for Non-Stanford Household Members and Affordable Housing utilizes the 2020 VMT per capita for Portola Valley. The County is concerned that application of home-based work VMT, a partial VMT metric, for Stanford Faculty and the VMT per capita metric used for Non-Stanford Household Members and Affordable are dissimilar such that Table 16.2 is not an apples-to-apples comparison. Noting OPR's Technical Advisory: *It is critical, however, that the agency be consistent in its VMT measurement approach throughout the analysis to maintain an "apples-to-apples" comparison. For example, if the agency uses a home-based VMT for the threshold, it should also use home-based VMT for calculating project VMT and VMT reduction due to mitigation measures* (December 2018, p.16).

3. In further consideration of the established Daily VMT per Capita for Stanford Faculty of 9.5 roundtrip miles, C/CAG SB 743 Implementation Decisions Whitepaper (p.vi) states *where a travel model is not available or not appropriate, VMT may also be estimated directly by multiplying the number of trips by an average trip length. Trips can be estimated using the results of local trip generation surveys or trip generation rate data published by the Institute of Transportation Engineers (ITE). Trip lengths can be extracted from models or from standardized averages or travel pattern data from the regional or subregional planning organization. Using trip length averages does not consider changes to the roadway network or to traffic congestion, or the project's potential effects on overall travel patterns*. It is unclear why the DEIR relies on a 9.5 roundtrip miles calculation when a more appropriate calculation for Stanford Faculty VMT may be the Trip Generation Table (DEIR, Table 16.1) which utilizes ITE Trip Generation rates, or the C/CAG San Mateo Countywide VMT Estimation Tool.

4. The Transportation Analysis (DEIR Appendix I) notes 343 daily trips (p.6) and states on p.16: *Given that the project is expected to add fewer than 100 peak hour trips, a C/CAG trip reduction analysis was not prepared.* The County notes that C/CAG's TDM Policy as of January 1, 2022 requires any project with 100 daily trips or more, as opposed to peak hour trips, must comply with the C/CAG TDM Policy.

Greenhouse Gas Emissions

1. The Stanford Wedge Housing Development Air Quality & Greenhouse Gas Emissions Assessment (DEIR Appendix C) analyzes emissions utilizing the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. This version has been superseded with Version 2020.4.0 which incorporates 2019 Building Code Title 24, ITE 10th edition trip rate data, and updated Utility Intensity Factors, among others. Emissions estimates and analysis should be revised using the current CalEEMod version.

Project Related Comments

Project related transportation comments are provided below. The County looks forward to reviewing the full Project at a future date.

1. Transportation Analysis (DEIR, Appendix I) Table 6: Existing Plus Project Intersection Level of Service shows the Alpine and La Mesa intersection degrading from Level of Service "C" to "D" resulting from project implementation. San Mateo County Traffic Impact Study Requirements (Section IV.C.5) states: *The minimum acceptable design level of service (LOS) in the County is 'C'. At intersections, analyses should show an overall LOS of 'C' with no individual movement operating at less than 'D' to be considered acceptable and not require mitigation measures. On occasion, level of service 'D' may be allowed for peak period in dense urban condition per County's discretion.* The County is not accepting of Level of Service "D" and requires the project include mitigation to the satisfaction of the County, which may include a roundabout (Alpine Road Traffic Corridor Study Project, March 2017).

2. The Transportation Analysis (DEIR, Appendix I) should include a LOS Full Build Horizon Year analysis as outlined in the San Mateo County Traffic Impact Study Requirements (Section IV.D).

3. Construction haul routes must be identified. Alpine Road between I-280 and Sand Hill Road shall not be a haul route.

We appreciate the opportunity to comment on the Draft Environmental Impact Report and look forward to your response.

Sincerely,

Melissa Ross
Planning Services Manager

cc: Supervisor Horsley, District 3
Justin Mates, Deputy County Executive
Steve Monowitz, Community Development Director
Sophie Mintier, Interim Assistant Director
Ann Stillman, Interim Director of Public Works
Khoa Vo, Deputy Director of Public Works
Rob Bartoli, Executive Officer, LAFCo
Interested Parties

From: Hultman, Debbie@Wildlife <Debbie.Hultman@wildlife.ca.gov>
Sent: Friday, May 13, 2022 12:04 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Cc: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>; Kanz, Will@Wildlife <Will.Kanz@Wildlife.ca.gov>; Stokes, Wesley@Wildlife <Wesley.Stokes@wildlife.ca.gov>; Weightman, Craig@Wildlife <Craig.Weightman@wildlife.ca.gov>; Swan, Robynn@Wildlife <Robynn.Swan@wildlife.ca.gov>; Stumpf, Serena@Wildlife <Serena.Stumpf@Wildlife.ca.gov>; Culpepper, Amanda(Mandy)@Wildlife <Amanda.Culpepper@Wildlife.ca.gov>
Subject: Stanford Wedge Housing Project-SCH2020010203

Good Morning,

Please see the attached letter for your records. If you have any questions, contact Will Kanz, cc'd above.

Thank you,

Debbie Hultman |Assistant to the Regional Manager
California Department of Fish and Wildlife – Bay Delta Region
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 13, 2022

Ms. Laura Russell
Town of Portola Valley
765 Portola Road
Portola Valley, CA 94028
stanfordeir@portolavalley.net

Subject: Stanford Wedge Housing Project, Draft Environmental Impact Report, SCH No. 2020010203, Town of Portola Valley, San Mateo County

Dear Ms. Russell:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) prepared by the Town of Portola Valley (Town) for the Stanford Wedge Housing Project (Project), located in San Mateo County, pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

CDFW is submitting comments on the DEIR to inform the Town, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is a Trustee Agency with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources (i.e., biological resources). CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA) or Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Permit must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, including the Southern California/Central Coast evolutionarily significant unit of mountain lion (*Puma concolor*), currently a candidate for listing, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially impact threatened or endangered species (Pub. Resources Code, §§ 21001(c), 21083, and CEQA Guidelines §§ 15380, 15064, 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code section 2080 et. seq.

Lake and Streambed Alteration

The Project has the potential to impact resources including but not limited to unnamed tributaries to Trancos Creek. CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for any project activities that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are generally subject to notification requirements. **If the Project would impact the unnamed tributaries to Trancos Creek, any other streams, or associated riparian habitat, then the Project would be subject to LSA Notification requirements as further described below.** CDFW, as a Responsible Agency under CEQA, would consider the CEQA document for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA (Pub. Resources Code § 21000 et seq.) as the Responsible Agency.

Raptors and Other Nesting Birds

CDFW has authority over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

Fully Protected Species

Fully Protected species, such as white-tailed kite (*Elanus leucurus*) and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), may not be taken or possessed at any time (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

PROJECT DESCRIPTION SUMMARY

Proponent: Stanford University

Objective: The Project consists of four general components: 1) a residential development, 2) a new looped public trail, 3) a new fire access road, and 4) a vegetation management plan. The Project would develop 7.4 acres of the 75.4-acre property. This 7.4-acre development site would be subdivided into 30 residential lots which would include 27 single-family residences and 12 multi-family units. A new private road would be constructed to loop through the residential development from Alpine Road. A new 6-foot-wide looped recreational trail would be constructed along the western edge of the development area within the undeveloped portion of the Project site. A permanent fire access road would be constructed to access the undeveloped portions of the Project site. A vegetation management plan would be developed for both the developed and undeveloped portions of the property to mitigate areas of high fire hazard.

Timeframe: The Project would be completed within 24 to 30 months.

ENVIRONMENTAL SETTING AND LOCATION

The Project site is located at 3530 Alpine Road on a 75.4-acre parcel (APN 077-281-020) that forms a generally triangular shape between Alpine Road, and developments along Westridge Drive, and Minoca Road in Portola Valley, California. The Project site is mostly undeveloped consisting of chamise chaparral (*Adenostoma fasciculatum*), coast live oak woodland (*Quercus agrifolia*), and blue oak woodland (*Q. douglasii*). In addition, two ephemeral streams and an intermittent stream, all tributaries to Trancos Creek, occur in the Project site. Mixed riparian forest consisting mainly of California bay (*Umbellularia californica*), California buckeye (*Aesculus californica*), and coast live oak occurs along the intermittent stream in the northern portion of the Project site. The Alpine Rock Ranch, a horse boarding facility with stables, currently occupies approximately 7.4 acres (10% of the total site area) in the northeastern portion of the Project site, where residential development would take place. Special-status species with the potential to occur in or near the Project site include, but are not limited to, San Francisco garter snake, state and federally listed as endangered and a Fully Protected species; Southern California/Central Coast mountain lion, state candidate for listing and a specially protected mammal (Fish & G. Code, § 4800); California red-legged frog (*Rana draytonii*), federally listed as threatened and a California Species of Special Concern (SSC); San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), SSC; pallid bat (*Antrozous pallidus*), SSC; western red bat (*Lasiurus blossevillii*), SSC; western pond turtle (*Emys marmorata*), SSC; white-tailed kite, a Fully Protected

species; western leatherwood (*Dirca occidentalis*), California Rare Plant Rank[2] (CRPR) 1B.2; bent-flowered fiddleneck (*Amsinckia lunaris*), CRPR 1B.2; Woodland woolly threads (*Monolopia gracilens*), CRPR 1B.2; and Santa Cruz clover (*Trifolium buckwestiorum*), CRPR 1B.1.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the Town in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on biological resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, including those recommended by CDFW below, CDFW concludes that an EIR is appropriate for the Project.

I. MANDATORY FINDINGS OF SIGNIFICANCE. Does the Project have potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

Environmental Setting and Related Impact Shortcoming

COMMENT 1: San Francisco Garter Snake

Issue: The DEIR identifies that the Project site is within the range of San Francisco garter snake (SFGS), a state and federally listed as endangered species and state Fully Protected species (DEIR Appendix D page 32). The Project site contains potentially low quality habitat for SFGS in and near the streams on the Project (*ibid.*). Construction and maintenance activities in suitable upland SFGS habitat has the potential to result in direct and indirect take to SFGS. Indirect take may occur as a result of upland habitat loss and degraded site suitability for SFGS to complete all stages of their life cycle such as through the construction of roads and loss of habitat through development.

There are five California Natural Diversity Database (CNDDB) occurrences of SFGS within five miles of the Project site, with the closest approximately 2.3 miles northwest of the Project. The DEIR assumes that SFGS is absent from the site and does not provide any avoidance, minimization, or mitigation measures for the species.

Evidence the impact would be significant: Project activities, including grading and vegetation removal, in potentially suitable SFGS habitat have the potential to result in significant impacts to SFGS, including crushing, injuring, or killing SFGS, and could

[2] CRPR 1B plants are considered rare, threatened, or endangered in California and elsewhere. Further information on CRPR ranks is available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline) and on the California Native Plant Society website (https://www.cnps.org/rare-plants/cnps-rare-plant-ranks).

result in a substantial reduction in the SFGS population. SFGS is an endemic snake with a highly limited range in the San Francisco Peninsula. SFGS utilize a variety of habitats including upland sites for basking, rodent burrows for shelter, and low-lying marsh and slow-flowing stream habitat for feeding and reproduction (U.S. Fish and Wildlife Service (USFWS) 1985). In coastal areas, SFGS may hibernate during the winter in small mammal burrows (USFWS 2007). SFGS are threatened by loss of habitat from agricultural, commercial, and urban development, illegal collection by reptile breeders, and decline of their prey species, California red-legged frog (USFWS 2007).

Recommendation: To reduce potential impacts to less-than-significant and avoid take of SFGS, CDFW recommends including the following mitigation measures in the EIR.

Recommended Mitigation Measure 1 San Francisco Garter Snake Avoidance: The Project shall be designed to avoid all impacts to SFGS within suitable SFGS habitat including but not limited to wetlands, streams and waterways as well as associated upland habitat capable of providing dens and basking habitat as determined by a qualified biologist, experienced with SFGS, in coordination with CDFW. The EIR shall include a report prepared by the qualified biologist detailing habitat survey methodology and a map demarcating any SFGS habitat or individuals occurs in the survey area, including potential burrow refugia. No build buffer zones around wetland and riparian resources shall be incorporated into the Project footprint to avoid impacts to any SFGS habitat. If take of SFGS may occur, the Project shall not be approved. The lead agency shall coordinate with CDFW to ensure the Project is designed to avoid take of a fully protected species.

COMMENT 2: Mountain Lion

Issue: The Project has the potential to increase human interactions with mountain lions that can result in conflicts and lead to potentially significant impacts to mountain lion movement, behavior and/or individuals. The DEIR states that the Project site may provide suitable habitat for southern California/Central Coast mountain lion, a candidate for listing as state threatened or endangered (DEIR page 7-4). The Project site is surrounded by low density residential land use and open space, including Foothills Park and Enid Pearson-Arastradero Open Space Preserve to the southeast, Jasper Ridge Reserve to the northwest, and Windy Hill Open Space Preserve to the southwest. Citizen scientists have documented evidence of mountain lion presence in these surrounding open spaces (iNaturalist 2022). In addition, home security surveillance systems at residences approximately one mile north of the Project have recorded mountain lion presence (Bay City News 2022). While the Project site is adjacent to human development and therefore unlikely to be used for reproduction and denning, its proximity to open space makes it potentially suitable hunting and dispersal habitat (Wang et al. 2015).

Evidence the impact would be significant: The Project would increase human presence adjacent to and within mountain lion habitat via increased residences, a public hiking trail, and ongoing vegetation treatment in the remaining open space. Increased human presence and associated factors such as traffic, noise, and light pollution, restrict mountain lion movement across the landscape. Most factors affecting the ability of the Southern California/Central Coast mountain lions to survive and reproduce are caused by humans (Yap et al. 2019). As California's human population has continued to grow and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety, particularly if mountain lions do not receive CESA protection in the future. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). For example, mountain lions tend to avoid roads and trails by the mere presence of those features, regardless of how much they are used (Lucas 2020). This restriction in mountain lion movement may reduce gene flow and could increase the decline in genetic diversity of mountain lions in southern and central parts of the State (Dellinger et al. 2020). In addition, increased traffic could cause vehicle strike mortality. Also, mountain lions avoid areas with low woody vegetation cover and artificial outdoor lighting (Beier 1995). Ultimately, as human population density increases, the probability of mountain lion persistence decreases (Woodroffe 2000).

Recommendation: To reduce potential impacts to less-than-significant, CDFW recommends including the following mitigation measures in the EIR.

Recommended Mitigation Measure 3 Mountain Lion Habitat Protection: The remaining open space in the Project area shall be permanently preserved through a conservation easement. No further development including new housing, shall be allowed within the conservation easement area.

Recommended Mitigation Measure 4 Mountain Lion Awareness Signage: Signage shall be installed at trailheads and posted in the community open space within the residential development identifying that the area is located in mountain lion habitat. The signs shall direct residents and trail users to keep all pets on leash and to stay on the trail. Additional information from CDFW's Keep Me Wild Mountain Lion brochure may be included on the sign:
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=57523&inline

II. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?

Project Description and Related Impact Shortcoming

COMMENT 3: Streams

Issue: As noted above, if the Project would impact the unnamed tributaries to Trancos Creek, or riparian habitat associated with these streams, or any other streams, then the Project would be subject LSA Notification requirements. The DEIR states that riparian habitat "may be impacted by vegetation management activities, which would necessitate an LSAA" (DEIR page 7-5).

Evidence the impact would be significant: Project activities would potentially remove riparian habitat. Riparian habitat is of critical importance to protecting and conserving the biotic and abiotic integrity of an entire watershed. When riparian habitat is substantially altered, riparian functions become impaired, thereby likely substantially adversely impacting aquatic and terrestrial species. Substantial removal of trees and other vegetation significantly reduces suitable nesting and roosting habitat for many bird and bat species, such as pallid bat, an SSC, and causes the loss of important refugia for small mammals. Mature riparian trees and mid canopy vegetation will take considerable time to reestablish and grow to function. Therefore, if the Project impacts stream and associated riparian habitat, Project impacts to these resources would be potentially significant.

Recommendation: To comply with California Fish and Game Code section 1600 et seq. and reduce impacts to stream and riparian habitat to less-than-significant, CDFW recommends that the EIR incorporate the following mitigation measure.

Recommended Mitigation Measure 5 Notification of Lake and Streambed Alteration: For Project activities that may substantially alter the bed, bank, or channel of the unnamed tributaries to Trancos Creek, or any other streams, including but not limited to riparian vegetation disturbance, an LSA Notification shall be submitted to CDFW pursuant to Fish and Game Code section 1602 prior to Project construction. If CDFW determines that an LSA Agreement is warranted, the Project shall comply with all required measures in the LSA Agreement, including but not limited to requirements to mitigate impacts to the streams and riparian habitat. Permanent impacts to the stream and associated riparian habitat shall be mitigated by restoration of riparian habitat at a 3:1 mitigation to impact ratio based on acreage and linear distance as close to the Project area as possible and within the same watershed and year as the impact. Temporary impacts shall be restored on-site in the same year as the impact.

COMMENT 4: Riparian Encroachment

Issue: The Project may impact riparian habitat associated with the unnamed tributaries to Trancos Creek, a potentially significant impact. The DEIR states that the Project would not directly impact any streams, but that the Project may impact riparian habitat (DEIR page 7-5). While the residential development would not impact the riparian

habitat associated with the unnamed tributary to Trancos Creek in the north of the Project site, it is not clear how far from the riparian forest the development is located, or how defensible space vegetation treatment adjacent to the housing would impact the riparian habitat. In addition, the proposed fire access road would enter the property within 50 feet of the unnamed tributary in the south (DEIR page 7-32). Encroaching into the riparian corridor can negatively impact sensitive species, such as western pond turtle, special-status frogs, and tree-roosting bats, that rely on an appropriately sized riparian buffer between development and the stream zone. Encroaching on the riparian zone may lead to deleterious materials, including wastewater discharge, sediment from increased erosion, and other pollutants, entering the stream (DEIR page 12-16).

Because natural stream processes are complex and dynamic, development too close to stream channels can result in threats to property from erosion due to lateral and/or vertical channel adjustments over time. Incorporation of a sufficient riparian buffer into the Project design is necessary to avoid the potential need for stream channel stabilization solutions in the long-term.

Evidence the impact would be significant: Riparian habitats are important to watershed integrity because they perform many ecological functions, such as enhancing water quality and quantity, increasing biodiversity, providing habitat connectivity, and supplying flood capacity. Impacts to riparian habitats have potential to cause a wide range of adverse effects to fish and wildlife resources for the following reasons.

Remaining riparian habitat is substantially reduced from historic levels. An estimated 2 to 7 percent of California's riparian habitat remains intact and has not been converted to other land uses (Katibah 1984, Dawdy 1989). Development within and adjacent to riparian habitat areas is a principal cause of habitat loss and degradation. Loss and degradation of additional riparian habitat occurs in the context of cumulatively significant losses.

Riparian vegetation improves stream water quality by removing sediment, organic and inorganic nutrients, and toxic materials (Belt and O'Laughlin 1994, Mitsch and Gosselink 2000, USDA 2000, Mayer et al. 2006). Riparian buffers help keep pollutants from entering adjacent waters through a combination of processes including dilution, sequestration by plants and microbes, biodegradation, chemical degradation, volatilization, and entrapment within soil particles. As buffer width increases, the effectiveness of removing pollutants from surface water runoff increases (Castelle et al. 1992). There is substantial evidence showing narrow buffers are considerably less effective in minimizing the effects of adjacent development than wider buffers (Castelle et al. 1992, Brosofske et al. 1997, Dong et al. 1998, Kiffney et al. 2003, Moore et al. 2005).

Riparian trees and vegetation, and associated floodplains, provide many essential benefits to stream and aquatic species habitat (Moyle 2002, CDFW 2007). Riparian forests provide thermal protection, shade, and large woody debris. Large woody debris stabilizes substrate, provides shelter and cover from predators, facilitates pool establishment and maintenance, and creates habitat for aquatic invertebrates, a key food source in aquatic and terrestrial food chains.

Riparian habitats also contribute to bank stability and provide flood protection. Development which includes increases in impervious surfaces and installation of stormwater systems and storm drain outfalls can modify natural streamflow patterns by increasing the magnitude and frequency of high flow events and storm flows (Hollis 1975, Konrad and Booth 2005). Riparian habitat and adjacent wetlands and floodplains are critical to lessening these impacts because they store and meter floodwaters, recharge groundwater aquifers, trap sediment, filter pollution, help minimize erosion, lessen peak flow velocities, and protect against storm surges (Mitsch and Gosselink 2000, Tockner et al. 2008). In doing so, they protect adjacent upland, downstream, and coastal properties from loss and damage during flooding and help maintain surface and groundwater during summer months.

In addition to direct habitat loss, development adjacent to a riparian zone has three principal indirect effects: 1) fragmentation of habitat into smaller, non-contiguous areas of less-functional habitat by structures, roads, driveways, yards and associated facilities; 2) the introduction or increased prevalence of exotic species or species that are habitat generalists, termed “human adapted” or “urban exploiters;” and 3) decreases in native species abundance and biodiversity and the loss of “human-sensitive” species that require natural habitats (Davies et al. 2001, Hansen et al. 2005, CDFG 2007).

Recommendation: To reduce potential impacts to less-than-significant, CDFW recommends that the Project establish and the EIR incorporate a riparian buffer zone for each unnamed tributary and limit development and vegetation clearing to outside of the riparian area. CDFW is available to coordinate with the Town to determine appropriate site-specific riparian buffers to reduce impacts to sensitive species and riparian habitat to less-than-significant. At a minimum, CDFW recommends a 50-foot riparian buffer as measured from the top of streambank to the nearest Project infrastructure.

COMMENT 5: Tree Removal

Issue: The DEIR states that approximately 114 or more trees would be removed on the Project development site (DEIR page 3-3); however, the DEIR does not include the species, location, or size of trees planned to be removed. The DEIR states that there are multiple habitat types located on the site including chamise chaparral (*Adenostoma fasciculatum*), coast live oak woodland (*Quercus agrifolia*), and blue oak woodland (*Q.*

douglasii). Removal of large native oak trees may result in a potentially significant impact due to the general decline of oak habitat in California and the loss of ecosystem services provided by oaks.

Evidence the impact would be significant: California oak woodlands have been reduced by approximately 50% from their historical range due to habitat conversion. Current rates of blue oak recruitment are not sufficient to provide population-level replacement (Zaveleta et al. 2007). Oak woodlands provide food and habitat to a variety of wildlife including birds, insects, mammals, reptiles, amphibians, and native understory plants and support some of the richest species abundance in California (Zaveleta et al. 2007, CalPIF 2002). Large mature trees (e.g., native oak tree that is greater than 15 inches in diameter) are of particular importance due to increased biological values such as providing nesting bird habitat and bat roost habitat. Loss of large mature native oaks has the potential to result in signification impacts for these reasons. While the DEIR includes on-site tree planting as a minimization measure for riparian trees removed, on-site planting alone is not sufficient to completely off-set temporal impacts from the loss of mature trees due to an uncertain time lag from when the new resources will be available (Marón et al., 2010).

Recommendation: CDFW recommends the Project avoid large diameter tree removal to the greatest extent feasible. Where large diameter tree removal is unavoidable, CDFW recommends Project mitigation include in-kind preservation of mature native trees. CDFW recommends that the Town include preservation of open space as a mitigation measure in the EIR for large tree removal, as identified in recommended mitigation measure 4 above.

III. Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Mitigation Measures and Related Impact Shortcoming

COMMENT 6: Nesting Bird Surveys

Issue: The DEIR proposes to implement mitigation measure Bio-13a: Nesting Bird Avoidance, Substrate Pre-removal, Pre-activity Surveys and Buffers to mitigate for impacts to nesting birds. The measure incorrectly identifies the nesting bird period for raptor species and does not describe how the active nest buffer will be established if active nests are found by the qualified biologist.

Recommendation: To evaluate and avoid potential impacts to nesting bird species, CDFW recommends incorporating the following mitigation measures into the Project's

DEIR existing measure, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 6 Nesting Bird Surveys: If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct two surveys for active nests of such birds within 14 days prior to the beginning of Project construction, with a final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area are typically the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; and iii) 1,000 feet for larger raptors such as buteos. Surveys shall be conducted at the appropriate times of day and during appropriate nesting times.

Recommended Mitigation Measure 7 Active Nest Buffers: If the qualified biologist documents active nests within the Project area or in nearby surrounding areas, a species appropriate buffer between the nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of the nest to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g. defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist shall have the authority to cease all construction work in the area until the young have fledged, and the nest is no longer active.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNNDB online field survey form and other methods for submitting data can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Plantsand-Animals.

FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

CONCLUSION

Thank you for the opportunity to comment on the Project's DEIR. If you have any questions regarding this letter or for further coordination with CDFW, please contact Mr. Will Kanz, Environmental Scientist, at (707) 337-1364 or Will.Kanz@wildlife.ca.gov; or Mr. Wesley Stokes, Senior Environmental Scientist (Supervisory), at Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...

Erin Chappell
Regional Manager
Bay Delta Region

ec: State Clearinghouse # 2020010203

California Department of Fish and Wildlife
Serena Stumpf, Serena.Stumpf@wildlife.ca.gov
Amanda Culpepper, Amanda.Culpepper@wildlife.ca.gov
Robynn Swan, Robynn.Swan@wildlife.ca.gov

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From: Don Bullard <DJBullard@WoodsideFire.org>
Sent: Friday, May 13, 2022 8:00 PM
To: Laura Russell <lrussell@portolavalley.net>
Cc: Rob Lindner <RLindner@woodsidefire.org>
Subject: Stanford Wedge Environmental Impact Report (DEIR)

Dear Planning Director Russell,

Cc: Chief Rob Linder

Please see the attached District response to the public comments and letters received concerning the Stanford Wedge Draft Environmental Impact Report.

Sincerely,

Don Bullard
Fire Marshal
Woodside Fire Protection District

Re: Stanford Wedge Draft Environmental Impact Report (DEIR)

Dear Planning Director Russell,

I write on behalf of the Woodside Fire Protection District (the "District"). The District notes that, pursuant to the California Environmental Quality Act ("CEQA") and its implementing Guidelines (including at 14 CCR §§15381 and 15096(a)), the District is not a Responsible Agency that is legally mandated to review the Stanford Wedge Housing Project Draft Environmental Impact Report ("DEIR") because the District is not responsible for any discretionary approval for the project.

That being the case, the District would like to clarify that, while it participated in preliminary review of the DEIR, the District has not reached a conclusion regarding the adequacy of the analysis contained therein.

The District has reviewed many of the public comments submitted in response to the DEIR, some of which identify what commenters assert are potential shortcomings in the DEIR and its conclusions regarding significant project impacts, or regarding project alternatives or mitigation measures. The District believes the public comments are worthy of consideration and warrant appropriate responses pursuant to CEQA.

The District understands that CEQA requires the Town to acknowledge, review, and respond to the public comments regarding the DEIR in the administrative record and the District appreciates the Town's efforts to fully address comments raised.

Sincerely,

Don Bullard – Fire Marshal

[The following comments were forwarded by WFPD to the Town and are included separately:
Tony Philip Vertongen, April 24, 2022
Ulrich Aldag and Helga Lewis, April 24, 2022
Yvette Michel, April 25, 2022
Thomas Buckholtz, April 25, 2022
Leslie Kraus, April 25, 2022
Bob Turcott, April 26, 2022
Eric Denys and Sonja Declercq, April 26, 2022]

From: Tom Hafkenschiel [email address redacted]
Sent: Wednesday, March 30, 2022 2:41 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Stanford EIR report

In the report I found no mention of the impact of this development on the current sewer system such as it is. Would the current system need to be replaced by larger diameter pipes? I imagine that a sewer hook up would be required for such a project.

Secondly, what would the impact of the project be on the water situation given our current severe drought situation?

Thanks,
Tom Hafkenschiel MD
1100 Westridge

Sent from my iPhone

From: David Cardinal [email address redacted]
Sent: Thursday, March 31, 2022 7:49 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Cc: Lorrie Duval [email address redacted]
Subject: Comments on the Stanford EIR

First, thank you for the opportunity to comment on the EIR for the project.

We've now read quite a few of the sections and are very impressed by the thoughtful and thorough way it has been written.

Overall, we believe it is a responsible, and productive, approach to developing the parcel. The mix of new families likely to live on the land will also add to the vibrancy of Portola Valley.

We also believe that the likely alternative of 20+ very-expensive homes and 20+ ADUs spread across all 75 acres would be a much worse outcome for everyone.

We like the tree-screened entrances, and the undergrounding of utilities along Alpine Road.

It didn't seem like anything in the Cultural or seismic survey was a show stopper, and Stanford is willing to have archaeologists with them in case there are finds of interest under the new foundations.

This plan also does, in our opinion, a much better job of preserving wildlife habitat than a sprawling development of large houses. Also, I'm sure this plan involves a lot less pavement than a lot of long driveway and streets.

We realize there is some concern about building spacing, but after having read numerous papers, studies, and after-action reports, we believe that a number of fire-hardened structures surrounded by an area with an approved vegetation management plan is a better alternative that dozens of homes each with their own approach.

We live uphill of "the Wedge" so we do have a personal stake in how it affects fire safety. In the past that parcel has typically been poorly-maintained and often seemed like a fire hazard. Having Stanford Housing and an aggressive (and hopefully audited) vegetation management plan would be a large step forward.

As far as traffic impact, the one specific thing we would like to see Stanford do as part of this project is to extend their shuttle service at least to Town Center, and perhaps around the loop. I know that Stanford has complained that they can't, or won't, or it is too expensive, but if we want it to happen, it seems like now would be the time to push hard on it. It would help residents as well as those who work in town and are paying $6/gallon for gas on their commute to serve our community.

If Glen Oaks turns out to be suitable for additional Stanford faculty/staff housing, that could be an additional incentive.

Thanks for listening! – Dave Cardinal & Lorrie Duval

--David Cardinal / Stanford University / Extremetech.com

http://www.extremetech.com/author/dcardinal
David Cardinal | LinkedIn
http://www.cardinalphoto.com

From: MJ-Social Lee [email address redacted]
Sent: Saturday, April 9, 2022 7:47 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Comment on Stanford EIR

Dear PV,
I did not read the EIR, i only read the Almanac's Apr-4-2022 summary by Angela Swartz. I did review the original proposal about a year ago.

If the Almanac summary is correct, then my preference is for Stanford to build the project with the clustered and duet housing rather than the possible alternative of a subdivision of 21 SFR lots that can all add their own ADUs.

I appreciate that Stanford is taking many steps to make the development as compact as possible and will manage the vegetation across the entire 75 acre property. I also appreciate that Stanford seems to be incorporating the latest home hardening techniques for wildfire preparedness.

I don't recall if Stanford plans to install water tank(s) on the property to ensure water availability for firefighting with appropriate location, supply, connectivity and signage.
If not, then that should be a requirement by WFPD.

There are quite a lot of parking spaces in the plan, in addition to each unit having a 1-car garage. It would be nice if communal parking areas were grouped together in a way that served as a fire break from the hillside backing up to Westridge residents.

I think that Stanford has designed the project to meet the recommendations of Moritz, M.A.; Butsic, V. (2020), "Building to Coexist with Fire: Community Risk Reduction Measures for New Development in California", *UC ANR Publication 8680* (https://anrcatalog.ucanr.edu/pdf/8680.pdf). But if not, I would appreciate hearing that was part of the plan.

I know change is difficult for most PV residents. But I feel Stanford is working hard to ensure that the people living in this new community will have the safest homes in PV. And they will have some of the shortest evacuation routes, with probably little impact on other residents.

Best wishes,
-mj lee
PV homeowner

Sent from my iPad

From: mimi meffert [email address redacted]
Sent: Thursday, April 21, 2022 5:25 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: DEIR Comment and Question

We have lived in Portola Valley for over 20 years near the proposed Stanford Wedge. With the number of buildings that Stanford is proposing with the Wedge on the land that it owns, I have not seen the property tax return that Portola Valley town will receive for this project.
I believe that Stanford will continue owning the land, but individuals homes would be responsible for property taxes on the buildings.

Request: break out the numbers for the anticipated revenue (property taxes) for land and housing

1) Include what is the **current property tax revenue** received for the Wedge land?
2) Upon completion of the development, what is the expected property tax revenue that the Wedge would generate?
3) What is the **current value** of the Wedge land 'as is'? and **expected changes in land value with the buildings?**

The requested information should be available to members of the Portola Valley community. If it was included in the EIR, I did not see it.
Thank you for your prompt response.

'Mimi' Amelia A. Meffert

From: Kurt Jaggers [email address redacted]
Sent: Sunday, April 24, 2022 12:36 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Comments on Stanford Wedge EIR

I have reviewed the EIR and fully support the development of the project. Any potential concerns regarding wildfire risk, traffic impact, tree removal, view impact, etc have been fully addressed in my opinion given the extensive mitigation measures that are outlined. I believe the project represents responsible development that will also provide below market rate units that are needed to meet the RHNA mandates.

Sincerely,
Kurt Jaggers

Forwarded as a comment on the Draft EIR to the Town from WFPD

From: Tony Philip Vertongen dds [email redacted]
Sent: Sunday, April 24, 2022 7:01 PM
To: Don Bullard <DJBullard@WoodsideFire.org>; Rob Lindner <RLindner@woodsidefire.org>; Matt Miller <mmiller@woodsidefire.org>; Randy Holthaus <rholthaus@woodsidefire.org>; Pat Cain <pcain@woodsidefire.org>
Subject: Portola Valley

Please see attached letter
Thank You

Tony p. Vertongen
100 Palmer Lane
Portola Valley

Re: Evaluation of Draft Environmental Impact Report

Dear Fire Marshal Bullard, Chief Lindner, and WFPD Board of Directors,

Thank you for taking on the important and challenging work of conducting a comprehensive hazard and risk assessment for the entire district. Our safety depends it.

Our safety also depends on the Fire District's professional and expert evaluation of the methods by which the draft environmental impact report (DEIR) for the Stanford Wedge Housing Project assesses the impact of the proposed development on fire safety and evacuation capacity.

The implementation of the California Environmental Quality Act assigns to the District both the responsibility and the authority to evaluate the DEIR, as formally released on March 30, 2022, from the perspective of fire safety. No other entity, including Town decision-making bodies and consultants who were hired and supervised by the Town, has both the expertise and the objectivity to do this.

Are the methods employed in the DEIR satisfactory?

Do they accurately assess the impact on public safety of this development proposal?

If the analysis methods used in this DEIR are adopted as the standard by which future proposals are evaluated, will the impacts on public safety be adequately assessed?

The DEIR is lengthy, complex document with portions addressing wildfire safety comprising well over 100 pages of highly technical analysis. The published document repeatedly references material that is necessary to evaluate the accuracy of the conclusions but is not made available to the public. The DEIR was in preparation for approximately 2 years, yet the public and responsible agencies such as WFPD are given only 45 days to provide informed comment.

If the brevity of the comment period or the absence of supporting material would compromise your ability to adequately evaluate the DEIR, I hope you assert your prerogative to require an extension and the disclosure of relevant supporting documentation.

The residents of Portola Valley - and adjoining communities - depend on you to evaluate the DEIR from the perspective of contemporary wildfire safety standards with the recognition that the methods used in this DEIR will likely also be used in many similar projects over the next 8-year housing cycle. Please share your evaluation with the public.

Thank you,

Tony p. Vertongen
Resident, Portola Valley

Forwarded as a comment on the Draft EIR to the Town from WFPD

From: Ulrich Aldag [email redacted]
Sent: Sunday, April 24, 2022 7:19 PM
To: Don Bullard <DJBullard@WoodsideFire.org>; Rob Lindner <RLindner@woodsidefire.org>; Matt Miller <mmiller@woodsidefire.org>; Randy Holthaus <rholthaus@woodsidefire.org>; Pat Cain <pcain@woodsidefire.org>
Subject: Re: Evaluation of Draft Environmental Impact Report/Stanford Wedge

Dear Fire Marshal Bullard, Chief Lindner, and WFPD Board of Directors,

We, both of us being residents of Portola Valley, are joining many other residents of our town in the concerns and requests expressed to you in the following:

Thank you for taking on the important and challenging work of conducting a comprehensive hazard and risk assessment for the entire district. Our safety depends it.

Our safety also depends on the Fire District's professional and expert evaluation of the methods by which the draft environmental impact report (DEIR) for the Stanford Wedge Housing Project assesses the impact of the proposed development on fire safety and evacuation capacity.

The implementation of the California Environmental Quality Act assigns to the District both the responsibility and the authority to evaluate the DEIR, as formally released on March 30, 2022, from the perspective of fire safety. No other entity, including Town decision-making bodies and consultants who were hired and supervised by the Town, has both the expertise and the objectivity to do this.

Are the methods employed in the DEIR satisfactory?
Do they accurately assess the impact on public safety of this development proposal?
If the analysis methods used in this DEIR are adopted as the standard by which future proposals are evaluated, will the impacts on public safety be adequately assessed?
The DEIR is lengthy, complex document with portions addressing wildfire safety comprising well over 100 pages of highly technical analysis. The published document repeatedly references material that is necessary to evaluate the accuracy of the conclusions but is not made available to the public.

The DEIR was in preparation for approximately 2 years, yet the public and responsible agencies such as WFPD are given only 45 days to provide informed comment.
If the brevity of the comment period or the absence of supporting material would compromise your ability to adequately evaluate the DEIR, I hope you assert your prerogative to require an extension and the disclosure of relevant supporting documentation.

The residents of Portola Valley - and adjoining communities - depend on you to evaluate the DEIR from the perspective of contemporary wildfire safety standards with the recognition that the methods used in this DEIR will likely also be used in many similar projects over the next 8-year housing cycle. Please share your evaluation with the public.

Best regards

Ulrich Aldag and Helga Lewis

Residents at 909 Westridge Drive, Portola Valley

Forwarded as a comment on the Draft EIR to the Town from WFPD

From: YVETTE MICHEL [email redacted]
Sent: Monday, April 25, 2022 7:26 AM
To: Don Bullard <DJBullard@WoodsideFire.org>; Rob Lindner <RLindner@woodsidefire.org>; Matt Miller <mmiller@woodsidefire.org>; Randy Holthaus <rholthaus@woodsidefire.org>; Pat Cain <pcain@woodsidefire.org>
Subject: Evaluation of Draft Environmental Impact Report

Dear Fire Marshal Bullard, Chief Lindner, and WFPD Board of Directors,

Thank you for taking on the important and challenging work of conducting a comprehensive hazard and risk assessment for the entire district. Our safety depends it. Our safety also depends on the Fire District's professional and expert evaluation of the methods by which the draft environmental impact report (DEIR) for the Stanford Wedge Housing Project assesses the impact of the proposed development on fire safety and evacuation capacity.

My family know first hand the impact of what a fire can do to homes and lives. In 2014 we were displaced from our home for a year due to a fire in our home. We were incredibly fortunate that no one was hurt. This topic is of the utmost importance to me personally.

The implementation of the California Environmental Quality Act assigns to the District both the responsibility and the authority to evaluate the DEIR, as formally released on March 30, 2022, from the perspective of fire safety. No other entity, including Town decision-making bodies and consultants who were hired and supervised by the Town, has both the expertise and the objectivity to do this.
Are the methods employed in the DEIR satisfactory?

Do they accurately assess the impact on public safety of this development proposal? If the analysis methods used in this DEIR are adopted as the standard by which future proposals are evaluated, will the impacts on public safety be adequately assessed? The DEIR is lengthy, complex document with portions addressing wildfire safety comprising well over 100 pages of highly technical analysis. The published document repeatedly references material that is necessary to evaluate the accuracy of the conclusions but is not made available to the public. The DEIR was in preparation for approximately 2 years, yet the public and responsible agencies such as WFPD are given only 45 days to provide informed comment. If the brevity of the comment period or the absence of supporting material would compromise your ability to adequately evaluate the DEIR, I hope you assert your prerogative to require an extension and the disclosure of relevant supporting documentation.

The residents of Portola Valley and adjoining communities depend on you to evaluate the DEIR from the perspective of contemporary wildfire safety standards with the recognition that the methods used in this DEIR will likely also be used in many similar projects over the next 8- year housing cycle. Please share your evaluation with the public.

Sincerely,

Yvette Michel

Yvette M. Michel
Michel Enterprises
[email and phone number redacted]

Forwarded as a comment on the Draft EIR to the Town from WFPD

From: Thomas [email redacted]
Sent: Monday, April 25, 2022 1:39 PM
To: Don Bullard <DJBullard@WoodsideFire.org>; Rob Lindner <RLindner@woodsidefire.org>; Matt Miller <mmiller@woodsidefire.org>; Randy Holthaus <rholthaus@woodsidefire.org>; Pat Cain <pcain@woodsidefire.org>
Subject: Evaluation of Draft Environmental Impact Report

To: WFPD Board of Directors, Fire Marshal Bullard, and Fire Chief Lindner
From: Thomas J. Buckholtz, Resident, Portola Valley
Re: Evaluation of the Draft Environmental Impact Report regarding the would-be Stanford Wedge Housing Project

April 25, 2022

Dear Fire Marshal Bullard, Chief Lindner, and WFPD Board of Directors:

Likely, you are receiving communications urging that the WFPD weigh in on the subject draft environmental impact report (STANFORD WEDGE HOUSING PROJECT, Draft Environmental Impact Report, March 2022, or "the DEIR").

Without trying to parallel aspects of such communications, let me add my encouragement and some possibly useful perspective.

Part of my property lies closer than 30 feet from each one of more than one of the homes proposed for the Wedge property. Those homes would be close to each other. Whether or not there would be fences between the homes, the homes would be perhaps too close to each other to prevent spread of fire from one to the next (and indeed to a total of about eight closely spaced nearby would-be homes). With or without fencing, access (from Stanford property) by WFPD personnel to some sides of the homes might be difficult. My property offers the possibility of access for WFPD personnel and equipment, but without putting in an emergency bridge over a natural waterway, it is likely that WFPD vehicles could not access Stanford property from my property.

It is not clear to me the extent to which the DEIR analyzes the availability – throughout regions that wildfire might impact – of adequate (with respect to quantity and pressure) water via fire hydrants. (A search of the DEIR turned up no uses of the word "pressure" with respect to water. The three instances of the word "hydrant" seemingly do not necessarily point to adequate study of the topic.)

Also, you might want to consider the notion that, regarding the DEIR, discussion regarding "other CEQA considerations" omits or downplays relevant topics. (See pages 19-1 through 19-3.) The DEIR does not discuss ...

- Possibilities for "impacts that are ... cumulatively considerable." (See the language stated in Mandatory Findings of Significance, item 2; page 19-1.)
- Possibilities for "substantial adverse effects on human beings either directly or indirectly." (See the language stated in Mandatory Findings of Significance, item 3; page 19-1.)
- Possibilities for cumulatively considerable impacts on human beings either directly or indirectly.

Please, for the safety of much of Portola Valley (and other neighboring communities) and of WFPD personnel, weigh in – in a timely manner – regarding the DEIR.

Thank you.

Thomas J. Buckholtz
Portola Valley

Forwarded as a comment on the Draft EIR to the Town from WFPD

From: Leslie Kraus [email redacted]
Sent: Monday, April 25, 2022 7:41:39 PM
To: Rob Lindner <RLindner@woodsidefire.org>; Don Bullard <DJBullard@WoodsideFire.org>; Matt Miller <mmiller@woodsidefire.org>; Randy Holthaus <rholthaus@woodsidefire.org>; Pat Cain <pcain@woodsidefire.org>
Subject: DEIR for the Stanford Wedge Project

Fire Chief Rob Lindner, Fire Marshal Don Bullard and Board Directors Matt Miller, Randy Holthaus, and Patrick Cain,

I am a native (Northern) Californian and never expected fire danger to reach the top of my worry list. I am wading through the DEIR for the Wedge project and it would take me way past the comment deadline to possibly gain even a vague understanding of the wildfire behavior assessment that is included. What I did notice is that the 2008 Moritz report and 2007-2010 Cal Fire maps are referenced. Based on those Cal Fire maps the DEIR states: "As it now stands, Cal Fire does not designate the site as a Very High FHSZ on their adopted map". It doesn't take much common sense to know that the situation in California has drastically changed over the last 15 years, especially in areas like Portola Valley, and it is incredibly hard to understand how the wildfire impact of the project is "less than significant" without consulting updated information. The minimal structure to structure separation alone exacerbates the problem.

You do so much for our community and I hate asking even more of you but you are the trusted experts here. I respectfully ask (beg!) you to review and evaluate the DEIR. Is this development as it is proposed really a safe addition to our community?

Thank you.
Leslie Kraus
Portola Valley Resident

Forwarded as a comment on the Draft EIR to the Town from WFPD

From: Bob Turcott [email redacted]

Sent: Tuesday, April 26, 2022 1:42 PM
To: Don Bullard <DJBullard@WoodsideFire.org>; Rob Lindner <RLindner@woodsidefire.org>; Matt Miller <mmiller@woodsidefire.org>; Randy Holthaus <rholthaus@woodsidefire.org>; Pat Cain <pcain@woodsidefire.org>
Subject: WFPD review of draft Environmental Impact Report

Please see the attached letter to the WFPD leadership.

thank you,
Bob Turcott

To: WFPD Board of Directors
Cc: Fire Chief Lindner, Fire Marshal Bullard
From: Bob Turcott, Resident, Portola Valley
Re: Evaluation of Draft Environmental Impact Report

April 26, 2022

Dear Woodside Fire District Board of Directors,

Thank you!
Residents of Portola Valley are deeply relieved that the District is undertaking a comprehensive hazard and risk assessment for the entire District and will formally designate zones of moderate, high, and very high fire hazard severity. We are deeply grateful for your dedication to public safety in this and so many other ways. Thank you!

Draft Environmental Impact Report (DEIR)
The Town of Portola Valley has recently released the DEIR for the Stanford Wedge Housing Project. The DEIR was not prepared by Stanford. It was prepared by the Town with the help of consultants. It is notable that the project has had the active support of our Town Council, which raises questions about the neutrality and objectivity of the DEIR.[1]

The methodology employed in this DEIR will almost certainly be used for many similar development proposals to follow. One Town official estimates that there will be 10 similar proposals in during the next 8-year housing cycle.

- Are the methods employed in the DEIR satisfactory?
- Do they accurately assess the impact on public safety of this development proposal?
- If the analysis methods used in this DEIR are adopted as the standard by which future proposals are evaluated, will the impacts on public safety be adequately assessed?

I have a number of specific concerns which I'll send separately, but, briefly, among them are the following:

- The DEIR assumes that all structures, vehicles, and other non-natural material is non-burnable. As a result, the computational modeling predicts that the dense development is protective in the event of a wildfire rather than a significantly exacerbating factor.
- The DEIR claims that the proposed vegetation management would slow the rate of wildfire progression on the parcel, but no analysis that supports this claim is provided. Furthermore, the proposed treatments would convert a sloped landscape that presently has woody shrubs under oak canopy to grass and herbaceous vegetation under no canopy. Experimental data shows that such a conversion would accelerate fire spread by 4-10x.
- The DEIR asserts that non-combustible sheathing is sufficient mitigation for the extremely close structure spacing despite the fact that Cal Fire, NIST, and the IIBHS document that such sheathing does not provide adequate mitigation (link). No analysis is provided by the

[1] 1) Documented by SJ Mercury News, reprinted in the East Bay Times (link). 2) Documented in Town Council meeting minutes (link). 3) John Donahoe, Director, Planning and Entitlements, noted at multiple public meetings that Stanford was not interested in developing the parcel. It was only after being approached by the Town and after several meetings that Stanford submitted a proposal at the Town's request.

DEIR to support this claim. Other important mitigation methods, such as avoiding windows on the building surface that faces other structures, are not employed.

The California Environmental Quality Act (CEQA) and WFPD

Under CEQA, the Fire District is *the* agency designated with the responsibility and the authority to evaluate the DEIR from the perspective of fire safety.

The District's evaluation should be based on the published DEIR, formally released on March 30, 2022, not preliminary, unpublished versions.

No other entity, including Town decision-making bodies and consultants who were hired and supervised by the Town to prepare the DEIR, has both the expertise and the objectivity to competently evaluate the DEIR's methodology.

Adequate review period?

The DEIR is a lengthy, complex document with portions addressing wildfire safety that comprise well over 100 pages of highly technical analysis. The published document repeatedly references material that is necessary to evaluate the accuracy of the conclusions but is not included in the document. The DEIR was in preparation for approximately 2 years, yet the public and responsible agencies such as WFPD are given only 45 days to provide informed comment.

If the brevity of the comment period or the absence of supporting material would compromise your ability to adequately evaluate the DEIR, I urge you to assert your prerogative to require an extension and/or the disclosure of relevant supporting documentation.

Our safety is in your hands

The residents of Portola Valley - and those of adjoining communities - depend on you to evaluate the DEIR from the perspective of contemporary wildfire safety standards with the recognition that the methods used in this DEIR will likely also be used in many similar projects over the next 8-year housing cycle. Please share your evaluation with the public.

Thank you,

Bob Turcott
Portola Valley

Cc:
Fire Chief Lindner
Fire Marshal Bullard

From: Eric [email address redacted]
Sent: Thursday, April 28, 2022 10:11 PM
To: Town Center <TownCenter@portolavalley.net>
Subject: Comment on DEIR

For distribution to pertinent committees.

Eric Denys

[This same attachment sent to WFPD email addresses DJBullard@WoodsideFire.org, mmiller@woodsidefire.org, pcain@woodsidefire.org, <rholthaus@woodsidefire.org, RLindner@woodsidefire.org on Tuesday, April 26, 2022 7:49 PM with the following text]

Attached are our views on the DEIR and full support for the Woodside Fire Department.

Sincerely,

Eric Denys, MD
Sonja Declercq, MD

[This same attachment sent to towncenter@portolavalley.net again on Sunday, May 1, 2022 10:38 PM with the following text]

Please distribute to the following:

Planning Committee,
Conservation Committee,
Equity Committee,
Trails and Paths Committee

Thank you,

Eric Denys

DEIR PV

We have lived in Portola Valley for the past 43 years. We have a property of 3.8 acres which borders the Alpine Canyon and Stanford land. We have no fences and wildlife is therefore constantly crossing our property. Not a day goes by without some visitors. The most numerous are of course the deer which often make it a habit to find a resting place, even in front of our window. They often arrive in families of four or five, old and young.

Other creatures include coyotes, bobcats, a mountain lion and a couple of foxes. We also have squirrels and recently lots of wild turkeys but raccoons are rare.
Owls and mourning doves are constant guests as are numerous circling hawks and other birds. We have adapted our gardens such that we can live in harmony.

These animals travel between the Alpine Canyon, over our property and Westridge drive, towards the canyon between Alamos and Bolivar as witnessed by our neighbor, Rita Comes-Whitney.

The Alpine canyon is the only undisturbed piece of land in its natural state in Portola Valley and has historic significance because it belonged in the past to the Native People of this area. Man made changes to nature may have a lasting impact. We have already seen a decline in the population of quail birds, undoubtedly due to the necessity of brush clearing for fire prevention.

The Stanford Wedge project and adjacent Alpine canyon deserve your fullest attention and stewardship in protecting our wildlife. In a review of the DEIR, we do not see adequate respect for the animal corridor between our home and the Wedge Development.

We are concerned about the denial of the existence of the breeding pairs of mountain lions in its habitat on the Wedge. Documented by so many of our neighbors by photo, observation, Paris plaster molds of prints and videos of groups of 3 and more. “ Chapter 7 and Appendix D

We sincerely hope that the committee reviewing the Draft Environmental Impact Report (DEIR) will keep this wildlife corridor in mind and make every effort to preserve it, because that is the unique beauty of Portola Valley. Please comment on how this important corridor will be protected and your evidence of recent out reach to the indigenous people who maintained this land in the past. Chapter 8 Appendix E.

Fire risk is another concern when new dense housing developments are proposed, particularly as we experience extreme droughts. Let me start by expressing our utmost confidence in the Woodside/Portola Valley fire department and that we value their input in the process much more than California State generated opinions. The Woodside-Portola Valley fire department is in the best position to assess and evaluate the local fire danger and recommend ways to mitigate the risks.
We continue to see inadequate respect for the warnings of the Woodside Fire Department Chapter 18 Appendix

In summary:

1. Please comment on how this important wildlife between the Alpine Canyon/Stanford Wedge

will be protected

2. Provide evidence of recent out reach to the indigenous people who maintained this land in the past.

2. Address why you are denying the existence of the breeding pairs of mountain lions on the Wedge.

3. Address your position with respect to the opinion of the Woodside Fire Department.

Sincerely,

Eric Denys, M.D.
Sonja Declercq, M.D.

From: Thomas [email address redacted]
Sent: Friday, April 29, 2022 10:23 AM
To: stanfordeir <stanfordeir@portolavalley.net>; Portola Valley - Planning <planning@portolavalley.net>; Town Center <TownCenter@portolavalley.net>
Cc: State Clearlinghouse, California Governor's Office of Planning and Research <state.clearinghouse@opr.ca.gov>
Subject: comments regarding the DEIR - proposed Stanford Wedge Housing Project (STATE CLEARINGHOUSE NUMBER 2020010203)

Planning Commission:

Per https://www.portolavalley.net/Home/Components/Calendar/Event/30585/20?curm=5&cury=2022, I am submitting public comments to you regarding the proposed Stanford Wedge Housing Project (STATE CLEARINGHOUSE NUMBER 2020010203).

Please see the attachment (to this email) and the seven comments that the attachment includes.

Regarding the May 4, 2022 meeting, please consider the comments.

Regarding more general contexts, ...

- The Town has acknowledged receipt – via its website – of the text of each of the seven comments.
- Via this email, I am submitting the comments to the California state clearinghouse.

- Tom

Thomas J. Buckholtz
Portola Valley resident

A. Regarding DEIR Chapter 4 - Aesthetics

1. Comment

Aesthetics (re DEIR chapter 4) - comment number 1

The discussion of “aesthetics related to visual character” on DEIR pages 4-14 through 4-15 is inadequate because the project proposes – from the standpoint of views from along the trail that parallels (and lies on the west side of) Alpine Road – approximately 650 horizontal feet of visually-essentially-continuous building. (To see the path of the trail, see Figure 4.2 on DEIR page 4-11. To estimate the linear footage, see Figure 4.2 on DEIR page 4-11. The visual height would generally vary from “at least 17 feet” (where there is only one structure and a low point of the roof for such a structure) to presumably “more than 30 feet” (where there is one structure behind another structure). This project would (to use words from the “thresholds of significance” stated on page 4-8) “Substantially degrade of [sic] the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from a publicly accessible vantage point.).” For example, the public would lose views of vegetation and hillsides behind the 650 horizontal feet times an average of at least 20 vertical feet. Public views would occur from the trail on the west side of Alpine Road, from Alpine Road, and from the trail on the east side of Alpine Road. The loss of views of hillsides might generally exceed amounts that one might estimate based solely on the above estimated vertical heights, because the ground-levels for the buildings generally exceed ground-levels pertaining to viewers. Mitigation should not include vegetation that increases risks related to fire. Mitigation should not include vegetation that diminishes safety for pedestrians, horse riders and horses, bicyclists, and vehicle drivers. (Mitigation that would include use of dirt [from the site or from elsewhere] or walls to block views [from the paths and road] of the buildings would add to the blocking of views of hillsides.)

2. Comment

Aesthetics (re DEIR chapter 4) - comment number 2

The presence of Figures 4.3a, 4.4b, 4.4a, and 4.4b and the absence of similar figures related to other views suggest significant incompleteness (in the DEIR). The report should include enough pairs of views (for which one view assumes no vegetation [or other view-blocking] and one view assumes realistic [with respect to fire risks] vegetation or other view-blocking) that span the gap between Photograph Viewpoint 1 and 50 feet south of Photograph Viewpoint 2 (as shown in Figure 4.2).

3. Comment

Aesthetics (re DEIR chapter 4) - comment number 3

Discussion related to Figures 4.3a, 4.4b, 4.4a, and 4.4b does not describe assumptions that underlie the development of Figures 4.3b and 4.4b. The vegetation might provide undo risk regarding spreading fire. Mitigation should include – regarding trees – appropriately sparse density of trees and appropriate clearance between tree leaves and the ground.

4. Comment

Aesthetics (re DEIR chapter 4) - comment number 4

Discussion related specifically to light and glare (for example, on DEIR pages 4-15 through 4-18) and generally to visual character is inadequate because the project proposes – from the standpoint of three neighboring residential lots that are generally to the north of the project – at least seven residential buildings for which each building has a side that lies close to the boundary with at least one of the neighboring residential lots. Each of the buildings would have two stories, as seen from neighboring residential lots. Three of the buildings face one lot. The DEIR seems not to discuss visual character, light, or glare that people would see from those lots. Mitigation should remove buildings, move buildings significantly farther away from the boundaries with neighboring lots, include visual-screening vegetation that is on Stanford's property and is [per fire protection guidelines] at least 30 feet [and, possibly, at least 100 feet] from the buildings [and that does not overhang neighboring properties], ensure that no or few windows or glass doors face north, and/or reduce the heights of buildings to one story.

B. Regarding DEIR Chapter 19 – Other CEQA Considerations

5. Comment

Other CEQA Considerations (re DEIR chapter 19) – comment number 1

Topic: Town residents, business license holders, and property owners.

Discussion regarding "other CEQA considerations" omits relevant topics. (See pages 19-1 through 19-3.) The DEIR does not discuss possibilities – regarding such topics – for "impacts that are ... cumulatively considerable" (Mandatory Findings of Significance, item 2; page 19-1), for "substantial adverse effects on human beings either directly or indirectly" (Mandatory Findings of Significance, item 3; page 19-1), or for cumulatively considerable impacts on human beings either directly or indirectly. Regarding the above-stated topic, the report should discuss each of "impacts / effects / concerns", mitigation (including activities that would produce the mitigation and who would be responsible for the doing of the activities), and aspects that studies indicate are not adequately impactful to need mitigation.

Impacts include quality of life, availability and costs of insurance, services from utilities (including indirect services via fire hydrants), services by police and fire-protection agencies, services by public schools, services by governing agencies, property values, taxes and tax rates, risks during emergencies or evacuations, and so forth.

Mitigation needs to be appropriate regarding each and every affected entity.

6. Comment

Other CEQA Considerations (re DEIR chapter 19) – comment number 2

Topic: Town evolution and character.

Discussion regarding "other CEQA considerations" omits relevant topics. (See pages 19-1 through 19-3.) The DEIR does not discuss possibilities – regarding such topics – for "impacts that are ... cumulatively considerable" (Mandatory Findings of Significance, item 2; page 19-1), for "substantial adverse effects on human beings either directly or indirectly" (Mandatory Findings of Significance, item 3; page 19-1), or for cumulatively considerable impacts on human beings either directly or indirectly. Regarding the above-stated topic, the report should discuss each of "impacts / effects / concerns", mitigation (including

activities that would produce the mitigation and who would be responsible for the doing of the activities), and aspects that studies indicate are not adequately impactful to need mitigation.

Impacts and concerns include the following. This project would be the only Portola Valley dense housing visible from a major road. This project might lead to precedent-setting changes to town vision, plans, zoning, and so forth. This project might lead to precedent-setting regarding Stanford's development west of I-280.

Mitigation needs to be appropriate regarding each and every affected entity.

7. Comment

Other CEQA Considerations (re DEIR chapter 19) – comment number 3

Topic: Traffic hazards.

Discussion regarding "other CEQA considerations" omits relevant topics. (See pages 19-1 through 19-3.) The DEIR does not discuss possibilities – regarding such topics – for "impacts that are ... cumulatively considerable" (Mandatory Findings of Significance, item 2; page 19-1), for "substantial adverse effects on human beings either directly or indirectly" (Mandatory Findings of Significance, item 3; page 19-1), or for cumulatively considerable impacts on human beings either directly or indirectly. Regarding the above-stated topic, the report should discuss each of "impacts / effects / concerns", mitigation (including activities that would produce the mitigation and who would be responsible for the doing of the activities), and aspects that studies indicate are not adequately impactful to need mitigation.

Concerns include the following. Vehicular egress (from the project) northward and ingress (to the project) from the south will be dangerous at each of the two "project-roadway plus Alpine Road" points. (Observations regarding similar activity regarding the intersections "Westridge Drive at Alpine Road," "La Mesa at Alpine Road" [in Ladera], and "La Cuesta at Alpine Road" [in Ladera] indicate such dangers.) Pedestrian activity at the two points will be dangerous. (Observation regarding the three extant intersections indicate such dangers.)

Mitigation would likely require three new pairs of left-turn lanes – with each pair facilitating each of entering and exiting Alpine Road. (New pairs would be two for the development and one for Glenoaks Equestrian Center.) Mitigation would likely require pedestrian crossing lights at (at least) two places – Westridge and one of the roadways into the Stanford property. Mitigation might require additional capacity to handle school-related bus stops – related to children getting to schools – and additional capacity regarding parents keeping children in cars until buses arrive. (Usage of and activities related to bus stops might include activities by more than just Wedge residents. Usage related to a bus stop near the Alpine Hills Tennis and Swimming Club indicates needs for non-bus parking.) Mitigation would likely require administration and enforcement regarding parking along the side of Alpine Road and regarding parking of trucks in middle-of-Alpine-Road areas. Mitigation may require more removal of dirt than Figure 4.4b suggests.

From: constantz family [email address redacted]
Sent: Tuesday, May 3, 2022 7:18 PM
To: stanfordeir <stanfordeir@portolavalley.net>; Portola Valley - Planning <planning@portolavalley.net>; Town Center <TownCenter@portolavalley.net>; California Governor's Office of Planning and Research <state.clearinghouse@opr.ca.gov>
Subject: Comment regarding DEIR - Stanford Wedge Housing Project (STATE CLEARINGHOUSE NUMBER 2020010203)

Planning Commission:

Per https://www.portolavalley.net/Home/Components/Calendar/Event/30585/20?curm=5&cury=2022, I am submitting the attached public comment to you regarding the proposed Stanford Wedge Housing Project (STATE CLEARINGHOUSE NUMBER 2020010203).

Please consider this comment in regards to the May 4, 2022 meeting. Note, with this email, I also submitted the comment to the California state clearinghouse.

Patricia McCrory
Portola Valley resident and Geologic Safety Committee Member

SURFACE FAULT RUPTURE | CHAPTER 9 GEOLOGY AND SOILS

1.i) Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Impact Geo-1: Surface Fault Rupture. According to state mapping and a focused site-specific investigation, there are no active faults within the Project site. The impact of surface fault rupture would be a less than significant impact.

According to the latest State of California Earthquake Fault Zone maps, the site is not contained within an Alquist-Priolo Earthquake Fault Zone boundary. The nearest fault zoned as active by the State is the San Andreas Fault located approximately 2 miles to the southeast. Other potentially active faults include the Monte Vista fault located approximately 0.7 miles from the Project location. Published geologic maps of the area show several faults in the site vicinity, including a fault mapped crossing the 75-acre overall property, but not within the Residential Development Area.

There had been some question of whether the Hermit fault extended onto the Project site. As noted in the setting, in response to these concerns, a trench investigation of the site was performed, which involved cutting trenches into the site to examine the soil formations for signs of a fault. The trench investigation is included as Appendix G. No signs of active faulting were found on the site with focused site-specific investigations.19 This work was peer reviewed by Questa Engineering Corporation for this analysis and determined to establish that the suspected Hermit fault is not active in Holocene time and therefore is not an active fault.

Based on the lack of active faults crossing the Residential Development Area and no other indication of an active fault with focused site-specific investigations, the impact of surface fault rupture is considered *less than significant* to the Project.

REGARDING DEIR CHAPTER 9 – GEOLOGY AND SOILS – Impact Geo-1

COMMENT 1.

As a longtime resident of Portola Valley with a background in earthquake hazard assessment and a member of the town's Geologic Safety Committee, I would like to comment on the draft DEIR prepared as part of the approval process for the proposed development of 39 housing units on a parcel owned by Stanford University (Stanford Wedge) which is located within town limits (Figure 1). Specifically, I urge the town to request better characterization of the Hermit fault which crosses the property and is categorized as 'undifferentiated Quaternary' age within the USGS Quaternary Fault and Fold Database (Bryant, compiler, 2017; U.S. Geological Survey, 2020a).

Although the trace of the San Andreas fault that ruptured during the Mw7.9 1906 earthquake cuts through Portola Valley to the west, that trace is not the only active fault trace associated with the San Andrea fault system. Indeed, the Monte Vista fault, part of the Foothills thrust

system to the east of the San Andreas fault, is considered active (*e.g.*, Field and others, 2013; Bryant, compiler, 2017). The Hermit fault may represent a northern extension of the Foothills thrust system as Holocene activity on this fault has not been ruled out

The draft DEIR evaluation of fault hazard relies on a report prepared for Stanford University by the geologic consulting firm, Cornerstone Earth Group (Cornerstone, 2017) which discusses such geologic hazards as fault rupture, seismically induced ground shaking and ground compaction, liquefaction, lateral spreading, and slope stability. A second Stanford report prepared by Cornerstone Earth Group (2021) describes their on-site trench and borehole study. This report dismissed potential on-site faulting and claimed no tectonic features were evident in the 183-ft long by 5–15 ft deep trench cut across the property (Figure 1). Only one photograph of the trench wall is publicly available plus generalized sketches of the late Quaternary alluvial deposits overlying sedimentary bedrock.

Thus the age of most recent fault activity on the Hermit fault remains unresolved and requires additional field investigation. An independent examination of currently available geologic data and high resolution 3D imagery derived from bare-earth airborne LiDAR data (U.S. Geological Survey, 2020b) focuses on late Quaternary deposits to constrain the timing of potential fault-related deformation (USGS Open-File Report, *in review*, LiDAR Investigation of geomorphic features associated with the Hermit fault, Portola Valley, California).

In particular, a shaded relief map derived from LiDAR data resolves a linear geomorphic feature, a subtle step, that crosses the site in the vicinity of the previously inferred Hermit fault trace (Figure 1; Pampayan, 1993). The subtle break in slope, northeast-side-down, has up to 8 feet of relief across an ~30-ft-wide zone.

The geomorphic lineation may represent surface expression of Holocene vertical offset along the Hermit fault. If so, it has deformed late Quaternary alluvial stream deposits and likely falls within both town regulations and Alquist-Priolo Act regulations guiding earthquake zone setbacks for new housing. Furthermore, a 100-ft buffer on either side of the step, mandated by active fault features that are moderately well located, would affect the majority of the proposed residences as depicted in the 04 August 2021 layout of the proposed development. Such an impactful modification merits further geologic investigation to determine whether the geomorphic step overlies an active fault.

References Cited

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Cornerstone Earth Group, 2021, Trench Investigation, Portola Terrace, Alpine Road, Portola Valley, California, 105-117-2, [last accessed April 8, 2022, at https://www.portolavalley.net/departments/planning-building-department/development-projects/stanford/stanford-eir.]

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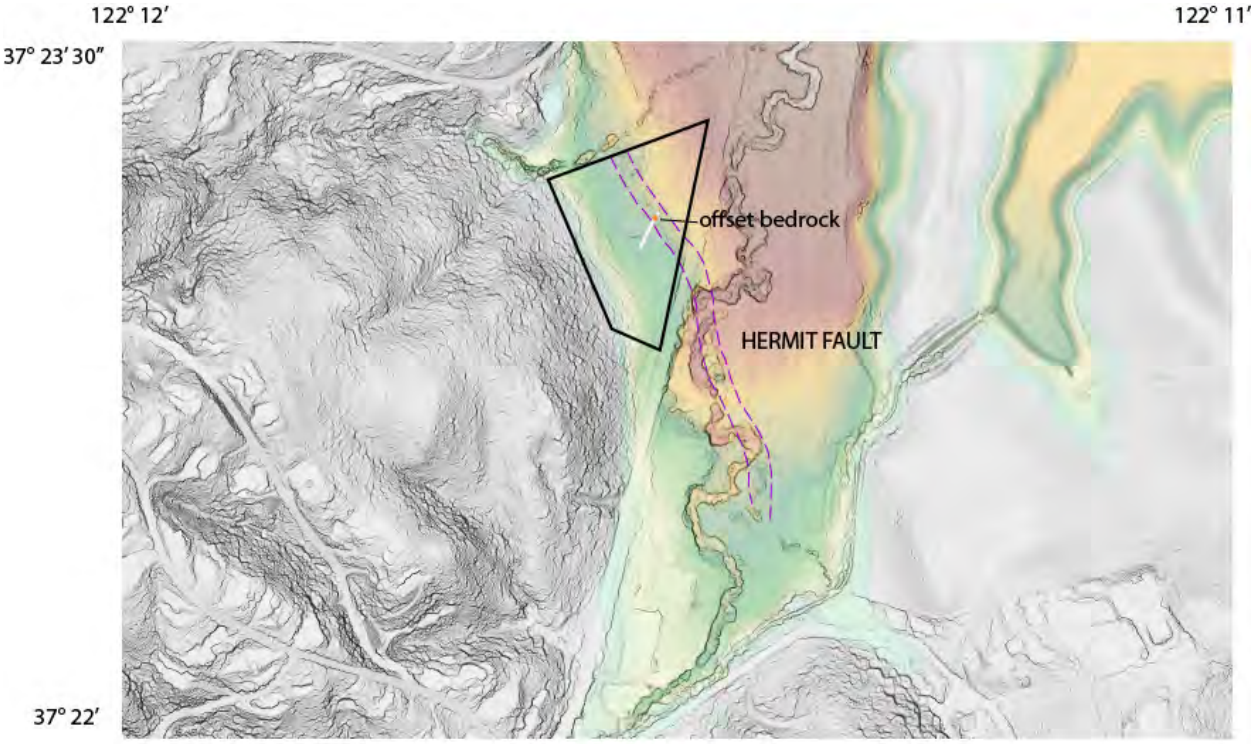


FIGURE 1.

Figure 1. Shaded relief map derived from bare-earth LiDAR data. Lineament visible as darker band, trending NW-SE across the study area and outlined by dashed purple line. Cornerstone (2021) trench locations denoted by white line. Approximate location of the two bedrock offsets (3-ft and 5-ft down to the north) exposed in the trench marked by orange circle.

Appendix. Steps for generating DEM image.

1. Downloaded LAZ LiDAR data files from USGS National Map website.
2. Opened point cloud LAZ files in Global Mapper software.
3. The software recommended gridding at a resolution of "1". Data are in State Plane (feet), so 1-foot resolution (~0 .3 m).
4. Opened in ArcMap and converted DEM to either a Slope file (or a MultiDirectional Hillshade file).
5. Overlaid DEM with a color scheme and a transparency of 65% transparent.
6. The lowest elevation in the area of interest is 75.2ft and the highest 249.1ft.
7. Adjusted the color scheme of the DEM to gradient between below 377ft elevation to draw out subtle elevation change in the range of the lineament. All the area above 377 is gray scale.
8. Exported image as pdf.

From: Teri McKelvy [email address redacted]
Sent: Tuesday, May 3, 2022 9:48 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Cc: Dorian J. Mckelvy [email address redacted]
Subject: Stanford Wedge Comments

To Whom It May Concern:
My husband and I adamantly appose the proposal of developing the Stanford Wedge. We have lived on Shawnee Pass for 27 years and raised both our kids here. We avidly take advantage of the incredible outdoor activities available to us just outside our front door. We enjoy running, hiking, and biking the various trails around us. The other day I was on a hike and came across a myriad of wildlife; birds, turkeys, deer, a baby coyote, lizards, and even snakes. Not to mention the incredibly beautiful fauna that surrounds are lovely trails. The beautiful rural environment in Portola Valley is what attracted us to the area. After careful research, I know that same fauna and wildlife thrives on the same land that is being called The Wedge. We are moving deeper and deeper into nature's territory and chasing our beautiful nature away.

In addition, the threat of wildfire in Portola Valley is greater than ever and increasing our density will only make this a more dire situation (as confirmed by the Woodside Fire Dept.), and I don't understand why the "powers that be" aren't listening to the experts here.

Lastly, the traffic congestion on Alpine Rd. has become so much worse than it was 27 years ago. Trying to make a left hand turn onto Alpine Rd. off of Westridge can take a good amount of patience and resiliency, as it is a solid ribbon going in an out during the morning hours. Increasing the housing density by developing The Wedge, will only add to what is becoming a dynamic impediment to living in Portola Valley.

Please add our names to the list of Portola Valley residents who oppose the development of the Stanford Wedge property.
Dorian & TERI MCKELVY
130 Shawnee Pass

From: Mary Page Hufty [email address redacted]
Sent: Wednesday, May 4, 2022 4:51 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Fwd: Undeliverable: Comments on DEIR

Trying again. Please see message below

From: Mary Page Hufty [email address redacted]
Subject: Comments on DEIR
Date: May 4, 2022 at 1:48:06 PM PDT
To: stanforddeir@portolavalley.net

This is a test e-mail to see if this is the correct e-mail for comment on the DEIR. There is considerable confusion about how, where and when responses, comments, and analyses will be received and reviewed. Please acknowledge receipt of this note and recognize that All letters that are part of the public record are included in the need for response and further refinement of the DEIR.

Best wishes
Mary

A thing is right only when it tends to preserve the integrity, stability, and beauty of the community, and the community includes the soil, waters, fauna, and flora, as well as people. — Aldo Leopold

From: Susan Kritzik [email address redacted]
Sent: Thursday, May 5, 2022 12:26 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Stanford Wedge Project

Town of Portola Valley,

As a PV resident, I am basically in favor of the Stanford Wedge Project.
I wish that not so many trees would be cut down, but in general, it seems well designed. Clearly a lot of hard work has gone into planning a safe and acceptable project.

Sure, I wish nothing would change there, and that I could continue to drive by and see the horses and other bucolic sights. But given the need for housing and Stanford's ownership of the land, the Wedge project seems acceptable to me.

Thank you for your hard work and diligence!

Susan Kritzik, MD
15 Possum Lane
Portola Valley

From: Kristi Corley [email address redacted]
Sent: Friday, May 6, 2022 11:10 AM
To: Kari Chinn <kchinn@portolavalley.net>
Subject: Re: Last Week to Comment - Draft EIR for Stanford Wedge Housing Project Open for Comment

DEIR Planning Dept,

Many people travel and need ability to upload DEIR comments in excess of 5MB while they are out of town.

I'm out of town next week.

Please let the clerk of the PV town know this request as it's crucial for pv residents to comment without upload worries.

Also Good Friday & Easter holiday was doing 45 day file period. Will there be a 1 day Extention?

Kristi

> On May 6, 2022, at 9:32 AM, Kristi Corley [email address redacted] wrote: >

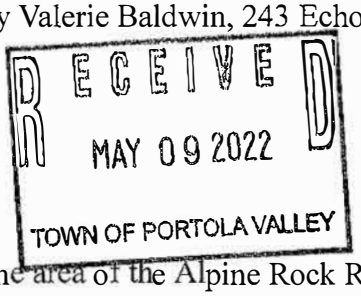
> Is the 5 space enlarged for large uploads?
>
> Kristi
>
>> On May 6, 2022, at 7:32 AM, Town of Portola Valley, CA <webmaster@portolavalley.net> wrote:
>>

From: Leslie Kriese [email address redacted]
Sent: Monday, May 9, 2022 2:48 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Bounce?

Hello!

Sent from Mail for Windows

Public Comment on Stanford Wedge Draft EIR dated March 2022 by Valerie Baldwin, 243 Echo Lane, PV. [phone number redacted]
5/9/2022
Overview



The Introduction and Project Overview of DEIR clearly states that the area of the Alpine Rock Ranch (several paddocks) covers 7.4 acres and is the site of the Project. But measuring the area on the Disposition Plan C4.1 in the 2020 submission, the ranch only covers about 4.3 acres, as seen from Google Earth and examined on site. This Public Comment argues that the removal the oak woodlands surrounding the horse ranch is not only environmentally devastating but damages much of the Stanford Wedge ecosystem. This DEIR fails to address these issues and needs to be revised to fully address the relevant project area.. Please respond to all of the individual issues in the DEIR raised below in this comment.

Chapter 5, Agricultural, Forest, Mineral Resources

Impact Ag-1 concludes that unspecified tree removal is a "less than significant impact" on the Wedge. This is wrong. The DEIR conclusion is based upon the land damaged by the Alpine Rock Ranch horse paddocks, however, most of the homes proposed are on the periphery of the Ranch area and are where many the heritage trees (100+ year old) reside. The removal of trees is greater if the DEIR more accurately included the removal of trees not only for building of the homes but to provide a defensible space for fire mitigation. Missing from the DEIR are two maps of trees to be removed (Disposition Plan C-4.1 and C-4.2 in 2020 submission and revised later that year (see references at this conclusion)_ which show 123 heritage trees for removal, most in existing landscape beyond the paddocks. The 177 trees shown for removal on these maps does not include trees taken down to create the upper access road or new trails. The DEIR only references that this will occur, but completely fails to enumerate or evaluate this further tree removal. This omission is significant in and of itself The state of California bans the removal of certain native trees, including oak trees. Homeowners have the right to remove trees that pose a health or safety risk, but they must petition the city before removing the tree. A fee of $82 is charged by Portola Valley for removal of any significant tree and requires a permit. "Significant tree" is a specified and defined term in PV but even so, the PV rule relates to single home owners and not massive developments where many more trees will be removed. PV must consider revision of the rule for removal of Significant Trees in the Wedge development given the extensive number of trees and the fact that the PV Town rule is aimed at home owners, not developers. Also, the revisited mapping on June 20, 2020 by Hort Science Bartlett Consulting shows 17 endemic blue oak trees, all of which are Significant as defined in the Portola Valley Tree Removal ordinance and the namesake of our local Blue Oaks Subdivision. Blue oaks grow extremely slow (a few centimeters per year) thus mitigation, which is not proposed in the DEIR but is required by SEQA, will not provide age replacement for over 50 years. In the cover letter for the 2020 Bartlett mapping they note that some of the previously recorded trees are missing tags or are not in the area designated by the C-4.1 and C-4.2 mapping. This is what I found (at the invitation of the current ranch management) in attempting to verify which trees were to be removed. How can the tree removal service know which trees to remove if the mapping is incorrect? This is another error in the DEIR, which undercuts all of the analysis. Here is an example of the need to scrutinize each tree individually: A several hundred year-old valley oak the horse owners call "Grandfather" #T-5767, is not listed on the first inventory but is on the second with the recommendation it should be preserved if possible and would be within the Development's common

area if a natural grade could be maintained within the 20 foot dripline. Who decides this and who will be monitoring? The State of California Oak Woodlands Conservation Act points out that oak trees are sustaining a severe regeneration problem. Further, all oak trees are sustained by a vast underground network of mycorrhizal fungi (Kate Marianchild, Secrets of the Oak Woodlands). The fungi provide water and minerals to the trees in return for carbohydrates. In addition, the fungi provide a network allowing chemical messaging among the trees critical for sustaining growing newer trees and signaling acres-wide among mature trees ((Scientific American, Oct 2007). By tearing up the land and isolating a few remaining trees, this important network is severed resulting in the degradation of the heritage trees and possibly the death of the younger trees left in the area. The report by Bartlett also points out that digging up for irrigation within the drip line of trees left remaining in the Project Area would be severely damaging. The landscaping plan in the EIR and supporting documents (July 14, 2020 resubmittal to the ASCC) shows planting would occur under the remaining oaks. The State of California CDFW Vegetation Classification and Mapping Program's (VegCAMP) has not kept up with current findings of cooperating vegetation involving fungi. I request that the Town Planning staff and Conservation Committee per the Portola Valley Municipal Code 15.12 reject permits to remove most oak trees from the Wedge The PV tree removal permit is not sufficiently comprehensive to cover such a large number of trees and large development. This situation does not match the purposes for which PV Town developed the rule.

Chapter 7, Biological Resources

Again, tree removal is addressed above on the impact to wildlife, etc. The DEIR erroneously points out that the area to be developed is currently occupied by Alpine Rock Ranch which is basically a small paddock area in the center of the property and not on the periphery where most homes will be built. This project description grossly under counts the size of the proposed project. Obviously if the project is defined as a fraction of the real, total area, the impacts identified and evaluate in the DEIR will necessarily be low and in error. Oak trees are a keystone species, supporting hundreds of species of birds, reptiles, bats and insects (Professor Douglas Tallmay: Natures Best Hope (April 2021) YouTube). Coast live oaks take 20-30 years to mature before producing acorns and blue oaks take 50-100 years to reach a diameter of 7 inches. The C-4.1 tree map does not identify the species of oak but the June, 2020 map by Bartlett does. These trees are very slow growing and mitigation efforts to plant young trees to replace 100+ year-old trees will not help the ecology for many years. Mature oak trees provide many species of birds caterpillars critical for baby bird growth, roosting places for sleep, and cavities or branches for nests. Each oak can support over 200 species of caterpillars which is why they are designated as a keystone species. A chestnut-backed chickadee family needs 6000-10,000 caterpillars (Tallmay, ibid) for survival in the spring so removing just one heritage tree will impact the number of chickadees in Portola Valley. 96% of terrestrial birds require insects to raise young and 90% of insects are host plant specific (Forister, et al, Conservation Science and Practice, 2019). Its impossible to count the loss of bird species with the removal of 177+ trees from the Wedge. The DEIR lists some of the species of birds that depend on the Wedge for survival then suggests that this has no significant impact. This fails to account for animal territories steadily shrinking and to suggest that they will find another habitat that is not already taken and defended is incorrect. Ever heard a bird singing to establish his territory? The Santa Clara Valley Audubon Society and the Sequoia Audubon Society (San Mateo County) in their Christmas and Breeding Bird counts over the years have documented the steep decline of our birds. This project cannot be allowed to add to this decline and this topic is not fully addressed in the DEIR. Let's not make this worse.

Impact Bio-12 Bird Collisions

Window collisions are a major cause of bird mortality due to window reflectivity of vegetation near the buildings disorienting the birds. The Smithsonian reports that collisions likely kill between 365 million and 1 billion birds annually in the United States, with a median estimate of 599 million It is wrong in the DEIR to state that local abundant species deaths would not matter. Every death matters. There are windows available that are not reflective that would seriously reduce collisions.

Impact Bio-13 Disturbance of Nesting Birds

The DEIR states: "The removal of trees and shrubs during the February 1 to August 1 breeding season could result in mortality of nesting avian species. This impact is less than significant with mitigation." There is no mitigation that would reduce the effect of construction activities during December and August. The failure to find this impact significant and then provide at least the obvious mitigation measure of no construction during birding season is another omission and failure of the DEIR. Anna's hummingbirds (passerine) begin nesting December 17 (William Bousman, Breeding Bird Atlas of Santa Clara County) and Great Horned Owls (Stringiform) begin January 29 (Bousman, ibid). Also a prominent local birder found 23 active nests from 1/6/21-2/28/21 and 32 nests from 1/27/22-2/28/22 (Janna Pauser, personal communication 4/19/22). This is a highly specialized and difficult expertise, particularly to find hummingbird and small passerine nests. These observations were in Santa Clara County, but relevant as this property borders SC County. The disturbance from the project goes beyond tree removal due to noise from construction, lighting, and mastication that would occur during December and August. As stated in this DEIR: "The California Fish and Game Code Sections 3503, 3513, and 3800 (and other sections and subsections) protect native birds, including their nests and eggs, from all forms of take. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by the CDFW". The DEIR specifying beyond 100 feet as non-disturbing is based on what? All animals in the Wedge area would be sensitive to construction noise and thus lead to nest abandonment. However, it is totally inappropriate to refer to other state agencies rather than address these issues directly in the CEQA review. The DEIR fails to do so.

Impact Bio 14

As stated above under Impact Ag-1 Removal of 177+ trees will have a significant impact on the flora and fauna of the entire area of the Stanford Wedge property. This is not a removal of a few trees on a residential property which is what the Town of Portola Valley addresses in its Planning Departments Tree Removal ordnance. Each tree is significant and should be scrutinized individually as well as the cumulative impact of removing such a large number of trees. The cumulative impact will also affect near by properties, perhaps in an indirect way, but must also be evaluated. The town needs to require a special bond from Stanford and mitigation of 3-4 large replacement trees for each tree proposed for removal. This bond must be posted prior to construction as well as a related enforceable mitigation measure. This, of course, would not completely mitigate the removal of 100+ year old trees. The DEIR must provide the public with more accurate analysis and what this analysis is based upon as well as a set of responsible, enforceable mitigation measures.

Portola Valley General Plan

4427 Living Environment Protection

DEIR states "while a vegetation management plan would remove some vegetation at the site, management of a site to reduce wildfire risk is ultimately intended to protect those areas from

being lost to wildfire" is incorrect. Fire in Oak Woodlands is a natural occurrence and regenerative for oak trees. This conclusion cannot be used to justify removal of oak trees for this construction. In fact, this statement in the DEIR underscores the previously made points about the inadequacy of the analysis of these issues.

In conclusion:

- There are many errors and omissions in conservation sections of this DEIR. Much analysis is incomplete. Of great importance were the two inventories of trees in the Project Site that were not included in the DEIR, but were in other documents submitted to Portola Valley earlier (see references below). These errors and omissions must be remedied and provided to the public so we can comment on a responsible document.

- Tree removal will devastate a large, vibrant population of interconnected oak trees at the site. Bonding and mitigation of at least 3-4 replanted trees for every tree lost is not addressed and should be. Also there must be an ongoing check that these new trees are being treated to survive not just planted and forgotten.

- Removal of 177+ trees will significantly reduce the availability of food and living sites for bird, mammal, and reptile species living at the site thus reducing their population in Portola Valley contributing to a severe decline in the United States. Citizens of Portola Valley should not be a party to this. For many years we thought we could pollute the oceans to no effect but look where we are now.

- Isn't there available Stanford land that would not require removal of a large oak woodland?

- Bird window collisions is not addressed with non-reflective windows.

- An inventory of trees to be removed for the upper access road is missing.

- The nesting season stated is incorrect as it occurs from Dec 17 through August of the following year to avoid incidental take against State laws. Further, construction noise and light is not addressed during the nesting season. Stating that construction noise is not a problem beyond 100' is questionable.

- The references to the bald eagles nesting at Felt lake is irrelevant and included why? They need a tree bigger than an oak to nest and fish to catch. DEIR should worry more about mountain lions in possible direct contact with faculty children and grazing goats.

References listed in the Portola website under Stanford Wedge Town Access:

- Plans Submitted 11-25-19 (to ASCC 1st tree cataloging C-4.1 and C-4.2)

- 3-TreeDispositionMemo-PortolaValley-06112020.pdf

Third Submittal - July 15, 2020 · Updated Jul 16, 2020 by John Donahoe (2nd tree cataloging prepared by Stanford consultant)

- JULY 14 2020 Stanford PV Complete ASCC Resubmittal Set.pdf (on PV website prepared by Stanford landscape architect)

From: Valerie Wookey [redacted]]
Sent: Tuesday, May 10, 2022 9:24 AM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Comments on Wedge Proposal

Hello,

I am concerned that the Stanford Wedge, as proposed, is not consistent with the current Portola Valley town plan. **The issues in the EIR that I do not believe are given adequate consideration include:**

1. **Impact on wildlife** with the removal of trees, especially historic oak trees.

2. **Increased density** beyond anything that is allowed as part of the current master plan, especially given the topography of the site. Why is this group allowed to ignore the current development rules?

3. **Increased fire risk** with the site. Dense housing at the base of this steep hillside, next to a busy road, is irresponsible.

4. Impact of increased density, on daily traffic, poses an extreme **safety issue** should the residents of the town need to evaluate during a wildfire.

Valerie Wookey
110 Shawnee Pass

From: Kathy Reback [redacted]]
Sent: Tuesday, May 10, 2022 12:09 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Stanford wedge project

Hi,

I fully support the construction of the Stanford wedge project. As we know, our region needs more housing and while ADUs will help with that, they do not address the dire need for housing for families. This project will help with that in addition to enriching our community and schools in many ways.

Kathy Reback
320 Escobar Road

From: Liz Babb [redacted]]
Sent: Tuesday, May 10, 2022 9:17 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Comments on the Stanford DEIR

I am writing to you with my comments relative to DEIR for the Stanford Wedge project.

Chapter 4 - Aesthetics
I actually think the project will have significant impact to aesthetics of the Alpine Scenic corridor, contrary to the document's statement.

DEIR Impact Aesthetics-1: Approximately 880 feet is currently frontage for the horse boarding facility and ***would become frontage for the Residential Development Area***.

The difference here is that currently there are no buildings along the frontage road. With the Stanford development there will be hundreds of feet uninterrupted views of buildings. *This is significant!*

DEIR Impact Aesthetics-1: **Views onto the site would change** as drivers or trail users proceed to and past the site.

Well, that's for sure! *The views would significantly change*. Even the renderings show that views of buildings and driveways are significantly different than what the public views today.

DEIR Impact Aesthetics-1:The General Plan notes that, "It is not practical to prohibit all building within this corridor, but ***in the development of individual properties***, building construction and planting should be designed to be compatible with and retain the natural and rural appearance of the area." As shown on Figure 4.1, the Primary Vista Corridor extends up the slope near the roadway and includes the entire Residential Development Area.

DEIR Impact Aesthetics-1: The Project is generally consistent with the General Plan guidelines related to development along the Alpine Road Scenic Corridor.

DEIR Impact Aesthetics-1: …the impact of the Project with respect to scenic vistas or scenic resources would be **less than significant**.

The General Plan contemplated the development of individual properties within the zoning allowed by the Town ordinances. The Wedge project is a multi-family development and not an individual property. I actually think that the clustering of the buildings as well as the height of the buildings (beyond the Town code) are not within the General Plan's principles and are a significant blight on the scenic corridor.

Impact Aesthetics-2: The impact of the Project with respect to visual character would be **less than significant**.

Disagree. Public views of the site come from Alpine Road as well as Westridge as well as from the homes above the development and along the hiking trails in the Westridge neighborhood.

Impact Aesthetics-2: The standard of significance is whether the change would constitute a substantial degradation of the existing visual character or quality of the site and its surroundings.

While the Alpine Road Scenic Corridor Plan does contemplate residential development in this area, it does not call for clustered homes within 6 to 8 feet of one another. The clustered housing IS a substantial degradation of the existing visual character of the site and its surroundings.

Impact Aesthetics-3: The impact of the Project with respect to light and glare would be less than significant.

The modeling is not believable. It does not represent lighting from 39 houses within the development as seen in a 360 degree view. The document only shows the view from Alpine Road. What about from above the site? Please provide modeling views from all perspectives.

Chapter 16 - Transportation

Impact Trans-1: Consistency with Circulation System Plans and Policies.

It's incredibly dangerous to add an additional driveway onto Alpine Road and an additional 101 people, without adding a crosswalk with lights at Westridge. Alpine Road at that junction has a speed limit of 40 mph. We have to slow people down who are driving near this proposed development.

Impact Trans-2: Additional Vehicle Crossings Across Alpine Road Trail….It is expected that the Project would generate some pedestrian/equestrian trips, which could utilize these trails. However, the increase in trail usage is not expected to degrade the quality of these trails because of the small number of pedestrian/equestrian trips that would be generated by the Project.

I disagree. This project will generate a significant increase in usage of Portola Valley trails. Stanford should donate funds to improve our trails. The area is known for it's 36 miles of trails. It is highly likely that residents of the development will make use of these trails including students walking to and from the area's schools.

Impact Trans-2: Trail Crossing Warning sign.

This is absolutely not enough. I completely disagree with the DEIR statement that Alpine Trail is lightly used along this area. It totally depends on time of day and in fact, it is highly used during typical commute hours, and many equestrians use it on the weekends. There should be bumps along the exit portions of the driveways of the development to 100% slow down cars exiting the development. Someone is going to get hit or killed by a car leaving. A stop sign as mentioned above at the Westridge junction (i.e. making that junction into a three way stop) will at least help reduce potential danger to pedestrians/equestrians from cars turning into the development. The document itself indicates "generate 26 trips during the AM peak hour (6 in and 20 out), and 34 trips during the PM peak hour" which would significantly impact the safety of that section of Alpine Road. This estimate does not seem to take into account the statement just made above it "The distances to the other schools are longer than typical walking (one mile) or bike (3 miles) distance for students. Thus, it is likely that most students would be driven to school, rather than walk or bike." Thus again more trips, more traffic, less safety.

Impact Trans-4: Adequacy of Parking. • The Project would install electric vehicle charging infrastructure to facilitate future installation and use of electric vehicle chargers at all the single-family units…

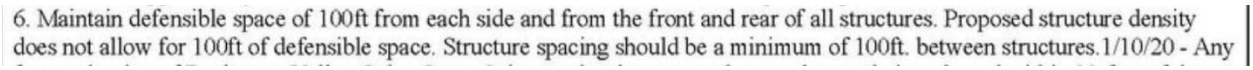
Is the provided infrastructure complete? That is, could a resident with an electronic vehicle start charging their vehicle from day one of residency at their house? If not, that should be added. It's not enough to just provide the infrastructure for EV. You have to provide the actual charging stations. Please clarify.

Chapter 17 - UTILITIES AND SERVICE SYSTEMS AND ENERGY

There is no mention of what the residents of the development are to do relative to blackouts. Will there be a generator on site to provide electricity? What is the noise implication, if so? Can residents place solar units on their roofs to generate power at any point in time? Please clarify.

Chapter 18 - Wildfire

There is no mention of the Woodside Fire Protection District's review of the site in August 2019 and their recommendation in their letter to Stanford of September 1, 2019:


6. Maintain defensible space of 100ft from each side and from the front and rear of all structures. Proposed structure density does not allow for 100ft of defensible space. Structure spacing should be a minimum of 100ft. between structures.1/10/20 - Any

Note recommendation is of structure spacing of minimum of 100 ft.

A study of home destruction in Paradise caused by the 2018 Camp Fire found that the separation distance between buildings was the strongest predictor of home survival. The proximity of structures to dense vegetative canopy was the next strongest predictor. In contrast, the Building Code's home hardening standards did not significantly improve the survival of homes built after their adoption. The project as designed is not safe vis-a-vis these standards.

The National Fire Protection Association recommends a 30 foot separation standard between structures on a property.

It's great Stanford proposes to manage vegetation on the Wedge (as any property owner should!). Yet ignoring WFPD recommendations and NPFA standards actually increases the risk to future Wedge residents and to the surrounding community, contrary to the DEIR statements.

Public review of the DEIR - we were told in various committee meetings that there could only be 5 public meetings on the DEIR. Here it is May 10th and we have had only one meeting (Planning Commission). When are the other 4? This is absurd.

That concludes my comments on the DEIR.

Elizabeth Babb
190 Trinity Lane

From: Rusty Day [redacted]]
Sent: Wednesday, May 11, 2022 6:36 AM
To: Laura Russell <lrussell@portolavalley.net>
Cc: Bullard Don <djbullard@woodsidefire.org>; Pfau Dale R [redacted]]; Wrucke Chet [redacted]]; Town Center <TownCenter@portolavalley.net>
Subject: Comments on Stanford Draft EIR

Attached please find a copy of comments I submitted today on the Draft Environmental Impact Report for the Stanford Housing Project via the Planning Department's web portal, as well as two enclosures referenced in the comments.

Thanks very much,

Rusty Day

May 11, 2022

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

Re: Draft Environmental Impact Report
Stanford Faculty Housing Development Proposal,
3530 Alpine Road, Portola Valley CA

Dear Laura,

I write to submit the following comments on Part 18 (Wildfire) of the March 30, 2022 Draft Environmental Impact Report for Stanford's proposed faculty housing project at 3530 Alpine Road in Portola Valley, as well as the Wildland Fire Behavior Assessment (Appendix J) on which Part 18 is based.

As explained in detail below, I believe a competent, professional peer-review of Appendix J of the DEIR will confirm that the wildfire behavior modeling, hazard analyses and risk assessment set forth in the DEIR and Appendix J fail to provide an adequate, complete or reliable basis for the conclusions presented in the DEIR regarding the wildfire hazards and risks of Stanford's proposed development project.

The future safety of thousands of residents whose families and homes immediately surround the proposed building and development project need and deserve much more competent, accurate, and reliable analysis of the project's likely future impacts on the site's pre-existing wildfire and seismic hazards and risks – as well as the fire prevention and protection steps needed to address those impacts – than the DEIR and Appendix J provide.

In particular, I believe the DEIR and Appendix J:

1. Fail to assess the impact on wildfire hazard and risk of the housing project Stanford seeks to develop
2. Fail to assess the impact on wildfire hazard and risk of the geologic fault that underlies the proposed development

3. Fail to include the rate of fire expansion and spread in their assessment of ”fire hazard” or “wildfire risk”
4. Apply and rely on an arbitrary and biased definition of "wildfire risk"
5. Fail to assess the effect of structural, vehicular and other non-vegetative fuels on the intensity, rate or extent of fire spread
6. Fail to assess the effect of suitably extreme weather conditions on projected fire intensity, rate of spread or expansion
7. Fail to assess the impact of Stanford’s proposed vegetation management plan on the rate of fire spread and expansion under extreme conditions
8. Fail to assess the impact of the Municipal Code concessions Stanford requests on wildfire hazards and risks
9. Fail to assess the comparative impact of Stanford’s project design with an alternative design that substantially complies with the fire protection objectives of the Municipal Code’s provisions
10. Fail to perform a sensitivity analysis of the effect of its selected fire modeling inputs on its modeled outputs and assessment conclusions
11. Fail to assess the proposed project’s effect on wildfire risk to impacted populations
12. Fail to assess alternative evacuation routes that could be provided by the developer to alleviate the project’s adverse impacts on existing evacuation routes and capacity

The Stanford project is merely the first of many such housing projects likely to occur within Portola Valley in the coming years. It is vitally important to establish appropriate standards of wildfire and seismic hazard assessment, risk reduction, and fire prevention and seismic safety standards that Town residents can trust and rely on to protect their public safety. The DEIR fails to demonstrate the project as currently proposed will not adversely impact wildfire hazard and risk or seismic safety. Nor does it identify appropriate mitigation measures to lessen or avoid the adverse effects, direct and cumulative, the project would have on existing wildfire and seismic hazards and risks.

CEQA’s Legal Requirements

Under the California Public Resource Code, an EIR must identify and analyze all potentially adverse effects of a project, including reasonably foreseeable direct, indirect, and cumulative impacts from all phases of the project. (Pub. Res. Code § 21100; Cal. Code Regs. 14:15126, 15126.2.)

Where a proposed project exacerbates existing environmental hazards, an analysis of the potential impact of such hazards on future residents or users must be made. *CBIA v. BAAQMD,* 62 Cal.4th 369 (2015).

> "In the context of wildfire, it is clear that development may exacerbate wildfire risks." (California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines* p. 87 (Nov. 2018)).

Consequently, as the Natural Resources Agency has succinctly stated, the essential question for investigation and analysis under CEQA is whether a proposed project will "expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?" CEQA Guidelines, Appendix G IX(g); *see also* XX(a)-(d).

The California Attorney General recently explained the purpose and nature of the wildfire investigation and hazard and risk analysis CEQA requires:

> "CEQA requires the EIR to analyze a project's potential to increase or exacerbate wildfire risk, including the increased risk of wildfire ignition or spread and the sufficiency of evacuation capacity, particularly in a wildfire-prone area. (Public Resources Code §21083.01; Cal. Code Regs., tit. 14, App. G., subds IX and XX.) This analysis must disclose the project's potential wildfire impacts based on its specific design, density, configuration, land uses, location, among other relevant factors." People's Petition for Writ of Mandate, *Center for Biological Diversity v. County of Lake*, Lake County Superior Court CV 421152 at 12 (February 1, 2021).

In short, as the Natural Resources Agency and California Attorney General have succinctly explained, the DEIR must competently and accurately:

1. Identify and assess the impact of the project's "specific design, density and configuration" on wildfire hazards and risks within the terrain, vegetation, surrounding neighborhoods and infrastructure in which it would be situated;
2. Inform decision-makers and exposed populations of the nature and full extent of the wildfire hazards and risks the project would likely entail or create over its expected life;

3. Identify the surrounding homes, essential infrastructure, resources and/or property that may be exposed to elevated expansion or spread of wildfire due to the project as proposed;
4. Assess – in light of the effects of 1 thru 3 above on the timing and extent of residents exposed to fire expansion and spread – the magnitude, adequacy and preparedness of evacuation resources that may be needed;
5. Identify and prioritize opportunities to mitigate and reduce the project's impacts on wildfire hazards and risks.

The Fire Ecosystem of Stanford's Proposed Development

Stanford's proposed housing project is situated at the mouth of a heavily vegetated ravine that rises nearly 400 feet between steep, juxtaposed slopes from the mouth of the ravine at Alpine Road to the ridgelines above, creating one of the highest hazard fire severity areas in Portola Valley according to the Town's 2008 Moritz Fire Hazards Assessment and Map. The District has previously characterized the project's setting as "a very dangerous place for fire," (Almanac, February 12, 2020) and for good reason. As the January 20, 2021 minutes of Portola Valley's Planning Commission reflect:

> "Don Bullard, Fire Marshal, said this 75 acres on the Stanford property is situated adjacent to three large inaccessible box canyons, below ridges of hundreds of houses, which would be inaccessible and nearly indefensible in a wildfire. He said this is of high concern to Woodside Fire and poses a very high fire risk to the residents of Portola Valley and the Firefighters. He said the vegetation management plan, in concert with the ignition resistant building materials, would indeed reduce the hazard, but in no way resolves the ultimate risk. He said the Wedge canyon and surrounding canyons will continue to be as problematic as they always have been. He said they are very difficult to access and defend, as are the houses on the ridges." January 20, 2021 Planning Commission Minutes at 12-13 (HERE).

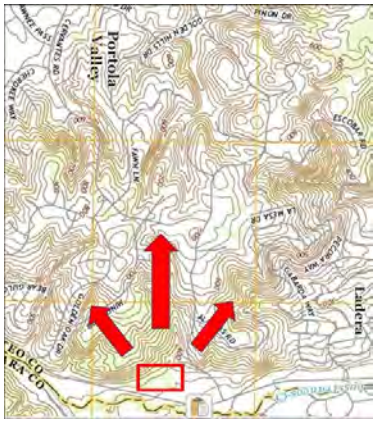
Appendix J of the DEIR briefly acknowledges this stark reality but fails to examine carefully its implications for fire expansion and spread:

> "based on fire behavior only, the current wildfire hazard is very high in many areas throughout the property, both adjacent to the proposed development project as well as along the property boundary where

residential homes exist. Inside the property, these very high areas account for a third of the property." Appendix J at 39.

The extreme fire hazard created by the steeply rising ravine and dense vegetation is exacerbated by the southern, southeastern and eastern aspects of some of its slopes. Winter rains feed the growth and propagation of vegetation along the ravine's walls, and prolonged exposure to sun during the increasingly hot and arid summer and fall months dries and cures the ravine's vegetation. The confined spaces created by the juxtaposed slopes of the ravine's walls can intensify the propagation and accelerate the spread of fire up and away from the ravine's mouth and over its ridge-tops toward the southwest, the west and the northwest.

The United States Geological Survey's Topographical Map for the Palo Alto Quadrant reveals the perilously steep slopes ringing the ravine and the multiple directions in which fire would likely climb these slopes:



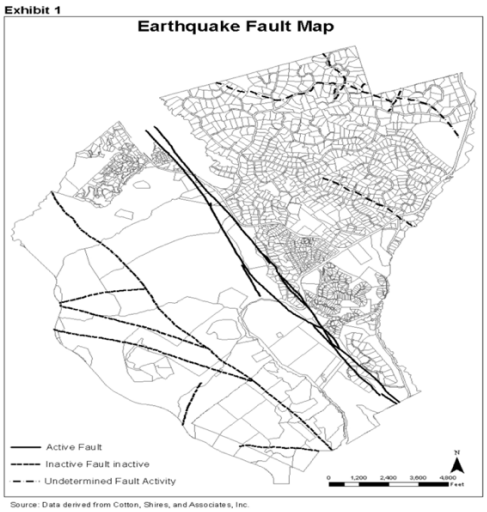
The closely juxtaposed walls of the ravine can create a chimney-like effect that intensifies and uplifts the thermal energy of any fire in the canyon, causing pre-heating, an uplift and spread of burning embers from the canyon, possibly in multiple directions simultaneously. Remarkably, Appendix J does not tabulate the rate of estimated fire spread under the conditions modeled for its assessment. Nonetheless, Figure 31 of Appendix J appears to show fire spreading under a 10 mph wind through moderately dry fuels from an ignition at the base of Westridge Drive near Alpine Road to residences along Minoca Road and Pine Ridge Way within 90 minutes of ignition. More severe conditions, commonly experienced throughout the year, would undoubtedly result in much faster and farther spread of fire.

Climbing the ravine's steep drainages and slopes, fire emanating in or near the ravine's mouth would threaten the site's immediate neighbors along Minoca, Pine Ridge Way, Cervantes and Westridge, as well as the hundreds of homes in the interwoven network of ravines and slopes beyond. The simultaneous spread of fire in different directions above and beyond the ravine toward Minoca Road, toward Cervantes Road, and toward Westridge Drive would greatly increase and likely overwhelm the resources needed to contain and suppress a fire affecting the ravine or its slopes. In addition, the spread of fire or dense smoke into any or all of these neighborhoods would impact and potentially block important access and evacuation routes along Westridge Drive, Cervantes, Minoca and Golden Oak, jeopardizing both fire-fighting and evacuation efforts.

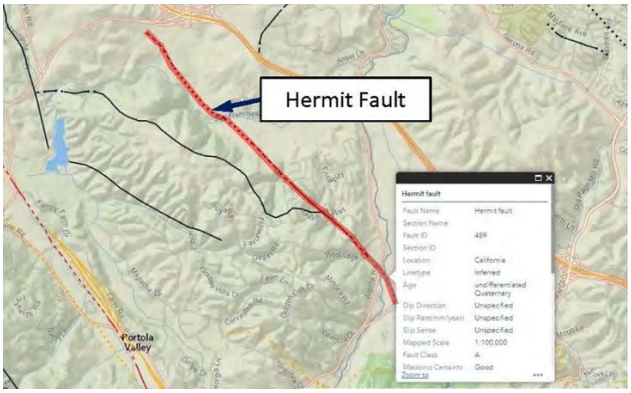
The Seismic Ecosystem of Stanford's Proposed Development Project

For more than 40 years, Portola Valley's geologic and ground movement potential maps have shown a fault running southeast across Westridge Drive near its intersection with Alpine Road and across Stanford's proposed development site to Alpine Road.

Exhibit 1 of the Housing element of Portola Valley's General Plan also shows a fault in the same location.



The 2020 Quaternary Fault and Fold Database of the United States Geological Survey similarly maps, with “good mapping certainty,” a fault, called the Hermit fault, running southeasterly across Westridge Drive, across the proposed development site and housing project, across Alpine Road and into Los Trancos Creek.



As documented in an October 4, 2020 report of Michael Angell – the only structural geologist to study the Hermit fault in detail – the path of the Hermit fault as mapped in the USGS database represents the consensus view of the geologists who have investigated and mapped the fault since 1963. Michael Angell, Mapping the Hermit Fault – San Mateo County (October 4, 2020) (enclosed).

Nonetheless, at some time after Town representatives first approached Stanford to develop a housing project at the site, the Town’s geologic maps were revised to remove the trace of the Hermit fault across the proposed development site. Contrary to the Town’s seismic safety policy, the fault was removed from its geologic and ground movement

potential maps without any prior review or approval by the Geologic Safety Committee, with no prior public notice, with no public hearing or vote of the Planning Commission, and no written explanation of any such decision by the Planning Commission.

A detailed, written request to restore the fault to the Town's geologic maps, sent over a year and a half ago, remains unanswered and unaddressed. October 6, 2020 letter to Jeremy Dennis, Town Manager (enclosed).

Pursuant to the Town's zoning ordinance, "[s]pecial building setbacks are established along earthquake fault traces to minimize potential loss of property and life resulting from differential movement along such traces caused by tectonic forces." Municipal Code 18.58.030(A).

The Town's geologic and ground movement potential maps provide "the basis for required fault setbacks. Two types of setbacks are established. One type is for setbacks along the San Andreas Fault. The other type is for setbacks from fault (other than the San Andreas)." Municipal Code 18.58.030(B). With respect to setbacks for faults other than the San Andreas, such as the Hermit fault, the Municipal Code provides that "it is still prudent to make certain that buildings for human occupancy do not cross such faults." Municipal Code 18.58.030(D). Accordingly, the Code goes on to provide that "[c]onstruction of new buildings for human occupancy within one hundred feet of such mapped fault traces shall be supported by a site-specific geologic investigation that demonstrates to the satisfaction of the town geologist that the structure is not underlain by the suspected fault." Municipal Code 18.58.030(D)(1).

The Municipal Code's requirement for suitably safe setbacks of buildings for human occupancy from seismic hazard is keyed to the location of faults depicted on the Town's geologic and ground movement potential maps. The unauthorized removal of the fault's trace from these maps directly impacts the development and building standards to which the project and its proposed buildings for human occupancy would otherwise be subject. But for that unauthorized action, the project would be subject to more stringent and less favorable development standards and constraints.

The Unacceptable Shortcomings of the DEIR's Wildfire Assessment

Appendix J compares a modeled depiction of vegetative "fire hazard" of Stanford's land ***before*** Stanford's proposed mitigation of vegetative fuels with a modeled depiction of vegetative "fire hazard" ***after*** its proposed mitigation of vegetative fuels. Appendix J concludes, on the basis of that incomplete assessment of vegetative fuels only, that

> "Overall, [Stanford's proposed] development does not increase fire hazard or risk. On the contrary, if the treatments and defensible space as required by the WFPD and the Vegetation Management Plan are rigorously applied, it will substantially lower both fire hazard and risk. In addition, the proposed structures are built to be ignition-resistant. Combined with stringent vegetation treatments, the area can serve as a fuel break, buffering the area from fire spread." DEIR, Appendix J at 89.

As explained in detail below, the DEIR does not assess the fuel complex that Stanford proposes to develop, nor does it competently assess the wildfire hazards and risks that CEQA requires to substantiate such conclusions.

1. The DEIR fails to assess the impact on wildfire of the fuel complex that Stanford's housing project would create

Neither the DEIR nor Appendix J assess the effect on wildfire hazards and risks of the housing complex Stanford proposes to create. Because the fire behavior models on which the DEIR and Appendix J rely for their assessment of fire hazard and risk are incapable of modeling the fire behavior of non-vegetative fuels (such as structures, vehicles, propane tanks, etc.), the models' projection and depiction of fire behavior (including fire intensity and fire growth) do not account for the effect that the addition of 30 two-story, densely-situated residential structures, scores of vehicles and other non-vegetative fuel sources would have on fire behavior within the very high fire hazard severity lands immediately surrounding them. Incredibly, the DEIR and Appendix J ***pretend*** that the addition of such man-made fuels to the site would reduce – not add to and increase – the thermal and radiant energy released by a fire impacting the site. Indeed, Appendix J goes so far as to assert that the addition of 30 densely packed two-story structures, scores of vehicles and untold human activities "can

serve as a fuel break, buffering the area from fire spread." Appendix J at 89.

WFPD has clearly articulated the potential hazards and risk posed by the addition and concentration of dense housing in such dangerous terrain. As you told Portola Valley's Planning Commission on January 20, 2021:

> "cluster housing in the WUI is risky business, posing the highest risk for structure-to-structure ignition. He said we have to learn our lessons from past mistakes. He said putting cluster housing in the WUI equates to a severe fire risk and is why we will continue to lose more and more structures to wildfire in California. He said less structures on the property would be a compromise well worth the benefit of a safer community. He said he is open to and looks forward to discussions on how to make this project safer for the community. He said that per damage assessments for communities that have been subject to wildfire, structures with 30 to 100 feet of defensible space and substantial distances from other structures have had a much better survival. He said the Stanford proposal promotes the opposite concept. He said cluster housing does not allow for true wildfire resiliency or defensible space between houses, which is why Blue Oaks was planned with large separation from structures. At that time, he said the Planning Department put wildfire at the forefront of the Blue Oaks PUD. He said reduced setbacks and reduced lot sizes are not in the best interest of wildfire resiliency in any WUI area. He said if there is an exterior or ignition of any one structure, there will likely be structure-to-structure ignition because of the close proximity. Fire Marshal Bullard said all of Woodside Fire Department's resources could easily be overwhelmed in this type of incident. He said the San Mateo County Board of Supervisors disapproved a zoning production change in all high fire risk areas. He said future land use and wildfire prone lands should use information from catastrophic losses in other communities as part of their roadmap. He said the CZU fire lost 1,300 structures and 87,000 acres. There are not 87,000 acres in Portola Valley, but there are 1,500 homes that could be lost. Fire Marshal Bullard recommended that these issues be thought about as this project moves forward. He said he is open to discussions about making this development safer." January 20, 2021 Planning Commission Minutes at 13 (HERE).

The glaring inaccuracy and unsubstantiated assumptions of the DEIR's assessment of wildfire hazard and risk is illustrated by its side-by-side depiction of "wildfire hazard" before and after the project is built.

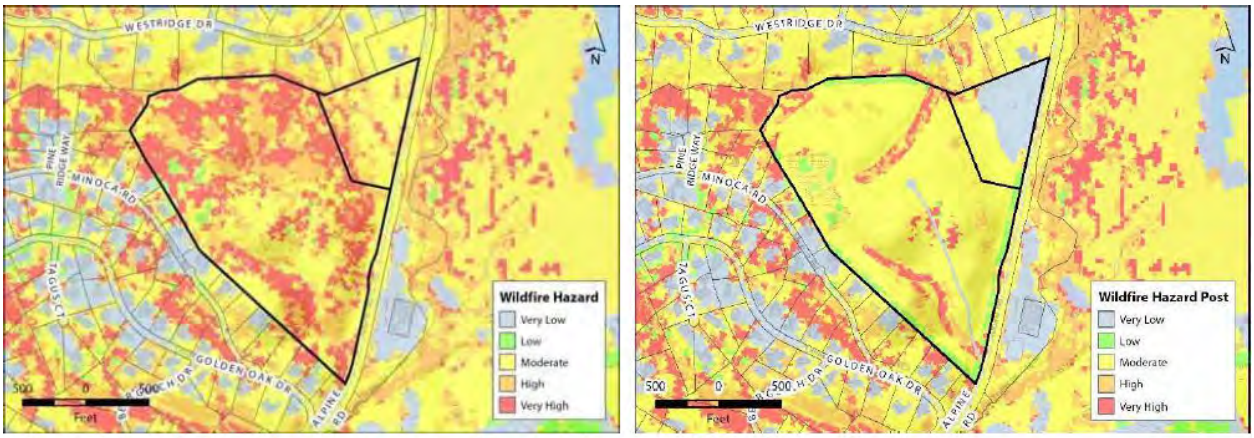


Figure 48. Side by side comparison of pre and post wildfire hazard rating.

As depicted in Figure 48 of Appendix J, the assessment asserts that replacement of grasses and other vegetative fuels with 30 two-story residential structures, dozens of vehicles and other non-vegetative fuels will result in a reduction of fire hazard throughout the northeast corner of the site wherever new buildings are added. Because the fire behavior and vegetative fuel models on which the assessment relies treat buildings and other non-vegetative fuel types as non-burnable surfaces, Appendix J and the DEIR ascribe no fire hazard to the structural fuel complex Stanford proposes to build.

Incredibly, in assessing the fire hazards and risks of Stanford's proposed housing development, Appendix J and the DEIR ***pretend*** that the project's structures and other non-vegetative fuel sources simply cannot burn. But structures, vehicles, furnishings, and other non-vegetative fuel types can and do burn. The heat of combustion they release can be enormous, far greater than that of any vegetative fuel. And yet, there is simply no evaluation or assessment in Appendix J or the DEIR of the fire hazards Stanford's new, non-vegetative fuel complex would create. Instead, all such hazards are simply assumed away on the pretext that the models on which the assessment relies do not have the ability to model accurately or effectively the fire behavior of such non-vegetative fuels or their effect on fire intensity, expansion or rate of spread.

In reality, the residential structures, vehicles and other non-natural fuels that Stanford proposes to add to the site are not only combustible surfaces

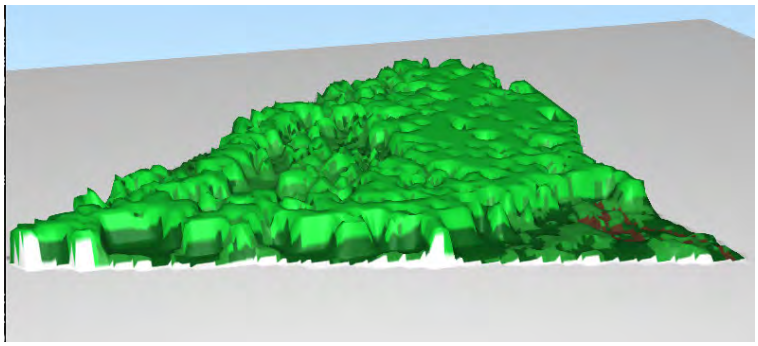
that can and do burn, but their potential energy release upon combustion can be thousands of times greater than the potential energy released by a comparable area of burning vegetative fuels. The moisture content of structural fuels is generally far lower than the moisture content of live, vegetative fuels, resulting in much quicker ignition and fire spread. And their compartmentalized architecture can increase the rapid pressurization and ignition of pyrolytic gasses resulting in much quicker, explosive combustion and convection than more exposed vegetative fuel types.

The fact that the fire behavior models chosen for assessment of Stanford's project are incapable of estimating accurately the fire behavior of non-vegetative fuels is no justification or excuse for failing to evaluate the effect such highly combustible fuel sources would have on fire intensity and expansion. The effect of adding and densely concentrating fuels with such immense heats of combustion cannot simply be assumed away. It must be assessed in a competent, professional manner that accurately accounts for the effect such fuels can have on fire behavior, as the Attorney General pointedly noted:

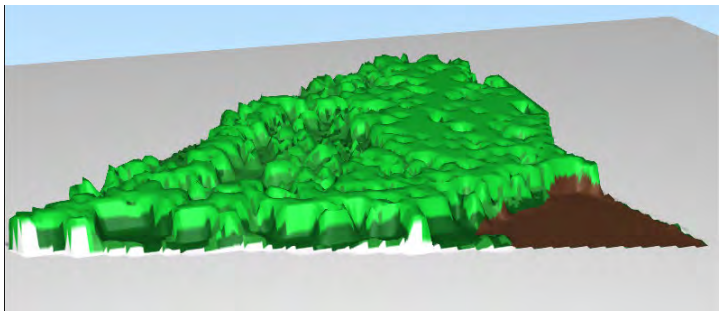
> "CEQA requires the EIR to analyze a project's potential to increase or exacerbate wildfire risk, including the increased risk of wildfire ignition or spread and the sufficiency of evacuation capacity, particularly in a wildfire-prone area." People's Petition for Writ of Mandate, *Center for Biological Diversity v. County of Lake*, Lake County Superior Court CV 421152 at 12 (February 1, 2021).

The enormous extent to which the potential energy release of structural, vehicular and other man-made fuel sources exceeds that of vegetative fuels cannot be over-stated or emphasized enough.
To illustrate the magnitude of difference between vegetative and structural fuel sources, the first graphic below uses data obtained from San Mateo County to depict the magnitudes of energy released (heats of combustion) of the fine fuel load of the different vegetative fuel types (grasses, shrubs, chamise, etc.) present on the Stanford property. The horizontal X- and Y-axes illustrate the locations on Stanford's land of the differing vegetative fuel types, and the vertical Z-axis and various shades of green illustrate the relative magnitude of each fuel type's heat of combustion. As the graphic illustrates, some vegetative fuel types can release as much as 10 to 14 times more energy upon combustion than other fuel types, either because their ignition causes much more rapid (flashier) combustion, or because the

density, compaction or composition of their vegetative fuels causes much more intense fire.

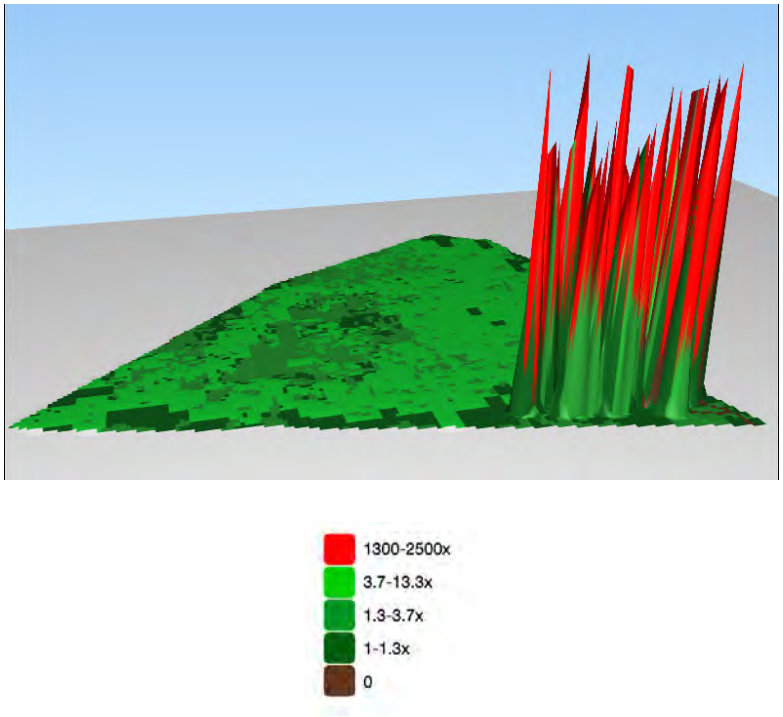


The next graphic below illustrates the fuel model used in Appendix J to assess the impact of Stanford's proposed project on wildfire hazard and risk. As the graphic shows, the fuel model used in Appendix J assumes that the structures, vehicles, and other non-natural fuels added by the project are all non-burnable surfaces that release NO energy when exposed to fire. Consequently, the area occupied by Stanford's proposed housing is depicted in the modeling of Appendix J as a non-burnable surface that releases no energy when exposed to fire, and is assessed to have ZERO fire hazard.



The last graphic below illustrates the relative magnitude of the actual heat of combustion of vegetative fine fuel types (green) in comparison to that of structural fuels (red). The vertical Z-axis illustrates the relative magnitude of the estimated heat of combustion of vegetative fine fuels in proportion to the magnitude of that of structural fuels. Because the magnitude of energy released by structural fuels is so much greater than that of vegetative fuels, it was necessary to re-scale and shrink the Z-axis depicted in the first two graphics above by 20x to allow the magnitude of energy release for structural fuels to fit on a single graphic. As the graphic illustrates, the potential energy release of structural fuels (excluding furnishings, vehicles, etc.) within the area occupied by Stanford's proposed project would be

more than 2,400 times greater than the vegetative class with the lowest fine fuel load.[1]



As the last graphic makes clear, the addition of structures will in fact greatly increase the potential heat of combustion far beyond the energy potential of the vegetative fuels they replace. Indeed, the replacement of vegetative fuels with dense structures will increase the heat of combustion at those locations by more than a thousand-fold. Such intense concentration of highly combustible fuels hardly has zero fire hazard, and yet that is precisely the false pretext on which the DEIR and Appendix J are based.

The much greater intensity and duration of structural fire in comparison to vegetative fire can have a significant effect on the level and cumulative dosage of thermal and radiant flux transmitted from a burning structure or vehicle to neighboring structures, vehicles or vegetation, thus increasing the propensity for fire propagation and spread. The energy released by burning structures provides an enormous increment in the energy available to intensify, expand and rapidly spread a fire affecting the proposed development. Ignoring that fact cannot satisfy CEQA's requirement to

[1] The green tint of the base of each structural fuel peak depicted in the graphic is an artifact of the graphics program and does not depict energy release associated with vegetative fuel types. The entire peak should be considered red.

assess the project's effect on the wildfire hazard and risk posed by the project.

The addition of new housing will not only add fuels of vastly greater heat of combustion than the vegetative fuels they replace, but the configuration and dense spacing of such structures will have a multiplicative effect on the intensity and rapidity of fire expansion and spread resulting from any combustion that affects such densely spaced fuel complexes.

Appendix J goes to some length to explain why it is important to reduce the density and agglomeration of vegetative fuel sources, to separate surface and canopy fuels from one another, and to distribute and reduce the overall load of vegetative fuels on the landscape. Appendix J at 58.

As with vegetative fuels, the density, configuration and location of non-natural fuels also impacts the potential intensity, expansion and rate of fire spread. But the vastly greater heat of combustion of non-natural fuel sources makes the spacing, proper positioning, separation and containment of such fuel sources all the more critical. The higher the concentration, the greater the density, the closer the proximity of such high energy fuels to one another, the higher the heat of combustion and the more explosive the propagation and spread of fire.

While Appendix J touts the benefits of Stanford's planned reduction in vegetative fuel density and improved spatial separation of vegetative fuels, it simply ignores and utterly fails to acknowledge the important need for reduced density and adequate separation of structural and other non-natural fuels. It also ignores the hazardous consequences of Stanford's proposed increase in structural and vehicular fuel density, reduction in adequate building separation, failure to provide adequate parcel sizes or vehicular shelter, increased massing of two-story structures on under-sized parcels, and side-by-side, chimney-like configuration of closely spaced two-story structural masses.

2. The DEIR fails to assess the impact on wildfire hazard and risk of the geologic fault that underlies the proposed housing development

As detailed in Angell (2020) (enclosed), a dip-slip or reverse (uplift) fault, commonly called the Hermit fault, underlies and transects Stanford's proposed development site and the entire housing project.

The Hermit fault lies within the San Andreas fault system, less than 2 miles from the main trace of the San Andreas fault. Based on its proximity to the main trace of the San Andreas fault, its orientation with respect to the current tectonic stress environment, and its potential structural linkage to Holocene active faults in the immediately surrounding area, it is likely the Hermit fault could also experience co-seismic movement during a large event on the San Andreas fault.

The presence and trace of the Hermit fault – in bedrock associated with the Whiskey Hill/Ladera contact – has been recognized by many well-respected professional geologists, has been published in several generations of federal and state geologic maps, and cited numerous times in scientific literature. The USGS Quaternary Fault Database currently records and depicts the Hermit fault as noted above.

The estimated width reflected in the fault's mapping is consistent with the width of the fault zone observed at the three key exposures: San Francisquito Creek (~400 feet wide); the bottom of Westridge Drive (~200-250 feet wide) and Los Trancos Creek (>250 feet wide). Well-developed subhorizontal slickenlines (dragmarks) and other kinematic indicators of the direction of shearing such as drag folds and fault zone structure preserved within the zone of faulting were observed at all of these key outcrops, as documented in Angell's field notebook of his 1995 field observations.

Based on these observations and the location and geometry of the Hermit fault with respect to the San Andreas Fault system, Angell and others (1997) infer that the Hermit fault may experience movement as secondary deformation during large rupture events on the San Andreas fault or the adjacent Monte Vista fault. Whether the Hermit fault is independently capable of producing a moderate-to-large earthquake is likely dependent on its area and strength of linkage to the main trace of the San Andreas Fault.

At both the northern and southern ends of the proposed development site, the exposures of the Whiskey Hill/Ladera contact show conclusive evidence of tectonic faulting. The fault can be observed in outcrop as a zone of intense shearing within the immediate vicinity of the contact, observable as the contact at some locations (e.g., the roadcut on Westridge Drive).

As Angell explains, the alignment of the Westridge Drive and Los Trancos Creek exposures with the Pampeyan (1970; 1993) trace of the fault, together with the extensive structural, geophysical and geomorphic data regarding the location, continuity and internal structure of the Hermit fault, demonstrate that the contact between the Whiskey Hill/Ladera formations observed and reported on the site is almost certainly the result of tectonic faulting. In short, when all of the known data are properly viewed in context together, the surrounding structural, geophysical and geomorphic evidence clearly indicate a fault across the proposed development site as depicted by Pampeyan and the USGS quaternary fault database.

Incredibly, the DEIR simply ignores the Angell (2020) report and the many published references it cites, including Angell's detailed 1997 report on his extensive field investigation of the fault, and instead relies on the fact that the Hermit fault does not appear on the Town's current ground movement potential map as evidence demonstrating the fault does not exist.

Simply removing a fault from a map in no way removes the hazard that its existence and potential rupture poses. Nor does it justify ignoring the immediately surrounding structural, geophysical, geomorphological evidence that demonstrates the fault's presence and recent activity at the site.

The fact that the Hermit fault was removed from the Town's geologic safety maps without public review or authorization is troubling at best and must be explained. But ignoring its existence and potential effect on public safety to approve a proposed housing project is inexcusable.

Because the Hermit fault is a slip-dip or reverse fault whose rupture or displacement is predominantly vertical and not horizontal, the lack of evidence relied on in the DEIR to show no recent lateral displacement or rupture is simply irrelevant to a competent assessment of the fault's potential vertical displacement or rupture.

Such vertical displacement would be difficult to assess by historical aerial surveillance alone. More recent advances in high resolution surveillance, such as LIDAR, may allow greater discrimination of vertical displacement, and thus delineation of both the fault's precise trace and evidence of relatively recent rupture or displacement.

Based on the incomplete and irrelevant field work and analysis performed to date, there are many important unanswered questions regarding the potential activity and interaction of the Hermit fault within the proposed development's geological setting, particularly in light of its close proximity to and uncertain relationship with the Jasper Ridge uplift, the San Andreas fault system, the Monte Vista fault, the Canada fault and the Jasper fault.

Further investigation and analysis of the Hermit fault within its geological setting are clearly needed in order to assess with any confidence the potential for future activity of the fault. Such analysis is also required to assess the effect that such rupture or displacement could have on:

- Structural integrity of improvements within the development
- Ignition or propagation of fire
- Availability, access and timing of emergency response
- Evacuation routes in and around the proposed development
- Continuity of essential infrastructure, including water, electricity, telecommunications and neighboring gas lines

3. The DEIR fails to include the rate of fire expansion and spread in its assessment of "fire hazard" or "wildfire risk"

Wildfire is the uncontrolled expansion and spread of fire. In assessing wildfire hazard and risk, the DEIR and Appendix J adopt and apply an erroneously narrow definition of "fire hazard" that excludes the rate and extent of uncontrolled fire expansion and spread and mistakenly focuses instead on the intensity of fire within small, discrete areas as its sole criterion of fire hazard.

By defining "fire hazard" as a combination of projected flame length, intensity of fire per meter, and crown fire potential (Appendix J at 21 and 38), the DEIR improperly constricts the definition of fire hazard to intensity of fire within a relatively small, discrete area and ignores the more important threat that the rapid expansion and spread of uncontrolled fire poses to public safety, emergency evacuation and effective fire suppression. The fact that Appendix J defines "fire hazard" as its projection of fire intensity (an integration of flame length, intensity/meter and crown fire projections) within discrete areas is demonstrated by its characterization of the site's pre-existing fire hazard: "based on fire

behavior only, the current wildfire hazard is very high in many areas throughout the property…."

Appendix J defines "wildfire risk" as a weighted combination of its "wildfire hazard" analysis, its "potential ignition sources" analysis, and its analysis of "wildfire suppression response." Appendix J at 43. By defining "wildfire risk" as this restricted combination of inputs, the DEIR ignores and excludes any consideration of the impact that the rate of fire growth and expansion would have on affected individuals, homes, infrastructure, evacuation capacity or emergency response and suppression.

In short, rather than assess behavior of fire within the site's fire ecosystem as a whole, Appendix J simply integrates a modeled projection of flame length, fireline intensity/meter and crown fire potential within each of many discrete segments of the site defined by the model, and then assigns a hazard rating to each of those segments.

By means of this definitional contrivance,[2] Appendix J diverts attention from the critical threat that fire growth poses for rapid spread into populated neighborhoods where ignition and structure-to-structure spread of fire can threaten entire residential communities.

The misguided emphasis on fire intensity to the exclusion of fire spread as a measure of fire hazard is illustrated by a comparison of projected fire growth depicted in Appendix J ***before*** vegetative mitigation (Figure 31, left-hand graphic below) and ***after*** vegetative mitigation (Figure 44, right-hand graphic below).

[2] The DEIR's focus on fire intensity to the exclusion of fire growth and expansion is a pretext that allows the DEIR to argue that a reduction in discrete areas of fire intensity through vegetative fuel removal is necessarily a reduction in fire hazard. In point of fact, however, a reduction of vegetative fuel in one or more specific locations does not necessarily result in a reduction in the rate of fire growth or expansion. Indeed, it may lead to the introduction of different, flashier or less viable fuel types that increase the rate of fire spread or expansion. The comparison of fire growth rates depicted in Figures 32 and 45 of Appendix J (see below) demonstrates that Stanford's proposed vegetative removal may result in a projected reduction in fire intensity but not a reduction in the rate or extent of fire spread under the assumed conditions on which the depictions are based. If an intervention causes reduction in fire intensity within discrete areas but an increase in the rates and extent of fire spread, can that truly be considered a reduction in fire hazard?

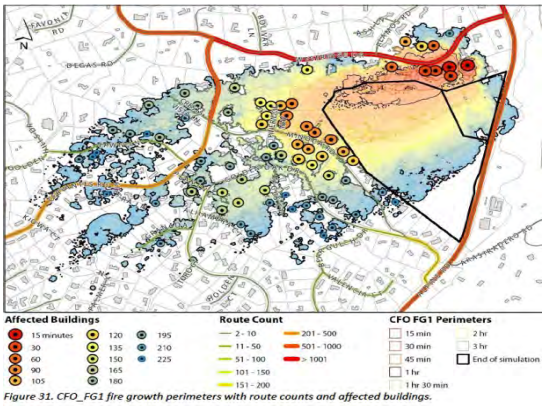


Figure 31. CFO_FG1 fire growth perimeters with route counts and affected buildings.

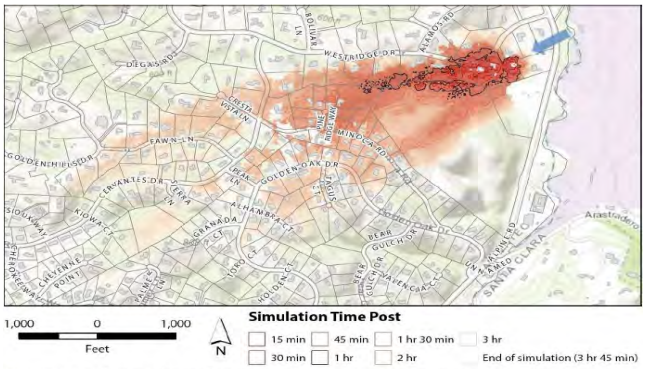


FIGURE 44. Perimeters for predicted fire growth for ENE -post treatment. Wind direction shown with blue arrow.

Before vegetative fuels are mitigated and replaced by structures, Figure 31 projects the spread of fire into the area proposed for development in the northeast corner of the property. ***After*** the project is built, Figure 44 projects no spread of fire into the area occupied by the development because its modeling ***assumes*** that structural and other non-natural fuel sources are non-burnable materials with zero heat of combustion.

Comparison of Appendix J's projection of before and after fire growth under a southwest wind confirms the critical effect of the assessment's assumption that structural fuels are simply non-burnable.

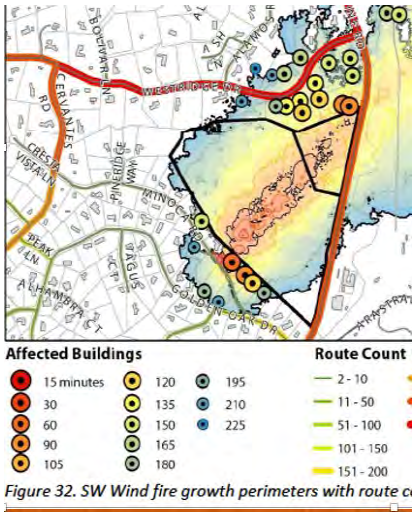


Figure 32. SW Wind fire growth perimeters with route c

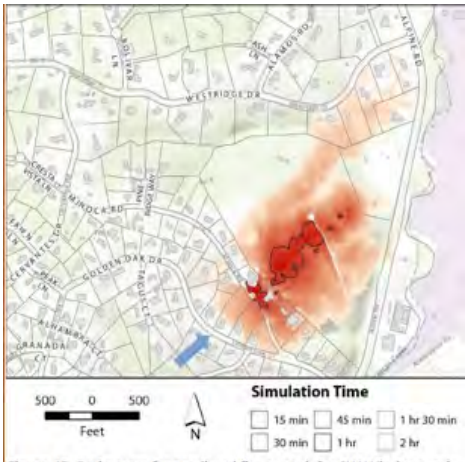


Figure 45. Perimeters for predicted fire growth for SW Wind scenario - directionshown with blue arrow.

Before vegetative fuels are mitigated and replaced by structures, Figure 32 (left) projects the relatively slow spread of fire into and through the area proposed for development in the northeast corner of the property. ***After*** the project is built, Figure 45 (right) projects a much more rapid spread of fire directly up to but not into the area occupied by the development. Because the modeling ***assumed*** that structural fuels are non-burnable surfaces with

zero heat of combustion, the fire simply stops when it reaches the model's non-burnable surfaces.

How accurate or valid is the DEIR's assumption that structural fuels cannot burn? If, contrary to the DEIR's assumption, structures, vehicles and other non-vegetative fuels are in fact combustible, indeed, if they have heats of combustion that are thousands of times greater than the vegetative fuels they replace, will the addition of such fuels increase or decrease the rate and extent of fire expansion and spread? The DEIR and Appendix J simply avoid this critical question and do not assess it.

4. The DEIR's definition of "wildfire risk" is arbitrary and biased

Appendix J defines "wildfire risk" as a weighted combination of three different inputs with no explanation or demonstration that the inputs chosen or the weights assigned to them have any empirical or even theoretical basis to support them. The inputs selected and the weights assigned to them are simply arbitrary, subjective adjustments by the study's authors to create an unjustified appearance of scientific rigor and precision where none exists.

> "To determine overall wildfire risk of the Stanford Wedge, we combined our results from the wildfire hazard analysis (50%), the potential ignition sources analysis (25%), and the wildfire suppression response (24%) to create a layer that would represent the wildfire risk on and surrounding the property. The resulting data layer was reclassified to a scale of 1 to 10; 1 equal to a low risk of wildfire and 10 being the highest risk of wildfire." Appendix J at 43.

The fact that the weighting applied in Appendix J is arbitrary and entirely without basis is confirmed by its acknowledgment that

> "the three components were each given a weight so that only a portion of their rating would be accounted for in the equation. In other words, the wildfire hazard rating was multiplied by 0.50, the potential ignition rating was multiplied by 0.25, and the suppression response was multiplied by 0.25. In this way we "weight" the resulting risk model toward the wildfire hazard rating. Alternatively, no weighting could be done." Appendix J at 43.

If, as the authors acknowledge, the assessment could be done with no weighting, then what empirical basis justifies the weighting that was done? The failure to specify any basis to justify the weighting used demonstrates that it is entirely arbitrary and subjective. Why not, for example, weight ignition potential by .40 and wildfire hazard by .40 and suppression response by .20?

The same specious reasoning is manifested in the assessment's contrived and arbitrary selection of categories to include in its definition of "wildfire risk."

- Why is the intensity of fire per discrete area included but the rate of fire expansion and spread not included?
- Why is suppression response included but not the demand for evacuation or number of homes impacted by fire?
- If the assessment were revised to focus on the rate of fire expansion and spread (not fire intensity), the number and locations of homes exposed to fire over time (not ignition potential), and the demand for and capacity of evacuation resources (not suppression resources), how would the depiction of risk differ?

What possible basis justifies the authors' decision to include some categories of risk but not others in their assessment?

By selecting a limited set of risk categories as a basis for scoring its assessment of risk – while ignoring equally or more important categories of risk – Appendix J biases the assessment without any explanation or justification for doing so.

5. The DEIR fails to assess the effect of structural, vehicular and other non-natural fuels on the intensity, rate or extent of fire spread

Structures situated in WUI lands can experience two different forms of hazardous exposure to fire: (1) ignition by burning embers, and (2) ignition by thermal and/or radiant flux. Protection against one form of exposure (i.e., embers) does not provide protection against the other form of exposure (i.e., convective or radiant flux). NIST TN 2205.

In WUI fire events, ember flux can originate from distant sources beyond a property owner's ability to control or reduce exposure. Because the

intensity or duration of such exposures cannot be predicted or controlled in advance, all such structures must be hardened against penetration or ignition by embers. Consequently, all structures and parcels potentially exposed to high ember flux must be hardened to withstand ember penetration and ignition.

In contrast to ember flux, the exposure of a structure or parcel to convective and radiant flux is closely related to the distance separating it from a potential source of fire. As separation distances decrease, the magnitude of exposure increases exponentially. That is why it is critically important to anticipate and protect against such potential exposures.

To protect structures and parcels against intense convective and radiant flux from nearby sources, NIST NT 2205 recommends (in priority order):

- Removing potential source(s) of convection/radiation, or
- Reducing the fuel content (potential enthalpy or heat of combustion) of such sources, or
- Relocating the potential source to adequately separate it from an an exposed structure or parcel.

If the heat of combustion of a potential source of convection/radiation is relatively modest and the risk of exposure is low (such as a mulch fire or burning shrub), hardening the exposed structure's exterior cladding, roof and underlying assembly may be sufficient to withstand the exposure. If, however, the potential heat of combustion from a nearby source is high (such as a 120 sf shed or larger structure), attempts to harden against such exposures are not reliably effective. For this reason NIST, Cal Fire, and the IIBHS recommend removal, reduction or relocation of such intense fuel sources rather than hardening, particularly if structures are separated by less than 25 feet.

Precisely because the intensity of convective/radiant exposure increases exponentially as the distance separating an exposed structure from the source of that burning energy decreases, the hazard of home ignition and combustion also increases exponentially as the density of structures increases and the distances separating them decreases.

A single burning structure or vehicle can also cause intense and prolonged convective uplift of super-heated air and corresponding downdrafts that

spread embers throughout the surrounding community. Multiple ignitions through structure-to-structure spread only intensifies the height and duration of upward ember flux, causing the spread of embers across a vastly increased distance.

In low density communities, where structures are separated by distances of 100 feet or more, a structure ignition will increase local ember exposures, which can be significant 300 feet downwind. There will also be increased local exposure to convective/radiant flux but likely no direct fire exposures to adjacent properties due to the increased separation distances between structures. TN 2205 at 42.

In moderate density communities, with separation distances between 30 and 100 feet, a structure ignition can ignite an adjacent property depending on wind conditions. Embers generated from a burning structure will generate significantly higher exposures to the downwind structures relative to the low density community due to the decreased separation distance between structures. TN 2205 at 43.

High density communities create a very different category of exposure. In high density communities, with less than 30 foot separation distances between structures, ignition of a single structure will "almost invariably" result in the ignition of one or more adjacent structures and the loss of a significant fraction of the community. Not only does fire spread occur very easily between tightly spaced structures, but containment becomes more difficult because it is very hard to remove heat between such closely spaced structures.

Collectively, the 30 densely-packed, two-story structures, vehicles and other non-natural fuels Stanford proposes to build in its "very dangerous" fire ecosystem could generate heats of combustion ***thousands of times greater*** than that of the vegetative fuels they would replace. And yet, nowhere does Appendix J assess the effect that the addition of such intense, highly combustible fuel sources would have on the rate of fire expansion and spread in the site's very hazardous fire ecosystem, or the potential intensity of fire in that ecosystem.

Incredibly, the fire behavior models on which Appendix J relies consider all non-natural fuel sources (such as structures, vehicles, etc.) to be non-burnable surfaces that release and contribute zero energy to a burning fire that affects them. Such wildly inaccurate premises hardly constitute a valid

or reliable basis on which to assess the effect that a proposed project's "specific design, density, configuration, land uses and location" would have on wildfire hazards and risks to the surrounding community.

Nothing in Appendix J or the DEIR addresses the hazards and risks of the 30 housing structures Stanford proposes to build in the context of its highest hazard setting. Nowhere does Appendix J or the DEIR assess the fire hazards created by adding such densely spaced, two-story structures, dozens of vehicles and other non-natural fuels immediately downslope of very high fire hazard areas. Nowhere do they assess "the project's potential wildfire impacts based on its specific design, density, configuration, land uses [and] location, among other relevant factors."

CEQA requires more. Much more. It requires a competent, professional assessment of the impact that Stanford's proposed dense housing, associated vehicles and other non-natural fuels would have on the likely rate of spread and expansion of fire under extreme weather conditions within the very hazardous setting of its fire ecosystem.

6. The DEIR fails to assess the effect of suitably extreme weather conditions on projected fire intensity, rate of spread or expansion

The DEIR fails to apply appropriately extreme weather and climatic conditions to assess the likely severity of fire affecting the project. The 90th percentile conditions selected in the Assessment for modeling fire behavior (e.g., 10 mph wind; 60% fuel moisture) are characterized by the models as "medium/high" conditions, not near-extreme (97% percentile) or extreme conditions (98th-100th percentiles). (*See* Appendix J at 100-101).

To the extent that climatic conditions continue to change, the use of past weather conditions as a basis to predict future weather conditions can bias and distort the Assessment's projection of future fire behavior. The Assessment's selection of 90th percentile conditions can also bias and distort the Assessment's projection of future fire behavior by ignoring the more extreme weather conditions that cause uncontrolled fire expansion and spread. The more extreme conditions ignored in the DEIR's assessment are not rare events; they occur 10% of the time and are happening with ever greater frequency than previously.

Use of 90th percentile conditions means that conditions more extreme than modeled historically occurred 10% of the time, or approximately 3 days a month. If fire season lasts only 5 or 6 months a year, and future conditions are no more extreme than historical conditions, Appendix J's assessment assumes the project would likely encounter more extreme conditions than modeled as often as 15 to 18 days a year. If the project's expected life is 40 years, the project would encounter conditions more extreme than modeled on more than 600 to 720 days.

The fact that the proposed project will undoubtedly encounter more extreme conditions than the historically moderate to high conditions selected for the Assessment underscores the important need to perform an assessment of the effect on fire behavior of far more extreme conditions than the conditions used for Appendix J and the DEIR.

7. The DEIR fails to assess the impact of Stanford's proposed Vegetation Management Plan on the rate of fire spread and expansion under as-built extreme conditions

Because the rate of fire spread depicted in Appendix J and the DEIR is based on modeling that erroneously assumes that non-vegetative fuels cannot burn and release no energy when exposed to fire, the assessment of before and after fire spread in Appendix J is both inaccurate and grossly misleading.

Notably, however, even as modeled in Appendix J, the projected rates and extent of fire growth before and after Stanford's proposed vegetative mitigation do not appear to differ materially in overall breadth of fire spread. It is noteworthy, however, that the depictions of fire spread in Figures 31 and 44, and Figures 32 and 45 appear to show increasing areas of rapid fire spread, suggesting that Stanford's proposed reduction of vegetative fuels may not have the beneficial effect the assessment claims, particularly once the effect of Stanford's structural fuel complex on fire expansion and spread is properly assessed under more extreme wind and fuel moisture conditions.[3]

[3] Figures 44 and 45 unfortunately lack any depiction of structures affected by fire shown in Figures 31 and 32, which makes their correct interpretation difficult.

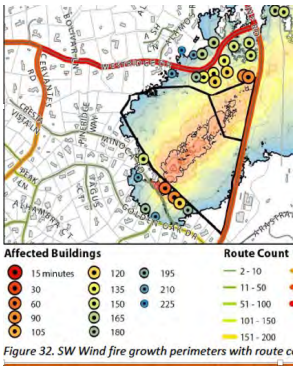


Figure 32. SW Wind fire growth perimeters with route c

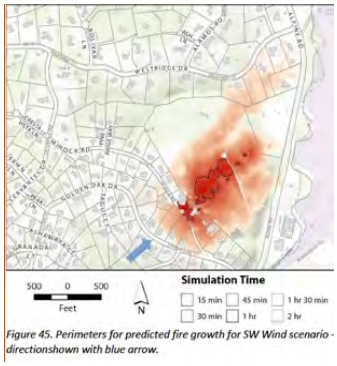


Figure 45. Perimeters for predicted fire growth for SW Wind scenario - directionshown with blue arrow.

The rate of fire spread depicted in Figure 45 is apparently much faster than the rate of fire spread in Figure 32, indicating that Stanford's proposed vegetative fuel mitigation would increase the rate of fire propagation and spread under the conditions modeled in this scenario.

Figure 45's projection is consistent with experimental data that shows that rate of fire spread and extent of asset loss both increase when slopes are covered with grasses rather than shrubs.[4] Excessive clearing, and especially excessive canopy removal, can result in a proliferation of grasses and thistles, which are more susceptible to moisture loss and ignition from ember showers, lit cigarettes, and similar sources. Unmanaged, the vertically oriented herbaceous material of grass and thistles burns faster than woody brush and leaf litter, with a rate of propagation that is 4 to 10 times faster than brush, depending on the slope.[5] For these reasons and others, low-volume grasses are associated with greater structure loss than woody shrubs.[6] The proposed Vegetation Management Plan goes well beyond simply eliminating ladder fuels and would convert much of the site's oak-canopy and shrub covered slopes to grasslands. Will this result in faster, not slower, propagation of wildfire up the site's steep ravines and slopes?

The impact of Stanford's proposed mitigation of vegetative fuels on the future potential spread and expansion of fire is among the most critical public safety questions a competent assessment of the project's impact on

[4] Engber et al. (2011) "The Effects of Conifer Encroachment and Overstory Structure on Fuels and Fire in an Oak Woodland Landscape" Fire Ecology 7.

[5] Neary and Leonard, "Wildland Fire: Impacts on Forest, Woodland, and Grassland Ecological Processes" in Wildland Fires - A Worldwide Reality (2015); Payne, "Introduction to Wildland Fire - 2nd edition" John Wiley & Sons (1996).

[6] Syphard et al. (2012) "Housing Arrangement and Location Determine the Likelihood of Housing Loss Due to Wildfire" PLOS One.

hazard and risk must address. By replacing woody fuels with flashier grasses and shrubs, reducing tree canopy, and removing ladder fuels will the proposed mitigation transform the existing site into one whose vegetative fuels dry more quickly, contain less moisture, burn faster and spread fire more quickly? How will a reduction of ladder and canopy fuels affect wind speeds across the property?

A comparison of Figures 31 and Figure 44, and Figures 32 and 45 suggests that Stanford's proposed vegetative changes can have a deleterious impact on fire expansion and spread. A much more thorough and specific assessment of the planned mitigation's impact on the long-term nature, aridity and combustibility of the site's future vegetative cover is critically needed. That assessment should examine the effect of ignitions occurring under varying wind conditions in and around the proposed development based on an accurate and complete depiction of the structural and vegetative fuels they would encounter.

8. The DEIR fails to assess the impact of Stanford's proposed Municipal Code concessions on wildfire hazards and risks

Stanford's proposed housing project would be situated immediately downslope from lands designated Highest Hazard in the 2008 Moritz wildfire hazard assessment commissioned by the Town of Portola Valley. Indeed, the fire behavior modeling on which Appendix J relies demonstrates that Stanford's site contains multiple very high fire hazard severity areas. Appendix J at 39.

As part of its proposed housing development, Stanford is asking the Town of Portola Valley to waive enforcement of various provisions of the Town's Municipal Code that serve to protect against structure-to-structure fire spread and expansion. Among the bonus density concessions sought by Stanford, it seeks waiver of the Town's requirements for a minimum of 10 acres for planned unit developments, a minimum of 20,000 square feet for building parcels within such developments, minimum side, rear and front building setbacks, minimum separation of structures across streets, and maximum square footage of allowed construction per parcel.

Each of these concessions would increase fire hazard by concentrating highly combustible fuels in closer proximity to one another. Taken together, the concessions Stanford seeks would collectively result in an exponential

increase in fire hazard and risk, as NIST TN 2205 clearly documents and explains.

NIST TN 2205 documents and explains in detail the role of fuel agglomeration on fire and ember fluxes generated from combustibles located in close proximity to one another. The impact of fuel agglomeration on increased fire intensity – and of increased fire intensity on structure ignitions – makes adequate spacing between combustibles essential. Adequate spacing between combustibles requires adequate parcel sizes to afford the space needed to allow the necessary fuel separations to occur. "Spacing requirements to prevent direct high fire exposure to residences, together with the need to reduce overall high fire exposure conditions to enhance life safety, require a detailed spatial parcel-level fuel loading assessment." NIST TN 2205.

NIST TN 2205 also underscores the important relationship between parcel size and the agglomeration of fuel sources into hazardous fuel complexes. Such complexes can include residences, vehicles, accessory structures fences, decks and vegetation as well as other fuel sources. They provide pathways to home ignition and structure-to-structure fire spread. Fuel agglomeration also has significant impact on energy release and fire expansion.

While zoning and development codes typically protect residences against fire exposures from within the same parcel, protection against exposures from neighboring parcels is no less important to prevent the expansion and spread of fire. That is why an adequate parcel size and an adequate separation between structures located on neighboring parcels as well as structures located on the same parcel is so critically important. It is also why limits on the allowable amount of fuel sources constructed within parcels is so important.

On February 12, 2020 residents of Portola Valley wrote the Town's Planning and Building Director requesting the EIR to assess the differential effect of Stanford's requested Municipal Code concessions on wildfire hazard and risk. Feb. 12, 2020 Letter to Laura Russell (Comments 7, 8 and 9).

Cal Fire's minimum fire safe development standards (14 CCR §1276), the National Fire Protection Association's Wildland Fire Protection standards 1144 and 1140, and the NIST TN 2205 all require and recommend

separation between structures and parcels consistent with the minimum requirements of Portola Valley's Municipal Code.

As NIST explains, where the separation between structures is less than 25 feet, "the very high fire exposures (e.g. direct flame contact from a fully involved residence) will ignite a structure and mitigation in the form of hardening will have limited or no effect in reducing the ignition potential of the structure." TN 2205 at 32. In such circumstances, as NIST goes on to explain in Table 3, the high fire exposure of structures separated by less than 25 feet from a burning structure, the low probability of structure survival in such circumstances, the low effectiveness of fire hardening to protect such structures against ignition, and the high risk of community-wide spread that results due to structure-to-structure ignition all mean that "the ignition of a structure will almost invariably result in the ignition of one or more adjacent properties and will likely result in the loss of a significant fraction of the community. NIST TN 2205 at 43.

The DEIR fails to assess the impact on wildfire intensity, expansion or spread of Stanford's request to waive enforcement of the provisions of the Town's Municipal Code that require

- A minimum area of 10 acres for a planned unit development (Stanford seeks approval of 7 acres)
- Minimum parcel sizes of 20,000 sf within planned unit developments (Stanford seeks approval of 3,000 sf parcels)
- Minimum side and rear setbacks of 25 feet (Stanford seeks approval for <5 and 10 foot setbacks, respectively)
- Minimum front setback of 50 feet (Stanford seeks approval of <10 feet),
- Maximum ratio of building sf to parcel area of 0.1955 building/parcel sf (Stanford seeks allowance of 0.7333 building/parcel sf), and
- Minimum separation between buildings across streets of 170 feet (Stanford seeks approval of 48 feet)

As NIST TN 2205 clearly warns:

> "High density communities are in a very different exposure category. Here the ignition of a structure will almost invariably result in the ignition of one or more adjacent properties and will likely result in the loss of a significant fraction of the community, as evidenced by several large loss WUI fires in the U.S. This is not only because the fire spread occurs very

easily between tightly spaced structures, but also because it is very difficult to contain a fully involved structure fire, even when only moderate winds of 10 mph to 15 mph are present. Fire spread is difficult to stop as it is very challenging to remove/block the heat between residential buildings when they are constructed 6 ft to 10 ft apart. In high-density construction, a single ignition can have a disproportionate impact on the overall community losses." NIST TN 2205 at 43.

That is why Cal Fire's minimum fire safe development regulations require a 30 foot building setback from all property lines for parcels within very high fire hazard severity areas. (14 CCR §1276). That is why the National Fire Protection Association's Wildland Fire Protection standards also call for a 30 foot setback from property lines, and a minimum 30 foot separation between all structures. And that is why NIST TN 2205 (Appendix A, Table B) recommends that the nearest neighboring primary residence should be located no closer than 25 to 50 feet away.

The Town's Municipal Code establishes minimum parcel sizes to allow adequate space for prudent separation of highly combustible fuels within and around each property. It establishes minimum setbacks to provide for prudent separation of structures and residences. It establishes prudent limits on the maximum allowable square footage of fuel sources that can be added by construction to each parcel based on the parcel's size.

Stanford's seeks to set aside all of these necessary and prudent limits so it can lower its cost of construction and build more houses on less land. That will certainly produce immediate economic benefit for Stanford but at what cost to the residents who buy these new homes and hundreds of families who surround them? The dense concentration and agglomeration of fuels Stanford proposes would exponentially increase the fire hazards and risk created by the neighborhood it seeks to build. But Stanford will not have to live with those hazards and risks. Those of us who continue to live here will, as will the residents who buy into this hazardous development. The failure of Appendix J and the DEIR to acknowledge and competently address those increased hazards is simply inexcusable.

9. The DEIR fails to assess the comparative impact of Stanford's proposed project design and that of an alternative design that substantially complies with the Municipal Code

On February 12, 2020 residents of Portola Valley wrote the Town's Planning and Building Director requesting the Stanford EIR to evaluate and compare the impact on wildfire hazard and risk of an alternative project that substantially complies with the unit numbers per acre and structural density allowed under the Municipal Code with the wildfire hazard and risk of Stanford's proposed unit numbers per acre and structural density. Feb. 12, 2020 Letter to Laura Russell (Comment 8). The DEIR provides no such assessment.

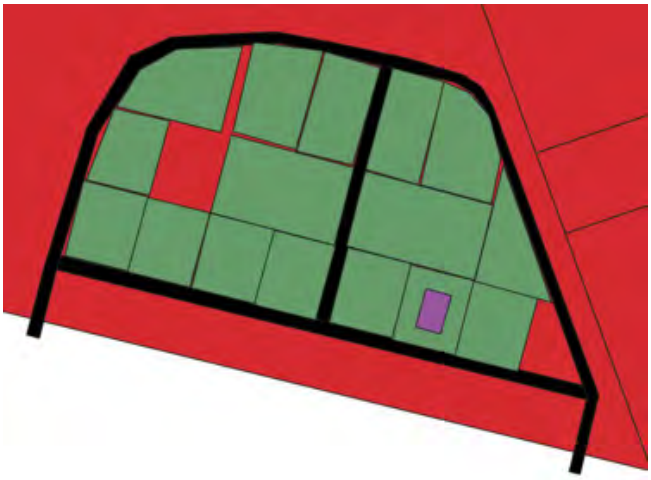
To frame the relevant analysis that should be performed for the DEIR, a project that substantially complies with the standards set forth in the Municipal Code might have:

- Fourteen single family houses and one four-family multi-family building unit (the Municipal Code would allow 7 single family parcels within Stanford's planned unit development; Stanford seeks 27 single family units and 2 multi-family units with six units each)
- A minimum area of 7 acres for a planned unit development (the Municipal Code requires 10 acres; Stanford proposes 7 acres)
- Minimum parcel sizes of 8,000 sf within the planned unit development (the Municipal Code requires 20,000 sf parcels; Stanford proposes 3,000 sf parcels)
- Minimum side and rear setbacks of 20 feet (the Municipal Code requires 25 foot side and rear setbacks; Stanford proposes <5 and 10 foot setbacks, respectively)
- Minimum front setback of 40 feet (the Municipal Code requires a front setback of 50 feet; Stanford proposes <10 feet),
- Maximum ratio of building sf to parcel area of 0.2500 building/parcel sf (the Municipal Code would allow 0.1955 building/parcel sf; Stanford seeks 0.7333 building/parcel sf), and
- Minimum separation between buildings across streets of 120 feet (the Municipal Code requires 170 feet; Stanford proposes 48 feet)

In each case, the alternative project would entail significant concessions from the Municipal Code's more exacting and stringent requirements. It would allow Stanford to build more units at greater density than the Municipal Code would otherwise allow. It would reduce Stanford's cost of development and increase its return on development by comparison to its cost and return for a project that conforms with the Town's Municipal Code. The alternative would, however, balance Stanford's economic interest against the public's safety interest in fire prevention and protection, and

make only such concessions as would serve to protect the safety of the development's residents and the many more families and homes surrounding the development who would be exposed to the development's wildfire hazards and risks.

A conceptual parcel map of such an alternative project reveals its many benefits in comparison to the project proposed by Stanford.



Among the alternative project's many improved fire prevention and safety provisions, it would allow for:

- A perimeter loop road that surrounds the project with a fire break that separates the proposed project from its very hazardous open space wildlands to the west and allows improved access to, suppression and containment of the project's fire hazards;
- Adequate parcel sizes to prevent the proposed project's very hazardous agglomeration of fuels;
- Adequate separation between residential structures to prevent the proposed project's very hazardous impact on structure-to-structure fire spread;
- Adequate setbacks and right-of-ways to allow pedestrian paths and bicycle lanes;
- Increased on-site garage parking to shelter vehicles from fire exposure and reduce hazardous on-street parking; and
- Improved road access and right-of-ways to facilitate emergency access and egress.

Stanford's understandable desire to maximize its economic interest is no reason for the District or its residents to forego their overriding public interest in safety. Nor is it any reason to ignore the essential, minimal safeguards needed to prevent and contain the spread of fire affecting the project.

10. The DEIR fails to perform a sensitivity analysis of the effect of its selected set of model inputs on its modeled outputs

The outputs of fire behavior modeling are highly sensitive to relatively small changes in input, such as wind speed, fuel moisture, or vegetative fuel type. For example, for GR2 grasses on un-sloped land, Scott et al., projects that fire will spread at a rate of

- 115 chains per hour (8 foot flame lengths) with live fuel moisture of 60% and 10 mph wind, versus
- 250 chains per hour (12 foot flame lengths) with live fuel moisture of 30% and 14 mph wind.

Similarly, for GS2 shrubs and grasses on un-sloped land, Scott, et al., projects that fire will spread at a rate of

- 65 chains per hour (8 foot flame length) with live fuel moisture of 60% and 10 mph wind, versus
- 170 chains per hour (14 foot flame lengths) with live fuel moisture of 30% and 14 mph wind.

Relatively small changes in fuel type only compound the dramatic impact on rate of spread and expansion. For example, Scott et al., projects that fire will spread at a rate of

- 30 chains per hour (2-1/2 foot flame lengths) for GR1 grasses with 60% live fuel moisture at 10 mph wind, versus
- 250 chains per hour (12 foot flame lengths) for GR2 grasses with 30% live fuel moisture at 14 mph wind.

The high sensitivity of modeled outputs to relatively small changes in the inputs selected for fire behavior modeling illustrates clearly why sound, peer-reviewed selection of input values for the model's parameters is so critical to the depiction of fire intensity and spread. It is simply too easy to

influence whatever level of intensity, expansion or rate of fire spread a model will depict by selecting input values that produce a desired output. And that is why a competent sensitivity analysis of the effect of changes in the set of modeled inputs on outputs is so critically important to demonstrate the objectivity, impartiality and reliability of the modeled outputs. It is also why an impartial professional peer-review of the assumptions and choices underlying the assessment presented in Appendix J and the DEIR is critically important.

11. The DEIR Fails to Assess the Proposed Project's Effect on Wildfire Risk to Impacted Populations

Neither Appendix J nor the DEIR assess whether the proposed project would expose people or structures to a significant risk of loss, injury or death involving wildland fires, or the sufficiency of evacuation capacity in such circumstances.

While Appendix J claims to present "a fire risk assessment" that "identifies wildland fire hazards and provides spatial information to allow for an adequate assessment of impacts" (Appendix J at p. 3), at most, it merely recognizes that increased human activity will likely increase the potential of fire ignitions affecting the site (Appendix J at 40 and 73).

Nowhere does Appendix J or the DEIR assess the fire risks created by adding 30 densely spaced, two-story structures, dozens of vehicles and other non-natural fuels immediately downslope of lands of very high fire hazard severity. Nowhere does Appendix J or the DEIR assess how fire impacting the fuel complex Stanford proposes to build would affect the population(s) of people that would be exposed to evacuation or immediate risk of fire. Nowhere do they assess the differential effect of Stanford's proposed project on the surrounding homes, essential infrastructure or evacuation routes that would be exposed to fire or closure as a result of fire affecting Stanford's proposed housing. And nowhere do they assess the magnitude, response time and availability of fire suppression resources required to contain or control fires affecting Stanford's proposed development.

Wildfires most commonly occur during periods of extreme weather conditions. The critically important questions that must be answered in assessing wildfire risk are:

- Under what conditions can fire affecting the project spread to and threaten the lives and residences of the populated neighborhoods surrounding Stanford's proposed project?

- Under what conditions, within what time periods, to what extent and with what intensity can fire affecting the project spread into the neighborhoods above and surrounding Stanford's project?

- What amount of time and what access and egress routes would be available under such circumstances for fire suppression and family evacuation?

- What would be the demand for evacuation under such circumstances and how would that demand compare with the available capacity and resources for evacuation?

- What resources would be needed and available to evacuate exposed populations?

- What fire suppression resources would be needed to contain and hopefully control fires affecting Stanford's proposed development under extreme conditions?

These essential questions cannot be answered by ignoring the impact of the proposed housing, vehicles and other non-natural fuel sources on the intensity and spread of fire. Nor can they be answered by a methodology that reduces the meaning of fire hazard to nothing more than a comparison of projected fire intensity within small, discrete areas based on their amount of vegetative fuels only.

These essential questions cannot be competently answered by ignoring the effect of extreme weather conditions on the intensity and spread of fire. Nor can they be answered by ignoring the extreme hazards of tiny parcel sizes and overbuilt structures that provide insufficient room for adequate separation of structures, sheltering of vehicles or the defensible space needed to protect them against ignition by thermal and radiant flux.

As the California Attorney General and numerous California courts have held, CEQA requires more. Much more. It requires a competent professional assessment of the impact of Stanford's proposed dense

housing, associated vehicles and other non-natural fuels on the likely rate of spread and expansion of fire under extreme weather conditions within the very hazardous setting of its fire ecosystem. It requires an impartial, competent analysis of "the project's potential wildfire impacts based on its specific design, density, configuration, land uses [and] location, among other relevant factors."

12. The DEIR fails to assess alternative evacuation routes that could be provided by the developer to alleviate the project's adverse impacts on existing evacuation routes and capacity

Among the most severe public safety risks confronting the proposed development and all of its neighboring residents is the severely limited capacity of the Town's existing evacuation routes and their hazardous exposure to closure in the event of wildfire, earthquake, or other similar disaster. The Town's existing evacuation capacity is constrained to two principal routes of escape along the Town's eastern and western borders. There are no evacuation routes to the south and no evacuation routes from central Portola Valley to the north.

Creation of new evacuation routes to the south of Town is physically constrained by steep mountain slopes and perilously narrow drainages through which such routes would transit. New evacuation routes south would be perilous, slow and likely severely constrained in capacity and throughput.

Creation of new evacuation routes to the north would likely provide much greater throughput through relatively safer land at lower risk of burn-over or interdiction.

The lands to the north of Town, including the Linear Accelerator, Jasper Ridge Biological Preserve and Webb Ranch, are exclusively controlled by the developer. The Town should insist on the creation of one or more new evacuation routes through the lands owned and controlled by the developer as a mitigation measure for any development of its lands in Town.

The creation of a new evacuation route through Webb Ranch from Ladera would provide much safer egress for residents of Ladera than the current, gated evacuation route along Goya Road, and would alleviate the volume of traffic that must currently use Alpine Road as its principal escape route.

Similar consideration should be given to the creation of additional escape routes, either through Stanford-owned lands along Alpine Road between I-280 and Arastradero Park, or along Portola Road between Family Farm and the Linear Accelerator.

Sincerely,

Rusty Day

cc: Don Bullard, Fire Marshall, Woodside Fire Protection District
Ann Kopf-Sill, Chair, PV Planning Commission
Chet Wrucke, Chair, PV Seismic Safety Committee
Dale Pfau, Chair, PV Emergency Response Committee

PVNU

Portola Valley Neighbors United

October 6, 2020

Jeremy Dennis
Town Manager
Town of Portola Valley
765 Portola Road
Portola Valley, California 94028

Re: Portola Valley's Ground Movement Potential Map and Stanford's Geologic and Seismic Hazard Investigation

Dear Jeremy,

We are writing to inquire when and why the Town's ground movement potential map was revised to remove the trace of the Hermit fault from the map. We also wish to learn whether Stanford's geologic and seismic hazard investigation of its proposed faculty housing project is complete, as Stanford's project website states.

<u>Removal of the Hermit Fault from Portola Valley's Geologic Maps</u>

For more than 40 years, Portola Valley's geologic and ground movement potential maps have shown a fault running southeast across Westridge Drive near its intersection with Alpine Road and across the Stanford Wedge property to Alpine Road.

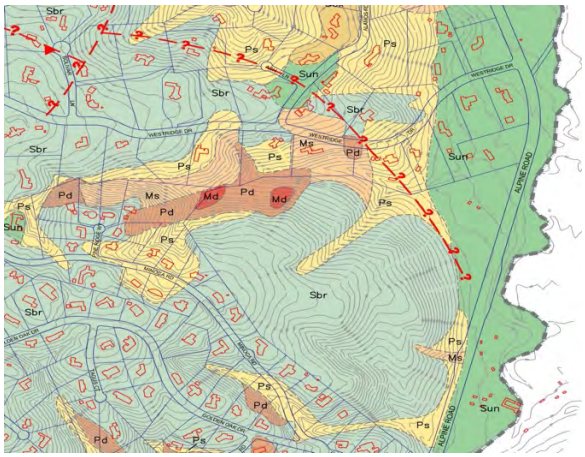
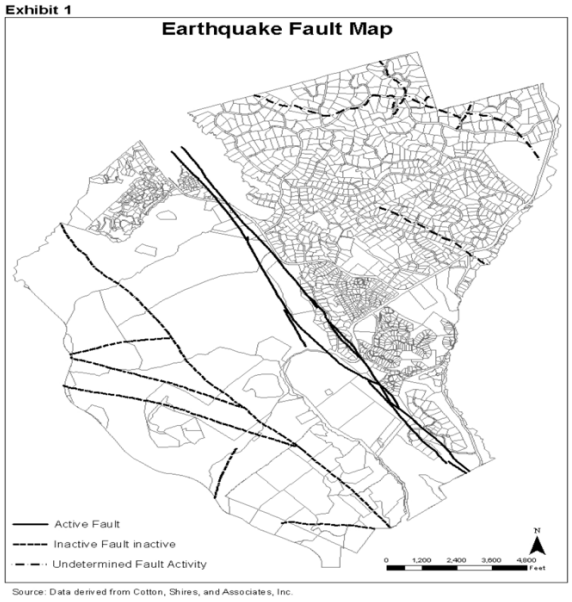
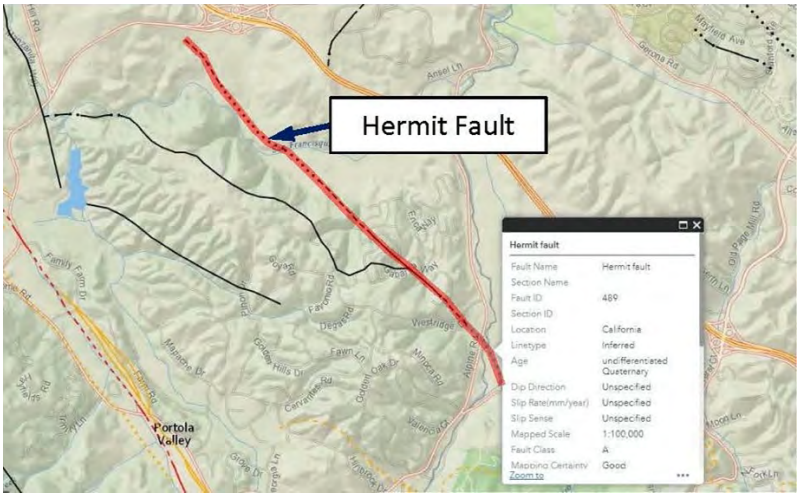


Exhibit 1 of the General Plan's Housing element also shows a fault in the same location.



The 2020 Quaternary Fault and Fold Database of the United States Geological Survey similarly maps, with "good mapping certainty," the Hermit fault running southeasterly across Westridge Drive, across Stanford's Wedge property through its proposed housing project, and across Alpine Road into Los Trancos Creek.



As documented in the enclosed October 4, 2020 report of Michael Angell – the only structural geologist to study the Hermit fault in detail – the path of the Hermit fault as mapped in the USGS database represents the consensus view of the geologists who have investigated and mapped the fault since 1963.

Nonetheless, at some time after Town representatives first approached Stanford to develop a housing project on the Wedge, the trace of the Hermit fault across Westridge Drive and the Stanford Wedge disappeared from the Town's geologic maps.

As you know, the Town Council has long specified a well-defined set of procedures to consider any request for modification of the geologic and ground movement potential maps at a noticed public hearing of the Planning Commission. If the Commission resolves, based on the evidence presented at a public hearing, to approve the request and modify the map(s), a written report must then be prepared by the town planner indicating the nature of the change and the reasons the Planning Commission approved it.

We have twice written the Town requesting it to search for and produce all records of any public hearing or resolution of the Planning Commission approving the removal of the fault from the Town's geologic maps. Based on our review of the records the Town has produced, we can find no record of any public hearing or resolution of the Town's Planning Commission to remove the fault from the Town's geologic maps.

As the evidence cited above clearly demonstrates, there is no sound basis to remove the Hermit fault from the Town's geologic maps, and the failure to do so would undermine the integrity and purpose of the maps. Removal of such a well-documented fault from the Town's geologic maps without an appropriate field investigation and sound geologic evidence demonstrating the absence of faulting could have very serious implications if residences are built, improved or occupied without notice of the fault's existence.

In the absence of any public hearing and resolution by the Planning Commission approving removal of the Hermit fault from the Town's geologic maps, please confirm that the maps will be corrected to restore the Hermit fault to the maps, consistent with the mapping of the United States Geological Survey and California Geological Service.

Stanford's Geologic and Seismic Hazard Investigation

Pursuant to the Town's zoning ordinance, "[s]pecial building setbacks are established along earthquake fault traces to minimize potential loss of property and life resulting from differential movement along such traces caused by tectonic forces." Municipal Code 18.58.030(A).

The Town's geologic and ground movement potential maps provide "the basis for required fault setbacks. Two types of setbacks are established. One type is for setbacks along the San Andreas Fault. The other type is for setbacks from fault (other than the San Andreas)." Municipal Code 18.58.030(B). With respect to setbacks for faults other than the San Andreas, such as the Hermit fault, the Municipal Code provides that "it is still prudent to make certain that buildings for human occupancy do not cross such faults." Municipal Code 18.58.030(D). Accordingly, the Code goes on to provide that "[c]onstruction of new buildings for human occupancy within one hundred feet of such mapped fault traces shall be supported by a site-specific geologic investigation that demonstrates to the satisfaction of the town geologist that the structure is not underlain by the suspected fault." Municipal Code 18.58.030(D)(1).

While Stanford's project website claims it has completed its geological hazard investigation of the site, there is no mention of or acknowledgment by Stanford of the Hermit fault or the potential hazard the fault poses to Stanford's proposed project. When we requested the Town to produce whatever geologic or geotechnical reports Stanford had submitted for its project, the Town produced an unsigned draft report prepared by Cornerstone Associates in September 2017 that asserted without relevant field evidence that the fault long mapped by the USGS is merely a depositional contact and not a fault.

An unsigned draft report of such importance is obviously unreliable, and a field investigation that neglects to expose and investigate the full extent and character of the acknowledged bedrock contact to study whether it is faulted or not is obviously insufficient. If, as Stanford's plans indicate, it proposes to build its housing project directly across the inferred path of the fault, our Municipal Code expressly requires a full and complete investigation of the location and extent of the fault as well as the hazard it might pose.

Please confirm that Stanford's investigation of the geologic and seismic hazard of its proposed project is not complete, and that a thorough and competent field investigation and analysis of the Hermit fault and whatever seismic risk it may pose will be required by the Town in connection with Stanford's subdivision application.

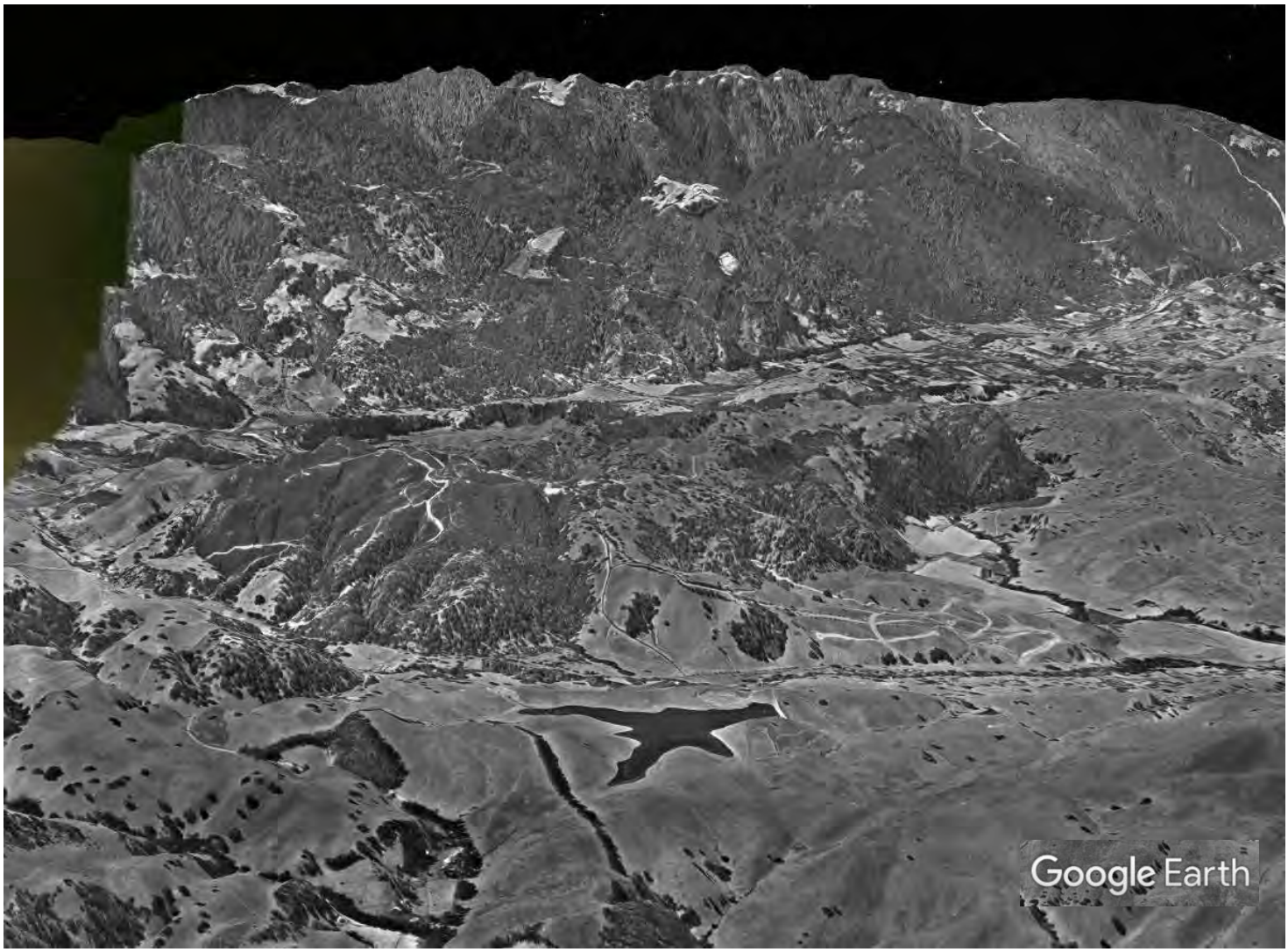
Your prompt response to these matters will be greatly appreciated. In addition, would you kindly provide a copy of this letter to each member of the Portola Valley Planning Commission and to each member of the Geologic Safety Committee.

Sincerely,

Portola Valley Neighbors United
PVNU.org
P.O. Box 199
3130 Alpine Road, Suite 288
Portola Valley, CA 94028

Cc: Portola Valley Planning Commission
Laura Russell, Portola Valley Planning and Building Department
Portola Valley Geologic Safety Committee
Don Bullard, Fire Marshall, Woodside Fire Protection District
John Donahoe, Director of Real Estate, Stanford University

Mapping the Hermit Fault
San Mateo County, CA



NeoGeologic
Consulting

Final Report

04 October 2020

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OBJECTIVE

The Hermit fault is located in San Mateo County, in the cities of Palo Alto and Portola Valley, extending from near the Stanford Linear Accelerator in the north to near the intersection of Alpine Road and Arastradero Road in the south.

The objective of this report is to provide my opinion regarding the existence, location, continuity, and structure of the Hermit fault as expressed in bedrock. Specifically, my opinion addresses the presence or absence of faulting along the southeastern reach of the Hermit fault in the vicinity of Alpine Road. My opinion is based on a review of published scientific literature, discussions with others who have mapped or written about the fault, and my personal experience mapping the fault on aerial photographs and in the field.

This report is not intended to clarify the different nomenclature by which others have referenced or mapped the Hermit fault in prior reports or mappings. Nor is this report intended to analyze or characterize the potential activity or structural evolution of the Hermit fault in its greater geological setting, which includes the San Andreas Fault system as well as the foothills thrust system east of the San Andreas Fault system.

As discussed below, while I believe it would be possible to model and estimate the potential activity and likely interaction of the Hermit fault under various scenarios in its geological setting, such work would require substantial additional field investigation and analysis to characterize not only the Hermit fault, but its surrounding geological setting as well. Such work is beyond the scope of my engagement.

In 1995 and 1996 I conducted a field-based research study in the Palo Alto region, funded by the USGS National Earthquake Hazards Reduction Program. The research was aimed at mapping faults and Quaternary geologic features in an effort to begin to evaluate the seismic hazard potential of the Stanford, Pulgas and Hermit faults. The results of the USGS study are presented in Angell and others (1997).

As part of the current study I revisited many of the bedrock exposures of the Hermit fault that I observed previously and reported in Angell and others (1997). I also include findings from a local borehole exploration program in the vicinity of the mapped trace of the fault (Cornerstone, 2017).

This report is intended to provide my opinion regarding the Hermit fault for educational purposes and should not be used as a basis for guidance, design or decision-making for engineering constraints without additional work.

METHODOLOGY

The following sections describe previous geologic mapping of the Hermit fault, including examples from published maps.

The geologic observations recorded in the published maps showing the Hermit fault satisfy criteria for identifying faults as described in the Nuclear Regulatory Commission NUREG volume *Identifying Faults and Determining their Origin* by Hanson and Others (1999).

The criteria for identifying faults fall into four categories:

Stratigraphic: Measurable offset of a previously continuous marker such as sedimentary layers, dikes, fossils, and man-made features.

Structural: 1) Anomalous juxtaposition of structural features such as bedding attitude; 2) Internal structure indicating shearing has occurred. These include breccia, gouge, slickensides, foliations, drag marks and systematic scale-invariant fault systems formed under simple shear; and 3) a direct structural association and kinematic linkage to known faults or features caused by deformation such as folded strata, particularly major faults with significant offset.

Geophysical: 1) Expression in the electromagnetic spectrum on aerial and satellite data; 2) Expression in potential field data such as magnetic and Bouger gravity anomaly maps; 3) Expression on active source subsurface seismic reflection and refraction seismic data; and 4) Association with seismic activity.

Geomorphic: 1) Expression in the landscape as a linear anomaly, with particular features associated with different characteristics. Geologists are always wary of lineaments that are parallel to the strike of bedding as the expression may be due to other causes due to changes in stratigraphy such as drainage pathways, changes in or alignment of vegetation, differences in erodibility etc.; and 2) expression in the landscape due to the effect of active faulting on the land surface and to sedimentary processes.

TECTONIC SETTING

The Hermit fault lies within the San Andreas Fault system, less than 2 miles from the main trace of the San Andreas Fault. After the October 17, 1989 Ms 7 .1 Loma Prieta earthquake on the San Andreas Fault in the Santa Cruz Mountains, coseismic ground rupture was observed along the northeast range front of the Santa Cruz Mountains, mostly along or adjacent to the mapped traces of the Shannon, Berrocal and Monte Vista faults (Haugerud and Ellen, 1990), but also as far north as Page Mill Road in Palo Alto and at the Stanford Linear Accelerator (Schwarzschild, 1990).

Quaternary uplift of the northeast margin of the Santa Cruz Mountains in the Palo Alto area is indicated by the presence of uplifted and deformed Plio-Pleistocene alluvial deposits of the Santa Clara Formation, uplifted Quaternary fluvial terraces, and incised and ponded fluvial deposits suggestive of rapid base-level changes (Angell and others, 1997).

Based on the proximity of the Hermit fault to the main trace of the San Andreas Fault, its orientation with respect to the current tectonic stress environment, and its potential structural linkage to Holocene active faults in the immediate surrounding area it is likely the Hermit fault could also experience coseismic movement during a large event on the San Andreas Fault. Given its limited length it is uncertain the Hermit fault is independently capable of producing a moderate-to-large earthquake. That would depend on its area and strength of linkage to the main trace of the San Andreas Fault.

HISTORICAL MAPPING

A review of the history of geologists recognizing and mapping the Hermit fault is important because the appearance alone of a fault on a map does not provide evidence it exists. The evidence is what was observed in the field and how those observations were interpreted. The presence of the fault on official state and federal maps reflects the judgement of the geologists who mapped the feature, as well that of the technical peer reviewers and committee members who approved of its inclusion on official maps.

Willis (1924)

The Hermit fault was first identified by Willis (1924), who inferred its presence along the northeast range front of Jasper Ridge. However, Willis apparently left no maps showing the fault's actual position or extent (Pampeyan (1993)).

Dibblee (1966)

The first comprehensive geologic map for the region was published by the USGS based on field mapping by T. Dibblee performed in 1963 and published in 1966 (Dibblee, 1966) (Figure 1a). Dibblee (1966) mapped the contact between the Butano formation sandstone of Oligocene age (~35-45 million years old) on the west and the Unnamed Sandstone formation of mid-Miocene age (~10-15 millions of years old) on the east as a depositional contact, not a fault. (NB: The Butano formation depicted by Dibblee is shown on subsequent maps as the Whiskey Hill formation (Twh) and the Unnamed Sandstone is shown as the Ladera formation (Tl)).

As depicted by Dibblee, the Butano formation west of the Twh/Tl contact directly overlies basement rock of the Franciscan formation (KJf) of Cretaceous age (greater than 70 million years old). This northwest-trending contact is mapped by Dibblee as depositional in the northwest and as a fault named the Jasper fault in the southeast (Figure 1a). The southeast end of the Jasper fault is parallel to the Twh/Tl contact and lies less than 500 feet west. Dibblee (1966) shows the Jasper fault crossing Westridge Drive near its intersection with Alpine Road, and across Los Trancos Creek, indicating he recognized shearing at both of these key exposures.

In the most recent publication of the *USGS Quaternary Fold and Fault Data Base of the United States* (USGS website, 2020) the trace of the Jasper fault converges with the trace of the Hermit fault north of Westridge Drive and both traces are named and identified as the Hermit fault (Figure 4).

Pampeyan (1970; 1993)

The Twh/Tl contact was first mapped in detail in the field by E. Pampeyan in the early 1960's. This mapping was first published in 1970 as a preliminary USGS Open File, and subsequently as a finished product in 1993 (Pampeyan, 1970; Pampeyan, 1993) (Figure 2). The Twh/Ti contact is mapped by Pampeyan as a fault from the southeastern end where it intersects the Arastradero thrust fault near Alpine Road, to the northwest across Jasper Ridge and along its base to San Francisquito Creek, where it ends at an intersection with a small northeast-trending fault. The contact is mapped as depositional north of San Francisquito Creek.

In his text accompanying the map, Pampeyan (1993) specifically addresses the existence of the Hermit fault trace as mapped by Willis (1924) along the base of Jasper Ridge from San Francisquito Creek to Los Trancos Creek. He states he has not included the Hermit fault on his map due to lack of evidence and misinterpretation of fluvial geomorphic features as fault-related. He distinguishes it from the faulted Twh/Tl contact that crosses the ridge in the southeast, which is mapped but not named in Pampeyan (1993).

Three important exposures of the fault observed by Pampeyan in the field (as indicated by the locations of his map data) are still accessible: San Francisquito Creek at the northeast corner of Jasper Ridge, a roadcut along Westridge Drive near its intersection with Alpine Road, and in Los Trancos Creek 1200 feet southeast of the roadcut (Figure 1b). These three exposures confirm the presence of faulting at these locations. The fault as described and mapped by Pampeyan (1993) satisfies the stratigraphic and structural criteria for identifying a fault.

Published Maps

The Hermit fault trace originally published in Pampeyan (1970) has subsequently (and currently) been included on the federal (USGS) and state (California Geological Survey) geologic maps. These include:

- USGS geologic map of the 1:24,000 Palo Alto quadrangle (Pampeyan, 1970)
- USGS geologic map of the 1:24,000 Palo Alto Quadrangle (Pampeyan, 1993) (Figure 1b)
- USGS geologic map of the 1:100,000 Palo Alto quadrangle (Brabb, 1993) (Figure 2a)
- USGS geologic map of the 1:100,000 Palo Alto quadrangle (Brabb and others, 1998) (Figure 2b)
- California Geological Survey geologic map of the San Francisco-San Jose quadrangle (Wagner and others, 1991) (Figure 3a)
- California Geological Survey Fault Activity Map of California (Jennings and Bryant (2010) (Figure 3b)
- USGS Quaternary Fault and Fold Data Base of the United States (USGS website, 2020) (Figure 4)

Page and Tabor (1967)

The Hermit fault was mapped in the field and described by Page and Tabor (1967) (Figure 5). These authors observed the contact between the Whiskey Hill formation and the Ladera formation in natural outcrop and where it was exposed during construction of the Stanford Linear Accelerator. They describe the contact as a zone of bedding-parallel shear (fault

movement along a bedding surface), and interpret the shearing as a result of east- directed subsea gravitational sliding triggered by over-steepening of the slope during Pliocene-Quaternary folding and uplift of the Jasper Ridge area to the west.

Page and Tabor (1967) identify three separate regions of deformation exposed in the SLAC excavation and in nearby outcrops. From oldest to youngest, the three regions of deformation are: 1) Isolated areas of severely disrupted sediments in the higher elevation section of Eocene Whiskey Hill referred to as the "Chaotic Zone"; 2) a detachment surface along the contact between Whiskey Hill and Ladera; and 3) a detachment surface within the Plio-Pleistocene Santa Clara formation.

Based on their descriptions and distribution of Whiskey Hill formation depicted on their map, there are discrete areas within Whiskey Hill comprised of isolated irregular blocks of sandstone and siltstone within a mudstone matrix. The blocks are described as randomly oriented with no apparent preferred orientation. Similarly, although the clay matrix is highly sheared, through-going zones of parallel shearing were rare. A through-going shear zone was observed associated with the Miocene Detachment. The authors interpret the Chaotic Zones to be a submarine slope failure deposit.

The detachment surface between Whiskey Hill and Ladera was observed by Page and Tabor in natural outcrop along San Francisquito Creek. It is described as a zone of bedding-parallel shear (fault movement along a bedding surface) that is the basal shear surface to a gravitational failure caused by oversteepening of the eastern slope during Pliocene-Quaternary folding and uplift. According to Page and Tabor (1967) this zone of deformation has undergone additional deformation in the current Plio-Pleistocene contractional tectonic setting.

Based on the proximity of the Chaotic Zone to the location of the Hermit fault it may also be affected by Plio-Quaternary faulting. Page and Tabor (1967) map the trace of the detachment surface between Whiskey Hill and Ladera in approximately the same location as the trace of the fault mapped by Pampeyan (1970; 1993). The fault as mapped and described by Page and Tabor (1967) satisfies the structural criteria for identifying a fault, supported by its position along the range front of Jasper Ridge and subtle geomorphic expression as an alignment of scarps to the south.

Page and Tabor (1967) also identify a detachment surface within the Plio-Pleistocene Santa Clara formation overlain by a debris flow deposit and infer it too was likely caused by oversteepening caused by uplift of Jasper Ridge.

Brabb and Olson (1986)

Brabb and Olson (1986) address earthquakes in the region that lies east of the main trace of the San Andreas Fault on the San Francisco Peninsula. These authors suggest some of the small earthquakes in the Palo Alto region may be associated with the Hermit fault (Figure 6). The mapping of the Hermit fault trace in Brabb and Olson (1986) is attributed to USGS geologist Darryl Herd. Herd mapped the trace primarily from air photographs and the amount of checking in the field is uncertain (E. Brabb, personal communication, 1995).

Herd's mapping of the Hermit fault connected the previously mapped trace of the Canada fault in the north with a fault mapped along the base of the ridge in the south, coincident with the Twh/Tl contact. To the south the fault does not follow the Whiskey Hill/Ladera contact over Jasper Ridge, but continues along the base of the range front to Westridge Drive near its intersection with Alpine Road. There, the fault turns south and crosses Los Trancos Creek at the same location as the trace shown in Pampeyan (1970; 1993). Subsequently, the trace of the Hermit fault shown in Brabb and Olson (1986) was changed in Brabb (1993) to conform with the mapping of Pampeyan (1970; 1993), showing the trace of the fault along the contact between Tw and Tl through the Westridge neighborhood and across Los Trancos Creek (Figures 1 and 2).

Kovach and Beroza (1993)

Kovach and Beroza (1993) address seismicity associated with reverse faulting on the San Francisco Peninsula. These authors explicitly show the Hermit fault and Monte Vista faults as a continuous structure. These authors cite the common association of the Hermit and Monte Vista faults with a strong continuous gradient in the Bouger gravity data presented by Carle and Langenheim (1990) (Figure 7a). The Hermit fault is also expressed in the aeromagnetic data published in Jachens and Roberts (1993) and shown in Figure 7b.

Kovach and Beroza (1993) conclude the Hermit-Monte Vista fault is likely seismically active and, based on the 25 km length of the anomaly, potentially capable of producing earthquakes in the range of magnitude 6.2 to 6.6.

Brabb (1993)

Brabb (1993) is a preliminary geologic map of San Mateo County later published as Brabb and others (1998). This map shows the trace of the Hermit fault as a linear feature following the Twh/Tl contact from near the Stanford Linear Accelerator in the north to the intersection with the Arastradero fault in the south (Figure 2). See discussion of Brabb and others (1998), below.

Kovach and Page (1995)

Kovach and Page (1995) provide a brief description of the seismotectonic setting of the Palo Alto area, with separate descriptions of eight faults, including the Hermit fault, which is labeled (Figure 8). The publication includes a statement that they observed evidence that the fault has not been active during the Holocene period (past 11,000 years), however there is no record for the basis of that determination. The trace of the fault as shown by these authors is consistent with geological criteria for identifying a fault.

Angell and others (1997)

Angell and others (1997) mapped the Hermit fault in the field at a scale of 1:6,000 as part of a research study funded through the USGS National Earthquake Hazard Reduction Program (Figure 9). Field mapping conducted for the study confirmed the trace of the Hermit fault as mapped by Pampeyan (1993) with minor exceptions.

The Hermit fault as mapped by Angell and others (1997) closely follows the trace published in Brabb (1993), connecting with the Canada fault in the north and extending south across Jasper Ridge to an intersection with the Arastradero thrust fault (Figure 9). The middle portion of the fault as mapped by Angell and others (1997) consists of several apparently discontinuous, left-stepping, en echelon mappable traces within a zone of intense shearing ~200-500 feet wide. The estimated width reflected in the mapping is consistent with the width of the fault zone observed at the three key exposures: San Francisquito Creek (~400 feet wide); the bottom of Westridge Drive (~200-250 feet wide) and Los Trancos Creek (>250 feet wide). Well-developed subhorizontal slickenlines (dragmarks) and other kinematic indicators of the direction of shearing such as drag folds and fault zone structure preserved within the zone of faulting were observed at all of these key outcrops. Field sketches of the outcrops exposed in the road cut on Westridge Drive and in the west bank of Los Trancos Creek recorded in my field notebook during my field observations in 1995 are shown in Figure 10. Based on these observations and the location and geometry of the Hermit fault with respect to the San Andreas Fault system, Angell and others (1997) infer that the Hermit fault may experience movement as secondary deformation during large rupture events on the San Andreas Fault or the adjacent Monte Vista fault.

Brabb and others (1998)

Brabb and others (1998) shows the same trace of the Hermit fault as mapped in Brabb (1993) and Pampeyan (1993) but there is a discrepancy in its assignment of lithologic formations. In Brabb (1993) (Figure 2) and in all prior and subsequent bedrock maps for the area (Dibblee, Pampeyan, Page and Tabor, Angell, Town of Portola Valley), bedrock east of the fault through

the Westridge neighborhood and across Los Trancos Creek is mapped as Miocene age Ladera, and bedrock west of the fault is mapped as Eocene age Tw. In Brabb (1998), however, these lithologies are reversed: bedrock east of the fault through the Westridge neighborhood and across Los Trancos Creek is mapped as Eocene age Tw, and bedrock west of the fault is mapped as Miocene age Ladera (Figure 11).

The assignment of Ladera east of the Hermit fault in Brabb and others (1998) does not agree with the paleontological age data presented in Pampeyan (1993) (Figure 12). Samples collected from the eastern side of the mapped trace of the fault near the top of the ridge are of Miocene age, and therefore Ladera. Samples collected from the western side of the mapped trace of the fault in the outcrop exposed in the roadcut at the base of Westridge road are of Eocene age and therefore Whiskey Hill. Both sample sites are within 100 feet of Pampeyan's (1970; 1993) mapped trace of the fault.

In my opinion, the lithologic mapping depicted in Brabb and others (1998) cannot be restored to a reasonable pre-deformation geological environment. For example, if the bedrock on Westridge east of the Hermit fault were in fact Eocene age Whiskey Hill formation there would either have to be a significant fault between exposures of the Miocene age Ladera formation in San Francisquito Creek and southern Jasper Ridge, or a significant change in strike of the southern portion of Jasper Ridge. No evidence for such a fault or change in strike is consistent with the data.

2020 FIELD RECONNAISSANCE

As part of this study I spent 14 hours in the field re-visiting exposures of the Hermit fault and field-checking the previous mapping. Many of the outcrops are now either completely or partially obscured by vegetation, soil, houses, retaining walls, and slope failures. However, there is still sufficient exposure to confirm the location and character of the fault. The road cut on Westridge Drive near Alpine Road still contains exposures of bedrock, including several faults, though much has grown over or is covered by colluvium. My observations of the fault during field reconnaissance is consistent with the mapping and descriptions of the fault in Pampeyan (1970, 1993) and Angell and others (1997). Though the zone of faulting appears wider than shown on Pampeyan's maps at the three key exposures, my field observations indicate that regardless of the fault's internal structure and strike geometry, it is an identifiable and mappable geologic feature at the locations mapped by Pampeyan (1993).

The exposure in Los Trancos Creek is almost entirely obscured by vegetation and colluvium. There is evidence suggesting at least part of the bedrock exposed at Los Trancos Creek may have

been affected by slope failure since I last visited in 1995. Therefore, the structural data from the site at present may not provide a reliable measurement of fault, fracture or bedding orientations, though deformation due to landsliding can, with careful analysis, often be distinguished from those caused by tectonic faulting (e.g., Hanson and others, 1999).

Oblique aerial views showing the approximate bounding limits to the location of the Hermit fault and associated shear zone are shown in Figures 14 and 15.

CORNERSTONE GEOTECHNICAL SITE INVESTIGATION

I have reviewed a copy of a geotechnical investigation conducted for development of the Stanford Wedge property on Alpine Road (Cornerstone (2017)). My purpose in reviewing the report was to learn whether it provided new or additional information regarding the Hermit fault. As such I did not read the entire report, only the boring maps and logs and portions of the report relevant to the fault. I make no comment on the remainder of the report. I have taken the boring data presented in the report "as is" and assume they are reliable.

The northern edge of the site is located approximately 400 feet south of the exposure of faults on Westridge Drive. The eastern edge of the site is approximately 250 feet west of the exposure in Los Trancos Creek as it appears on Pampeyan (1993).

A subsurface boring investigation at the site was conducted as part of the Cornerstone study. A site map and cross section from the Cornerstone (2017) report presenting the findings of the boring program are shown in Figure 13.

The boring data presented in the report confirm with positive evidence that the Whiskey Hill/Ladera contact is present on the site. The location of the contact is based on their interpretation that it is associated with a geomorphic scarp, and that this scarp in the landscape reflects a bedrock scarp at depth due to differential erosion across the contact. A difference in elevation of the top of the two formations observed in the boring data is the basis for estimating the height of the bedrock scarp at depth.

Although bedrock scarps caused by differential erosion are present along the trace of the fault to the north, there is no direct evidence there is a relationship to the geomorphic scarp. Given the Quaternary geologic setting of the site It is also possible the scarp may also be due to local fluvial processes, which does not appear to have been considered.

The data presented in the draft Cornerstone report do not provide direct or indirect evidence that can be used to make a reasonable judgement as to whether the Whiskey Hill/Ladera

contact on the site is depositional or a fault. Direct evidence to establish whether the contact is either depositional or a fault would require exposure of the contact at sufficient locations to permit direct observation and an informed judgment. Absent such direct evidence, well-supported inferences based on indirect evidence are necessary to make an informed decision. Such decisions require good supporting data, reasonable assumptions, and logical inferences to be valid.

In my opinion, when the data reported in the draft Cornerstone report are considered in the context of the published data and observations regarding the geology immediately surrounding the site, including in particular the exposures of faults associated with the contact at San Francisquito Creek, Westridge Drive and in Los Trancos Creek, as well as the extensive additional evidence demonstrating the location, structural and geophysical characteristics and activity of the Hermit fault from Arastradero Road to the northern edge of Jasper Ridge, the Whiskey Hill/Ladera contact referenced in the Cornerstone report is far more likely to be the result of tectonic faulting than deposition or landslide. In my opinion, this conclusion is reinforced by the extensive additional evidence supporting a highly confident interpretation of the presence and location of the fault across the site, including its location and orientation in the past and current tectonic settings.

CONCLUSIONS

I have mapped the Hermit fault in detail based on fieldwork, aerial photographs, and geophysical data. In my opinion the trace of the Hermit fault as mapped by E. Pampeyan in the early 1960's (Pampeyan, 1970; 1993) and subsequent geologists and geophysicists is based on high quality mapping, good data and with reasonable and admissible interpretations regarding the presence and location of the fault.

The presence of a fault in bedrock associated with the Whiskey Hill/Ladera formation contact has been recognized by many well-respected professional geologists, has been published on several generations of federal and state geologic maps, and cited numerous times in scientific literature. The USGS Quaternary Fault Database records and depicts the Hermit fault as depicted in Figure 3b. At both the northern and southern ends of the site, the exposures of the Whiskey Hill/Ladera contact show conclusive evidence of tectonic faulting. The fault can be observed in outcrop as a zone of intense shearing within the immediate vicinity of the contact, observable as the contact at some locations (e.g., the roadcut on Westridge Drive).

Regarding the southern extent of the Hermit fault, the alignment of the Westridge Drive and Los Trancos Creek exposures with the Pampeyan (1970; 1993) trace of the fault, together with the

extensive structural, geophysical and geomorphic data referenced above regarding the location, continuity and internal structure of the Hermit fault, demonstrate, in my opinion, that the contact reported in the Cornerstone (2017) report is almost certainly the result of tectonic faulting.

In my opinion, for all of these reasons, the bedrock mapping depicted in Brabb and others (1998) along its southern reach is most likely due to an editorial error and is not a correct, field-based characterization of the bedrock lithology along the fault. The distribution and characterization of bedrock formations as shown on Brabb and others (1998) are not viable because they do not agree with the field data reported by Pampeyan (1993).

As stated at the outset, I do not attempt to analyze or characterize in this report the potential activity or structural evolution of the Hermit fault in its greater geological setting. Based on the limited field work and analysis performed to date, there are many important unanswered questions regarding the potential activity and interaction of the Hermit fault within its geological setting, particularly in light of its close proximity to and uncertain relationship with the Jasper Ridge uplift, the San Andreas Fault system, the Monte Vista fault, the Canada fault and the Jasper fault. Further investigation and analysis of the Hermit fault within its geological setting are clearly needed in order to assess with any confidence the potential future activity of the fault.

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INVESTIGATIONS TO EVALUATE LEVEL-OF-ACTIVITY

The Hermit fault may be a public safety issue, depending on its potential for movement in the future. The fault is assigned Quaternary active by the CGS and USGS because it shows positive evidence of movement in the current tectonic environment (i.e., past 1.6 million years). Although Kovach and Page state evidence was observed indicating no Holocene movement on the fault, there is no record for the basis of that determination. Nor are there records of any detailed investigation of its potential level-of-activity. Based on the indirect evidence suggesting it may be capable of movement (e.g., Quaternary activity, local seismicity, proximity to and possible linkage with known Holocene-active faults, etc.) and there remains considerable uncertainty regarding the level-of-activity of the Hermit fault.

Therefore, I include a brief summary of the methods required to characterize the level-of-activity on the Hermit fault, should the need arise. Level-of-activity includes a characterization of the recency and magnitude of movement on the fault.

Briefly, a fault characterization study typically will follow a Phased Approach, designed with the intent to satisfy project requirements as efficiently and early as possible. A Phased Approach project will begin with a Phase 1 literature review followed by a Phase 2 regional study, and Phase 3 detailed site investigations. The level of detail within each phase is determined primarily by the level of confidence required by the project. The list of activities is not comprehensive, and is only intended to summarize the types of investigations required to carry out a proper characterization of fault activity.

Phase 1

- Comprehensive review of publicly available scientific papers, maps, and site investigation reports.
- Regional geologic mapping of the Hermit fault and surrounding bedrock and Quaternary geology.

Phase 2

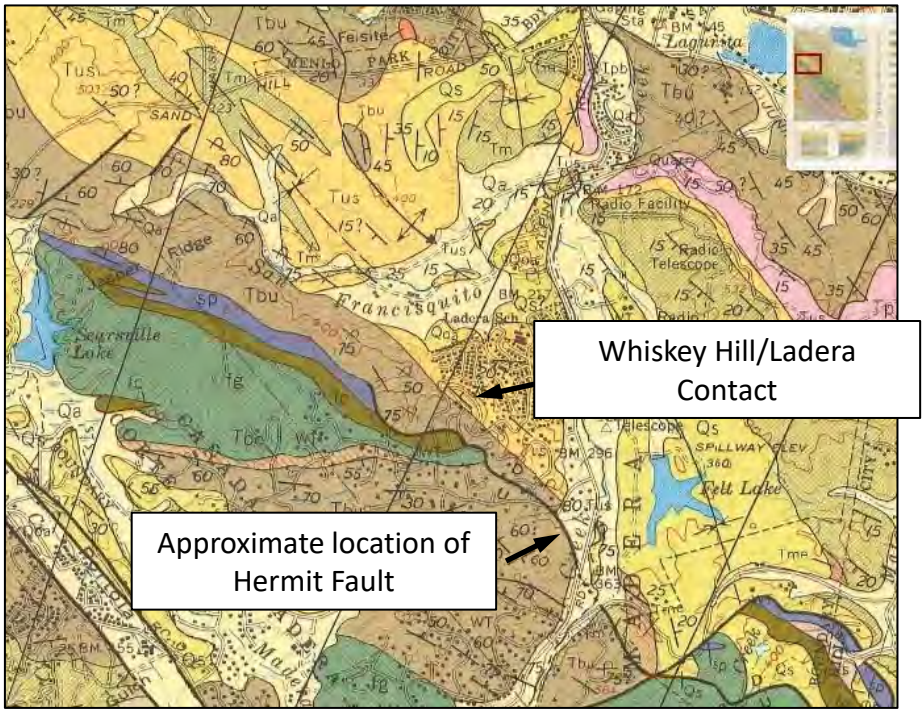
- Tectonic geomorphic mapping and analysis of neotectonic landforms such as stream morphometry and uplifted fluvial terraces along San Francisquito and Los Trancos Creeks.

- Phase 2 development of alternative viable and permissible structural models for the evolution of the Hermit fault and Jasper Ridge anticline constrained by the Quaternary geologic data.
- Identification of locations/methods for detailed investigations
- Attempt to develop relative and absolute ages of Quaternary deposits and landforms

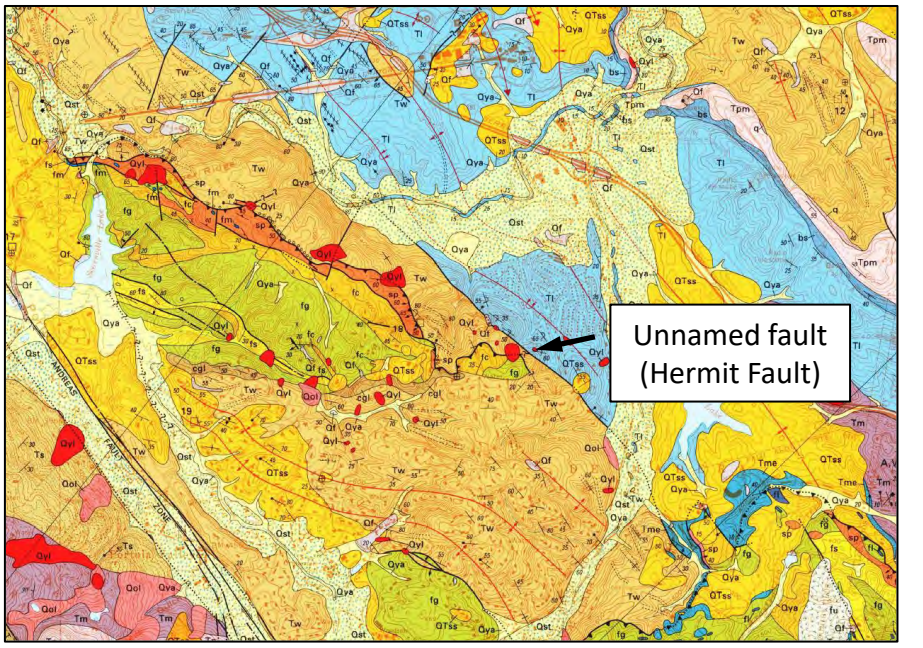
Phase 3

- Detailed geologic mapping at sites identified as having a potential record of Quaternary movement.
- If viable sites are identified, subsurface investigative techniques to characterize recency of activity may include trenching, borings, geophysical surveys and sampling to evaluate age constraints.

A detailed scope of work can be developed to fit the specific needs of any given project and budget constraints. The cost of a fault investigation can be modest depending on the goals, and increasing with the level of detail and certainty required by the project.

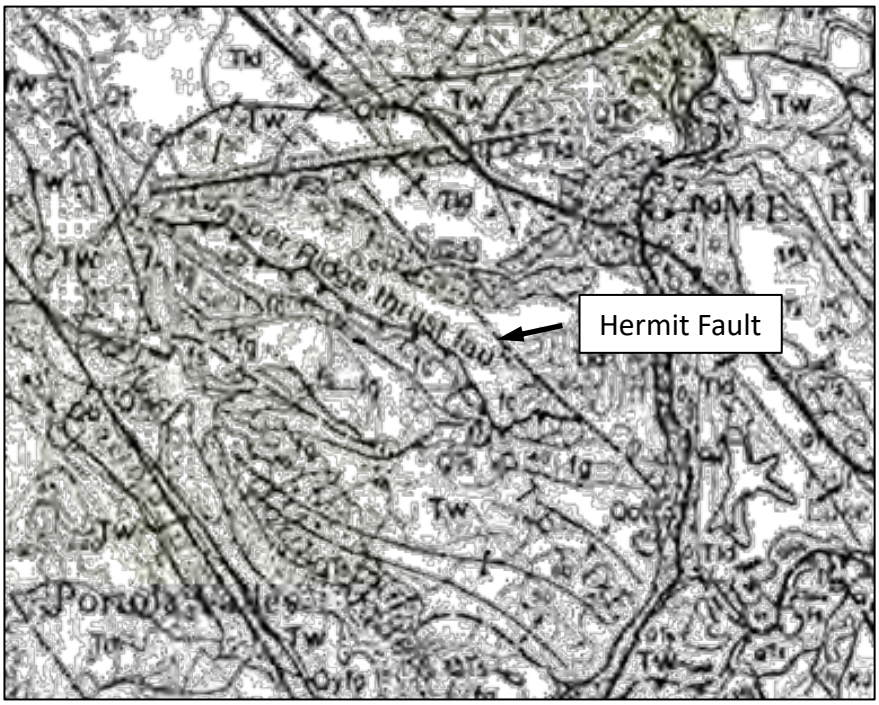


A. Dibblee (1966)

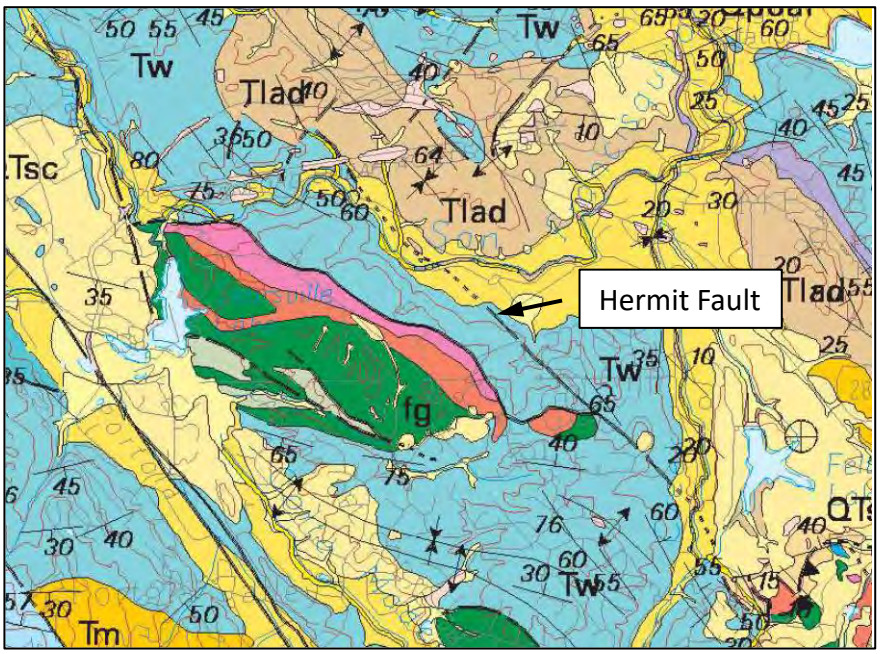


B. Pampeyan (1993)

Figure 1) USGS Geologic maps of the Palo Alto 1:24,000 quadrangle: A) Dibblee (1966); B) Pampeyan (1993). Note: The mapping shown in Pampeyan (1993) is a color version of the original map published in Pampeyan (1970).

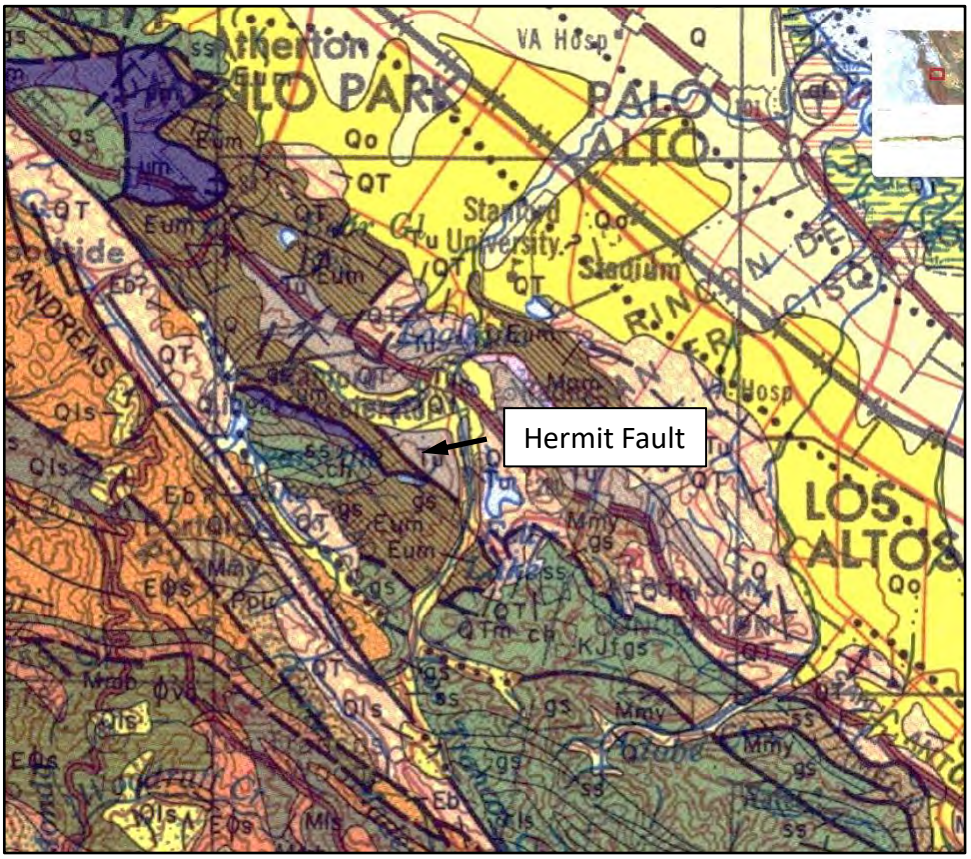


A. Brabb (1993)

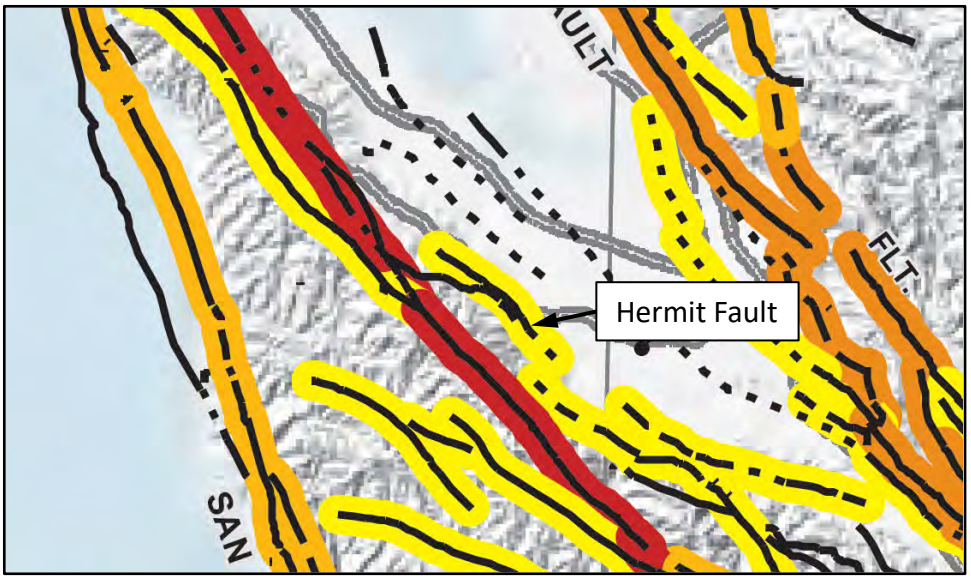


B. Brabb and others (1998)

Figure 2) USGS Geologic maps of the Palo Alto 1:100,000 quadrangle: A) Brabb (1993); B) Brabb and others (1998).

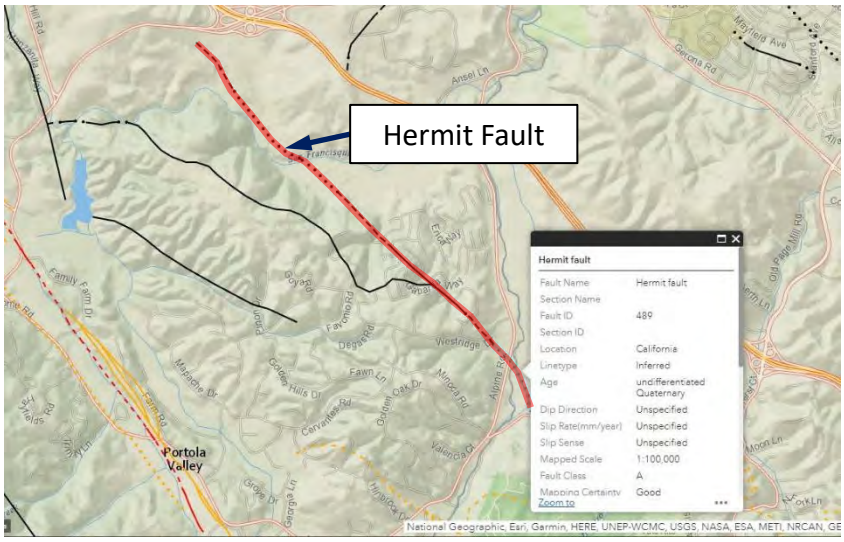


A. Wagner and others (1991)

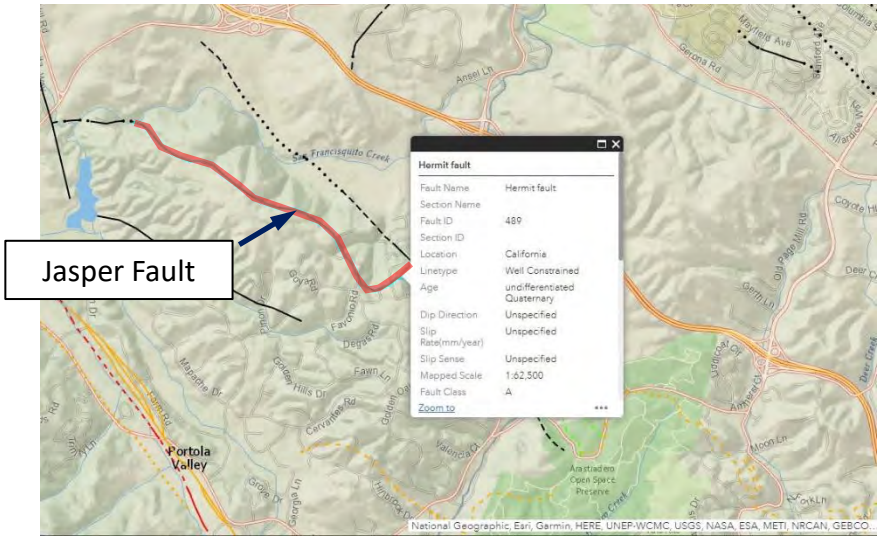


B. MS-54, California Geological Survey (2010)

Figure 3) The California Geological Survey geologic maps of the San Francisco-Palo Alto 1:250000 quadrangle (A), and the California Geological Survey 2010 Fault Activity Map of California (B). Note the Hermit fault appears on both maps.

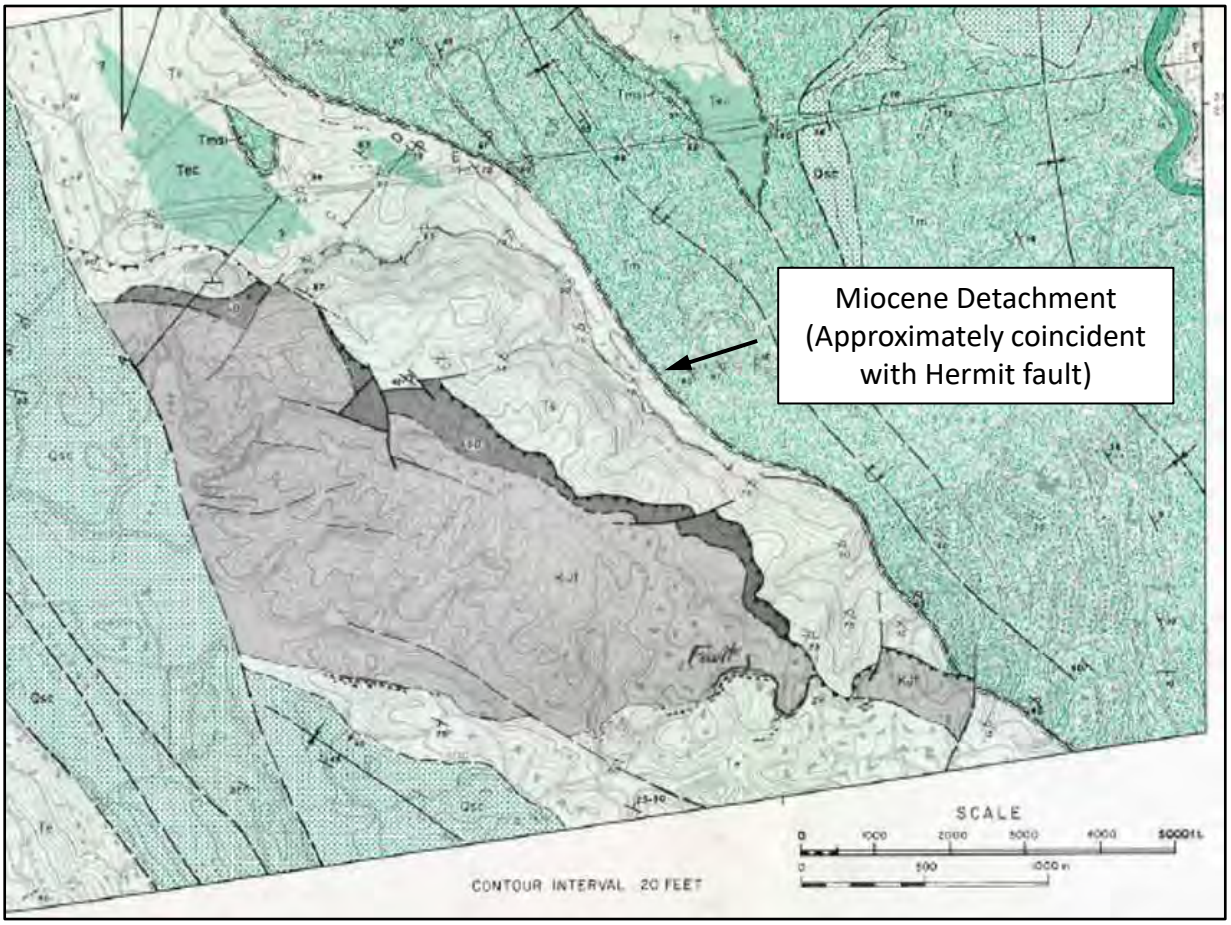


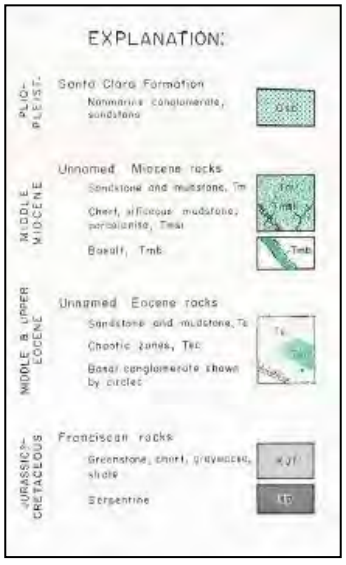
A.

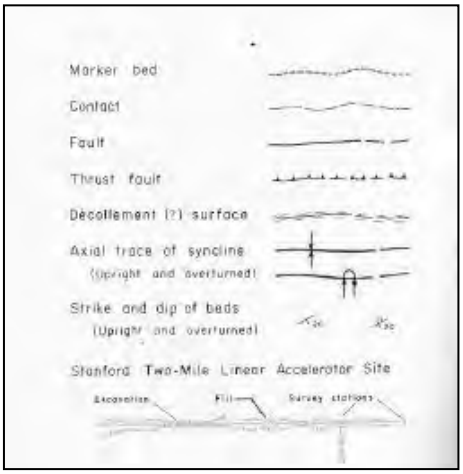


B.

Figure 4) USGS Quaternary Fold and Fault Map of the United States (2020) identifying the both the Hermit fault (A) and the Jasper fault (B) as the Hermit fault, and classifying them as Quaternary active faults (see balloons).

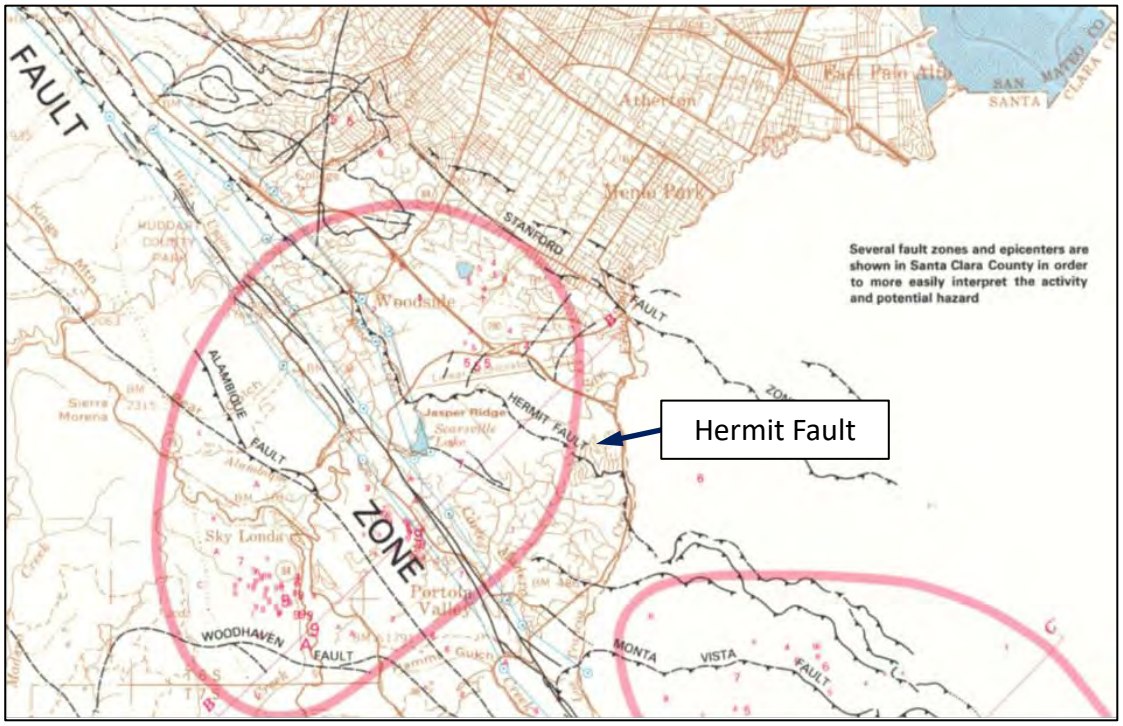






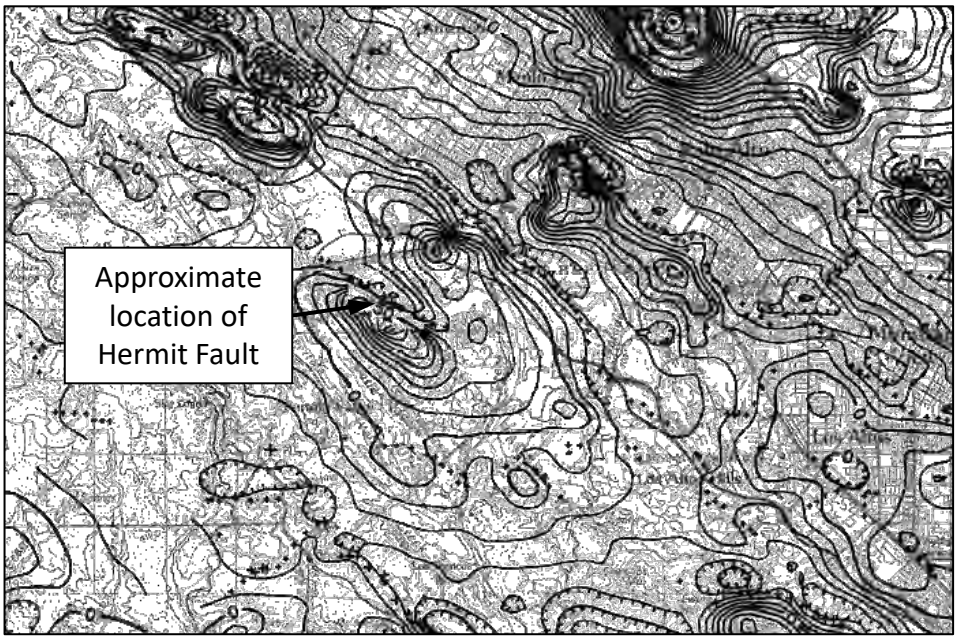
Page and Tabor (1967)

Figure 5) Geologic map of the Jasper Ridge region from Page and Tabor (1967). Note the distribution of the Chaotic Zone and the coincidence of the Miocene detachment with the Hermit fault.

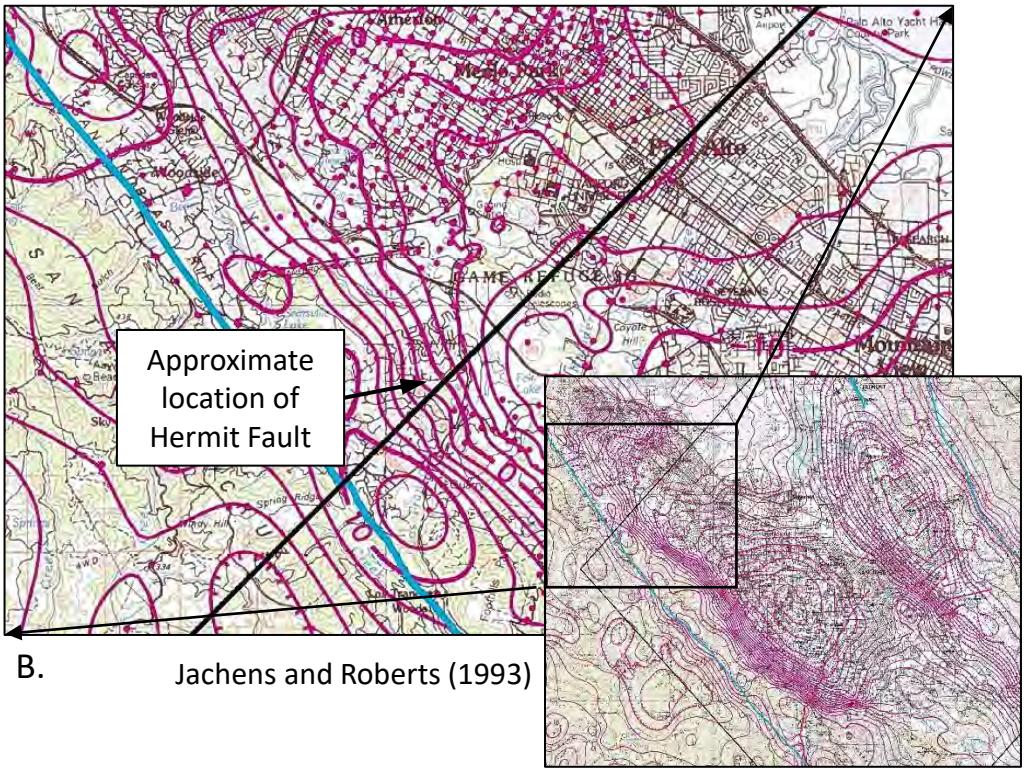


Brabb and Olson (1986)

Figure 6) Map showing potentially active reverse faults northeast of the San Andreas Fault (Brabb and Olson, 1986)

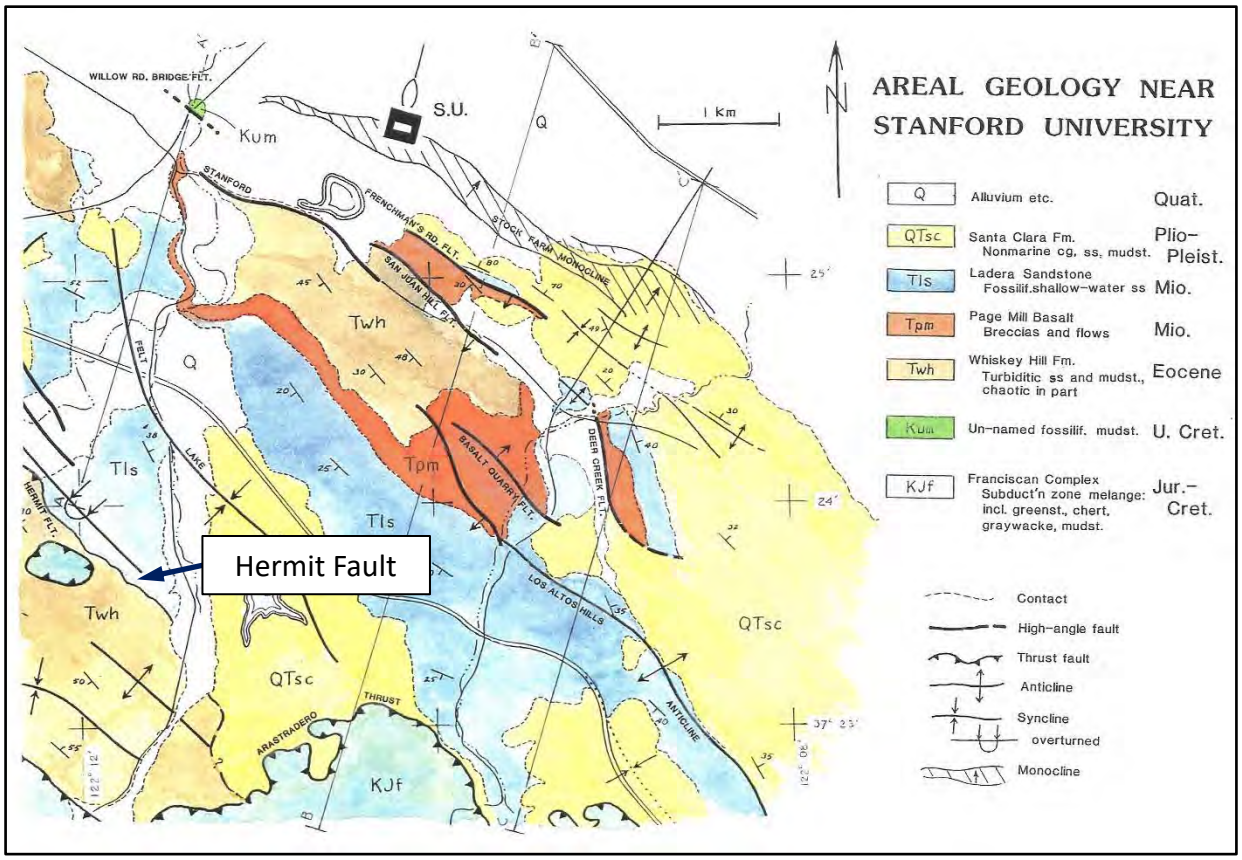


A. Carle and Langenheim (1990)



B. Jachens and Roberts (1993)

Figure 7) Map coverage of: A) Bouger gravity anomaly; and (B) aeromagnetic anomaly.



B. Page, Pers. Comm., 1995)

Figure 8) Preliminary geologic map of the Palo Alto area provided by B. Page (Pers. Comm., 1995). Published by California Geology in Kovach and Page (1995).

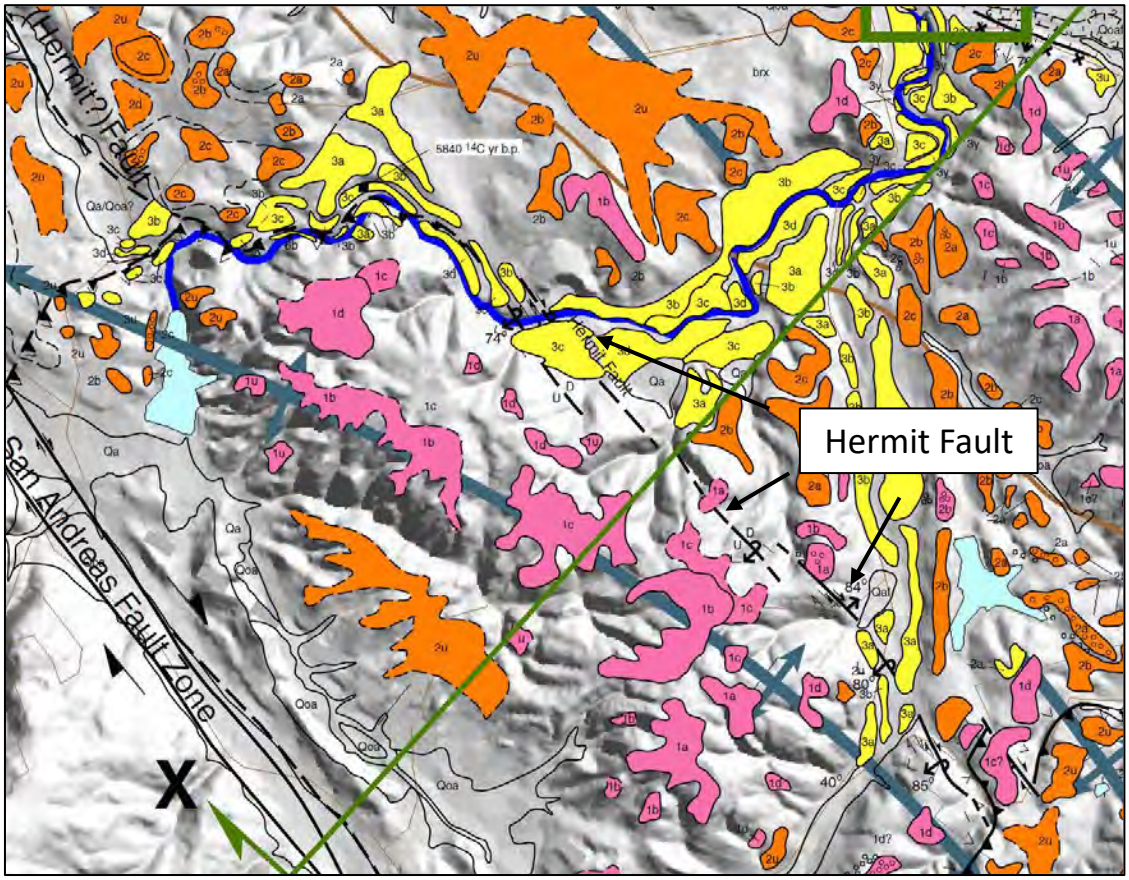
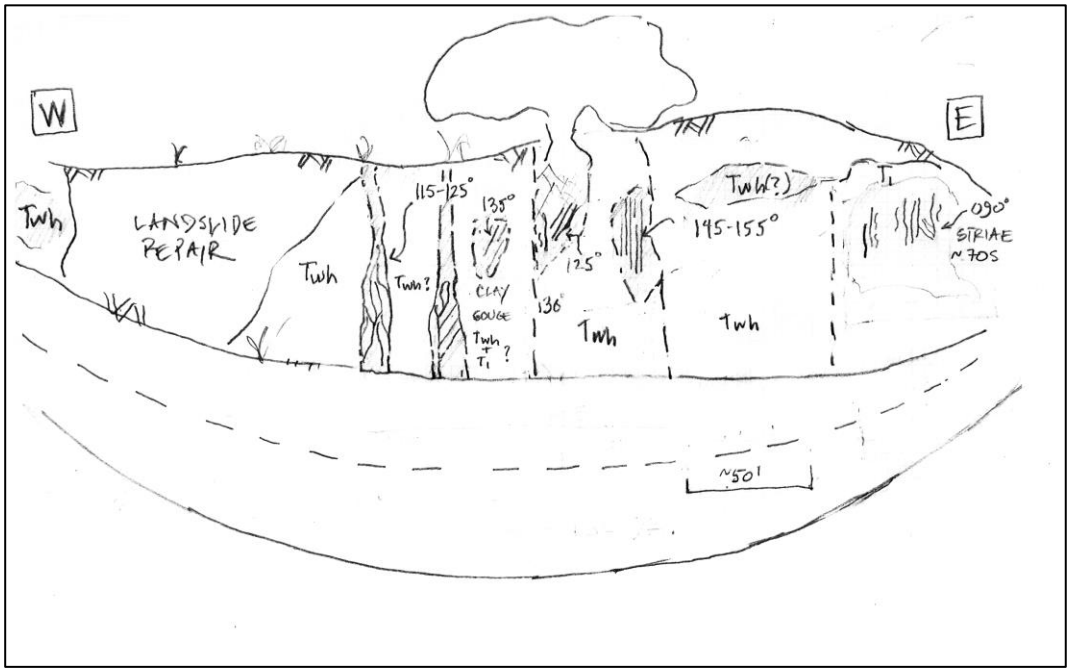
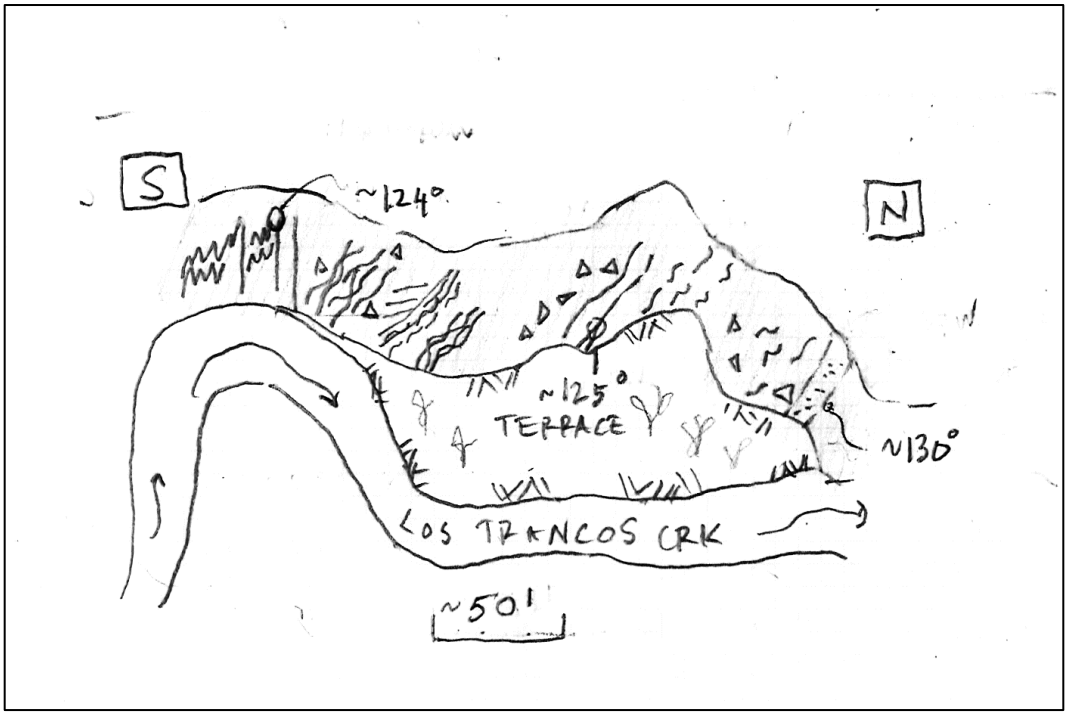


Figure 9) Geologic map of the Palo Alto area showing the Hermit fault as mapped by Angell and others (1997).

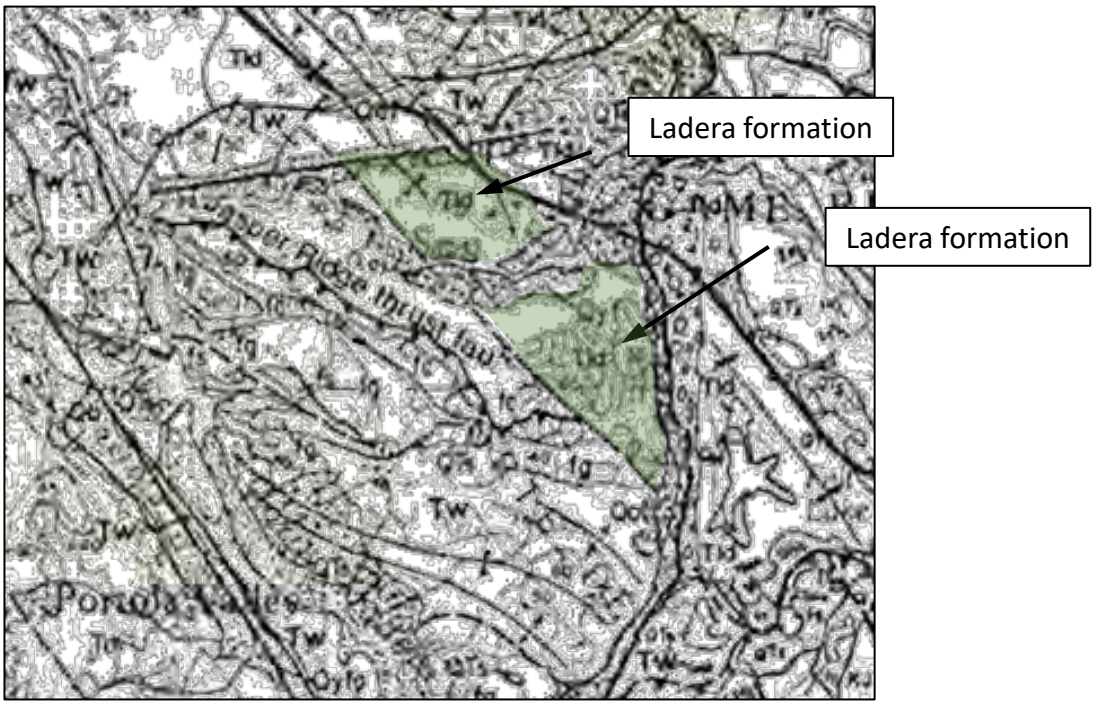


A.

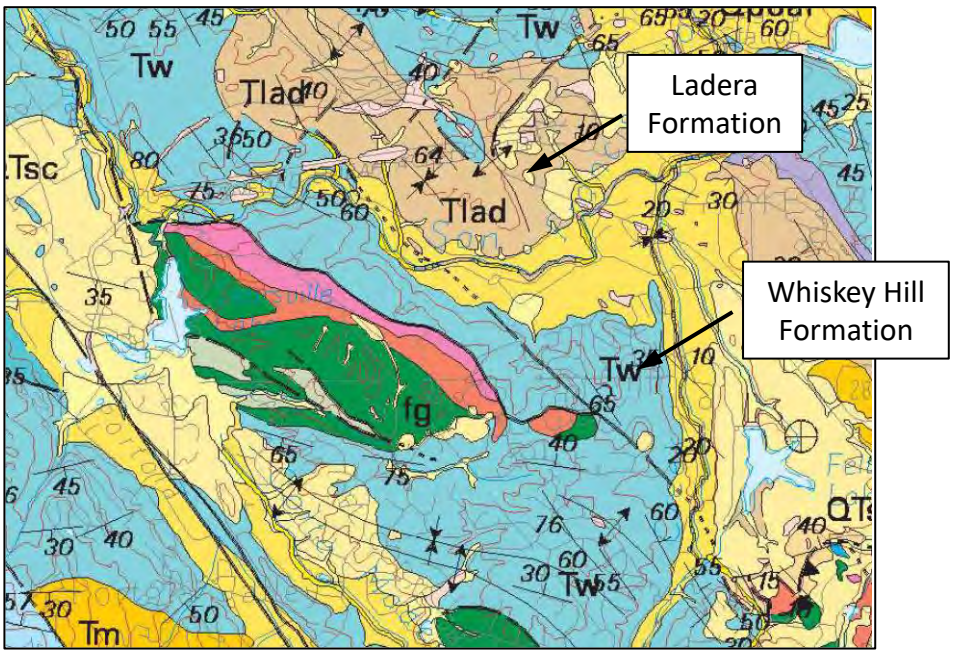


B.

Figure 10. Field sketches of bedrock exposures of the Hermit fault: A) Section of roadcut on Westridge Drive, 1400' west of Alpine Road; and B) Map of the west bank of Los Trancos Creek 1200' south of Westridge Drive and Alpine Road. From M. Angell field notes in 1995).



A. Brabb (1993)



B. Brabb and others (1998)

Figure 11) USGS Geologic maps of the Palo Alto 1:100,000 quadrangle: A) Brabb (1993); B) Brabb and others (1998). Brabb (1993) shows Ladera formation at the southeast end of Jasper Ridge. However, a later edition of the same map (Brabb et al, 1998), shows the same area mapped as Whiskey Hill formation.

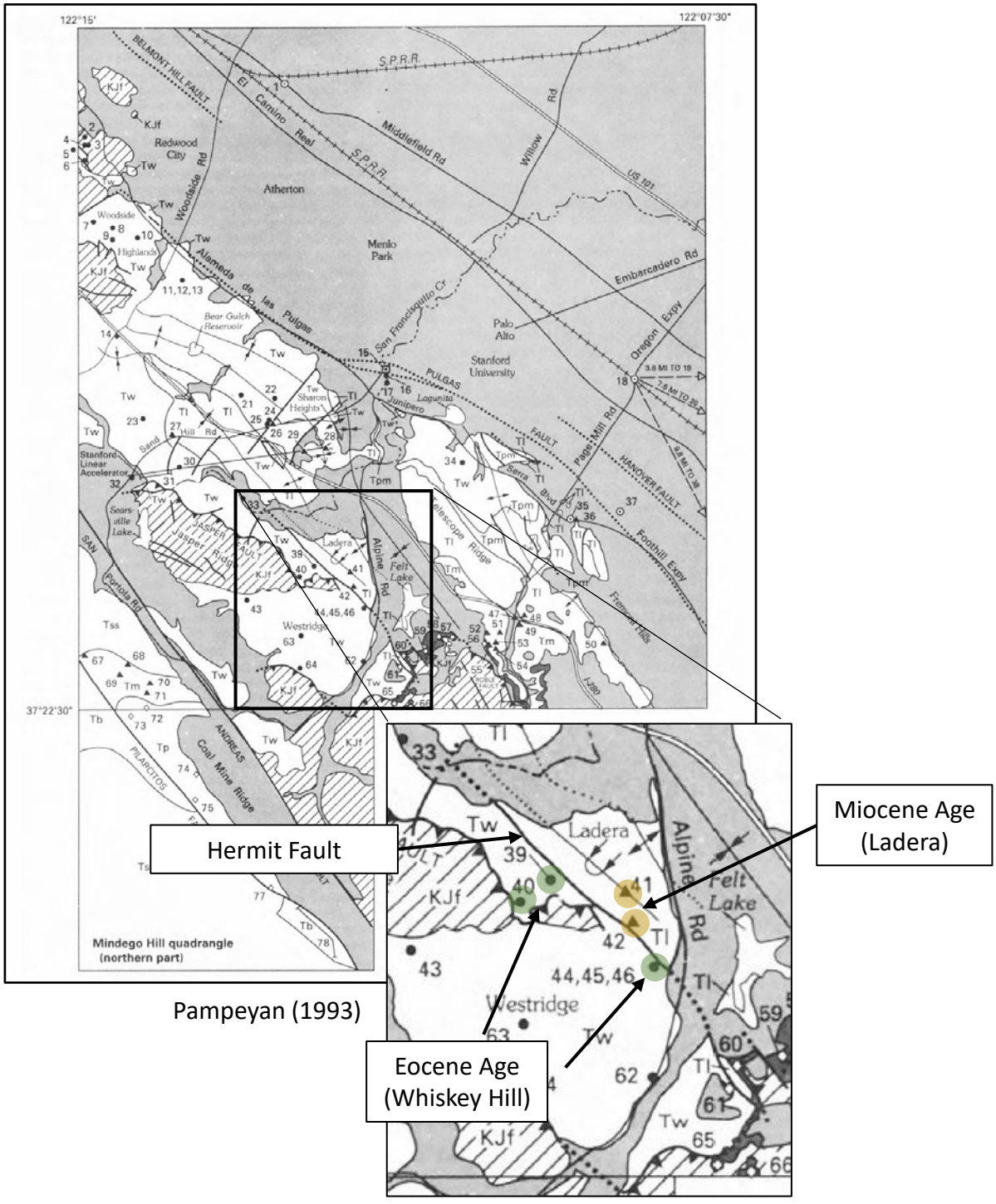
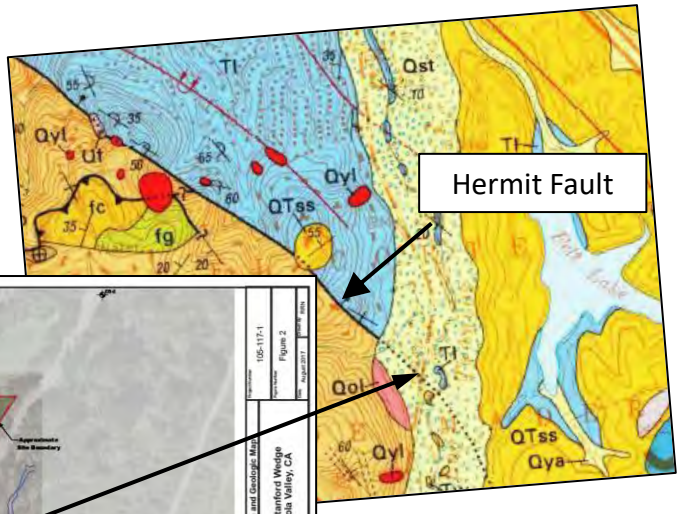


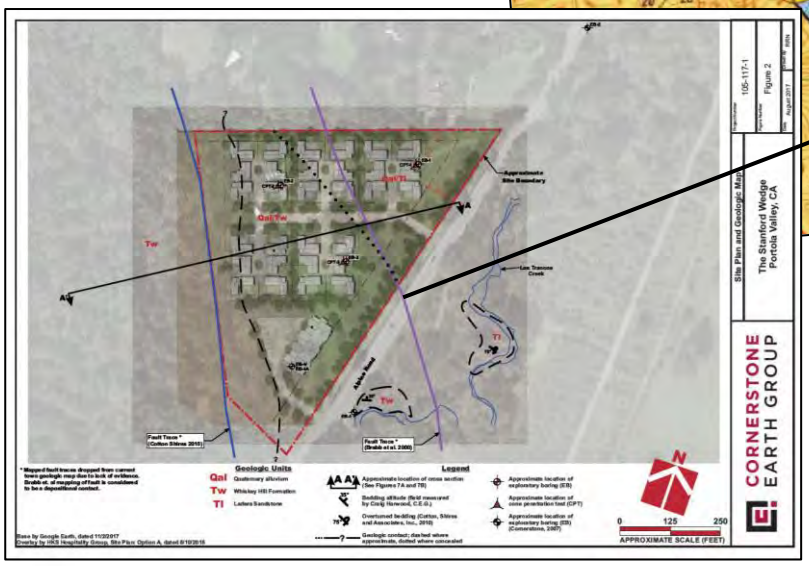
Figure 12) Index map of paleontology fossil sample locations for age dating from Pampeyan (1993) showing locations of Eocene and Miocene samples on either side of the Hermit fault, demonstrating Twh on the west and Tl on the east.

B.



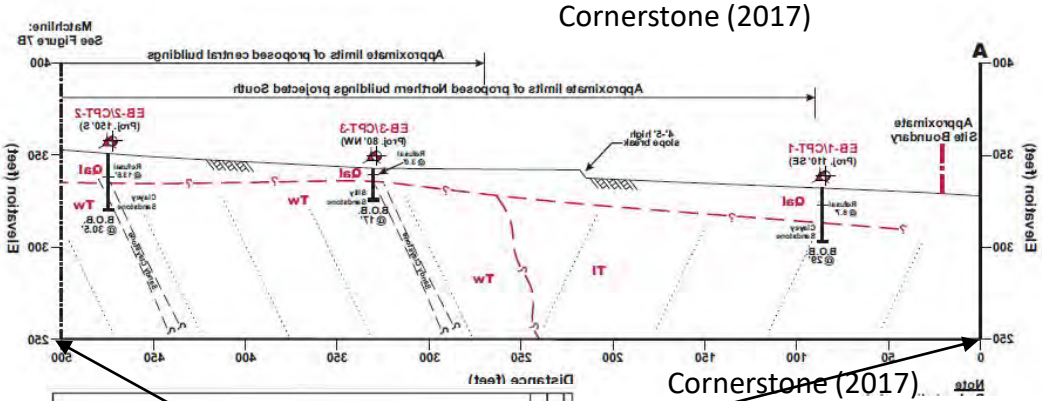
Pampeyan (1993)

A.



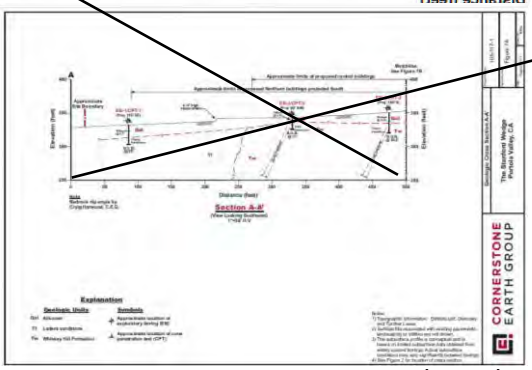
Cornerstone (2017)

C.



Cornerstone (2017)

D.



Cornerstone (2017)

Note: The larger scale cross section (inset C) is reversed to have a consistent orientation with the map for easier interpretation.

Figure 13. A) Geologic map of the site from the Cornerstone report. B) Location where the Pampeyan (1993) crosses Alpine Road. C) Cross section from Cornerstone (2017) shown reversed for easier interpretation. D) Cross section as presented in Cornerstone (2017).

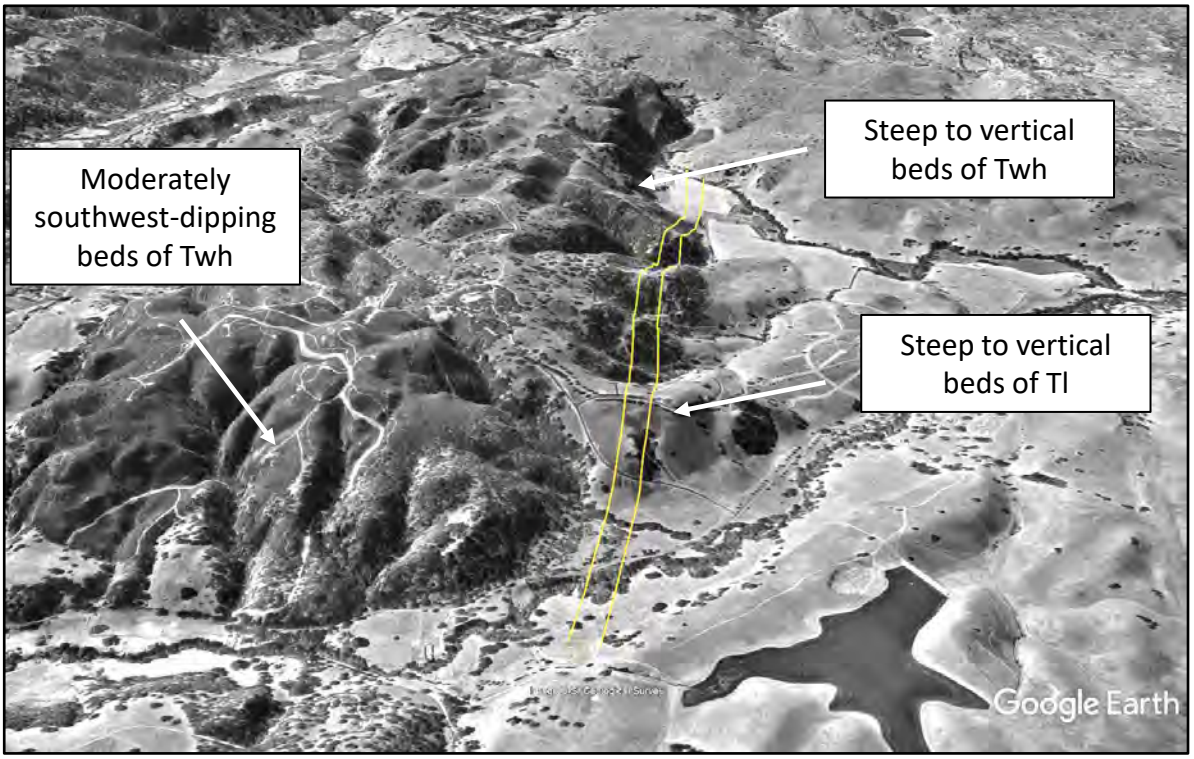
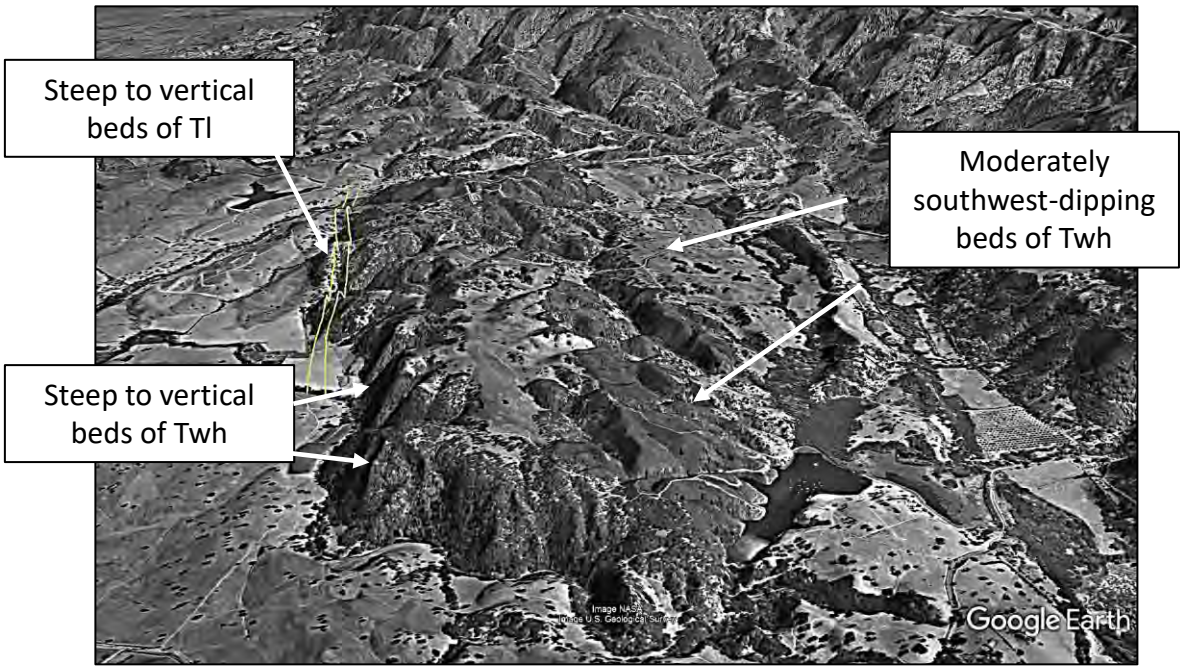
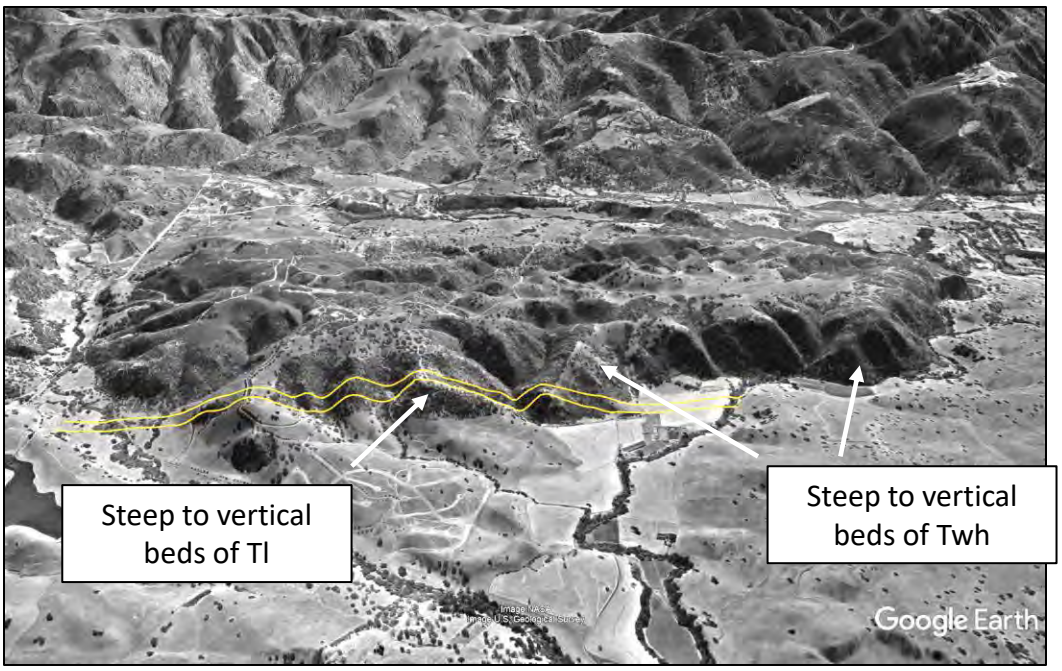


Figure 14) Oblique northwest view of Jasper Ridge in 1948 aerial photographs draped on existing topography (from google Earth). Orange lines bound the location of the Hermit fault and associated shear zone.



A.



B.

Figure 15) Oblique aerial views of Jasper Ridge from 1948 aerial photographs. The approximate bounds of the Hermit fault and associated shear zone are shown in orange. A) View to southeast - The southwest dipping panels of bedding within the Whiskey Hill formation (Twh) on the southwest side of the ridge define the back limb of the Jasper Ridge anticline. B) View to west - The triangular facets on the northeast define steeply-dipping beds of the Ladera (Tl) and Whiskey Hill formations the forelimb.

From: Mary Paine [redacted]]

Sent: Wednesday, May 11, 2022 10:28 AM
To: Town Center
<TownCenter@portolavalley.net>

Subject: Stanford Wedge

to Members of the town Council
Please consider the following :

1.I continue to be alarmed by the prospect of so much increased traffic near the Westridge/Alpine intersection. it is already backed up and often dangerous. if the Stanford wedge is built with that many more cars the impact will be huge.

2.I worry the town is not giving enough concern to the fire danger of close knit homes at the base of a canyon where fire could easily spread. I have read the fire department report many times and sense they do not feel this is a good area for so many homes tucked together.

3.I am aware there is an earthquake fault beneath the Stanford Wedge property and hope this will are taken into consideration

4.Considering we are in a drought year and may be for decades how can the state request or the town permit additional construction when there is no new water source???

Mary Paine 290 Mapache DR PV

From: Sylvia Thompson [redacted]]
Sent: Wednesday, May 11, 2022 3:26 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Cc: Andy Thompson [redacted]
Subject: Comments on Stanford Wedge DEIR

We believe the Stanford Wedge DEIR does not accurately address the fire and seismic hazards from the project.

The proposed development is at the bottom of a steep south and southeast facing canyon. The canyon is one of the highest fire severity zones in Portola Valley according to the Town's 2008 Moritz Fire Hazard Assessment. The topography of the canyon creates a chimney-like effect in a wildfire, causing the fire to climb the steep slopes extremely quickly in 3 directions, putting those who live above and beyond the canyon at mortal risk.

The DEIR fails to accurately assess the added fire danger from structures themselves. The closely spaced structures and ancillary vehicles would provide orders of magnitude more fuel for a fire than the natural vegetative environment and these manmade fuels would burn with far more heat and intensity. Furthermore, the proposed building separation is small enough that even non-combustible materials will cause each other to ignite in case of a wildfire.

The Hermit fault, which mysteriously disappeared from the Town' geological maps around 2016, is directly under the proposed development, creating significant seismic risk. In a seismic vent, gas lines could be severed starting a fire.

The proposed development would remove over 177 trees, destroying habitat for bird, mammal and retile species living in the area. In addition to the damage to the ecosystem, it would likely drive mountain lions closer to human habitation.

Sylvia Thompson
[email address redacted]

From: Valerie Baldwin [redacted]]
Sent: Wednesday, May 11, 2022 11:35 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: My comments on the DEIR

I took my comments by the town office but in case they got misplaced, I am sending my document along by email.

Thank you for letting me comment.

Valerie Baldwin

Public Comment on Stanford Wedge Draft EIR dated March 2022 by Valerie Baldwin, 243 Echo Lane, PV. [redacted]]

5/9/2022

Overview

The Introduction and Project Overview of DEIR clearly states that the area of the Alpine Rock Ranch (several paddocks) covers 7.4 acres and is the site of the Project. But measuring the area on the Disposition Plan C4.1 in the 2020 submission, the ranch only covers about 4.3 acres, as seen from Google Earth and examined on site. This Public Comment argues that the removal the oak woodlands surrounding the horse ranch is not only environmentally devastating but damages much of the Stanford Wedge ecosystem. This DEIR fails to address these issues and needs to be revised to fully address the relevant project area.. Please respond to all of the individual issues in the DEIR raised below in this comment.

Chapter 5, Agricultural, Forest, Mineral Resources

Impact Ag-1 concludes that unspecified tree removal is a “less than significant impact” on the Wedge. This is wrong. The DEIR conclusion is based upon the land damaged by the Alpine Rock Ranch horse paddocks, however, most of the homes proposed are on the periphery of the Ranch area and are where many the heritage trees (100+ year old) reside. The removal of trees is greater if the DEIR more accurately included the removal of trees not only for building of the homes but to provide a defensible space for fire mitigation. Missing from the DEIR are two maps of trees to be removed (Disposition Plan C-4.1 and C-4.2 in 2020 submission and revised later that year (see references at this conclusion)_ which show 123 heritage trees for removal, most in existing landscape beyond the paddocks. The 177 trees shown for removal on these maps does not include trees taken down to create the upper access road or new trails. The DEIR only references that this will occur, but completely fails to enumerate or evaluate this further tree removal. This omission is significant in and of itself The state of California bans the removal of certain native trees, including oak trees. Homeowners have the right to remove trees that pose a health or safety risk, but they must petition the city before removing the tree. A fee of $82 is charged by Portola Valley for removal of any significant tree and requires a permit. “Significant tree” is a specified and defined term in PV but even so, the PV rule relates to single home owners and not massive developments where many more trees will be removed. PV must consider revision of the rule for

removal of Significant Trees in the Wedge development given the extensive number of trees and the fact that the PV Town rule is aimed at home owners, not developers. Also, the revisited mapping on June 20, 2020 by Hort Science Bartlett Consulting shows 17 endemic blue oak trees, all of which are Significant as defined in the Portola Valley Tree Removal ordinance and the namesake of our local Blue Oaks Subdivision. Blue oaks grow extremely slow (a few centimeters per year) thus mitigation, which is not proposed in the DEIR but is required by SEQA, will not provide age replacement for over 50 years. In the cover letter for the 2020 Bartlett mapping they note that some of the previously recorded trees are missing tags or are not in the area designated by the C-4.1 and C-4.2 mapping. This is what I found (at the invitation of the current ranch management) in attempting to verify which trees were to be removed. How can the tree removal service know which trees to remove if the mapping is incorrect? This is another error in the DEIR, which undercuts all of the analysis. Here is an example of the need to scrutinize each tree individually: A several hundred year-old valley oak the horse owners call "Grandfather" #T-5767, is not listed on the first inventory but is on the second with the recommendation it should be preserved if possible and would be within the Development's common area if a natural grade could be maintained within the 20 foot dripline. Who decides this and who will be monitoring? The State of California Oak Woodlands Conservation Act points out that oak trees are sustaining a severe regeneration problem. Further, all oak trees are sustained by a vast underground network of mycorrhizal fungi (Kate Marianchild, Secrets of the Oak Woodlands). The fungi provide water and minerals to the trees in return for carbohydrates. In addition, the fungi provide a network allowing chemical messaging among the trees critical for sustaining growing newer trees and signaling acres-wide among mature trees ((Scientific American, Oct 2007). By tearing up the land and isolating a few remaining trees, this important network is severed resulting in the degradation of the heritage trees and possibly the death of the younger trees left in the area. The report by Bartlett also points out that digging up for irrigation within the drip line of trees left remaining in the Project Area would be severely damaging. The landscaping plan in the EIR and supporting documents (July 14, 2020 resubmittal to the ASCC) shows planting would occur under the remaining oaks. The State of California CDFW Vegetation Classification and Mapping Program's (VegCAMP) has not kept up with current findings of cooperating vegetation involving fungi. I request that the Town Planning staff and Conservation Committee per the Portola Valley Municipal Code 15.12 reject permits to remove most oak trees from the Wedge The PV tree removal permit is not sufficiently comprehensive to cover such a large number of trees and large development. This situation does not match the purposes for which PV Town developed the rule.

Chapter 7, Biological Resources

Again, tree removal is addressed above on the impact to wildlife, etc. The DEIR erroneously points out that the area to be developed is currently occupied by Alpine Rock Ranch which is basically a small paddock area in the center of the property and not on the periphery where most homes will be built. This project description grossly under counts the size of the proposed project. Obviously if the project is defined as a fraction of the real, total area, the impacts identified and evaluate in the DEIR will necessarily be low and in error. Oak trees are a keystone species, supporting hundreds of species of birds, reptiles, bats and insects (Professor Douglas Tallmay: Natures Best Hope (April 2021) YouTube). Coast live oaks take 20-30 years to mature before producing acorns and blue oaks take 50-100 years to reach a diameter of 7 inches. The C-4.1 tree map does not identify the species of oak but the June, 2020 map by Bartlett does. These trees are very slow growing and mitigation efforts to plant young trees to replace 100+ year-old trees will not help the ecology for many years. Mature oak trees provide many species of birds caterpillars critical for baby bird growth, roosting places for sleep, and cavities or branches for nests. Each oak can support over 200 species of caterpillars which is why they are designated as a keystone species. A chestnut-backed chickadee family needs 6000-10,000 caterpillars

(Tallmay, ibid) for survival in the spring so removing just one heritage tree will impact the number of chickadees in Portola Valley. 96% of terrestrial birds require insects to raise young and 90% of insects are host plant specific (Forister, et al, Conservation Science and Practice, 2019). Its impossible to count the loss of bird species with the removal of 177+ trees from the Wedge. The DEIR lists some of the species of birds that depend on the Wedge for survival then suggests that this has no significant impact. This fails to account for animal territories steadily shrinking and to suggest that they will find another habitat that is not already taken and defended is incorrect. Ever heard a bird singing to establish his territory? The Santa Clara Valley Audubon Society and the Sequoia Audubon Society (San Mateo County) in their Christmas and Breeding Bird counts over the years have documented the steep decline of our birds. This project cannot be allowed to add to this decline and this topic is not fully addressed in the DEIR. Let's not make this worse.

Impact Bio-12 Bird Collisions

Window collisions are a major cause of bird mortality due to window reflectivity of vegetation near the buildings disorienting the birds. The Smithsonian reports that collisions likely kill between 365 million and 1 billion birds annually in the United States, with a median estimate of 599 million It is wrong in the DEIR to state that local abundant species deaths would not matter. Every death matters. There are windows available that are not reflective that would seriously reduce collisions.

Impact Bio-13 Disturbance of Nesting Birds

The DEIR states: "The removal of trees and shrubs during the February 1 to August 1 breeding season could result in mortality of nesting avian species. This impact is less than significant with mitigation." There is no mitigation that would reduce the effect of construction activities during December and August. The failure to find this impact significant and then provide at least the obvious mitigation measure of no construction during birding season is another omission and failure of the DEIR. Anna's hummingbirds (passerine) begin nesting December 17 (William Bousman, Breeding Bird Atlas of Santa Clara County) and Great Horned Owls (Stringiform) begin January 29 (Bousman, ibid). Also a prominent local birder found 23 active nests from 1/6/21-2/28/21 and 32 nests from 1/27/22-2/28/22 (Janna Pauser, personal communication 4/19/22). This is a highly specialized and difficult expertise, particularly to find hummingbird and small passerine nests. These observations were in Santa Clara County, but relevant as this property borders SC County. The disturbance from the project goes beyond tree removal due to noise from construction, lighting, and mastication that would occur during December and August. As stated in this DEIR: "The California Fish and Game Code Sections 3503, 3513, and 3800 (and other sections and subsections) protect native birds, including their nests and eggs, from all forms of take. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by the CDFW". The DEIR specifying beyond 100 feet as non-disturbing is based on what? All animals in the Wedge area would be sensitive to construction noise and thus lead to nest abandonment. However, it is totally inappropriate to refer to other state agencies rather than address these issues directly in the CEQA review. The DEIR fails to do so.

Impact Bio 14

As stated above under Impact Ag-1 Removal of 177+ trees will have a significant impact on the flora and fauna of the entire area of the Stanford Wedge property. This is not a removal of a few trees on a residential property which is what the Town of Portola Valley addresses in its Planning Departments Tree

Removal ordnance. Each tree is significant and should be scrutinized individually as well as the cumulative impact of removing such a large number of trees. The cumulative impact will also affect near by properties, perhaps in an indirect way, but must also be evaluated. The town needs to require a special bond from Stanford and mitigation of 3-4 large replacement trees for each tree proposed for removal. This bond must be posted prior to construction as well as a related enforceable mitigation measure. This, of course, would not completely mitigate the removal of 100+ year old trees. The DEIR must provide the public with more accurate analysis and what this analysis is based upon as well as a set of responsible, enforceable mitigation measures.

Portola Valley General Plan

4427 Living Environment Protection

DEIR states "while a vegetation management plan would remove some vegetation at the site, management of a site to reduce wildfire risk is ultimately intended to protect those areas from being lost to wildfire" is incorrect. Fire in Oak Woodlands is a natural occurrence and regenerative for oak trees. This conclusion cannot be used to justify removal of oak trees for this construction. In fact, this statement in the DEIR underscores the previously made points about the inadequacy of the analysis of these issues.

In conclusion:

- There are many errors and omissions in conservation sections of this DEIR. Much analysis is incomplete. Of great importance were the two inventories of trees in the Project Site that were not included in the DEIR, but were in other documents submitted to Portola Valley earlier (see references below). These errors and omissions must be remedied and provided to the public so we can comment on a responsible document.

- Tree removal will devastate a large, vibrant population of interconnected oak trees at the site. Bonding and mitigation of at least 3-4 replanted trees for every tree lost is not addressed and should be. Also there must be an ongoing check that these new trees are being treated to survive not just planted and forgotten.

- Removal of 177+ trees will significantly reduce the availability of food and living sites for bird, mammal, and reptile species living at the site thus reducing their population in Portola Valley contributing to a severe decline in the United States. Citizens of Portola Valley should not be a party to this. For many years we thought we could pollute the oceans to no effect but look where we are now.

- Isn't there available Stanford land that would not require removal of a large oak woodland?

- Bird window collisions is not addressed with non-reflective windows.

- An inventory of trees to be removed for the upper access road is missing.

- The nesting season stated is incorrect as it occurs from Dec 17 through August of the following year to avoid incidental take against State laws. Further, construction noise and light is not addressed during the nesting season. Stating that construction noise is not a problem beyond

100' is questionable.

- The references to the bald eagles nesting at Felt lake is irrelevant and included why? They need a tree bigger than an oak to nest and fish to catch. DEIR should worry more about mountain lions in possible direct contact with faculty children and grazing goats.

References listed in the Portola website under Stanford Wedge Town Access:

- Plans Submitted 11-25-19 (to ASCC 1st tree cataloging C-4.1 and C-4.2)

- 3-TreeDispositionMemo-PortolaValley-06112020.pdf

Third Submittal - July 15, 2020·Updated Jul 16, 2020 by John Donahoe (2nd tree cataloging prepared by Stanford consultant)

- JULY 14 2020 Stanford PV Complete ASCC Resubmittal Set.pdf (on PV website prepared by Stanford landscape architect)

From: BOB BOYLE [redacted]
Sent: Thursday, May 12, 2022 9:16 AM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Stanford wedge

Do not build anywhere in portola valley unless you adhere fully to our general plan Taking $24 million in concessions from a small town is disingenuous at the very least Build your homes somewhere else

Sent from my iPhone

Stanford Wedge Housing project – Draft EIR
By Lamphier -Gregory

Introduction- I am resident eagerly anxious for the Town of Portola Valley to materially improve its wild fire safety preventions, mitigations and its community resiliency to the consequences of wild fire damages.

I. Sufficiency of the document in identifying and analyzing possible environmental impacts and in ways they might be avoided or mitigated, including assessing what is amiss or unacceptable. Competitors might submit comprehensive criticisms motivated by a business intent to disqualify Lamphier-Gregory.

The authors asserted compliance with CEQA guidelines. Had their been any material omissions, as determined by a neutral third party, the Portola Valley City Council should declare the draft EIR uncertifiable.

I am a motivated citizen stressed by the risk of a Portola Valley wildfire engulfing my neighborhood. This layperson has studied the entire draft EIR twice. Professional, comprehensive analysis has been executed. Yes, some insignificant omissions have been committed, E.g., the mitigation of non-glare residential windows might result in bird-strikes.

The document is sufficient to the highest professional rank. Its fact-based analyses are comprehensive and credible. Conclusions that described risks and their described following mitigations by the Project would "not result in any Significant and Unavoidable impacts' are entirely credible.

II. Comments on ways which significant impacts might be avoided or mitigated- This author did not identify significant impacts.
Q Are their adverse impacts as a consequence of the VMP?

III. Suggest specific alternatives or mitigation measures that would provide better ways to reduce impacts to less than significant levels.

The Draft EIR concludes that the No Project is environmentally superior while commenting that the site would not have benefitted by the Project's Vegetation Management Plan.

The Draft EIR observes that the No Project alternative would result in the Project Objectives not being fulfilled. The Stanford Wedge will provide residential dwelling units for faculty families and affordable (Below Market Rate) community workforce housing. Prospects for the BMR units surely include The Sequoias employees and service workers for Portola Valley town, residential landscape workers, and resident domestic services.

There are contemporary morally driven ESG criteria available to The Portola Town governance. The draft EIR evaluates the Environment. The Project embraces community strengthening the social benefits asserted in the paragraph prior to this one.

IV. This interested citizen concludes with independent judgment agreement with the Draft EIR's findings.

I observe that motor vehicle transportation along the Alpine Road Corridor impact will be insignificant by the increase of 39 units of family housing.

V. The entire Draft EIR's analysis and descriptions along with my experiential knowledge of Portola Valley and its region leads me to observe:

a. It retains in Open Space a large oak woodland
b. The introduced VMP and additional fire prevention measures in the housing development improve the Town's security and sustainability.
c. As a small housing development for the Housing Element of the Town of Portola Valley it is compatible with PV"s scale, it will enhance social and economic lifestyle of the Town.
d. Property taxes, fees, and other taxes will increase funding for the Woodside Fire Protection District the Town School District and the Sequoia Union High School District.

Sincerely,
Harry A. Turner

H A Turner
481 La Mesa Dr
Portola Valley, CA
94028-7412

From: Evan A. Braun [redacted]]
Sent: Thursday, May 12, 2022 8:25 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Cc: Evan A Braun [redacted]]
Subject: Public comments on DEIR submission

From:
Evan A. Braun
1160 Westridge Drive
Portola Valley, CA 94028

May 12, 2022

To:
Town of Portola Valley
Planning Dept. DEIR – Stanford Wedge Housing Project
765 Portola Road
Portola Valley, CA 94028

As homeowners in the city of Portola Valley we would like to respond to the city's consideration for the proposed Stanford Wedge Housing Project.

We purchased our property four years ago specifically because we wanted to live in a quiet and rural community that values maintaining the increasingly rare qualities of nature and tranquility while remaining nestled in a greater area of far more congestion yet avoiding their resulting issues and problems. We are opposed to the Stanford Wedge Housing Project not only because this major housing development would directly conflict with the very reasons we (and most other homeowners) have chosen to live here, but because the development's inherent problems which violate so many of the Portola Valley long-standing values and land use rules, make it difficult to understand how city government officials would overrule the vast majority of the citizens residing in the city limits.

The major reasons for vehemently opposing this project relate to traffic congestion, fire danger, fire and other emergency evacuation plans and effectiveness, and the violation of Portola Valley's land use laws and Stanford University's pledge to develop all available lands east of Highway 280 prior to developing any land west of Highway 280.

Understanding the State's mandate for additional housing, we in Portola Valley are in a special area that is extremely flammable and as such we must prioritize public safety before all else.
Ignoring destroyed towns like Paradise, CA among others is not acceptable, not when it comes to the lives and property of everyone that lives here. Fire safety and emergency evacuation should come before generalized rules that are not customized and tailored towards special consideration localities such as the dry and wooded area of Portola Valley.

In addition to Portola Valley's detailed rules that the Stanford Wedge Housing Project intends to violate, through variances or other rule changes, and Stanford's own pledge to develop east of 280 prior to anything east of 280, this planned development would create unwanted traffic congestion and probably necessitate a traffic light to accommodate the left turn traffic on to Alpine Road that we currently see congested every day at Ladera and Alpine. The increased traffic congestion and traffic lights will

inevitably retard emergency egress during any emergency evacuation plan – which essentially jeopardizes lives.

Regards,

Evan A. Braun

From: Bob Turcott [redacted]]
Sent: Thursday, May 12, 2022 10:00 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Comments for draft EIR

Hello,

Attached please find my comments for the Stanford Wedge draft EIR.

thank you,
Bob Turcott

Bob Turcott
60 Pine Ridge Way
Portola Valley, CA 94028
[email address redacted]

May 12, 2022

Laura Russell, Planning Director
Town of Portola Valley, Planning Department
765 Portola Road
Portola Valley, CA 94028
Stanford Wedge Housing
3530 Alpine Road

Re: Comments on Draft Environmental Impact Report, Stanford Wedge Housing, 3530 Alpine Road

Dear Planning Director Russell,

The Draft Environmental Impact Report (DEIR) states:

> **"Impact Wildfire-1: Reduced Wildfire Roadway Blockage.** Overall, if the Project including proposed vegetation management activities were implemented, it would result in slower spread of wildfires and resultant fewer blockages of roadways and intersections during an evacuation despite small increases in vehicles to be evacuated from Project residences. Therefore, the Project would not substantially impair emergency response or evacuation and would have a less than significant impact in this regard."[1]

And, further:

> **Impact Wildfire-2: Lessened On-Site Wildfire Risk but Increased Activity and Related Ignition Risk.** Overall, if the Project and proposed vegetation management activities were implemented, it would substantially lower Wildfire Risk at the Project site. However, the additional human activity creates a greater likelihood of ignition at the site if not mitigated. Therefore, the Project impact with respect to Wildfire Risk would be less than significant with mitigation.[2]

While superficially appealing, the above conclusions are unsubstantiated and unreliable. They are based on flawed reasoning and incomplete evidence that overlooks or ignores the elements of the development that will increase — not reduce — its cumulative and incremental effect on wildfire hazard and risk.

The DEIR is inadequate because it is conclusory. The analysis is flawed and unreasonable. Both of the above impacts would likely be found to be significant, rather than non-significant, had a more appropriate and robust analysis were undertaken.

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[1] Page 2-30

[2] Page 2-26

1. The impact of the proposed development on safety of the surrounding community was not assessed.

A central mandate of the California Environmental Quality Act (CEQA) and supporting guidelines — that the impact of a proposed development on risk to the surrounding community be evaluated — was simply ignored, not elucidated. The review was therefore inadequate or incomplete.

Multiple wildfire scenarios were explored which purportedly assessed the impact of the proposed Vegetation Management Plan. In each of these, the development site was treated as unburnable and protective, as described below. This treatment is simply inaccurate and it is unsubstantiated.

No scenario was examined in which a fire started *in* the development site. No scenario involved a *structure* fire. The DEIR is incomplete by failing to contemplate and include this reasonably likely scenario.

Technical Note 2205 "WUI Structure/Parcel/Community Fire Hazard Mitigation Methodology"[3], published jointly by the National Institute of Standards and Technology (NIST), Cal Fire, and the Institute for Business and Home Safety (IIBHS), states that noncombustible sheathing is ***not*** adequate mitigation for structure separation that is less than 25'. So insignificant is the benefit of such sheathing for structures separated by less than 25' that the Technical Note recommends ***against*** using it in retrofits. Yet the DEIR assumes without analysis that such sheathing is adequate mitigation for the extremely reduced (9-10') building separation that is proposed. The DEIR fails to state a rationale for its presumption that noncombustible sheathing is adequate mitigation, contrary to the findings of NIST, Cal Fire, and IIBHS.

The Technical Note further states, "High Density (structure separation distance on the order of < 25 ft) – must not have any structures ignite as risk of entire community loss is very high due to structure-to-structure fire spread."

In addition to structure-to-structure fire spread facilitated by the extremely short separation distances of this proposal (9-10'), the structure spacing would make it difficult for the Fire District to access a burning building, substantially compromising its ability to suppress a fire.

The DEIR notes that increased human activity will increase the likelihood of ignition, but it does not examine what impact to the surrounding community can be expected should such an ignition occur. In particular, it ignores the possibility of a structure fire within the development and the "very high" likelihood (per NIST TN 2205) that the entire development would be consumed by fire.

While the DEIR purports to assess the impact of the Vegetation Management Plan, it fails to address the impact of the *development* on the safety of the surrounding community. There is no characterization of the number and amount of lives and property at risk should a structure fire originate at the development site. There is no assessment of the impact on evacuation of the "very high" risk of "entire community loss" due to design decisions that grossly violate defined best practices for development in a wildland-urban interface. The DEIR utterly fails to address, let alone analyze, off site impacts. These omissions are significant flaws of the DEIR.

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[3] nvlpubs.nist.gov/nistpubs/TechnicalNotes/NIST.TN.2205.pdf

The DEIR is inadequate because it fails to discuss or analyze the following:

- Explicitly and fully address the impact of a structure fire within the proposed development on the lives and property of the surrounding community.
- Evaluate the increased risk of structure-to-structure ignition that the ultra-short structure separation distance represents compared to best design practices as defined by Cal Fire, NFPA, NIST, and IIBHS.
- Meaningfully evaluate the impact of a "very high" likelihood scenario in which the "entire community" is consumed on the lives and property of the surrounding population.
- Analyze the reduced ability of the Fire District to suppress a house fire due to ultra-short separation distances, which both increases the probability of structure-to-structure spread and reduces access for fire suppression efforts.
- Characterize the impact on the lives and property of the surrounding community of the reduced ability of the Fire District to suppress a house fire within the development due to design decisions that compromise safety.

2. The DEIR fails to consider the larger context of the development site.

The development site is at the bottom of a steep canyon network that leads into central Portola Valley where hundreds of homes are located with tenuous evacuation capacity. The site is immediately adjacent to a primary evacuation route.

The Town of Portola Valley was assessed by Cal Fire almost 15 years ago as being 65% High or Very High Fire Hazard Severity. This assessment was done remotely with very coarse spatial resolution (20-200 acre blocks) using imaging and topographical maps. There was no ground-verification.

The Cal Fire assessment was understood at the time to underrepresent the extent of fire hazard in the community. Subsequent ground-verified analysis by Woodside Fire Protection District (WFPD) and Moritz Arboricultural Consulting identified much more extensive areas of highest fire hazard compared to Cal Fire's findings, including large areas up-canyon from the proposed development site. These studies, also conducted almost 15 years ago, are acknowledged by the current WFPD Fire Marshal, Don Bullard, and the Town's current fire safety consultant, Zeke Ludner, as being the most comprehensive and accurate analyses that are available, though both these fire safety authorities believe the WFPD and Moritz studies understate the degree of fire hazard.[4]

As described below, because of multiple design decision by the developer, the entire development complex is at "very high" risk of burning if a single structure ignites. Such a conflagration would be devastating and would put lives and property in its immediate surrounds at risk anywhere, but the potential impact to the surrounding community is especially high when the inferno would be located at the base of a steep canyon network leading to the heart of a town whose topography, vegetation, and climate make for an extreme fire hazard.

[4] Ad Hoc Housing Element Committee meeting, February 2022

The DEIR failed to consider and address this impact given the larger context. It similarly failed to consider the impact of a site-wide conflagration on evacuation potential through the Alpine corridor.

The context of Portola Valley also includes multiple active seismic faults. The San Andreas Fault is the best-known, though by no means the only fault in the town. All major evacuation routes cross faults. As reported at a recent Portola Valley Geologic Safety Committee meeting[5], in the event of a significant earthquake, we can expect multiple fires in the town. Such an event would likely tax emergency services to the point where fire suppression resources would not be available. Given the fire hazard severity throughout the town, any one fire carries the real potential of becoming an uncontrolled wildfire.

At the same Geologic Safety Committee meeting it was noted that there is a 72% chance of a magnitude 6.7 or greater earthquake in the region by 2044 — 22 years from now. Such a severe earthquake would likely result in multiple fires, as noted above. Since all evacuation routes cross faults, it would not be surprising if at least one was rendered impassable in a severe event.

A 72% probability is not low for an event of this magnitude over such a short time horizon.

The DEIR failed to consider the cumulative impact of the proposed development in the context of the very high fire and seismic hazard of the larger community. It failed to consider the cumulative impact of the proposed development in the context of an uncontrolled fire resulting from a significant earthquake, in other words, the likely scenario of an uncontrolled wildfire and earthquake occurring jointly.

3. The DEIR uses an inappropriate baseline for comparison which misleadingly overestimates the benefits of the proposed Vegetation Management Plan.

The purported wildfire safety benefits of the proposed development rests entirely on the results of fire behavior modeling that compares the current state of vegetation on the parcel to what would be present if the property owner's Vegetation Management Plan is implemented.

The current state of vegetation is the result of decades - likely more than 100 years - of neglect.

CEQA requires that a proposed project be compared to the current condition; however, CEQA also requires an assessment of the impacts of a project, where as here other underlying considerations are paramount. In any case, the cumulative impacts must be analyzed.

A more appropriate baseline of comparison would be the state of the parcel had the property owner complied with current regulatory requirements and locally defined best practices:

1. Woodside Fire Protection District (WFPD) Ordinance 12 Section 304.1.2.A, Perimeter Property Line Clearance, requires that certain flashy fuels be cleared 50' from the

[5] May 11, 2022

property line and 100' from neighboring structures.[6] Where environmental considerations would prevent property line clearance according to Section 304.1.2.A, for example due to the presence of a riparian zone, the property owner should provide the clearance as close to the property line as possible while avoiding the riparian zone - ie, the 50' clearance should be set back from the property line and placed adjacent to the riparian zone.

2. Portola Valley's Wildfire Preparedness Committee further defined and approved best practices at its October 13, 2020 meeting. According to the minutes that were approved at the March 18, 2021 meeting,[7] the Committee voted 7 to 1 to adopt a requirement that any "underdeveloped land" larger than 50 acres have a vegetation management plan to be reviewed by the WFPD and inspected periodically. Land currently impacted includes: Windy Hill, Coal Mine Ridge (PV Ranch, Blue Oaks), Stanford Wedge, Mid-Pen, Hawthorns, El Mirador, and Neely Winery.

Had the property owner of the Stanford Wedge complied with best practices as defined by the community, the 'baseline' and the 'post-treatment' conditions of the parcel would be identical - both would be governed by the VMP.

That the property owner has ignored both the District's fire safety ordinance and locally defined best practices is not justification for using the current state of the parcel - which represents decades of neglect - as the 'baseline' for comparison.

The DEIR must include a scenario that uses as the baseline for comparison the state that a conscientious property owner would maintain if they are compliant with local regulations and practices.

Since locally-defined best practices call for large parcels to be maintained according to a Vegetation Management Plan, the baseline should be the condition of the parcel as defined in the proposed Vegetation Management Plan, minus the development and the fire access.

4. The DEIR erroneously uses the inability of computational models to incorporate the impact on wildfire of non-natural fuels as evidence that the proposed development will be protective in the event of a wildfire. By doing so, the DEIR completely underestimates the likely impacts and the significance of the impacts.

The authors of the DEIR acknowledge that the analysis models structures, vehicles, yard vegetation, gas grills, fences, high-capacity lithium-ion batteries, and other non-natural material as unburnable.

As shown in Fig. 37 in Appendix J of the DEIR, reproduced below, the entire development area is modeled as Fire Behavior Fuel Model Class 91 ("Urban/Developed") and Class 99 ("Bare ground/Road"). Both these classes are unburnable - that is, they have zero fuel content from the perspective of the computational model. In the fire modeling that was performed for the DEIR they absorb heat and embers but they do not ignite.

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[6] "Section 304.1.2.A Perimeter Property Line Clearance. Persons owning, controlling, or leasing structures and or property are required to remove, a minimum of 50 feet from the perimeter of the property line and 100 feet from any neighboring structure, specifically; flashy fuels consisting of dead weeds and dry annual grasses, as well as dead vegetative material and litter that is capable of being easily ignited and endangering property as determined by the Fire Marshal."

[7] www.portolavalley.net/home/showpublisheddocument/14333/637508984288930000

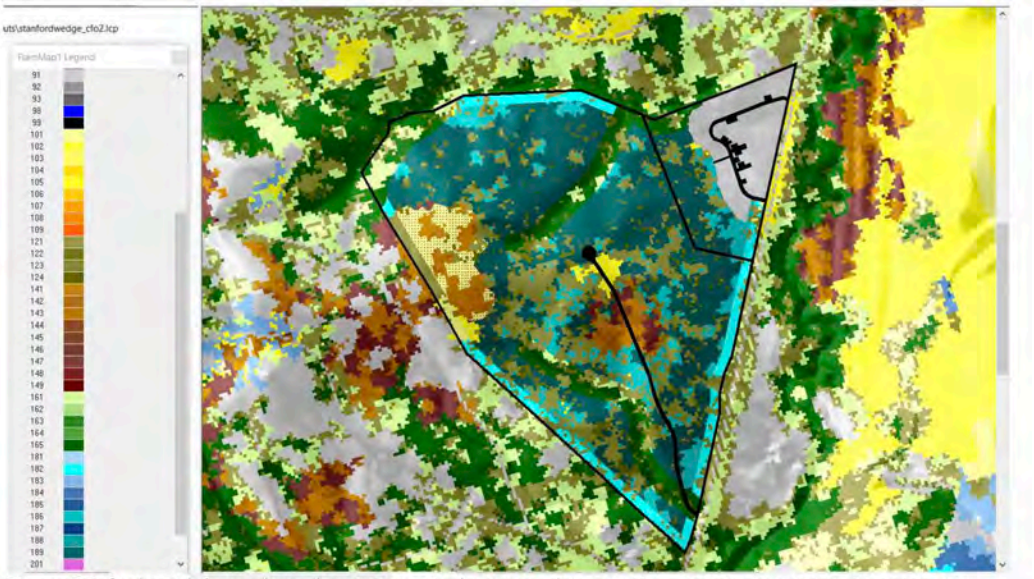
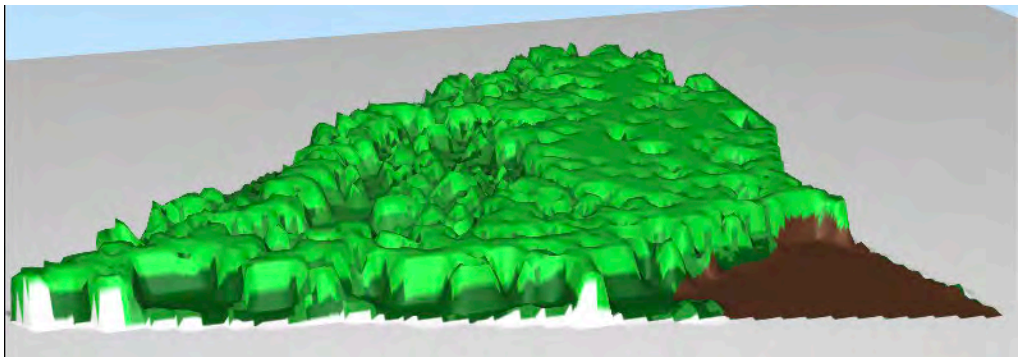


Figure 37. fuel model map based on interpreted proposed vegetation management treatments post development. – zoomed into Stanford Wedge property.

In reality, the structural fuel content of the proposed development is quite different.

Using LiDAR data from San Mateo County and vegetative fuel modeling performed for the County, the figure below shows fuel density (expressed as relative heat of combustion) for the Wedge on the vertical axis. Higher (light green) excursions represent greater vegetative fuel density. The DEIR assigns the entire development area (right foreground) a fuel content of zero.



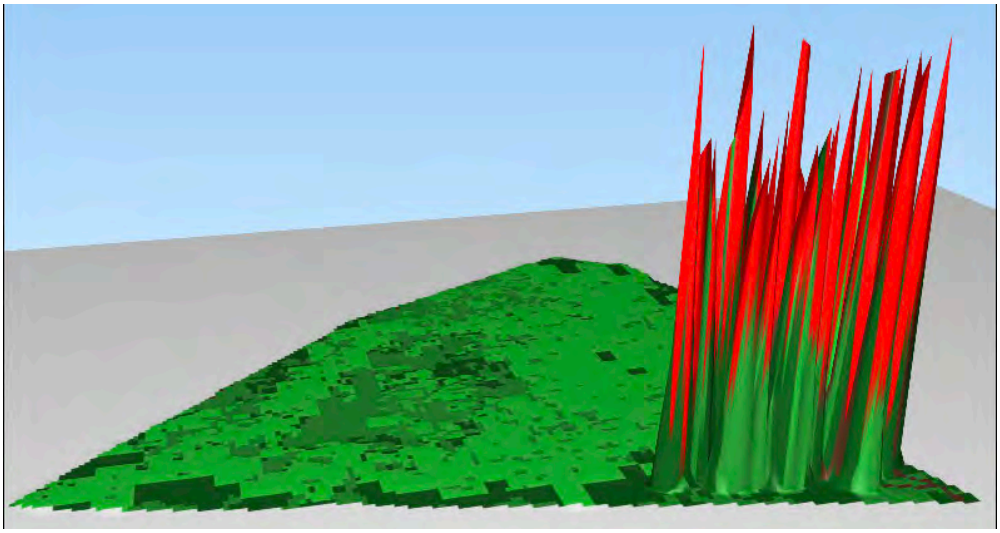
Fuel density on the Stanford Wedge. Vegetative fuel density was modeled by San Mateo County using LiDAR data (green). Fuel density for structures, vehicles, other non-natural fuels, and landscaping on the 7-acre development site was set to zero in the modeling conducted for the draft EIR (brown). Alpine Road is in the foreground. West is in the background. The proposed development site, as modeled by the DEIR, is in the foreground to the right.

But, in fact, the structural fuel content of the proposed development is enormous. Using the total structure size reported by the developer and residential fuel density estimated by Ray Moritz[8], the fuel density is over 2400x that of the Fine Fuel Load of the Fire Behavior Fuel Model class with the lowest fuel density (TL7). It is almost 200x greater than the densest

[8] Certified forester and principal consulting arborist with Urban Forestry Associates,

vegetative fuel load presently on the Wedge. And it is distributed over an enormous total footprint (> 40,000 sq ft).

Incorporating the actual structural fuel yields a very different picture, shown below. The vertical axis had to be compressed 20x in order to visualize the extremely high fuel content of the structures. So great is the structural fuel that differences among different vegetative fuel types, including bare earth, are negligible in comparison. This analysis ignores other non-natural fuels, such as synthetic furnishings, vehicles, and lithium-ion batteries. Including them would increase the fuel density significantly, likely by another 2x.



Fuel density on the Stanford Wedge with actual structural fuel density shown. The z-axis had to be compressed by a factor of 20 in order to include the structural fuels.

Structural and other non-natural fuels matter greatly, and should be accounted for in assessing fire behavior, but the DEIR implicitly and incorrectly treats them as a ***protective*** rather than an ***exacerbating*** factor.

Indeed, according to the DEIR, a propagating wildfire would magically end at the borders of the development, as shown in Appendix J Fig. 20 (fire growth model before development and vegetation management) and Fig. 44 (fire growth model after development and vegetation management). The computational model performs as programmed - it 'predicts' that

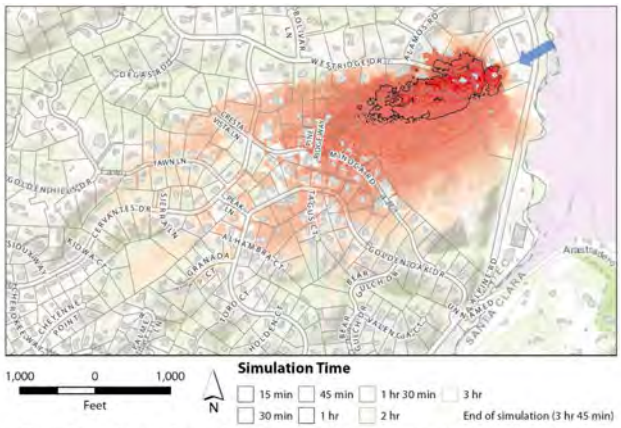


Figure 20. Perimeters for predicted fire growth for ENE Wind. Wind direction from NE (shownwith blue arrow).

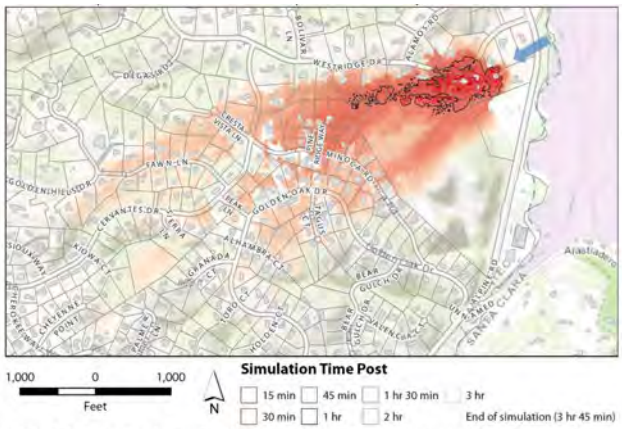


FIGURE 44. Perimeters for predicted fire growth for ENE -post treatment. Wind direction shown with blue arrow.

'unburnable' areas won't burn in a wildfire and therefore won't exacerbate or propagate the wildfire.

Figs. 21 and 45 show similar results for a SW wind. The unrealistic assumptions of the model - that non-natural fuels don't burn - results in an erroneous prediction that not only is the proposed development spared, it also doesn't exacerbate the wildfire and is protective of the downwind areas.

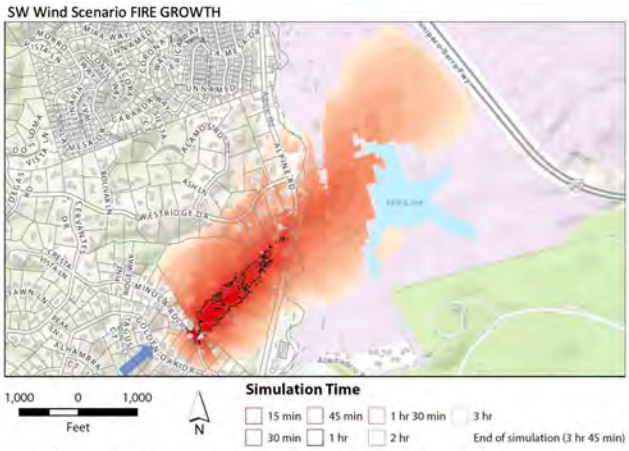


Figure 21. Perimeters for predicted fire growth for the ENE Wind Scenario. Wind direction from SW (shownwith blue arrow).

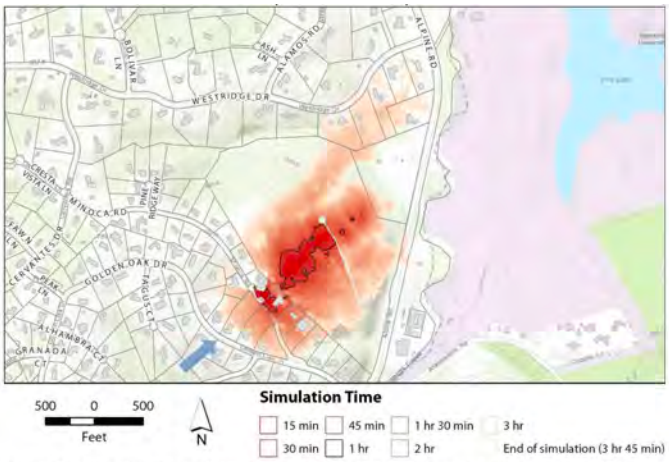


Figure 45. Perimeters for predicted fire growth for SW Wind scenario – post treatment. Wind directionshown with blue arrow.

5. The DEIR correctly states that the parcel in question is not near a formally and legally designated Very High Fire Hazard Severity Zone (VHFHSZ), but fails to discuss the background and the basis for exclusion.

By ignoring the true reason for this - that the Town of Portola Valley refused to comply with a State law mandating that it make such designations and refused to accept the recommendations of Woodside Fire Protection District (WFPD) and its own consultant - the DEIR incorrectly and misleadingly states that the parcel in question does not meet the criteria for a VHFHSZ.

The DEIR thereby understates the intrinsic hazard represented by topography, vegetation, and climate, and therefore misleads the reader. The DEIR ignores Cal Fire regulations that apply to VHFHSZs and would apply to the parcel in question had the Town complied with State law and had it accepted the recommendations of the Fire District and its own consultant.

California law requires local municipalities to formally designate VHFHSZs and explicitly states that the municipality may exceed the recommendations of Cal Fire, but it may not designate a lesser area[9]:

> 51179 (a) A local agency ***shall*** designate, by ordinance, very high fire hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the State Fire Marshal pursuant to Section 51178.

[9] leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=51179

> (b) A local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as very high fire hazard severity zones by the State Fire Marshal, as very high fire hazard severity zones following a finding supported by substantial evidence in the record that the requirements of Section 51182 are necessary for effective fire protection within the area.

The Town of Woodside, which borders Portola Valley to the northwest, promptly implemented not just the recommendations of Cal Fire, but the much more extensive recommendations of WFPD as well. As documented in a local newspaper at the time[10], the area identified by WFPD was much more extensive than that recommended by Cal Fire. Nevertheless, the Town of Woodside promptly made the formal designation. Cal Fire's maps were subsequently updated to reflect the designation of the Town of Woodside.

Seeking confirmation of WFPD's more extensive findings, the Town of Portola Valley hired Moritz Arboricultural Consulting to conduct an independent ground-verified survey. Moritz not only confirmed the areas WFPD identified as meeting the criteria of VHFHSZs, he identified numerous additional areas. WFPD endorsed Moritz's findings, and joined Moritz in appealing to the Town to designate all of Moritz's highest-hazard areas as VHFHSZs. Cal Fire agreed with this assessment and joined the appeal to the Town.[11]

Despite the appeals of 3 fire safety authorities, and despite a State mandate, Portola Valley declined to designate any area a VHFHSZ. Had it complied with State law and formally designated VHFHSZs, and had it complied with WFPD's and its own consultant's recommendations, the parcel in question would be in a VHFHSZ, and all State laws and regulations that apply to such zones would be applicable.

The DEIR should acknowledge that the parcel meets the criteria of VHFHSZs as determined by the only two ground-verified studies to have been conducted in Portola Valley — those of WFPD and Moritz Arboricultural Consulting.

The DEIR analysis should use as a baseline the condition that the parcel would be in had the property owner complied with Cal Fire regulations for VHFHSZs, WFPD ordinances, or Portola Valley Wildfire Preparedness Committee recommendations, whichever would result in lowest hazard.

6. The DEIR employs a faulty methodology that fails to incorporate formal scientific controls.

The conclusions of the DEIR rely heavily on the simulations that were performed using computational modeling.

Properly designed experimental studies (whether physical experiments or computational simulations) use positive and negative scientific controls as validation mechanisms[12].

A negative control represents experimental conditions or input parameters that are guaranteed to give a negative result if the experimental preparation or computational model is functioning as intended.

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[10] www.almanacnews.com/news/2008/06/23/woodside-sets-final-votebr-tonight-on-fire-hazard-map

[11] personal communication, former Fire Marshal Denise Enea

[12] en.wikipedia.org/wiki/Scientific_control

A positive control represents experimental conditions or input parameters that are guaranteed to give a positive result if the experimental preparation or computational model is functioning as intended.

This is why there is a ‘C’ (‘Control’) on Covid home test strips. If the ‘C’ doesn’t turn positive, then the test strip isn’t functioning as designed, and is incapable of detecting the presence of the virus to the specifications of the test. If the control doesn’t turn positive, a negative result can’t be trusted because the result could be due to a failure of the test to function properly.

The methodology of the DEIR failed to incorporate formal controls. There is no systematic, designed validation that the model is performing as designed and intended. The reader is simply asked to believe that the results are valid.

The analysis must be repeated using formal positive and negative controls.

7. Either the fire behavior model is inappropriate for our landscape, or the input parameters that were selected are unrepresentative of relevant conditions.

Despite the failure to incorporate formal controls in the methodology, the authors did include partial controls, apparently unwittingly. The inadvertent positive control confirms that a major flaw of the entire fire analysis is the failure to meaningfully incorporate and analyze local conditions.

The proposed development area serves as a partial negative control. It demonstrates that the model correctly predicts that areas specified as unburnable indeed don’t burn when the model is run. This is what we’d expect and the outcome demonstrates that, for the fuel model classes used in the development area, the model is performing as expected.

The much more interesting and informative unintended control is a positive control that does appear in the analysis, apparently unwittingly.

From the catastrophic fires that plague California and beyond with increasing frequency, we know that the primary mechanism of spread is ember cast in the presence of moderate or high winds, so that spot fires are generated well in advance of the main fire — sometimes miles in front of the fire. If this weren’t the case — if these fires spread primarily via propagation through adjacent fuels — then a simple fire break, such as a road, would be sufficient to contain the fire, and the fire wouldn’t become catastrophic. That is not what is observed in severe and catastrophic wildfires. Such fires aren’t impeded by multi-lane highways, let alone simple fire breaks such as dirt roads.

The CZU fire burned over 86,000 acres in an area whose terrain, vegetation, and weather is substantially similar to Portola Valley’s. The CZU fire proves that Portola Valley has the conditions to support a catastrophic wildfire. If those conditions are present — particularly low humidity and moderate or high wind — and if a fire is ignited, then the fire would spread primarily through ember cast, not via propagation through adjacent fuels. A simple fuel break, such as a dirt road, would not contain the spread of the fire.

Yet the modeling of the DEIR indicates that a simple fuel break *would* largely contain a fire under the conditions that were modeled, as seen in Figure 45 on page 70 of Appendix J, reproduced below. The black outline shows the area that has burned within one simulated hour

in this run of the model. An extensive area upwind of the fire access road has been consumed. The consumed area extends to the fire access road, but the road effectively blocks further progression. Only 3 spot fires have started downwind of the fire access road within the first hour. The dirt access road appears like a wall that blocked progression of the fire.

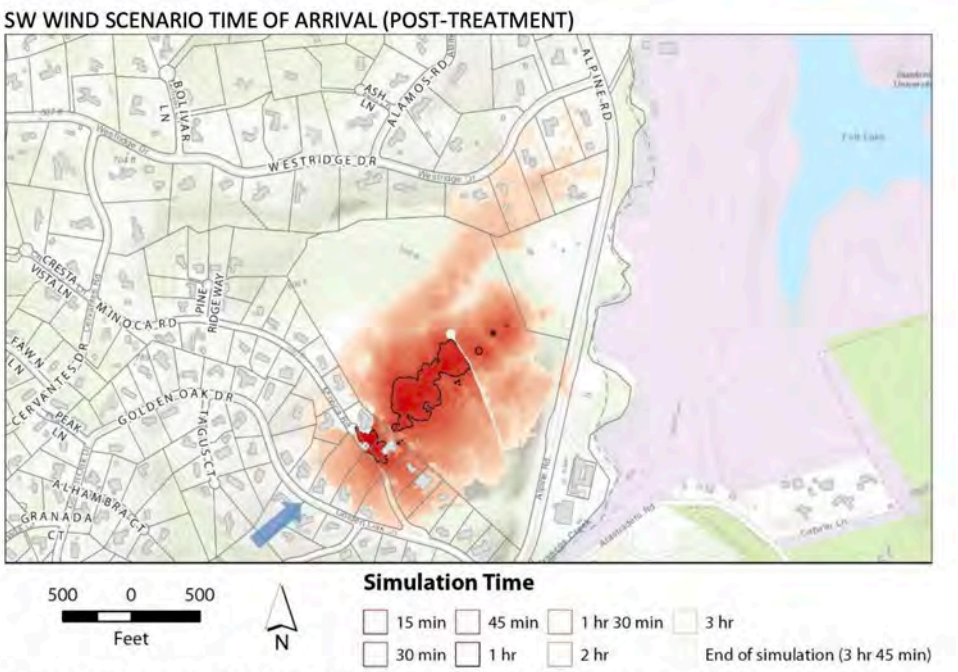

Figure 45. Perimeters for predicted fire growth for SW Wind scenario – post treatment. Wind directionshown with blue arrow.

While such a pattern might be expected under mild conditions (as with 10 mph winds simulated here), this burn pattern is not consistent with what is seen during severe or catastrophic fires that occur under more extreme conditions — conditions that are not infrequent in Portola Valley.

Under severe conditions in which fire spreads primarily through ember cast, the presence of the fire road would be inconsequential. The appearance of the fire growth pattern upwind and downwind of the fire break would be similar. A road or similar simple fuel break would not have the appearance of a wall that blocks fire propagation. The unintended positive control that was present in this simulation failed.

This unintended positive control demonstrates that there is either a flaw in the execution of the model, or that the input parameters (wind, humidity, fire behavior fuel model class, fuel moisture content) are not representative of the conditions that exist in Portola Valley that would support a severe or catastrophic wildfire.

The model must be re-run using appropriate input parameters. The failure to use these appropriate input parameters results in non-meaningful conclusions regarding significance.

In addition, each scenario should be repeated with and without simple simulated fire lines, oriented perpendicular to the prevailing wind, to serve as positive controls. If the model is functioning properly and the input parameters are representative of severe conditions, a fire growth pattern that is representative of a severe or catastrophic fire — the kind that can happen in Portola Valley and presents the highest risk to life and property — should be

apparent[13]. The extent of burned area should not be significantly different upwind vs downwind of the simulated fire break.

8. Fire safety authorities consistently recommend significant structure separation to prevent structure-to-structure ignition in wildland settings, yet the proposed development would substantially violate this with most of the large (two-story) structures aligned in parallel and separated by only 9-10'. The DEIR fails to identify and address this hazardous design decision.

All fire safety authorities recommend significant structure separation in wildland areas in order to prevent structure-to-structure ignition:

- The National Fire Prevention Association (NFPA) Standard for Wildland Fire Protection 1140[14] calls for 30' separation between buildings.

- Cal Fire regulations for Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Areas require 30' setbacks from the property line.[15] This results in at least 60' separation between structures on adjacent properties.

  As explained above, the parcel in question would have been in a designated VHFHSZ had the Town of Portola Valley complied with a California State mandate to make such designations, and had it accepted the recommendations of its consultant, Moritz Arboricultural Consulting, and Woodside Fire Protection District.

- Cal Fire, the National Institute of Standards and Technology (NIST), and the Insurance Institute for Business and Home Safety (IIBHS) recommend that concentrated fuels, such as structures, be separated by at least 50 feet in wildland areas[16]. For existing structures that are separated by 25-50', hardening against direct flame impingement and radiant heat can be beneficial and is recommended, though the authors note that because greater separation is more effective such hardening is a last resort for existing structures.

  NIST, Cal Fire, and IIBHS in Technical Note 2205 document that non-combustible sheathing is ***not*** sufficient mitigation against structure-to-structure ignition via direct flame impingement and radiant heat when structure separation is less than 25'. So inconsequential is non-combustible sheathing for structures separated by less than 25' that it is not even recommended as a mitigating retrofit.

All these authorities recommend *significant* structure-to-structure separation in a wild land-urban interface.

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[13] Plotting the density of area burned as a function of orthogonal distance from a fire break should not show a significant and temporally persistent step down at the fire break when ember cast is the primary mechanism of spread.

[14] https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=1140

[15] www.law.cornell.edu/regulations/california/Cal-Code-Regs-Tit-14-SS-1276-01

[16] Technical Note 2205 WUI Structure/Parcel/Community Fire Hazard Mitigation Methodology. nvlpubs.nist.gov/nistpubs/TechnicalNotes/NIST.TN.2205.pdf

At a public presentation of Technical Note 2205, I asked Alexander Maranghides, the lead author of the Technical Note, to confirm the obvious implications for new development of the findings they report in the Technical Note:

Bob Turcott:

> "I understand that the purpose of this Technical Note is to address existing structures, but as you know there's a big push for development, and in our community there's a big push for dense development, and it seems to me that the implication of first pursuing the three R's [Reduce, Relocate, or Remove the fuels] before hardening and the implication of hardening against flame impingement not being recommended for the shortest distance [< 25'], it seems that to me that the implication of that is that we really shouldn't put structures next to each other - less than 25 feet - in general as we're envisioning new development, and in particular in situations where a fire in that development would disproportionately put surrounding areas at risk due to topography or something like that. So I was wondering if you would correct my thinking where it's wrong. Thank you."

Alexander Maranghides:

> "Bob, you are you are right on."[17]

Fig. 15 of NIST Technical Note 2205 illustrates the recommendations of NIST, Cal Fire, and IIBHS[18]. According to the authors, structure separation > 50' is strongly preferred. For existing structures whose separation distance is 25-50', exterior hardening against direct flame impingement and radiant heat can be beneficial and is recommended (depicted as thick blue lines in the middle panel). Such hardening is ***not*** recommended for **distances less than 25'** because it does not offer significant protection. In other words, according to NIST, Cal Fire, and IIBHS, **hardening against radiant heat and direct flame impingement is not sufficient mitigation for structures that are separated by less than 25'**.

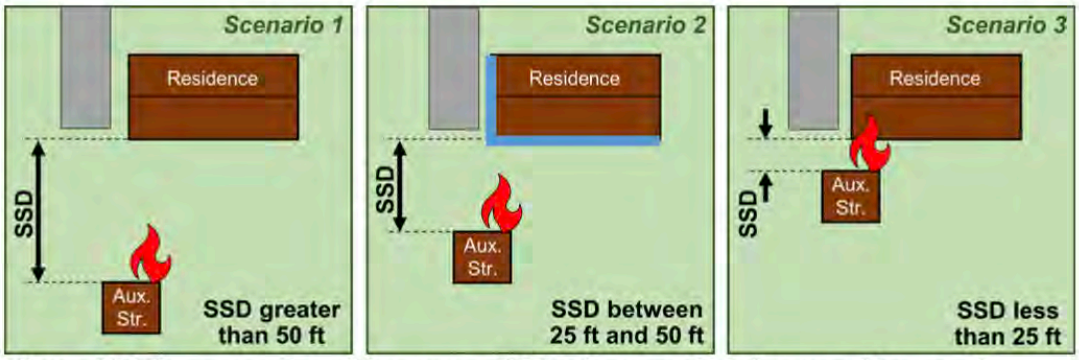


Figure 15. Three scenarios with a range of SSDs between the primary residence and auxiliary structure >120 ft^2: *1)* greater than 50 ft, *2)* between 25 ft and 50 ft, and *3)* under 25 ft. Structure hardening to increase ignition resistance is illustrated in blue (Scenario 2). Note that hardening is directional and is not necessarily required around the entire structure. Hardening for embers is required in all scenarios.

[17] youtu.be/uFINClHwN28?t=6253

[18] nvlpubs.nist.gov/nistpubs/TechnicalNotes/NIST.TN.2205.pdf

In TN 2205 NIST, Cal Fire, and the IIBHS clearly state, “High Density (structure separation distance on the order of < 25 ft) – must not have any structures ignite as risk of entire community loss is very high due to structure-to-structure fire spread.” (Page 28) The document notes that this remains true even when the structures are optimally hardened.

As shown below, the proposed development would have multiple large structures densely packed with a typical separation distance of 9-10'. The large, 2-story surface area, arranged in parallel with the neighboring structure, further exacerbates the risk of structure-to-structure ignition.

With respect to structure separation, the DEIR has three significant failings:

1. The DEIR fails to identify inadequate structure separation as a hazard. As noted above, all fire safety authorities recommend or require significant structure separation in wildland areas in order to minimize the risk of structure-to-structure ignition by radiant heat and direct flame impingement. Instead of complying with accepted best practices, the proposed development would have the majority of the structures separated by as little as 9-10’.

   The DEIR must highlight this significant deviation from accepted best practices and quantify the increased risk that this deviation represents.

2. The DEIR fails to analyze whether hardening against direct flame impingement and radiant heat using noncombustible sheathing offers sufficient mitigation for inadequate structure separation. Yet, as noted above, NIST, Cal Fire, and IIBHS have concluded that not only does noncombustible sheathing ***not*** offer sufficient mitigation for structure separation less than 25’, the benefits are so inconsequential that it is not even recommended as a retrofit.

   The DEIR must identify the conclusions of fire safety authorities about the inadequacy of noncombustible sheathing to protect structures that are separated by less than 25’. The DEIR must recommend that the developer comply with accepted best practices for building separation as defined by Cal Fire, NFPA, NIST, and IIBHS.

3. As noted by NIST, Cal Fire, and IIBHS in TN 2205, when structures are densely spaced (separation distance < 25’), if one structure burns, the “risk of entire community loss is very high due to structure-to-structure fire spread.”[19] Such an event would represent not only a tragedy for the residents of the development, it would pose an extreme risk to the

[19] nvlpubs.nist.gov/nistpubs/TechnicalNotes/NIST.TN.2205.pdf, page 28

community that surrounds the canyon network that leads upslope and away from the development site, and beyond.

The DEIR must identify and analyze the elevated risk to residents of the development that is imposed by the developer's decision to ignore best practices for building separation — that if one structure burns, the entire development is likely to be consumed.

The DEIR must also identify and analyze the elevated risk to the community that surrounds the development, similarly imposed by the developer's decision to ignore accepted best practices for building separation in a wildland-urban interface. According to fire safety authorities, if one structure burns, it is "very high" likelihood that the entire development will burn. Such a conflagration would pose an extreme risk to the surrounding community. The DEIR fails to discuss this risk. It must do so, and it must quantify the degree of increased risk that this design decision represents.

9. The structure design of the proposed development ignores important mitigation methods.

Openings (eg, windows and doors) in an exterior wall that would be subjected to direct flame contact and extreme radiant heat are well-recognized vulnerabilities in structure-to-structure ignition. It is for this reason that authoritative sources recommend avoiding windows and doors in exterior walls that face closely-spaced structures.

Alexander Maranghides, lead author of a Technical Note 2205 (cited above), a joint publication by Cal Fire, NIST, and IIBHS, addressed such vulnerabilities. According to TN 2205, structures should ideally be separated by more than 50'. If this is compromised and structures are separated by 25-50', then vulnerabilities such as windows and doors should be strictly avoided on the sides of the building that faces nearby structures:

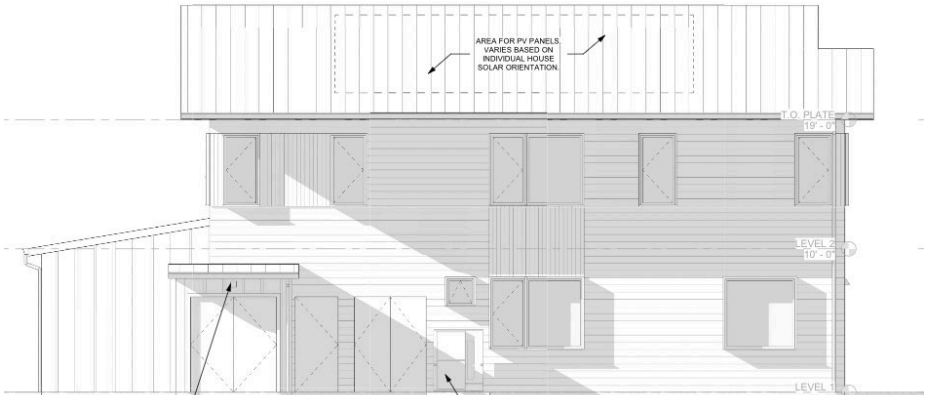
> "I would like to see very hard guidance for these sides [of buildings that face nearby structures] where most of the vulnerabilities are removed. If we're going to be in this - I'm calling it the sweet spot - but in this range [25-50' structure separation] then let's not have windows on the sides. Get rid of that vulnerability. Let's not even have vents on that side. If there are eaves let's go ahead and enclose the eaves. Let's try and remove and reduce those ignition potentials on those sides and then move them to other sides of the building that are much more easy to manage in terms of the exposures."[20]

The building separation Alexander Maranghides was referring to when he called for the elimination of windows, doors, and other vulnerabilities was 25-50'. If a leading national authority on safe construction in woodland areas calls for elimination of doors and windows on sides facing another structure 25-50' away, then surely they should be avoided when the adjacent structure is 9-10' away, as is the case in this development proposal.

The elevation shown below is for a proposed 4 bedroom structure. Such structures will appear throughout the site, for example, in lot #18 in the site plan shown above. The structures adjacent to lot #18 are aligned perfectly parallel, with separation distance only 9-10'. Despite the close proximity and the extreme radiant heat and direct flame impingement to which the structure will be subjected should an adjacent house burn, multiple windows and doors appear

[20] youtu.be/uFINClHwN28?t=6619

on the exterior wall that faces the adjacent houses. Yet, as noted above, fire safety authorities recommend eliminating windows from building sides that face another structure 25-50’ away.



Elevation for proposed 4-bedroom house showing multiple windows and doors on the side of the structure that faces an adjacent building 9-10’ away. Doors and windows make the building extremely vulnerable to structure-to-structure ignition, which is why fire safety authorities recommend eliminating such openings when buildings are separated by 25-50’.

With respect to structure openings, the DEIR has two significant failings:

1. The DEIR fails to identify the significant hazard presented by openings (windows and doors) on the sides of buildings that face adjacent structures that are less than 50’ away. The EIR must recognize and evaluate this significant hazard.

2. Consistent with recommendations of fire safety authorities, the DEIR must recommend that the developer remove windows and doors on the sides of buildings if the side faces another structure that is less than 50’ away.

10. The method used by the DEIR to assess likelihood of ignition is misleading and understates the impact of the proposed development.

The DEIR assigns a qualitative likelihood of ignition to a range of distances away from structures, roads, and power lines. It then combines these and rescales to yield an overall relative, qualitative likelihood of ignition.

While the methodology purports to account for increased population and human activity, the methodology is misleading and in fact understates the increased likelihood of ignition associated with the new development. It does this by ignoring the density of people.

1) The methodology assigns a likelihood of ignition according to distance from *any* structure. For example, it assigns the same value of ‘very high’ to areas that are within 100’ of one home, areas that are within 100’ of two homes, and areas that are within 100’ of three homes. Clearly, the likelihood of ignition due to human activity is 3x higher for the area that is within 100’ of three different homes, but the methodology assigns it the same likelihood of ignition as an area that is within 100’ of only one structure.

   By associating the same likelihood of ignition to an area whether the area is near one single-family residence or 3, the methodology underestimates the likelihood of human-

caused ignition for high-density housing.

2) The methodology bases its estimate of ignition likelihood on distance from structures without regard to the number of housing units within the structure. It assigns the same value of 'very high' to areas within 100' of a structure, whether the structure is a single family home or a 4-family multi-unit structure. Clearly, the likelihood of ignition due to human activity would be 4x higher near a 4-family structure compared to a single-family residence, but the methodology assigns them each the same likelihood.

   By associating the same likelihood of ignition to an area whether the area is near a structure that contains one household or four, the methodology underestimates the likelihood of human-caused ignition for multi-unit structures.

A much more accurate way to estimate the likelihood of ignition is to use an additive likelihood based on distance from *each household*. Doing so would show that the proposed development is at significantly increased risk of ignition compared to the surrounding community. Indeed, it has nearly twice the number of households compared to the total number of parcels that border the Wedge, and these households are densely concentrated in a very small footprint.

The likelihood of ignition by human activity in fact will be substantially higher in the new development compared to the existing surrounding community. The methodology misleadingly conceals this fact.

Since the results of this calculation are incorporated into the overall estimated 'wildfire risk', the 'wildfire risk' associated with the development is also misleadingly understated.

11. The DEIR erroneously cites a guideline for developing an evacuation plan as an actual plan.

The DEIR refers to an 'Evacuation Plan' and provides links to a document, eg, footnote 4 on page 11-5. However, this document (as downloaded on 4/22/2022, link here) appears to be nothing more than a template or guideline provided by the Fire District by which Portola Valley can develop an evacuation plan. Indeed, the template states that 'The Evacuation Plan, including appendices, will be reviewed and approved on an annual basis.' — yet the template has never been completed, let alone reviewed and approved on an annual basis. Of note, the meta-data of the document indicates that it was created 7 years ago.

It is grossly misleading — and possibly fraudulent — for an EIR to claim the existence of an 'Evacuation Plan' when none exists. A central purpose of an EIR is to highlight the cumulative impact on public safety by the proposed development. Asserting an evacuation plan exists when in fact none does misrepresents the baseline condition against which the impact of the proposal is to be evaluated and understates the impact that increased human activity and increased population will have on public safety.

What is needed is an Evacuation *Program* — the implementation of a completed Evacuation Plan by a responsible individual or group, including community education, instructional materials and resources, established public communication protocols and procedures, trained leaders and personnel, and public implementation drills.

Until such an Evacuation Program is in place, the discussion of the DEIR regarding evacuation is purely speculative. Impacts cannot be based upon a speculative Evacuation Program.

During the more than 26 months that it took to prepare the DEIR was it not possible for the Town of Portola Valley — the Lead Agency of the DEIR — to complete the evacuation plan template that was provided to it in 2015 and to implement the plan as a program?

Revision of the DEIR should await the long-overdue completion of the Town's evacuation plan and implantation of the plan in a functioning Evacuation Program. Only then can the baseline conditions and the impact that the development will have on evacuation be meaningfully assessed.

12. The DEIR fails to assess the cumulative impact of the proposal on evacuation capacity.

The California Environmental Quality Act (CEQA) and associated guidelines require an EIR to assess the *cumulative* impact of the proposal under study, not just its *incremental* impact.

The evacuation analysis failed to assess the cumulative impact on evacuation in at least four ways:

1) Assessing the cumulative impact requires that the baseline (existing conditions) be assessed. Yet the DEIR ignores large residential areas whose evacuation will be impacted by the proposed development. Examples of such areas include the Corte Madera neighborhood, Portola Valley Ranch, and Los Trancos. These neighborhoods, and others, use Alpine Road as their primary evacuation route. The vehicles that would be evacuating from these areas were not included in the assessment.

2) Assessing the cumulative impact, according to CEQA and guidelines, requires conducting the evaluation in the context of growth that can reasonably be expected. Portola Valley is required to plan for an additional 253 housing units during the upcoming 8-year housing cycle to comply with its Regional Housing Needs Allocation. This represents a 14% population growth in an 8-year period. We can reasonably expect a mandate for a similar amount of growth for the subsequent 8-year period under applicable state law. This represents a 30% compound growth over the next 16 years.

3) There is no characterization of total evacuation time nor is there an analysis of what evacuation time should be considered acceptable.

4) In the absence of an evacuation program (see #11, above), it is impossible to characterize the baseline evacuation capacity, and therefore impossible to conduct an assessment on the cumulative impact of the proposal. Again, the failure of the DEIR to even address this topic is a fatal flaw. The DEIR must at a minimum be recirculated as another DEIR which includes the omitted topics.

In order to meaningfully assess the cumulative impact of the proposed development on evacuation, the analysis should include all areas that evacuate through the Alpine corridor and should incorporate the growth that can be reasonably anticipated.

The evacuation analysis should demonstrate that the evacuation time for the baseline, current conditions is acceptable and will not be significantly impacted by the proposed development in the context of the growth that can be reasonably anticipated.

13. The DEIR fails to analyze evacuation in the context of severe wildfire conditions.

The types of wildfires that are of most concern and that place the community at greatest risk are those that occur under extreme conditions. However, fire growth modeling in the DEIR that assessed impact on evacuation used unrealistically benign assumptions about wind speed. As stated on page 69 of the DEIR, "wind speed remains at or below 10 mph." The DEIR selected this windspeed in part by using moderate/high weather conditions (as defined by the modeling software), rather than extreme conditions. (See #17, "The DEIR uses an unconventional and misleading threshold to identify conditions that would lead to the 'worst' fires", below.)

Portola Valley routinely experiences winds in excess of 20 mph. Winds greater than this magnitude are not rare. It is in the context of such winds that a fire can become catastrophic. Wildfire is greatly intensified with greatly increased rate of spread under strong winds, and grassy areas, which would be significantly expanded under the proposed Vegetation Management Plan, are particularly susceptible to this intensification and increased rate of spread.

The DEIR ignores the conditions that would lead to the highest-risk fire behavior and does not evaluate the impact of the proposed development on evacuation during a severe fire event. As a result, the evacuation analysis is flawed and suggests a misleadingly benign impact.

14. In its assessment of fire hazard, the DEIR focuses on fire intensity but ignores the factor that more directly impacts public safety - rate of fire spread.

Rate of spread is a key parameter in determining safe evacuation time and capacity for fire suppression and protection of surrounding structures. The management proposed by the developer would convert a landscape dominated by woody shrubs under oak canopies to uncanopied grassy and herbaceous vegetation. Experimental data (not computational modeling, which is less reliable) shows that such flashy, desiccated fuels significantly increase the rate of fire propagation on slopes compared to woody shrubs, particularly under moderate or high winds.

The analysis must be repeated with rate of spread reported and compared in pre- and post-treatment scenarios.

15. The DEIR uses unrealistically high fuel moisture content.

Wildfire behavior is exquisitely sensitive to fuel moisture content. Small changes in fuel moisture content will dramatically change susceptibility to ignition and the intensity and rate of spread of a fire.

The DEIR uses a foliar moisture content of 60%. This is unrealistically benign and is not representative of the conditions that are commonly seen in our area - conditions that would support a severe or catastrophic wildfire.

Indeed, reviewing *measured* data for the area reveals a fuel moisture content that is frequently much lower than the value used in the DEIR. Consider, for example, the measurements taken

from old-growth chamise on Blackberry Hill.[21] In 2021, nearly half the measurements showed a moisture content that was *less than* the value used for modeling in the DEIR. The 90th percentile moisture content for 2021 was 45%, well below the 60% value used in the DEIR.

The analysis must be repeated using realistic fuel moisture content. The selected parameters must be compared to historical measured values with this comparison reported, along with the fuel moisture values that were used in the model.

16. The DEIR uses an unrealistically low wind speed.

The types of wildfires that are of most concern and that place the community at greatest risk are those that occur under extreme conditions. Fire growth modeling used unrealistically benign assumptions about wind speed. As stated on page 69 of the DEIR, "wind speed remains at or below 10 mph." The DEIR selected this windspeed in part by using moderate/high weather conditions (as defined by the modeling software), rather than extreme conditions. (See #17, "The DEIR uses an unconventional and misleading threshold to identify conditions that would lead to the 'worst' fires", below.)

Portola Valley routinely experiences winds in excess of 20 mph. Winds greater than this magnitude are not rare. It is in the context of such winds that a fire can become catastrophic. Wildfire is greatly intensified with greatly increased rate of spread under strong winds, and grassy areas, which would be more extensive and widespread under the Vegetation Management Plan, are particularly susceptible to this intensification and increased rate of spread.

The DEIR ignores the conditions, commonly experienced in Portola Valley, that would lead to the highest-risk fire behavior.

17. The DEIR uses an unconventional and misleading threshold to identify conditions that would lead to the "worst" fires.

Without explanation, the DEIR selects "the 90th percentile range of data values that would represent the worst fires that often exceed fire suppression resources."[22]

And, further, the DEIR states "A weather analysis defined extreme weather conditions (the 90th percentile), based on historical data from a representative weather station."[23]

Yet, a threshold that results in 10% of the year exhibiting more severe fire weather conditions can hardly be called "extreme".

Furthermore, the software used in fire behavior modeling for the DEIR defines extreme weather conditions as corresponding to the 98-100th percentile, as shown in Figure 9 of Appendix J on page 100, reproduced below. The figure also makes clear that the 90th percentile does not represent "extreme" weather conditions. Rather, the 90th percentile is at the lowest end of the "high" range, essentially at the cutoff between moderate and high severity conditions. Had the

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[21] www.wfas.net/nfmd/public/site.php?gacc=NOCC&state=CA&grup=CalFire+Santa+Clara+Unit&sitefuel=fuel&site_fuel=Chamise%2C+Old+Growth&display_type=Graph+With+Tables+Actual&submit_button=Submit+Request

[22] Appendix J, page 94

[23] Appendix J, page 21

threshold been reduced by a single point, to the 89th percentile, the conditions would have met the software's definition of "moderate" — hardly the conditions that commonly occur in Portola Valley that can lead to the the worst wildfires.

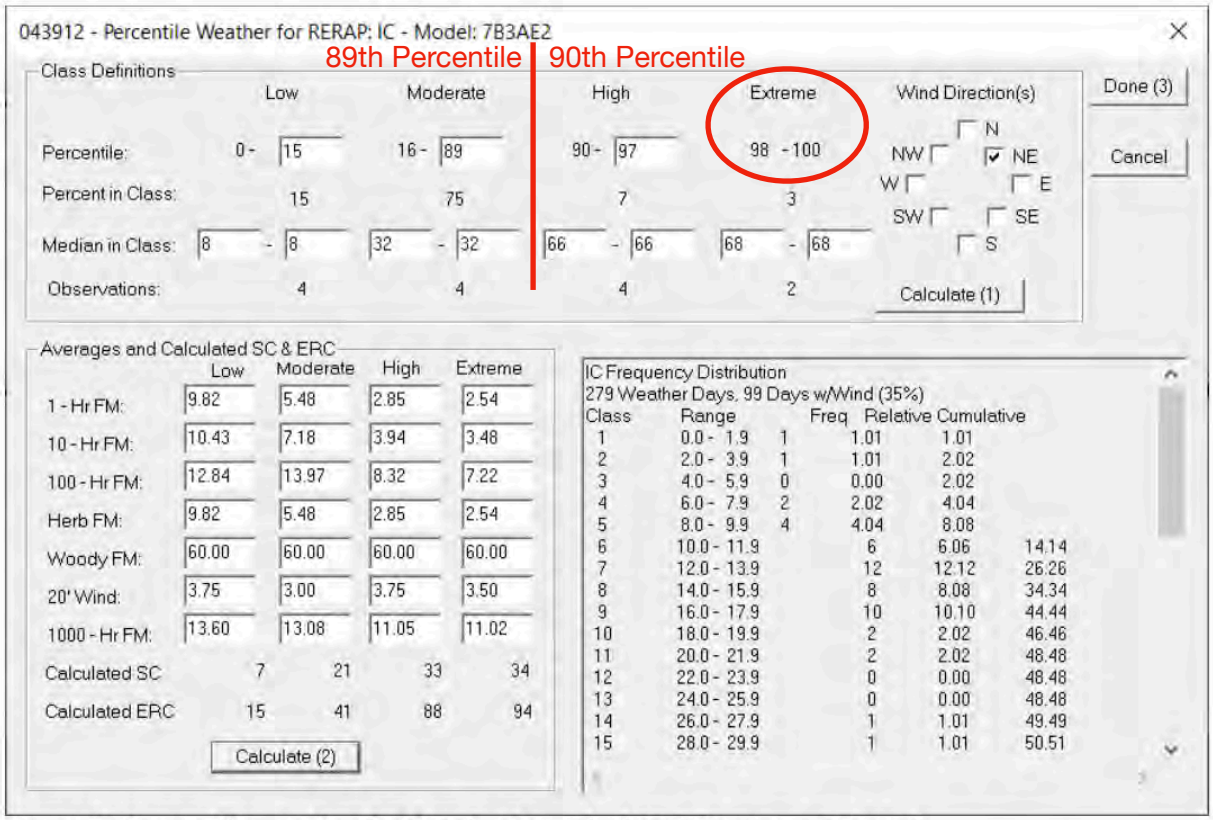


Figure 9. Percentile weather for October for calculated IC using a NE wind

Even the property owner's Vegetation Management Plan used much more severe conditions — the 97th percentile:

> "The 97th percentile weather conditions were utilized. Percentiles are based on a scale of 0-100 and are used to sort and rank a collection of data collected over a period. For wildfire, when values at the upper end of the scale occur, complex fires are expected, where initial attack may often fail. **The 97th percentile is often termed 'the most likely worst-case scenario.'** These are the days where weather conditions are greatest for wildfire ignition and spread."[24]

90th percentile conditions were intentionally selected and known to the modeler to represent the cutoff between "moderate" and "high" severity conditions, yet were presented to the reader as representative of "extreme" conditions. This is an egregious misrepresentation of fire weather conditions with consequences that are potentially substantial and tragic. To intentionally and misleadingly refer to "moderate"/"high" conditions as "extreme" is stunning.

Recognizing that climate change makes makes weather conditions progressively more favorable for severe and catastrophic wildfires, in order to obtain a meaningful representation of fire behavior, the only reasonable choice is what the software package labels "extreme" conditions: 98th-100th percentile. We can reasonably expect that what was the 98th-100th percentile over recent years will likely correspond to the 90th percentile in the near future.

[24] Stanford Wedge Property Development Vegetation Management Plan, page I-5

Since the EIR is attempting to characterize the impact of the proposal on safety over a 20 year or longer time horizon, it would be appropriate to use conditions in the 98th-100th percentile range.

18. The DEIR uses a flawed method to identify weather parameters that correspond to the nominal percentile.

1. Inappropriately long averaging time. In addition to the inappropriately low percentile that was selected to identify the weather conditions to model (described above), the DEIR methodology used an unconventional method for identifying weather parameters that results in a misleadingly benign set of conditions.

The Wildfire Risk Assessment Framework for Land and Resource Management[25], published by the Forest Service, states

> "The (year-round) 97th percentile value of the probable **maximum 1-minute average wind speed is a reasonable wind speed to use**, applied in the upslope direction on all pixels regardless of aspect. Likewise, the 97th percentile dead fuel moisture contents are reasonable values to use for the near-maximum condition." (Page 22)

An authoritative source on the computational modeling of fire behavior, Introduction to Fire Behavior Modeling[26] by Joe Scott (2012), also calls for short averaging periods:

> "The 1-minute average wind speed is the mean wind speed occurring over a period of one minute. The 1-minute average wind speed can be calculated by computing the mean of a sample of instantaneous wind speeds during a one-minute period, or by dividing the total distance of air traveling past an anemometer by the 1-minute time period. This, along with the 2-minute average wind speed, **is an appropriate time-averaging period for use in fire modeling; it is not so long that important periods of high or low wind speeds are averaged out,** nor is it so short that the fire cannot respond to it." (Page 87)

The description of the methodology used in the DEIR is vague, but it appears that rather than using year-round, 1-minute average wind speed, as is best practice according to the Forrest Service and Scott, the DEIR first computes **a 28-day average**, then identifies that data that is above its nominal (90th percentile) threshold.

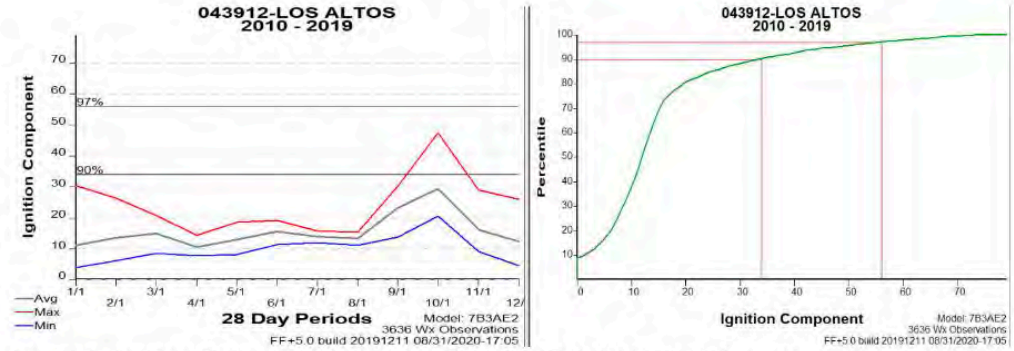


Figure 3. Ignition Component for the Los Altos RAWS station, monthly average using data from 2010 through 2019.

[25] www.fs.fed.us/rm/pubs/rmrs_gtr315.pdf

[26] pyrologix.com/wp-content/uploads/2014/04/Scott_20121.pdf

But the Xth percentile of averages is significantly less than the Xth percentile of raw, unaveraged, 1-minute interval data.

2. Percentile of model parameters rather than percentile of weather parameters. Rather than first identifying the nominal (90th) percentile weather parameters, then estimating the Ignition Component (IC) and Energy Release Component (ERC) from those values as recommended, the DEIR appears to estimate the IC and ERC for each month (misleadingly averaging the weather parameters, as described above), then identifies the month with the worst IC and ERC.

3. Erroneous focus on a particular month. The DEIR erroneously claims that "the IC is relatively low (below 50%) and it is only in October when conditions might warrant a fire that may exceed local suppression forces."

Had the authors calculated the IC and ERC from raw (1-minute) weather data (as required by best practices), they would be in a position to assess what parts of the year are most likely to support fires that exceed local suppression forces. Indeed, the 86,000-acre CZU fire that came within 8 miles of Portola Valley suggest that catastrophic fires in our area are not limited to October.

4. Erroneous conclusion that moderate and high wind speeds are rare. After mistakenly concluding that the most severe fire weather is limited to the month of October, the DEIR analysis conducts a more refined assessment of wind speed and direction during that month, while ignoring these weather parameters during other, equally fire prone months, such as July, which are more likely to have higher wind speeds.

Using this flawed analysis, the authors conclude that "Wind speeds over 13 mph are rare but do happen (2.2% of the period summarized)." This misleading conclusion is a direct result of the flawed methodology that is based on 28-day averages, rather than the recommended 1-minute samples, and limiting the detailed analysis to the month with the worst average IC and ERC, rather than identifying the high-percentile weather parameters based on 1-minute samples over the entire year.

5. Joint rather than independent assessment of weather variables. Finally, rather than identifying the 97th percentile wind speed and 97th percentile humidity independently and using 1-minute data, as A Wildfire Risk Assessment Framework for Land and Resource Management (referenced above) recommends, the DEIR appears to select the *combination* of wind and humidity that yields a 90th percentile IC and ERC.

These 5 deviations from defined best practices contributed to the unrealistically benign weather conditions and fuel moisture content that were modeled - a 10 mph wind and 60% foliar content.

What impact would the proposed development and implementation of the proposed Vegetation Management Plan have on public safety in the context of a severe wildfire? We don't know, because the DEIR didn't model the conditions that support a severe wildfire.

The analysis must be repeated using a conventional methodology for selecting wind and fuel moisture parameters, such as that defined in Introduction to Fire Behavior Modeling, referenced above. The moisture content of all fuel types must be reported and compared to historical measured values.

19. The DEIR misleadingly uses a fixed wind direction for the entire area that is modeled, rather than directing the wind up-slope, as required by defined best practices

Best practices require that the wind be directed up-slope when modeling worst-case fire behavior. See, for example, A Wildfire Risk Assessment Framework for Land and Resource Management.[27]

20. The DEIR failed to conduct a sensitivity analysis.

As noted above, the values for wind and fuel moisture content that were used in wildfire modeling were unrealistically benign. Furthermore, small changes in these values can disproportionately change fire intensity and rate of spread.

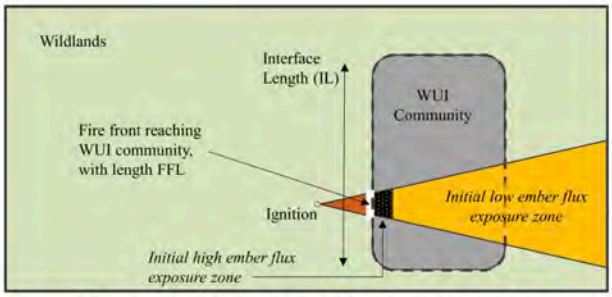
For these reasons, best practices for computational modeling include a sensitivity analysis[28], in which the impact on the predicted behavior can be evaluated for small changes in input parameters. If the change in predicted behavior is modest, then we can have more confidence that the results correspond to the scenario that it purportedly characterizes. On the other hand, if small changes in input parameter values lead to significant changes in modeled behavior, then the results should be viewed with skepticism and the choice of input parameters should be carefully reviewed.

21. The DEIR fails to examine worst-case wildfire ignition sites.

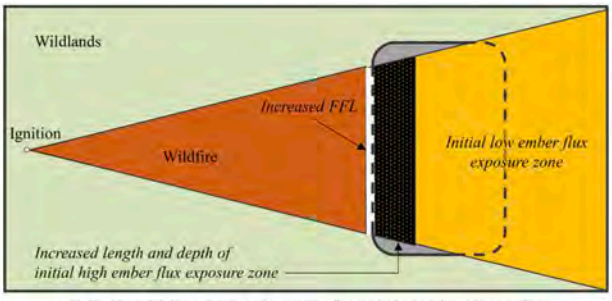
Careful study of the 2018 Camp fire, in which the Town of Paradise was destroyed in 12 hours and 85 people lost their lives, revealed that one of the main factors that made the fire so catastrophic was the location of its origin.[29] As illustrated in the adjacent figure, the ignition was close enough to the Town to allow very limited evacuation time, yet far enough away so that ember showers — the primary mechanism by which wind-driven wildfire spreads — engulfed the entire town.

What is the impact of the development proposal and vegetation management plan on evacuation, structure loss, and fire spread in the setting of a worst-case ignition site?

The DEIR fails to address these important questions and therefore cannot adequately assess the potential impact of the proposal.



a) Ignition near WUI community – fire front impacting community



b) Ignition far from WUI community – fire front impacting community

Figure 57. Idealized relationship between ignition location, a) near or b) far, from a WUI community and the fire front and ember exposures reaching the community. The wind is directed from left to right.

[27] www.fs.usda.gov/treesearch/pubs/56265, page 22

[28] en.wikipedia.org/wiki/Sensitivity_analysis

[29] NIST Technical Note 2135 A Case Study of the Camp Fire – Fire Progression Timeline https://www.nist.gov/publications/case-study-camp-fire-fire-progression-timeline

22. The DEIR makes unrealistic assumptions about fire suppression.

Throughout the fire safety analysis of the DEIR is a recurring and misleading message that fire suppression interventions will be readily available and can be relied on.

Indeed, page 32 of Appendix J states "The fire suppression capabilities of the Woodside Fire Protection District cannot be overestimated."

While WFPD has impressive capabilities and is staffed by dedicated and talented professionals, in fact the resources of the Fire District are finite and ***can*** be overestimated. There are scenarios in which the full complement of WFPD resources along with those of nearby fire districts and departments will be entirely dedicated to evacuation and life safety. The type of fire that engulfed the Town of Paradise is but one example. In cases such as those resources will not be directed to fire suppression.

Furthermore, the fire access road is repeatedly cited in the DEIR as an asset for fire suppression. In fact it would likely only be used for this purpose in highly selected circumstances — when weather, wind, fuel moisture content, and fire size make it safe for a crew to use the road. There are many scenarios in which it would be unsafe to send a crew up the dead-end road which traverses steep, vegetated terrain.

The DEIR should acknowledge that in the most serious wildfire events suppression efforts would likely be nonexistent.

23. According to State Bonus Density law, two land use and zoning concessions that do not compromise public safety may be sought by a developer who provides affordable housing. The proposal seeks many concessions that compromise safety. The DEIR fails to acknowledge and examine the adverse impact on public safety of these concessions.

Under State bonus law a developer may request 2 enforcement concessions that do not adversely impact public safety. Stanford requests many more than 2 concessions, including concessions such as dramatically reduced parcel sizes, negligible setbacks, and large increases in building allowances, all of which contradict Cal Fire's Fire Safe regulations, NFPA's guidance, and would greatly increase fire hazard, as NIST, Cal Fire, and the insurance industry have recently documented and confirmed in Technical Note 2205[30].

The wide array of authoritative standards, regulations, and recommendations by fire safety authorities - NFPA, Cal Fire, NIST, IIBHS - make clear that the degree of density concessions sought by the developer would greatly compromise public safety.

- The National Fire Prevention Association (NFPA) Standard for Wildland Fire Protection 1140[31] calls for 30' separation between buildings.

- Cal Fire regulations for Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Areas require 30' setbacks from the property line. This results in at least 60'

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[30] nvlpubs.nist.gov/nistpubs/TechnicalNotes/NIST.TN.2205.pdf

[31] https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=1140

separation between structures on adjacent properties. While the parcel in question has not been formally designated as being in a VHFHSZ, as explained above both the Fire District and the Town's consultant concluded in 2008 that it qualified for such a designation. The Cal Fire regulations that apply to such zones must be treated as accepted best practice by the authors of the DEIR.

- Cal Fire, the National Institute of Standards and Technology (NIST), and the Insurance Institute for Business and Home Safety (IIBHS) recommend that concentrated fuels, such as structures, be separated by at least 50 feet in wildland areas[32]. For existing structures that are separated by 25-50', hardening against direct flame impingement and radiant heat can be beneficial and is recommended, though the authors note that because greater separation is more effective such hardening is a last resort for existing structures.

  NIST, Cal Fire, and IIBHS in Technical Note 2205 document that non-combustible sheathing is ***not*** sufficient mitigation against structure-to-structure ignition via direct flame impingement and radiant heat when structure separation is less than 25'. So inconsequential is non-combustible sheathing for structures separated by less than 25' that it's not even recommended as a mitigating retrofit.

The analysis of the DEIR fails to acknowledge the violations of defined and accepted best practices represented by the design decisions of the developer.

The DEIR must identify and quantify the increase in hazard and risk that each concession, separately and jointly, that is sought by the developer would represent.

24. The DEIR mischaracterizes the fire history of the area.

On page 16 of Appendix J, the Report states "Luckily, wildfire is a rare occurrence in the area, and locally, the area has been spared of large, damaging wildfires."

This is simply incorrect. While the report goes on to acknowledge the CZU fire, it doesn't acknowledge that the CZU fire consumed 86,000 acres, destroyed 1500 structures, cost at least 2 lives, and came within 8 miles of Portola Valley. While the conditions that caused ignition might be rare (dry lightning), the conditions that promoted the fire's explosive spread (low humidity, significant wind) are not.

It is indeed rare for wildfires to be ignited by natural causes. For homes that are threatened by wildfire, 97% of the time the wildfire is caused by human activity.[33] The significance of the CZU fire to Portola Valley is that it demonstrates that our weather, topography, and vegetation are capable of supporting such cataclysmic wildfires. Dry lightning isn't a necessary component. Human activity along with the conditions we have are more than sufficient.

That the CZU fire didn't come closer than 8 miles of Portola Valley can't be cited as evidence that Portola Valley's risk factors - vegetation, low humidity, wind, terrain - are substantially different and therefore protective. In fact, these risk factors are substantially similar to the area that burned in the CZU fire.

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[32] Technical Note 2205 WUI Structure/Parcel/Community Fire Hazard Mitigation Methodology. nvlpubs.nist.gov/nistpubs/TechnicalNotes/NIST.TN.2205.pdf

[33] www.science.org/content/article/human-sparked-wildfires-are-more-destructive-those-caused-nature; www.mdpi.com/2571-6255/3/3/50/htm

The EIR must highlight the ominous significance of the CZU fire - that weather conditions, topography, and vegetation in Portola Valley will support a catastrophic wildfire similar to the CZU complex fire, that human activity causes the vast majority of wildfires that threaten structures, and that increased population will increase the likelihood of Portola Valley experiencing such a devastating fire.

The photos below were taken in Portola Valley in August of 2020.

25. The DEIR excludes fire growth results for one of the scenarios that it claims to have analyzed.

Analysis of fire growth was conducted for four combinations of wind directions and ignition locations. The results for the analysis for NE wind direction with ignition site located to the west of the development site were not provided. The EIR should include this analysis.

	Pre-treatment	Post-treatment	
ENE	Fig 20, pg 33	Fig 44, pg 69	
SW	Fig 21, pg 34	Fig 45, pg 70	
SE	Fig 22, pg 35	Fig 46, pg 71	
NE	Fig 23, pg 36	Missing	

26. The DEIR's fire growth analysis uses a single sample from a probabilistic (stochastic) model instead of an ensemble average.

As noted on page 80 of Appendix J:

> "It is important to note that there is an element of randomness associated with the propagation of spot fires. The parameters given specify the percentage of fires allowed to propagate (in this case, 5 percent), however, which of those spot fires are allowed to burn is chosen randomly. Therefore, there is a slight variation in direction and size of a fire growth progression from one scenario run to the next, even if all parameters remain the same."

Different 'runs' of the model will yield different results. Furthermore, the variability from run to run will increase as the wind speed increases. (With no wind embers will travel a limited distance, if at all. With increasing wind the distribution of embers will greatly increase. Which embers ignite spot fires — which is randomly selected in the execution of the model — will have a progressively greater impact on the projected outcome of the model run with progressively greater wind speeds.)

Yet the DEIR presents the results of only a single 'run' for each model scenario.

A much more meaningful analysis would be based on an *ensemble* of runs of the model, not on an arbitrarily selected — or a carefully selected — *single* run of the model.

The analysis of the EIR should be based on ensemble averages of the stochastic model.

27. The Wildfire Risk metric is based on an arbitrary mathematical combination of qualitative variables. The DEIR ignores fire rate of spread.

The DEIR's assessment of "wildfire risk" uses an arbitrary mathematical combination of output variables — fireline intensity, flame length, and crown fire potential. The Wildfire Risk metric ignores the critically important rate of spread, which is more relevant to public safety since it directly impacts time for evacuation.

The analysis must separately and comprehensively report rate of spread, and use this metric in comparing pre- and post-treatment scenarios.

If a mathematical combination of output variables is used, the combination must be justified with rate of spread included and heavily weighted.

28. Certain interventions in the Vegetation Management Plan, as cited by the DEIR, would exacerbate the intensity and rate of spread of wildfire.

Page 60 of Appendix J of the DEIR states that oak canopy cover will be reduced to 40%.

In general, tree removal and canopy reduction is recommended in certain circumstances in order to form breaks in the canopy so that propagation of a canopy fire, should one occur, would be interrupted. The benefit of such discontinuities is greatest in woodlands composed of highly flammable trees, such as pine, and when the woodland is located on a slope with a southern exposure.

Oaks are much more resistant to canopy fires and much less likely to support a canopy fire than other species, such as pine. The benefits of forming discontinuities in the canopies of oak woodlands is therefore significantly reduced compared to other, more flammable, tree species.

In addition, growth of ground vegetation is attenuated by the reduced sunlight caused by the overlying canopy, particularly on north-facing slopes. Indeed, within the same canyon shared by the parcel in question are examples of naturally occurring shaded fuel breaks which have never been actively managed, yet the ground vegetation - woody shrubs - remains limited to 1-2' in height, consistent with Fire District recommendations.

Opening such a canopy would promote the proliferation of ground vegetation. If the native woody vegetation is cleared, as the Vegetation Management Plan proposes, the area would be converted to grassy and herbaceous vegetation. At best this would result in increased maintenance demands. At worst, should maintenance be neglected, it could result in a more hazardous situation since wildfire travels faster on grass-covered slopes than those covered by woody shrubs.[34] In addition, creating discontinuities in the canopy will accelerate the growth of ground vegetation and ladder fuels.

The benefit to risk/cost of forming discontinuities in oak woodlands is therefore unattractive.

The authors of Appendix J agree. They write (page 90),

> "We do not believe that the oak woodland needs to be thinned to a 40% canopy cover. This level of canopy openings actually promotes growth of understory shrubs and small trees. These type of fuels comprises ladder fuels, the biggest factor in tree torching, ember production, which in turn is the biggest threat to adjacent residences."

The EIR should require preservation of oak canopies as a mitigation measure, with removal of ladder fuels.

The EIR should require the property owner to provide funding in perpetuity to maintain the parcel as defined in the Vegetation Management Plan. In particular, funding should be provided to eliminate vertically oriented, desiccated grassy and herbaceous fuels.

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[34] Wragg et al. (2018) "Forbs, grasses, and grassland fire behaviour";
Engber et al. (2011) "The Effects of Conifer Encroachment and Overstory Structure on Fuels and Fire in an Oak Woodland Landscape" Fire Ecology;
Neary and Leonard (2015) "Wildland Fire: Impacts on Forest, Woodland, and Grassland Ecological Processes" in Wildland Fires - A Worldwide Reality;
Payne (1996) "Introduction to Wildland Fire - 2nd edition" John Wiley & Sons.

29. The California Environmental Quality Act (CEQA) requires that the EIR compare the impact of the proposed development to alternatives. An alternative which complies with best practices for building separation in a WUI was not evaluated. The entire topic of proposed alternatives fails to address a range of important issues.

The DEIR states the following on page 20-4:

> "*Reduced Unit Count Alternative*
>
> As detailed in the previous chapters, the Project would not result in significant impacts dependent on the number of units (such as transportation impacts or operational emissions). The level of the construction-related impacts depends mostly on the area of the site to be disturbed and amount of grading. Because the proposed Project is already clustered on the generally flat portion of the site, the un-developed portion of the site would be subject to vegetation management disturbances to manage wildfire risk, and the unit count is not necessarily tied to site disturbance as larger lots could be allowed, a reduction in unit count would not be tied to a reduction in construction-related impacts. Additionally, a reduced unit count would reduce the Town's ability to meet its share of the Regional Housing Need. Alternatives B and C will present discussion of development of a different or additional portion of the site. Therefore, because a reduced unit count would not be tied to a reduction in significant impacts, such an alternative was determined not to meaningfully contribute to the analysis in this EIR and a reduced unit count alternative was rejected from further consideration.
>
> "*Larger Setbacks between Buildings*
>
> "The National Fire Protection Association (NFPA) is a global self-funded nonprofit organization, with a stated purpose to eliminating death, injury, property and economic loss due to fire, electrical and related hazards. While not a regulation or requirement for Project's in Portola Valley, NFPA issues codes and standards that can be used by those establishing criteria for building, processing, design, service, and installation around the world. One of these standards (1140), recommends a 30 foot separation between buildings and an alternative conforming to this informational standard was considered.
>
> "As discussed in Chapter 18: Wildfire and Appendix H, the Project as proposed would result in a reduction of wildfire hazard and risk at the site and would implement additional measures to further reduce the potential for ignitions due to human activity. Because the clustering of development along Alpine Road with surrounding defensible space separating the development from wooded slopes is identified as a component contributing to reduced wildfire risk at this site, consideration of an expanded development with larger spaces between units would a) result in a larger development footprint closer to wooded slopes; b) not serve to substantially reduce potential wildfire impacts; and c) not achieve project objectives. Therefore, an alternative with larger setbacks between buildings was rejected from further consideration."

In reaching the decision to not examine larger setbacks between buildings, the DEIR asserts that there would be no safety benefit to such larger setbacks. This analysis

- ignores the important and well understood safety benefits of increased building separation — knowledge that has led to a consensus among Cal Fire, NFPA, NIST, and IIBHS that structures on adjacent parcels in wildland areas should be separated by at least 50-60';

- uses a limitation of its model — treatment of structural and other non-natural fuels as unburnable — as evidence that the development would not be vulnerable to ignition by wildfire or human activity;

- ignores the conclusion of NIST, Cal Fire, and IIBHS that hardening with non-combustible sheathing is not sufficient mitigation for reduced structure separation (< 25'), and therefore certainly would not provide adequate protection for the separation distances of the proposed development (9-10'); and,

- ignores the conclusion of NIST, Cal Fire, and IIBHS that with reduced structure separation (<25') if one building burns, structure-to-structure ignition is very likely to be unstoppable, even with nonconbustible sheathing, so that the "risk of entire community loss is very high due to structure-to-structure fire spread."

The DEIR simply assumes, without evidence and without acknowledging contrary conclusions by Cal Fire, NFPA, NIST, and IIBHS, that there is no cost to public safety in significantly violating best practices for wildland areas as defined by these fire safety authorities.

In order to assess the impact of the proposed project on public safety, the increase risk both to the occupants of the new development and the surrounding community that is imposed by the design decisions of the developer must be acknowledged and quantified.

In order to conduct this analysis, an alternative site plan that complies with best practices must be analyzed for comparison.

According to Cal Fire regulations for VHFHSZs in LRAs, this alternative would have 30' setbacks from the property line.

According to NFPA 1140, this alternative have buildings separated by at least 30'.

According to NIST, Cal Fire, and IIBHS, buildings would be separated by at least 50'.

If such separation would unduly extend the site into steep terrain, fewer structures should be used. The fact that fewer structures would make it more challenging for the Town to achieve its Regional Housing Needs Allocation goals is not a valid reason to avoid analysis of an alternative plan that *does* comply with defined best practices.

The impact on public safety of such an alternative site plan must be evaluated and compared to the proposed development plan.

30. CEQA requires that the EIR compare the impact of the proposed development to alternatives. An alternative which complies with best practices for risk mitigation of inadequate building separation was not evaluated.

As noted above, fire safety authorities uniformly call for significant building separation in wildland areas.

When recommended building separation distances are not satisfied, mitigation measures should be used. Since building openings — windows and doors — represent an extreme vulnerability and susceptibility to ignition by radiant heat, such openings should be avoided on the sides of the structure that face closely spaced buildings.

As discussed in #9, above, the development proposal ignores this mitigation measure. The development proposal calls for multiple windows and doors on the sides of houses that face other large, parallel structures only 9-10’ away.

The EIR must acknowledge and characterize the extreme hazard that these openings represent in such closely spaced structures.

The EIR must examine an alternative plan in which these openings would be removed from the building sides that face adjacent structures, and compare such a plan to the proposed design in order to characterize the increased risk to both occupants of the new development and members of the surrounding community that the proposed design decisions represent relative to an alternative in which, consistent with defined best practices, openings are avoided on sides that face adjacent, closely spaced buildings.

Thank you,

Bob Turcott

From: Taylor, Loverine P [email address redacted]
Sent: Friday, May 13, 2022 10:35 AM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Response to Stanford DEIR

For your consideration.

[a shorter version of the attachment also sent to TownCenter@portolavalley.net on Thursday, May 12, 2022 4:13 PM and planning@portolavalley.net on Thursday, May 12, 2022 7:06 PM with the following message]

Thank you for the opportunity to respond. See Attached.

From: Loverine Taylor, 35 Naranja Way, Portola Valley CA, 94028. Resident since 1974

My concerns are that the proposed numbers for added vehicle traffic during an emergency evacuation are underestimated in the DEIR.

From the DEIR: The proposed development adds 39 units and provides 89 parking spaces. In the Emergency Response and Evacuation Section of the DEIR (pgs 18-14 and 18-15, especially Footnotes 8 and 9) a project-specific analysis was described that assumed "two vehicles "**per structure"** (emphasis mine). The conclusion in the DEIR was that "The project, with 39 residential units, would be expected to add 78 vehicles during evacuation." I think that number is a **serious underestimate** of the number of vehicles that would be attempting to turn left onto the Alpine Road Scenic Corridor in the event of an evacuation.
I think a more realistic metric for calculating the number of vehicles leaving the site would NOT be the number of vehicles per structure **but be the number drivers occupying the 104 bedrooms plus the assorted support/maintenance personnel that may be on site at the time.**

A more accurate assessment of the number of vehicles that the development would generate is not the number of units but the number of BEDROOMS. A home with 4 bedrooms had the potential to accommodate more drivers than a studio apartment.
I calculate the number of bedrooms as follows:

# Single Famiiy Units	#BR	Total BR
13	3	39
8	4	32
6 (Duets)	3	18

Multifamily Units: (three-4unit buildings each includes 2 studios, one-1 BR unit and one-2 BR units = total of 5 BR each. Total BRs = 15.

Total BRs for development = 104.

Leaving out the studio unit BRs (6) and assuming that at least one of the BR's in the remaining units accommodates 2 drivers, generates **196 vehicles.** The additional BRs could generate additional drivers, e.g., teenage drivers, adult children, multi-generational occupants could drive the vehicle estimate well into the mid-200's.

Moreover, nowhere in the DEIR did I note that additional vehicle traffic would be generated by the service and maintenance personnel that the development would generate such as gardeners, house keepers, tutors, food/merchandise delivery trucks, etc.

One only has to try and turn left onto Alpine Rd. from Westridge around 8 am or 4 pm on weekdays to be convinced that the area has the potential to become blocked by added truck and vehicle traffic.

In an emergency evacuation situation, the number of vehicles trying to exit the development site will be more than the DEIR's projection of 78!

I think there is a need for a more realistic calculation of the number of vehicles this site will generate. And then another Project-Specific Analysis needs to be done to determine the impact of the added vehicles on the Alpinr Road Corridor in an Emergency Response Situation.

Thank you for the opportunity to present this view.

From: Gene Chaput [redacted]]
Sent: Friday, May 13, 2022 1:24 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Stanford Wedge Draft EIR

To the PV Planning Commission and others involved in the Stanford Wedge draft EIR -

Completely agree and second Bob Turcott's comments and submission re the Stanford Wedge draft EIR. Please add my total concurrence to his conclusions and recommendations. His thoughtful observations are well stated and complete.

Susan and Gene Chaput
358 Alamos Road, PV 94028

From: Judith Murphy [redacted]]
Sent: Friday, May 13, 2022 1:30 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: comment on DEIR for Wedge

Chapter 4 - Aesthetics: *"In general, a project would be considered to have a significant aesthetic impact if it would result in substantial*
negative changes to visual resources considered to have aesthetic value. Such changes include visible alteration of significant landforms, visual clutter or disorder, or substantial disruption of the surrounding visual context, especially if such changes were to have more than temporary duration."

Replacement of our current open woodland (occupied by only a few horses and fences) with 39 two story housing units easily visible from the road clearly represents a substantial negative change in the esthetic. The required scenic corridor setback is some help, but insufficient. In our near future, because of extreme concerns about fire and evacuation, Alpine Road may soon become 3 or 4 lanes. Then this project will no longer have its scenic corridor setback and there will be a tighter squeezing of the trail between housing and traffic.

I hope the Town will have the foresight to require that the entire project be moved 50 feet back further from Alpine Road. This will require only a bit more grading, but will substantially mitigate the negative visual impact of the development now and in the future.

Respectfully,

Judith Murphy
8 Portola Green Circle

May 10,2022

Comments re DEIR, proposed Stanford Wedge Housing Project development

We wish to add two comments regarding this DEIR, both related to the Hexagon Transportation Analysis

(1) PARKING – INADEQUATE

The DEIR fails to adequately assess the impact of the parking needs of a tightly packed community of 39 residences. In particular, it fails to account for the visual impact of off-street parking along Alpine Road, and the safety impact of such parking in light of the established heavy vehicle and bicycle use along this main artery in and out of Portola Valley.

This project proposes a total of 89 parking spaces for 39 units, in an area where public transportation is almost nonexistent. At two vehicles per unit, 78 spaces would be required for these proposed units, and at 2.5 vehicles per unit, 97 spaces would be required, NOT including spaces for construction, repair, and support vehicles, and vehicles which guests and visitors would require to access/visit the property.

The Hexagon analysis recognizes the problem of guest parking and suggests a specific designation of 8 of these spaces as designated guest spots, with the HOA to referee whether these spots are actually occupied by guests.

There is also specific reference to "on-street parking " along Alpine Road, now permissible on the east side, with those parking there and wishing to access the property having to brave an on -foot crossing of Alpine Road. The incompatibility of such off-street parking with the Alpine Road Scenic Corridor designation is mentioned only in passing.

The Parking section of the Transportation Analysis ends with a less-than emphatic conclusion that
"parking demand is expected to be accommodated within the site"
which it bases not on analysis, but solely on the fact that there are more parking spaces proposed for the project than the bare minimum required by the bonus density provisions.

As MITIGATION for insufficient parking, the developer should be required to add additional and "overflow" parking behind the development.

(2) EFFECT OF DRIVEWAY REQUIREMENTS ON 75' BUFFER VEGETATION IN SCENIC CORRIDOR – INCOMPATIBILITY WITH PV GENERAL PLAN

The DEIR acknowledges the Alpine Road Scenic Corridor , as defined in the General Plan, but does not provide adequate analysis to demonstrate that the impact of this proposed development is "not significant". It is indeed significant.

This high-density development will impact not just the Scenic Corridor, but it will be placed entirely within the Primary Vista Corridor. The DEIR does not adequately analyze the compatibility of such a high-density development with the " linear park" enshrined in the General Plan. The DEIR simply ignores and brushes off rather than addresses this incompatibility.

This project lies in the Alpine Road Scenic Vista Corridor, and the objectives enumerated in the General Plan for this corridor include 3312. "trees and natural growth should be preserved and increased". A screening buffer zone 75' wide along Alpine Road is proposed in order to try and screen the development and continue the adjacent line of natural vegetation. The "Sight Distance at Projected Driveways " requirement, however, will preclude the screening effect of this zone. A sightline of 350' in each direction is required at each of the two driveways, and this will be accomplished by "low level landscaping" at the entrances, and planting "street trees" with "high canopies". The report emphasizes the proposed open feel for the safety of pedestrians and riders along Alpine Road.
The lack of intermediate height trees and vegetation will allow this high density project to be open and fully visible to anyone driving by on Alpine Road, an effect referred to in the General Plan as undesirable .

The DEIR blithely states (13.18) the development is " consistent with General Plan guidelines related to development along the Alpine Road Scenic Corridor Including Objectives 1-8 " . We submit that it is NOT consistent with sections 2 and 3 (p.13.14).

One can visualize cars parked on Alpine Road across from the densely packed houses, "no parking" signs in red all along the property frontage, and full view of all structures from the street – NOT a scenic vista.

As minimal MITIGATION, off-street parking on Alpine Road for this project must be avoided (per provisions in the General Plan) and screening landscaping in the 75 foot buffer strip along Alpine Road should be dense between , and on either side of , the two driveways, and include many intermediate height shrubs and trees.
The "linear park" along Alpine Road as called for in the General Plan must be maintained.

Respectfully submitted,

Robert and Mary Jack
938 Westridge Drive
Portola Valley, CA 94028

From: Bob Turcott [redacted]]
Sent: Friday, May 13, 2022 4:25 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Comments for draft EIR - Addendum

Hello,

Please add the attached addendum to the comments I submitted yesterday.

thanks,
Bob Turcott

Bob Turcott
60 Pine Ridge Way
Portola Valley, CA 94028
[email address redacted]

May 13, 2022

Laura Russell, Planning Director
Town of Portola Valley, Planning Department
765 Portola Road
Portola Valley, CA 94028
Stanford Wedge Housing
3530 Alpine Road

Re: Comments on Draft Environmental Impact Report, Stanford Wedge Housing, 3530 Alpine Road

Dear Planning Director Russell,

Please accept this addendum to the 30-item comment letter I submitted on May 12, 2022.

31. The DEIR fails to adequately disclose the methodology by which analysis was performed.

In order for the reader to make informed comments about the analysis that was performed, the methodology and input data must be disclosed to a sufficient level of detail that the reader can independently reproduce the results that are presented in the DEIR.

1. Computational modeling of fire behavior and growth: All input data and a detailed description of the workflow must be provided.

2. Wildfire Hazard: The precise formula by which the various modeled outputs of flame length, fireline intensity and fire type are integrated and reduced to a common categorization of “wildfire hazard” must be disclosed.

3. Ignition Potential: A detailed description of the algorithm by which the input layers are combined and rescaled must be provided. Is a linear combination used? How was rescaling conducted? What thresholds were used to define the various categories after rescaling?

4. Simulated fires: The precise location and heat release of each ignition source for each scenario modeled for the assessment.

5. Missing Table: The table referenced in the second paragraph of page 2 of Appendix J. Apparently the table was omitted in error.

Thank you,

Bob Turcott

From: Mary Page Hufty [redacted]
Sent: Friday, May 13, 2022 4:28 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Public Comment on Stanford DEIR

Mary Page Hufty MD
257 Mapache Dr
Portola Valley, Ca 94028
[redacted] home
[redacted] cell
[redacted]

Comments on Draft Environmental Impact Report (DEIR) for Stanford's Faculty Housing Project

Dear Ms. Russell:

Chapter 7

The DEIR fails to adequately recognize or explore the cumulative impact on the flora and fauna of the Wedge, including the presence of denning mountain lions and the existence of a clear Wildlife corridor connecting Jasper Ridge Biological preserve through Westridge to the Wedge to the Felt Lake/ Arastradero green spaces. (for more information: The Last Wild Place)

History:

When Leland Stanford first acquired the Wedge in 1887, the property looked much as it does today, a 74.97 acre parcel, purchased simultaneously with the Felt Lake Tract, sitting directly across the San Francisquito Creek from the Wedge.

Ever since 1887 the Wedge has remained a respected sanctuary for the flora and fauna that inhabit it. In 1919 the Board of Trustees of Stanford first worked on legislation to create the first California State Game Refuge 3-G, ultimately taking its case to the California Supreme Court. In 1941, 127 signs were posted, and a California Department of Fish and Game warden was assigned, indicating and defending the animal sanctuary as a protected refuge. At least 5 of these signs existed along the border of the Wedge and one still remains below Minoca Drive! Recent photo:

The ecological role of the mountain lion, our top predator, is to maintain a balance of populations of rodents, deer, and coyotes; the negative effect of removing them from an environment, creates an event known as a "trophic cascade," which creates overgrazing and environmental damage due to over proliferation of prey species.

A single mountain lion provides that service to as many as 17,000 private properties. They do their job quietly and without notice. If we are respectful, aware, and protect our domesticated animals, we can coexist.

Mountain lions are recognized by the surrounding community to den and raise young on the Wedge. Many videos and photos show their pattern of movement through our neighborhoods and the corridors they use to make connections with other breeding lions. Over 100 different sightings have been collected including groups of lions (example: Figure A) and fighting males in the near environs of the Wedge. In addition, a plaster-of-Paris print of a mountain lion kit was taken from the edge of the Wedge within the last several years.

<u>Impact:</u>
In stark contrast with this unbroken respect for animal and habitat protection, the DEIR attempts to rationalize the destruction of this protected sanctuary with little or no assessment of its adverse impact on the dwindling population of the Central Coastal California Mountain Lion, an evolutionarily significant group with a genetic bottleneck threatening its existence. The Wedge serves as a connector between Jasper Ridge, Felt Lake / Arastradero and the Crystal Springs Reservoir. Every planning effort possible must be made to mitigate against another bottleneck limiting genetic diversity.

I strongly support two functionally adequate corridors for wildlife be dedicated and left open in perpetuity on either side of any Wedge development. Safe passage across Alpine Road for wildlife at both ends of the Alpine frontage are critical for the safe coexistence of man and wildlife.

- Adequate responses would be to allow/maintain / deed a connection between Westridge's Alpine Canyon Trail to the Alpine Trail and Scenic Corridor with a prescribed and supported animal crossing at both ends of the Wedge border with Alpine

- Options might also include a bridge, tunnel, or marked crossing.

In Summary:

1. California Fish and Wildlife is in the process of determining if the California Mountain Lion living in and around Portola Valley and the Peninsula is a candidate species for protection. (Figure B)

2. The Wedge provides important habitat for the Mountain Lion's survival in this area because of its role in connectivity, sandstone cliffs, water sources, and deep canyons with adequate game.

3. There is substantial evidence demonstrating that mountain lion hunt, travel and den on the Wedge.

4. The Wedge provides critical shelter for lions traveling and hunting within the SF water preserve, Jasper Ridge and Arastradero Preserve.

5. Development of the Wedge would interdict and jeopardize the passage of lions from Crystal Springs and Jasper Ridge to Arastradero preserve, further limiting and threatening their ability to mate with more distant lions and promote genetic diversity.

The DEIR fails to explore critically needed protections for the potentially listed species on the Wedge. As usual there is no weight behind the voice of Nature until it is too late.

Please respond with a complete analysis of the true presence including past, present and future of the species currently being considered of concern for extinction, due to genetic depletion.

Sincerely,
Mary Page Hufty

Figure A: Video of Three Mountain Lions on Shady Trail PV 9/2020
(Still here; Video here)

Figure B:
Petition to List Mountain Lion as Threatened or Endangered
(link to document)

BEFORE THE CALIFORNIA FISH AND GAME COMMISSION

A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA)

A Mountain Lion in the Verdugo Mountains with Glendale and Los Angeles in the background. Photo: NPS

Center for Biological Diversity and the Mountain Lion Foundation
June 25, 2019

From: Janet Davis [redacted]d]
Sent: Friday, May 13, 2022 6:16 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Fw: Addendum to Objection to Wedge DEIR

----- Forwarded Message -----
From: Janet Davis [email address redacted]
To: Laura Russell <lrussell@portolavalley.net>; stanforddeir@portolavalley.net <stanforddeir@portolavalley.net>
Cc: Justin Mates <jmates@smcgov.org>; sophie Mintier <smintier@smcgov.org>; mross@co.sanmateo.ca.us <mross@co.sanmateo.ca.us>; Mike Callagy <mcallagy@smcgov.org>; Don A Horsley <dhorsley@smcgov.org>
Sent: Friday, May 13, 2022, 02:56:04 PM PDT
Subject: Addendum to Objection to Wedge DEIR

Biological Section:

I had hoped that the **Committee for Green Foothills** replied to this highly flawed DEIR, but have not yet seen any response from them. One species that the authors discounted was the bat. However, there is a recent scientific article whose author is a **Stanford** scientist working on the nearby **Jasper Ridge reserve** in Portola Valley who explains their importance to the community, to agriculture and the environment, and who stresses the need for preserving their habitat. https://news.stanford.edu/news/2001/march14/bats-37.html

Nursing mother bats can eat 4500 insects such as mosquitos and other harmful insects in one night. Mosquitos spread Lyme Disease, West Nile Virus, and Heart worm. Bats reduce this risk without the deleterious effect of toxic substances or expense of fumigating. Ms Evelyn explains what bats need to survive. What Stanford plans to do would wipe out most of this beneficial population.

I have no scientific credentials but dispute many of the findings of the preparers of the Biological section of the DEIR from my own experience. You absolutely cannot judge what does or does not live in an area based on a few visits. I have lived in the same place since the 60s but have only rarely spotted e.g. garter snakes, Western Pond Turtles and tarantulas. We have been visited by a bald eagle, a king snake, a mountain lion, wild bees, numerous birds, butterflies, lizards, salamanders, rabbits and ***many*** other animals. I only recently, after working in the garden most days for nearly 60 years, discovered several Dusky Footed Wood Rat nests, so I dispute the purported findings in the DEIR.

Fallen oaks provide much needed cover and habitat for many animals and are not as flammable as grasses. Some should be left in place to decompose.

The DEIR states that the fiddleneck flower is rarely seen on the Wedge. However a nearby resident photographed one in flower and several dead ones right there, which goes to show that the author of that section of the DEIR was unobservant or negligent to say the least.

The dense collection of steel roofs proposed could also have a negative effect on wildlife in addition to humans. See the scanned 1997 photos of the north side of the structure next to our property that replaced illegally removed oak trees. The 25 year old photos do not do justice to the blinding effect at certain times of the day which would be a severe annoyance to neighbors, birds and perhaps even some aircraft.


11 17 '97

Even if the evacuation routes proposed actually existed, they all end up at Alpine or Sand Hill Road, both of which are beyond saturation point, and in the event of a catastrophe would be full of other residents from W. Menlo Park, Ladera and Stanford Weekend Acres. Given that Portola Valley is "horse country" there is no plan on how to evacuate the many horses in the vicinity of the Wedge. Several years ago there was a major fire along Arastradero that killed several horses. There was another huge fire at the Dish decades ago that threatened everybody in the vicinity and blackened large areas of that property. Earlier this year an eminent Stanford professor died on the golf course: perhaps because the emergency vehicles got stuck in the mud and could not access the man via Rural Lane. Emergency access is critical for survival in this area, and the Wedge development would ***increase*** this peril for everybody and it should not be built.

The DEIR document was a deceptive, sloppily produced document with several typos, the most egregious of which was the inaccurate address to which responses should be sent. This resulted in my initial objection being sent back to my spam file. Given this major error the deadline for responses should be extended. There is nothing in the Wedge proposal that has any benefit to Portola Valley: rather it would be a danger to those residents, and to surrounding neighborhoods.

Stanford has many sites **on campus** for housing and Portola Valley needs to find other ways to fulfill its Housing Element obligations and that should not be as a dense development that violates so many of the Portola Valley ordinances and the General Plan. There is a basic flaw in the ABAG requirements in that while one jurisdiction such as Menlo Park, can build large commercial structures requiring many employees, much of the responsibility for housing them falls on rural residential communities such as

Portola Valley. The bottom line is why is the Portola Town Council Is even considering the proposal when there is absolutely nothing that benefits its citizens and it appears that a substantial number of residents oppose the project on clear scientific grounds. Even San Mateo County is raising objections, and I hope that Woodside and Santa Clara County also find many faults with the project that could negatively impact their jurisdictions.

The clear response is **NO PROJECT**

From: Rita Comes [redacted]]
Sent: Friday, May 13, 2022 6:29 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Rita Comes Whitney Comments re Stanford Wedge DEIR

Please find attached my comments regarding the Stanford DEIR. I am sending this document at 3:30pm on May 13th, 2022.

Rita Comes Whitney
Portola Valley Resident

Rita Comes Whitney

300 Westridge Drive

Portola Valley, CA 94028

Submitted 5/13/22

Please find my comments on the Stanford Wedge DEIR below.

I believe that this project should be reduced in size and moved over to make it safe for the future residents. All of t=my other comments on the document can be found below.

Rita Comes Whitney

Portola Valley

“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), as well as a picnic and play area and stormwater detention and bioretention treatment facilities. The approximately 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 through an enforceable covenant or other mechanism. “

Number of Units The Planning Commission in 2021 discuss the possibility of 43 units being built on the Stanford wedge property. Those 43 units would be associated with 2 of the multi housing units. This would bring the number of units proposed onto this property to 43 units it is unclear how these 43 units with the addition of these 43 units will affect the current planning of trails and fire safety on the property and surrounding neighborhood. This document fails to highlight the impact this publicly discussed issue.

“Within the approximately 68-acre open space hillside area, the Project would implement an ongoing Vegetation Management Plan (VMP) to reduce and manage wildfire risk on the property. As a part of these efforts, the Project proposes a permanent fire access road, which would be used for ongoing vegetation management and fire access. A looped public trail is also proposed on this open space hillside, connecting to the existing Alpine Road Trail along the Project’s site’s frontage. “

HOA and Fire Risk What does Stanford have in place for on site management to ensure that residents won't have piles of items or abandoned cars that will increase the fire danger on the property and to the community. Will there be an HOA or something similar in place? Can you give us an example of what will be in place? Also, what practices will be in place for fire mitigation on the site during the build and during post build.

As detailed in the following chapters of this EIR, all potentially significant impacts of the Project would be reduced to less than significant levels through implementation of the identified mitigation measures. All other impacts would be less than significant without the need for mitigation (also included in Table 2.1).

- The chapters do not adequately address “all” potentially significant impacts of the Project being reduced to less than significant levels.

The **“Larger Setback” Alternative** representing the same development as proposed, shifted a little farther to the south farther from concerned neighbors but into a less flat area requiring more disturbance of the hillside. The fire access road and trails would be developed the same as under the proposed Project and a vegetation management plan would be implemented.

- Since the whole project will disturb and disrupt the site – the above statement is inadequate in addressing this issue that could possibly appease the neighbors and address some of the issues that the community is asking for

“Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations. “

48 hr response time - a 48 hour response time is inadequate for an emergency situation. This time span for response is unacceptable. The information that people will need to call in case of emergency should not just be located on the site which would then cause more of a dangerous situation for the person trying to make an alert about the situation.

Animals - Animals will not be protected – How can the turtles or other animals be protected? The document says that the worker would stop what they are doing and would move the animal to a safe location but this procedure as written is inadequate for the safety and continued diversity of the animals, some endangered, that are in the report.

- https://www.biologicaldiversity.org/species/reptiles/western_pond_turtles/

Project Description – The project as written in the DEIR suggests that approvals have been approved and that is misleading. It does not state which approvals have been approved and the plan should be presented on that basis – not by what concessions the project may get.

Although Chapter 3 mentions that ADUs will not be built due to a private road, Stanford is not saying that those units will never be built and Stanford sent a letter to the Portola Valley Trails Committee in 2021 saying that I, Rita Comes Whitney, was wrong in that Laura Russell, Planning Commissioner of Portola Valley, stated that that Stanford may build four ADUs on the project. Stanford fails to state in writing that they will never allow ADUs to be built on the property – their research is misleading and incomplete.

Aesthetics. The DEIR document shows parts of the Portola Valley General Plan but it also states "The following General Plan includes the following Major Community Goals that could be related to the aesthetics of the Project site." The document does not say that it will follow the aesthetics of the General Plan and based on drawings and comments from residents that spoke to Stanford during the time of the Staging Poles, the project inadequately follows the Portola Valley General Plan. Stating the phrase "..could be related to the General Plan" is not following the General Plan and is confusing.

Other land

"Other land is land not included in any other mapping category. Common examples include low density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as other land. "

Although DEIR is calling this land zoned as "residential Estate" based on the above description in the DEIR itself, noted above, the analysis of the zoning status is incomplete and should be rereviewed for being rezoned for "Other Land," if that is a category. I also disagree about the statement that this project would have no impact on agricultural resources – this land currently houses several horses, unique plants, animals and a lion's den – which has been verified by observers.

Mineral Resources

"Mineral resources in the region include gold, silver, lead, mercury, magnesium, and aggregate (traprock), but there are no known mineral resources at the Project site close enough as to cause interference. [3] The Project site has not been delineated as a locally important mineral recovery site on the City of Portola Valley General Plan, on any

specific plan, or on any other land use plan. Therefore, the proposed Project would have ***no impact*** on mineral resources. “

There is proof that the wedge site has been used as a quarry in the past – The DEIR is incorrect in saying that there is “NO IMPACT” on mineral resources. This issue needs to be explored further – I believe that it was Stanford that was using this site as a quarry and an analysis should be done for perspective minerals, especially with select mineral shortages in the world.

Air Quality Although the DEIR alludes to minimum noise and impact on air quality during the building of the proposed project it fails to figure out the actual impact of the area during the construction phase. The document mentions that the trucks will be rinsed twice a day to reduce the dust, but where will that run off go? It also mentions a street sweeper truck every day; the project is in an area that has most of the cars in the area driving through this construction zone – will the project also pay for street sweeping for the surrounding streets where the debris will be dragged to people’s homes via their cars. Will Stanford also consult with the neighboring homes on a regular basis to see how the project is affecting their air quality and the about of construction dust at their homes. What does Stanford propose to do to keep the streams and plants on the property for being choked up from such a large project within the concentrated vegetation reptilian area.

Biological Resources Stanford has been researching the animals and plants in Portola Valley for many years. It is unacceptable that Stanford would not use research that was created by Stanford to support information about the animals and plants on the property. The report in this section is misleading since there are many inconsistencies. There are active nests on the property, a lion den and several plants that Stanford deemed rare for the proposed building site are in such abundance that animals use their discarded parts for homes. The Stanford Jasper Ridge facility does research on Mountain lion habitat and the plant species in Portola Valley – it is unacceptable that this report is contrary to the vast research that Stanford has not only conducted in the area but their students have defended their PhDs on the basis of this research.

The DEIR document in this section mentions a few very contrary statements:

- Animals are not in this area although there is proof about bats, lions, woodrats turtles etc
- Nests are protected and there are many nests on the property, some nests are on the ground – turkeys etc
- There are several plants that are mentioned in the document as being rarely noticed at the proposed building site- this is untrue and photos asre attached.

https://news.stanford.edu/news/2001/march14/bats-37.html

How to reach https://www.coastwildlife.ca/our-story 604-989-1007

page 7-5 of the DEIR

“Bats and other non-game mammals are protected by California Fish and Game Code Section 4150, which states that all non-game mammals or parts thereof may not be taken or possessed except as provided otherwise in the code or in accordance with regulations adopted by the commission. Activities resulting in mortality of non-game mammals (e.g., destruction of an occupied nonbreeding bat roost, resulting in the death of bats), or disturbance that causes the loss of a maternity colony of bats (resulting in the death of young), may be considered “take” by the CDFW.”

7-13

“The structures within the rural residential habitat provide nesting sites for several bird species including barn swallows (Hirundo rustica), black phoebes (Sayornis nigricans), Bewick’s wrens, and mourning doves (Zenaida macroura). No suitable roosting habitat for bat maternity colonies or large bat roosts was observed in the structures, but individual bats such as Yuma myotis and California myotis may occasionally day-roost in crevices observed on the structures. Scattered oak trees in the rural residential area provide habitat for small numbers of wildlife species described in Woodlands sections above. “

two nests with eggs located at the Stanford Wedge May 2022

Old sign on tree at Wedge Property warning people to walk carefully so that they did not hurt the nests on the ground

Plants

7-15

“Based on an assessment of site conditions, it was determined that the Residential Development Area did not provide suitable habitat for Michael’s rein orchid (Piperia michaelii) or Brewer’s calandrinia (Calandrinia breweri). The remaining 8 species were further evaluated based on a focused survey of the Residential Development Area during the flowering period. These plants include: bent-flowered fiddleneck (Amsinckia lunaris), western leatherwood (Dirca occidentalis), woodland woollythreads (Monolopia gracilens), Santa Cruz clover (Trifolium buckwestiorum), California androsace (Androsace elongata ssp. acuta), Oakland star-tulip (Calochortus umbellatus), bristly leptosiphon (Leptosiphon acicularis), and California bottle-brush grass (Elymus californicus). No special status plant species were observed in the Residential Development Area during the focused survey. Nevertheless, these 10 species have some potential to occur on the remainder of the approximately 75.4-acre site, including the entirety of the areas that would be impacted by vegetation management activities. In addition, all 10 species could potentially occur within the area where the fire access road and hiking/equestrian trails would be constructed. “

Dried fiddleneck plants

Fiddle neck flower May 2022 @ Wedge

Fiddle neck flower May 2022 @ Wedge

Fiddle neck flower May 2022 @ Wedge

Chapter 8: Cultural and Tribal Cultural Resources

Cultural and Tribal Resources Studies are said to have been done and contacts were attempted with the tribal communities but I do not hear the voices of any Native persons that examined the site and at this point, Stanford due to its past with the people's remains at this site and others – should not be in control of the monitoring of future artifacts of the native peoples that were on the land a the

proposed site location. A Native American representative should be onsite at all times when activity is happening on the site. A recent study of the Stone Circle was performed, but once again I did not see any engagement of Native people nor did it seem that they were able to locate the stone circle during that study but it is noted as if it had been found and examined. Have all the tribes been involved in the tribal consultation - were the offices sent certified letters or was there "phone calls" for each of the groups, Chairman Lopez from the Amah Mutson tribe did not show up in the list of persons contacted.

Geology and Soils – I am not a geologist but have been following the information concerning the Hermit Fault and although I heard the rational of why it was removed at the 5/11/22 Geology Safety Meeting – Since these are the same people that are approving the project that are examining the site – there should be a neutral party re examining the potential for the hermit fault at this proposed site. It will be devastating if anything were to happen to the residents that might love to that location and the "Hermit Fault" ruptured.

Greenhouse Gases Stanford should find a way to make the proposed build more Climate friendly. The proposed materials and plan suggest that they "may" follow certain practices but that phrase fails to ensure that all Climate best practices guidelines are being accomplished in the building and planning of this proposed project.

Hazards and Hazardous Materials Portola Valley has an interesting history and some properties in the area have been found to have barrels of materials underground on the property that have been left over from past uses of the property. Has the possibility of underground barrels been explored and is there a process for alerting the town and disposing these types of items safely off the property?

Hydrology and Water Quality There is just not enough water in California to go around. The proposed project will increase the number of limited resources that are being pulled through an aging infrastructure. The Hydrology section does not adequately address a real plan for how to move forward with the building of this project in these high drought conditions. Drought.Gov gives a very bleak outlook for California https://www.drought.gov/states/california and this needs to be taken into account when planning landscaping, possibly restricting the number of homes and water restrictions on the property. With the increased volume of residents per acre using water at this location – the document does not adequately address what efforts and concessions will need to be made.

Land Use and Planning

13-1

"The Town of Portola Valley General Plan (updated in 2015) designates the Project site as Conservation-Residential. Conservation-Residential includes existing developed

areas where net residential land area per housing unit averages from 2 to 4 acres and relatively accessible undeveloped lands with few to considerable potential geologic instabilities. Conservation-Residential is to be developed with a slope-intensity standard whereby the net residential land area per housing unit increases from 2 acres on level to 9 acres on slopes of 50 percent or greater. The Conservation- Residential intensity is assigned to less steep land close to community and circulation facilities and existing development. “

This project is not following the General plan by clustering the homes and being given exception to the rules of the General Plan. The homes that have been built in this area meet the code of the General plan and this project does not and fails to comply with the General Plan and the Housing in the area of the proposed build.

Noise and Vibration The section does not adequately address the Noise and vibration this project will produce to the surrounding neighborhood during the building.

Population

Affiliate Housing. In past meetings, Stanford stated that it “may” open some of the proposed housing for teachers and other Portola Valley residents/workers but the document states that the housing is only open to Stanford Affiliates- Faculty, Staff, and students. – this is unacceptable. What is the upside for the Portola Valley Community when the intention was increased available housing in Portola Valley?

Infrastructure. This build as proposed, will be a huge drain on the already fragile infrastructure of Portola Valley. In the DEIR the document does not adequately discuss the enormity of this project on the Town’s fragile infrastructure, nor does it mention how it will impact the neighboring homes utilities.

Transportation. Although transportation is touched on in chapter 16 in chapter 15 the document mentions the addition of shuttle vans and possibly zipcars. Since there are so many residents in Portola Valley that work or shop at Stanford where will those people that are then commuting to Stanford park their own vehicles on the wedge property? Zipcars take a few parking spaces and shuttle vans tick parking spaces. There has been lots of talk about the Marguerite coming to patrol a valley or not coming to Portola Valley but if that were to happen in the future where would those cars park and it would cause more congestion on the Alpine corridor with people dropping others off at that location. Shuttle. The on-site parking for residents and for visitors is inadequate as it is currently planned. The increase of cars possibly not in those few designated parking spots will increase the fire danger for all of Portola Valley due to fire trucks not being able to access the roads because of being blocked by parked vehicles.

Transportation There doesn't need to be much to be said about this section because it fails to portray an accurate picture of the current or future Transportation situation in Portola Valley and needs to be redone.

- SamTrans has canceled bus service in Portola Valley, the buses that are noted in the DEIR will not exist as thought
  https://www.samtrans.com/?active_tab=route_explorer_tab
- Agenda -Portola Valley Town Council Meeting w SamTrans 5/12/21
- Video- Portola Valley Town Council Meeting w SamTrans 5/12/21
- SamTrans Virtual Community Meeting May 18, 2021
- Reserved parking places on the proposed site for commuters will overflow and cause hazards
- VMT calculation is flawed. The VMT information in the document seems to represent one person in the household going to Stanford Campus property next to the Hospital. This calculation does not consider anyone else in the household going to school, running errands, going to a job that is different than the Stanford near the Hospital location or anywhere else.
- Based on Table 6 in this section of the DEIR, wondering if this report was done during the pandemic, traffic will only deteriorate more and
- Does not properly address the impact for bikes, car and pedestrians during the possible construction of the proposed project

Utilities and Service Systems and Energy Portola Valley has seismic and aging infrastructure problems. This section of the document does not properly address how this possible build would move forward without the Town first upgrading infrastructure in the surrounding area of the project. Electricity, phones and sometimes waters are disrupted many times in the year without notice.

Water used for dust suppression is noted that it will not have an impact, but it will since it has no place to run off to except into the riparian stream where local animals are desperate for hydration. The DEIR document does not address how these animals will be able to access water during the construction.

Wildfire This section inadequately portrays that safety measures that have been laid out will minimize the chance of Wildfire at the proposed location based on the proposed build as is in the Stanford Wedge DEIR.

- Houses need to be built further apart per best practices
- Less homes built in the area would add to safety
- Video of the concentrated brush in 2020 at the Wedge Location
- Guidelines from the Fire Marshall in 2019 need to be followed

Other CEQA Considerations "Localized impacts such as aesthetics, emissions, noise, and transportation for these types of projects (including the Stanford Wedge Housing

Project) would not contribute to cumulative impacts more than about 1,000 feet away – much less the 1.5 to 2 miles to these cumulative projects. Therefore, there is no potential for additional significant cumulative localized impacts between these projects and the Stanford Wedge Housing Project. Implementation of the Project would not cumulatively impact the environment provided all policies, rules and regulations of all relevant governing bodies are adhered to, and the mitigation measures contained within this document are implemented. “

The above statement is ignoring the cumulative impact of ongoing projects that would be happening simultaneous in the community. This analysis is incomplete and needs to be reconsidered. When a tree is down on Los Trancos Road, the Town is almost immobilized and cannot adequately function to handle daily needs of getting to work and shopping, etc. This project will have a significant impact on Safety, Evacuation, Ease of Movement, Traffic, and other actions of everyday life in Portola Valley, especially since it is located at a critical juncture in our Town.

SELECTION OF ALTERNATIVES

Three alternatives to the Project are evaluated in this chapter. Each of the alternatives is located on the Project site.

1. No Project
2. Larger Setback (from Nearby Lots)
3. No Clustering

I feel that Alternative 2 is our only choice if this project moves forward. I would also like to see it with less structures and being built further away from each other for Safety concerns, aesthetics, retention of the scenic corridor and many other reasons. The project as it is currently being presented is inadequate and does not match the Town’s General Plan.

Rita Comes Whitney
Portola Valley Resident

From: Mary Page Hufty [email address redacted]
Sent: Friday, May 13, 2022 8:01 PM
To: stanfordeir <stanfordeir@portolavalley.net>; Laura Russell <lrussell@portolavalley.net>
Subject: More comments on the DEIR from Mary

Attachment available until Jun 12, 2022
Click to Download

sent with errors due to time Final DEIR comments.pdf
55.6 MB

Mary

A thing is right only when it tends to preserve the integrity, stability, and beauty of the community, and the community includes the soil, waters, fauna, and flora, as well as people. — Aldo Leopold

[Redline showing deletions and formatting changes was removed from the submittal for readability. Final submitted text is shown in the attachment.]

Additional Individual Comments on the Draft EIR for the Stanford Wedge Development
by Mary Hufty

Submitted 4:51 on Friday May 13, 2022

Dear Laura,

As time is fleeting and your deadline presses us to close our documents, I will quote a much more famous writer than I , Cicero " If I had more time I would have written you a shorter letter" and add, better organized and easier to read. I am not a DEIR expert, a writer, an anthropologist, or a fire expert. I can only reflect what I have learned from studying, loving and exploring this little bit of California Wilderness for 54 years. The natural and cultural gem that was called the Horshead Property and then the Stanford Wedge remains the heart of what is most loveable about the Peninsula. I still suspect that the indigenous language word "Hors" which I believe means Welcome might have been the reason for this property's original name. I would allow imagination to believe that it would have been the welcoming place to our peaceful and beautiful valley and that as indigenous people came back to the hills from the bay every spring, they felt the embrace of its cliffs and canyons as home as the animals and people of Portola Valley still do.

Below is all I have been able to get written .. There is much more.

Chapter 7
The DEIR fails to respect the precedent of adequate setbacks to allow animal corridors and preserve habitat as set out in the Portola Valley General Plan which is very clear as to the definition of rural character (Figure D).

The Alpine Canyon Creek and Trail has remained nameless and unrecognized by Stanford throughout the DEIR. This needs to be corrected and the development needs to be moved south and west sufficiently to provide a wildlife corridor. We could expect a wildlife over pass or underpass as the traffic along Alpine Road increases. The demarcation for wildlife safety is clearly at 280 and has been since its construction.

The Alpine Canyon Trail has been resisted and disparaged by Stanford and by residents on Cervantes who wish to maximize their real estate investment at the expense of the environment, neighborhood recreation and wildlife and Codes Covenants. The Westridge Architectural Supervising Committee continues to meet monthly and work tireless to enforce these CCNR's, following a commitment to public good, the environment, and the beauty of nature that is set forth by its founding architects in 1986? We stand by the easements that exist along the Canyon between Pine Crest and Westridge 1 and look forward to Stanford's contribution to the environment and the wilderness in your community by the recognition of the Wildlife Corridor and the historic and current trail with easements which could enhance your development. In order to make this a real asset the development must, in our opinion, concede to the "larger setback" option and we would recommend a 150-foot move from the north east border to provide

a corridor for wildlife with a well designated wildlife crossing sign with a panther on it at either end of the Wedge Alpine Road frontage.

The DEIR fails to amplify how this project fits with the Stanford University Conservation plan in which the Wedge is designated as part of the No Build Zone (Figure F) . Where is the need for mitigation of environmental damage and the loss of a major area designated as "No Build" recognized and how does this effect the rest of the University's conservation commitment? This should be fully covered in this DEIR These communities were planned over 50 years to be part of the Earth Day hope for healing our Ecosystems. Where in this DEIR is the legacy of Earth Day which was born in these hills recognized and celebrated ?

Chapter 9

The DEIR fails to recognize the community's ideals and character as outlined in the General Plan and in the historic planning process for the Alpine Scenic Corridor (fFigure C)

The DEIR fails to comment on the long-known fact that the Wedge is a dangerous place for development.Beside the fire risk of building at the mouth of a chimney (Figure J) since 1968 the Wedge has been recommended by our planners that it's highest use was as an open space. summary by Nancy Lunde, town Historian, on William Spangle and Associates plan for the Alpine Parkway. Even in the case of a freeway being put through the area it was considered by planners to be inadvisable to build even individual houses here, also note fault lines and existing trails on detail of map and information on sites 28 and 29.

The DEIR fails to Identify and consider the environmental assets and liabilities of the surrounding communities along the Alpine Canyon.

Orange outline represents approximate limits of grading for the Residential Development Area under the proposed Project Purple outline represents a shift of that footprint to the south such that residential lots are 100 feet from the northern property line. Source: modified from Project plan set

Although this alternative is clearly more acceptable it does not explore the trade off's with less market rate housing and less environmentally destructive and dangerous terracing.

1. Chapter 18 and Appendix J The DEIR fails to acknowledge or adequately mitigate the increased risk for fire brought into a community by ignition and electrification of wilderness.

Extensive conversations with the Woodside Fire Marshall were required for me to understand why buildings add so much to fire risk no matter how well built or hardened the buildings are. It was explained to me that walls reflect heat against each other when separation is inadequate or when walls are parallel. It was explained that electric storage batteries when they are ignited, burn for days and produce large amounts of toxic materials which require several firemen to be occupied at the site for days. It was explained to me that heat and flame go up

canyons like a chimney and the heat reaches tremendous levels. But I never really got how different this situation was going to be on the Wedge until, in frustration, I was told "Mary horses don't play with matches". The warnings of the Woodside Fire Department were ignored, avoided and suppressed until the process of this project was well under way and every effort had been made to change the position of the Fire Department. It is my feeling that these denials should have been completely explored in this DEIR. Apologies should be issued to all the professionals and amateurs that have been attempting to keep safety foremost in the minds of those intent on development in the WUI and that more than adequate measures be taken to assure that we are not having our risks compounded exponentially at every turn. These would include defensible space between single or multi-family buildings, angulation of walls, movement of the development away from the mouth of the Alpine Canyon, and a reduction of number of buildings at a minimum. A great deal of community anxiety has accompanied the obfuscation of risk and hazard with allegations of science on both sides and political pressure on the professionals that protect us when we should have had access to early projections of real fire risk and hazard to the whole community in the face of Climate Change which were given at the start of the permitting process.

2. The DEIR fails to mitigate adequately the environmental damage that the project will have and fails to plan for enhance of environmental assets or mitigate against the greatly underestimated damages that are planned.

3. Chapter 20 appendix D The DEIR fails to complete an adequate description and in-depth exploration of the "larger setback" option which might include a decrease in number of buildings and an increase in affordable housing that is equitable for its residents. What is the data behind the 100 foot option? Is the choice of a 100-foot set back on the "larger setback option" on the basis of particular species, light, or riparian habitat? Has a circumferential trail for the new residents been considered as indicated by the Portola Valley Trails General Plan Map of the area? Why not?

4. Chapter 8, Appendix E The DEIR fails to offer an option that increases the community's respect for the indigenous people who still survive among us. What does this project offer to the people who were displaced and bounty hunted from these lands? Does the DEIR offer them more than just taking their free time and limited assets to do the work of the DEIR? There is opportunity here to revive the culture assets that still exist on their land. A profound lack of curiosity is displayed for the archeology known or easily anticipated that still exists on this "culturally significant site". Affordable (or exchange for participation) housing should be considered for the people whose ancestors managed these lands in equilibrium for millenia while perhaps providing sustainable management with respect to their artifacts, the flora and fauna and fire risk management.

5. Chapter 8 The DEIR fails to show either curiosity or humility about the destruction by dynamite and by greed of native artifacts and agricultural practices. Chapter 8. Attached are photos of dynamite blast shafts cut through ceremonial mortars and the splitting of sandstone platforms at the base of traditional terraced gardens of curated edible and medicinal plants. Who blew up these rocks and when? No information is present and no investigation has been done in this EIR. Is it too brutal a point for consideration in "environmental impact reporting"? There are still existing artifacts of that blasting and transport as well as early 20th century settlement and industry. What is the history of that work? Why was it not fully explored and explained in the DEIR? Below are photographs of the mining operation and the dynamite shafts which tore the ceremonial platform apart.

6. The DEIR fails to amplify the importance of the San Francisquito Creek Watershed and the role that the 2 recognized seasonal streams on the Wedge have in contributing to downstream flood control, water purity and habitat and the regulations that control alterations in this critical mid Peninsular watershed. The input from the San Francisquito Joint Power Authority is critical here and the draft EIR should not proceed without it. The San Francisco Bay suffers from a lack of flood plains up stream and from a lack of siltation reaching the Bay. The advantages and disadvantages of increasing impermeable surfaces and run off along the alpine canyon watershed and in the shared flood plain of the Alpine Canyon Creek and San Francisquito Creek are not adequately explained in this document. (Figure
7. The DEIR fails to show a curiosity or respect for the Indian paths that lead up to traditional Jasper Ridge hunting grounds from water sources along Los Trancos Creek and the San Francisquito Creek and the vantage for communication between the dominant indigenous sites which surround the Wedge around the Bay from mount Uhmunum to Mount Diablo which are visible from many parts of the Wedge.
8. Indian paths which have gone unnoted include the Alpine Canyon Trail and the trails below Minoca. The Alpine Canyon Trail has most likely been in constant use for millenia and the DEIR continues to allege that the Alpine Canyon Trail, if it exists at all, has been abandoned. Twice yearly maintenance has been performed by Westridge and Portola Valley residents with photographic documentation for the last 30 years. Regular and safe passage has been made on foot and on horseback every year for more than 50 years of community memory.
9. The DEIR fails to show the lidar maps shown here that confirm- trails' deep indentation, the old cultural circle and the geography which connects the Wedge to the Peninsula's Globally Significant biological hot spot–the Jasper Ridge Biological Preserve which was a hunting and gathering area for the summer and fall foods of the bay area indigenous people. Refer to The Ohlone Way for beginners and for the more advanced, An American Genocide. The United States and the California Indian Catastrophe (USCIC) by
Benjamin Madley. The California Indian catastrophe fits the two-part legal definition set forth in the UN Genocide Convention, yet there is no evidence that lands of Stanford have been put aside to mitigate against the shocking legacy of lethal Civil War-era against the California Indians signed into legislation in part by Governor Stanford. Could this DEIR explore some of these mitigation opportunities? P316 of USCIC For example,

> On February 7, 1863 Stanford called out ten new companies of California Volunteers to to kill all male Indians in California. It was certainly not safe for Indians on Stanford's lands. In that setting would there be any reason to avoid blasting through ceremonial artifacts? Is it time for recognition of some of this destruction? The cavalier approach to the indigenous artifacts on the Wedge is astounding. Which of the local tribes would come forward to donate their time to help Stanford with its on-going destruction of their ancestoral lands?

The DEIR deeply disappoints those of us who were looking forward to a scholarly and thorough, even-handed assessment of this enormously valuable cultural and biologically rich acreage whose historic roots are so much deeper than even the depth of the current owners. At least, there needs to be a renewed and adequately supported outreach to the spokesmen for the tribes of the area without any possibility of further retribution.

Adequate response would include, an offer of mitigation to the indigenous people of the site in terms of affordable housing, rights of access to farm and gather native plants, rights to restore their lands and the rights to educate their children on the process of cultural annihilation and retribution. A celebration of a brighter future in which we live lighter and more harmoniously on the Peninsula is possible and overlooked. These are viable and unexplored possibilities with precedence and momentum in today's culture of sustainability.

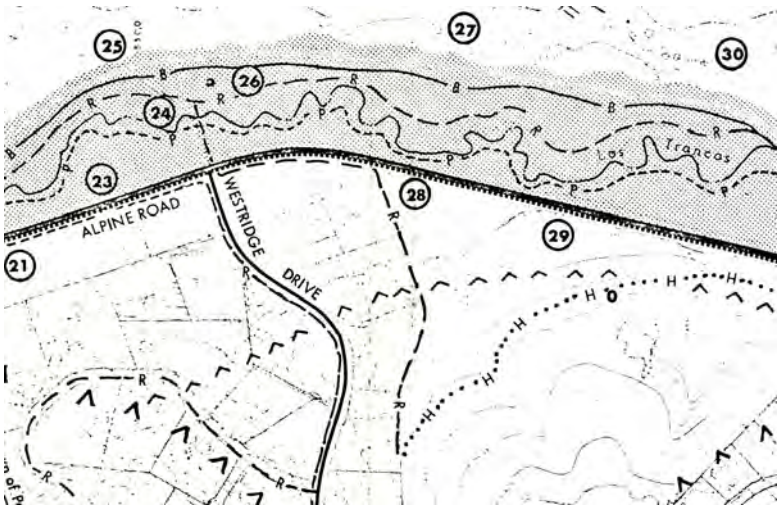
Please give your best effort at deepening the voice of the land at this place and work tirelessly as I know you do to assure this process is done as beautifully as you deserve.

All my best wishes,

Mary

Figure A: Alpine Parkway proposed general plan October 1969 summary by Nancy Lunde March 2020

In the late 1960s, William Spangle and Associates, Portola Valley Planners, developed a plan to improve Alpine Road from the corner of Alpine, Santa Cruz and Junipero Serra all the way to Skyline. Alpine Road was called a route of great beauty with unspoiled creek-sides, magnificent trees, intimate meadows, and open sweeping views of the mountains. It was feared that with the nearby urban residential and industrial growth, those splendid natural features would erode with increased traffic. Thus, it was determined to plan carefully for growth of traffic, rather than to just let the two counties and three cities determine its future piece by piece. "The people of Santa Clara and San Mateo counties have a stake in keeping this green land along their common boundary." The plan was to modify the road as a parkway with careful attention being paid to maintaining the natural state through which the road would pass. It focused on important features to consider: e. g. underground utilities, building setbacks, maintaining a 'primary visual corridor' along the edges, restrictions on removal of natural vegetation. Once all reviews and been completed, permissions and funding obtained. The Alpine Parkway, as it was named, would become part of the Portola Valley General Plan. Emphasis was placed on making the new parkway as beautiful and rural as possible. Viewpoints and groves of trees would deserve special identification. Included were designated riding trails, a pedestrian path, a bicycle path, a bicycle lane, a through trail or path, and local trails or paths. Creeks and meadows would be maintained for wildlife conservation. Public access to the creeks was considered. *Small* recreation sites were to be set aside.



A map of the proposed parkway identified 83 points deserving of special consideration. These points indicated such items as: special visas, historic sites, creek-side areas, residences and commercial enterprises, significant trees. As examples, item 21: Residential development; Presents opportunity to enlist cooperation in keeping planting and building in view of parkway compatible; 23: Meadow and group of trees needing special protection; 24: Creek flow picks up about here in summer; 25: Views of hills and oaks important to parkway; 26: Shallow Creekside bowl bordered by trees; possible recreation opportunity; Vista to mountains; 27: View of ridge behind Stanford; 28: Vista to mountains; 29: Steep wooded canyon and hillside (Stanford land); extreme care will be needed in design and construction if these lands are developed in the future. Would be desirable to maintain as permanent open space; 30: Diversion ditch to Felt Lake.

submitted
Nancy Lund March 2020
Figure B. Legend for Alpine Parkway Maps – trails and scenic consideration on above map.

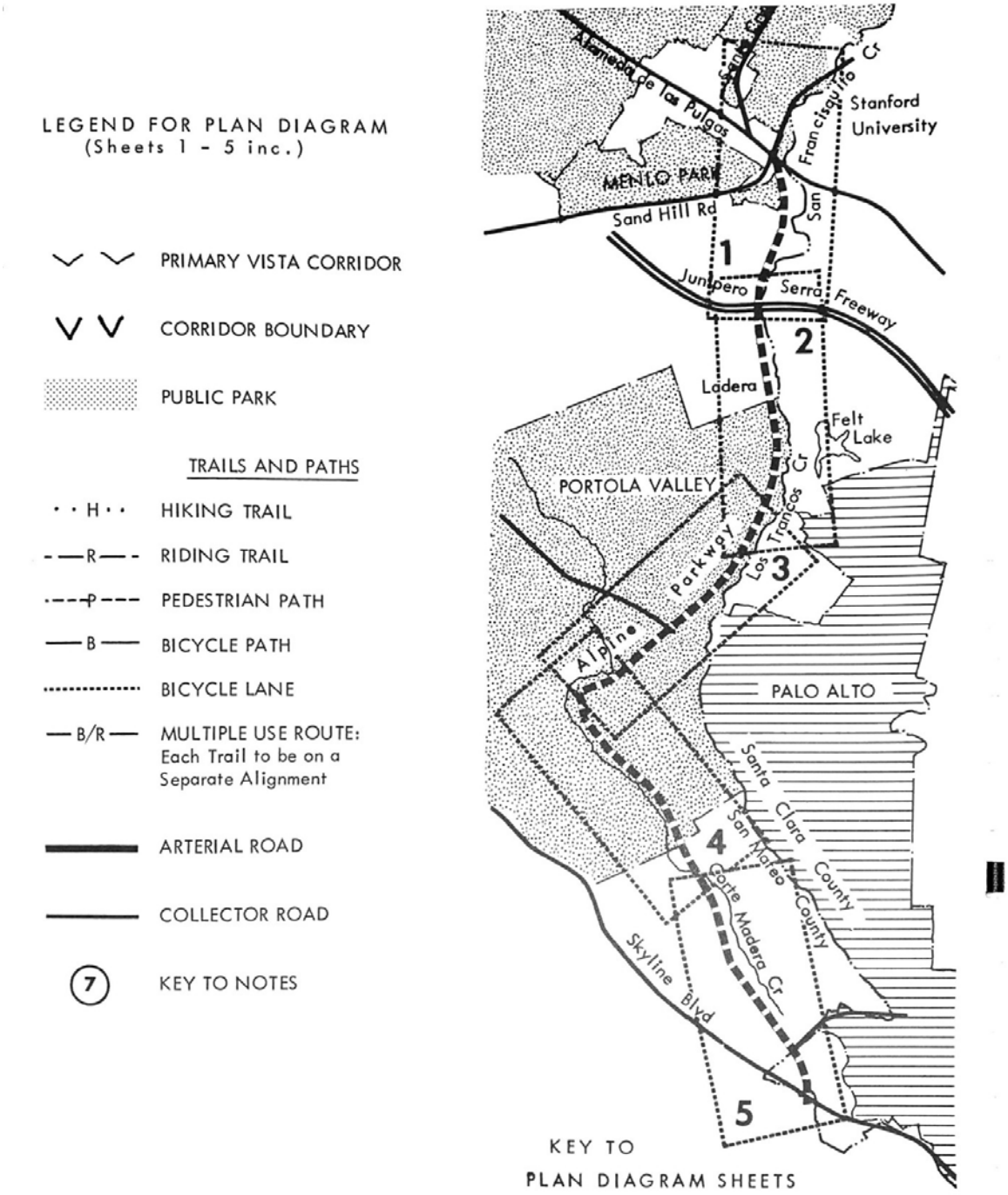


Figure D. Excerpts from Portola Valley General Plan on Alpine Road and rural quality. There is no doubt our community knows what rural is.

"Alpine Road is now a route of great natural beauty and variety. The creeks it follows through the foothills are lined with tall trees, and the countryside has kept much of its rural tranquility. The mountain canyon is still wild and new views open up at each turn of the road. A superb scenic route already exists. It is threatened by change. The challenge is to find and pursue the ways that can protect and preserve this route through the mountains for our present enjoyment and the delight of future generations."

The town has, since its incorporation, endeavored to protect the scenic quality of the Alpine corridor. From a policy statement adopted in July 1969:

> "The 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 Scenic corridor should be developed in accordance with the 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. Recreational uses should be in keeping with a peaceful and rural atmosphere".
>
> …
>
> "Rural quality- lighting so that stars may be readily seen at night, sense of quiet except for the sound of nature, man-made features blend with the natural environment, an overall impression of open space, the ability to maintain horses on private properties…paths and trails that allow for easy access

1. To conserve the rural quality of Portola Valley and maintain the town as an attractive, tranquil, family-oriented residential community for all generations compatible with the many physical constraints and natural features of the area. Rural quality as used in this plan includes the following attributes:
    0. Minimal lighting so that the presence of development at night is difficult to determine, so that the subtle changes between day and night are easily discernible and so that the stars may be readily seen at night.
    1. Minimal man-made noise so that the prevailing sense tends to be one of quiet except for the sounds of nature.
    2. Man-made features which blend in with the natural environment in terms of scale, materials, form and color.
    3. An overall impression of open space, natural terrain and vegetation, interrupted minimally by the works of people.
    4. Narrow roads bordered by natural terrain and native vegetation.
    5. Unobtrusive entrances to properties, primarily designed to identify addresses and provide safe access.
    6. Minimal use of fencing except when necessary to control animals and children on properties and then of a design which is minimally visible from off-site.
    7. The ability to maintain horses on private properties and to enjoy a trail system throughout the town.
    8. Paths and trails that allow for easy access throughout the town.
    9. Agricultural pursuits in appropriate locations.

Figure D. DEIR shows unacceptable set back from the fenced yards of the Lots 15 to 21

Figure E. larger set back option – does not show any change of design to fit terrain

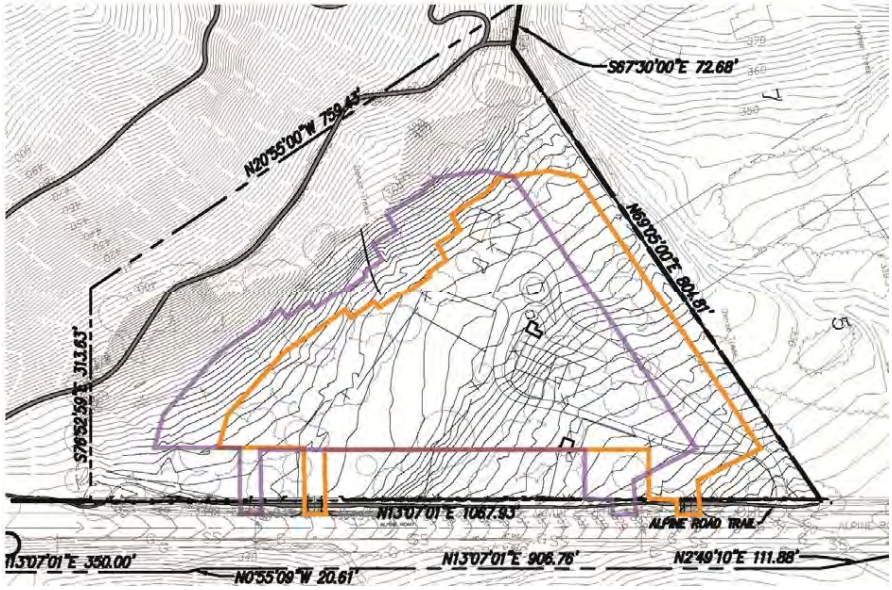


Figure F. Stanford University Habitat Conservation Plan showing no build areas in grey

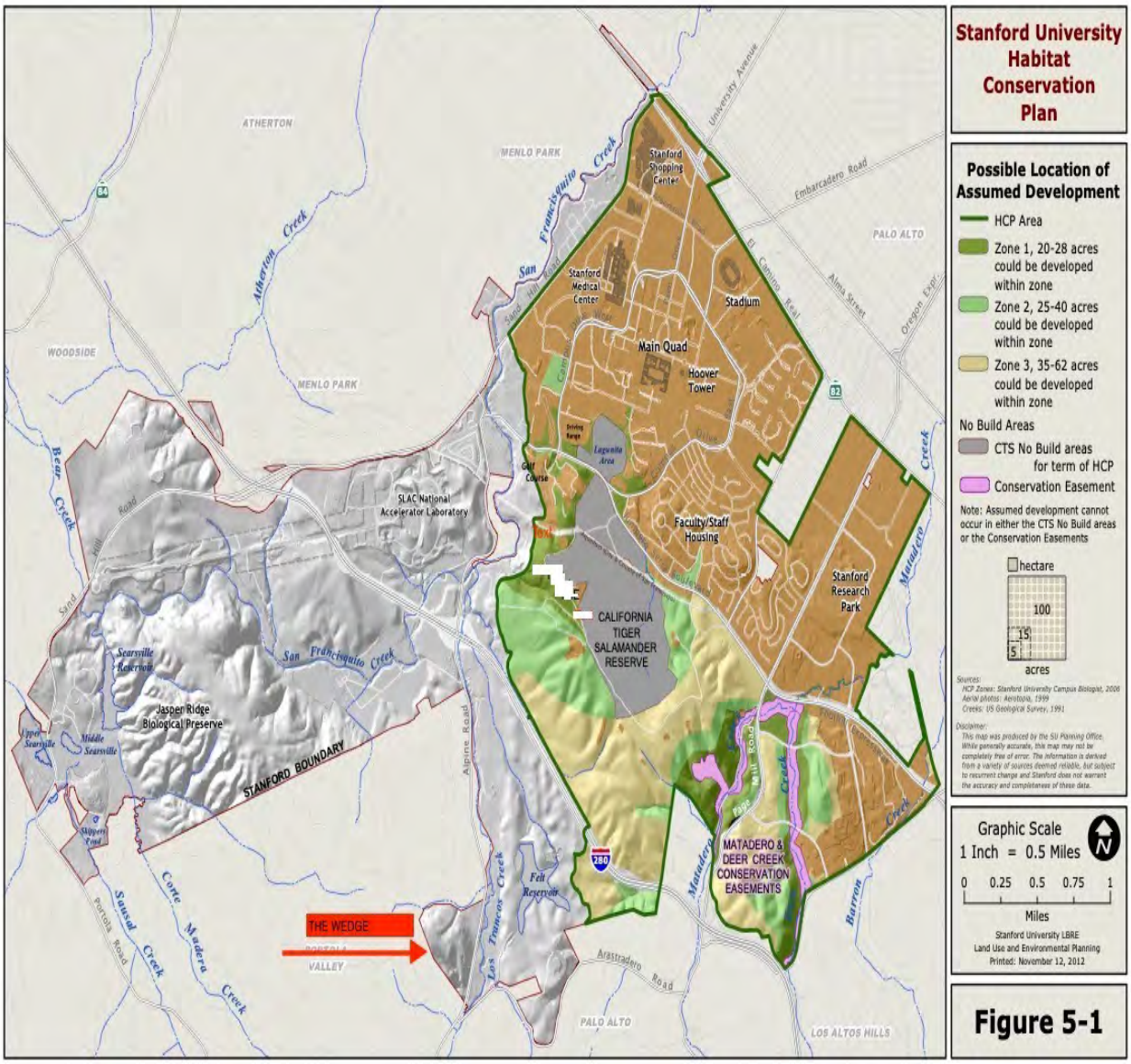


Figure G. Although referred to as a “nameless creek “ on many official documents Alpine Canyon Creek is acknowledge on the San Francisquito Watershed map as a tributary

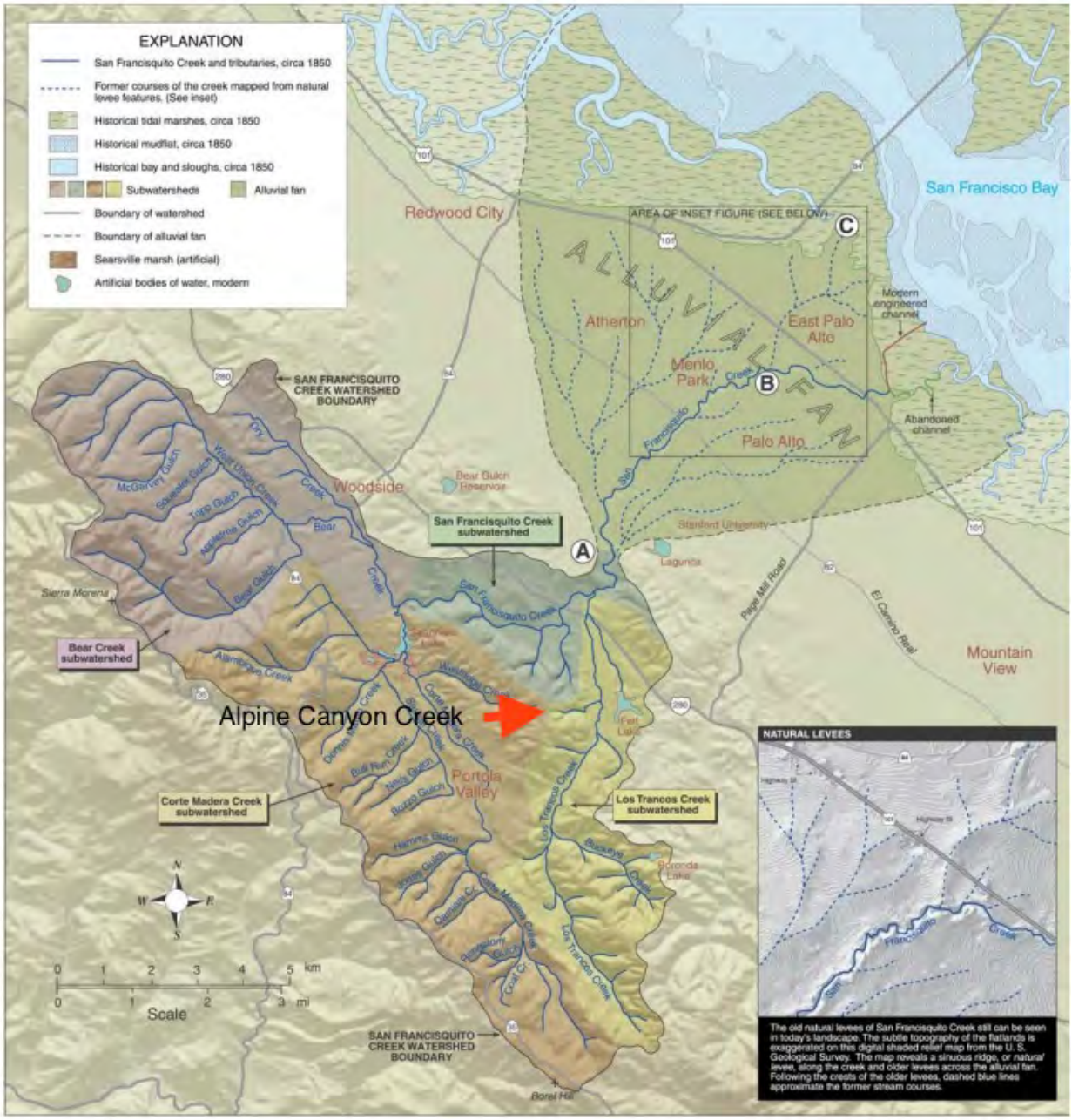


Figure 1: San Francisquito Creek Watershed Map

Figure H Alpine Canyon Creek is also recognized on the Stanford University Conservation Plan

fig2-1 stanford MARKED Wedge conservation plan watersheds copy.jpg

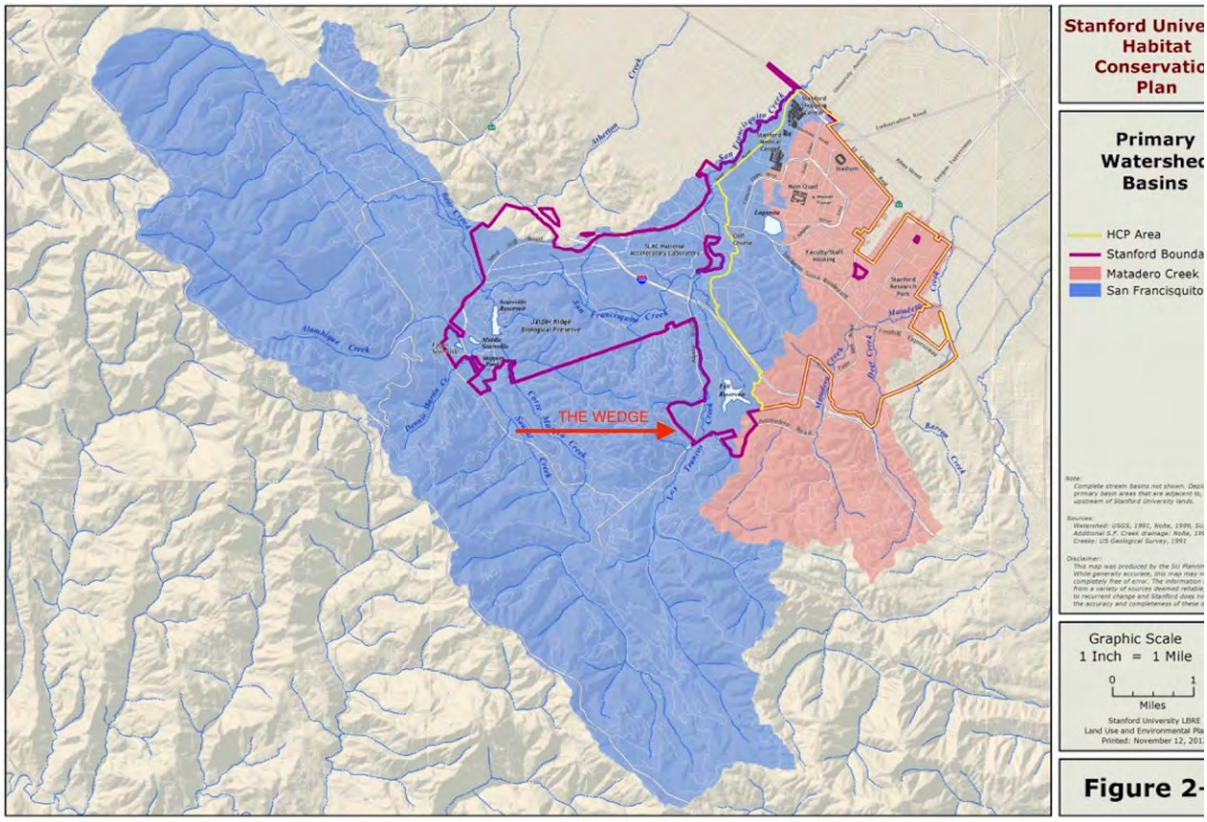


Figure I Almanac Article and the still existing sign of the last remnant of Stanford's disappearing game refuge *Created by state in 1927 after a decade of efforts by Stanford, 7,500-acre refuge lingers only in name, old records, one battered sign ... and the law?*

Figure J How fire builds and spreads from the Alpine Canyon Chimney

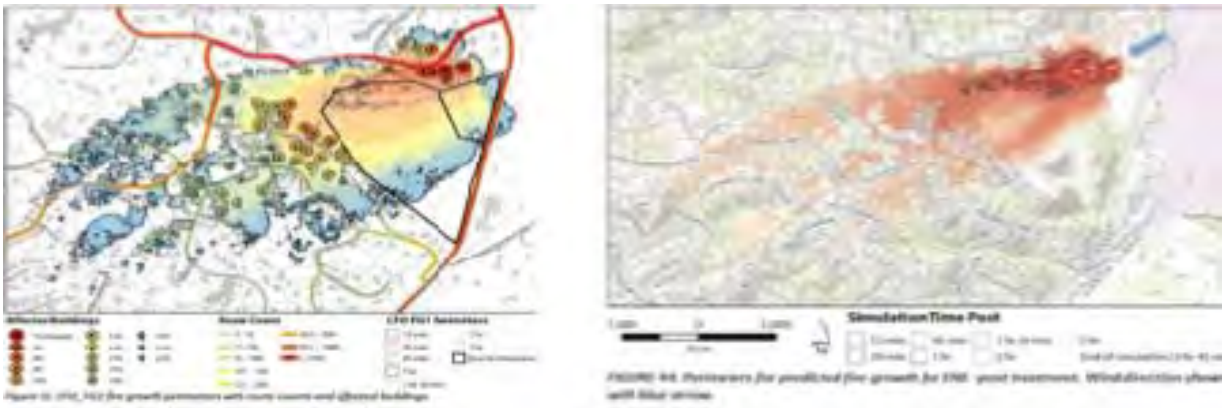
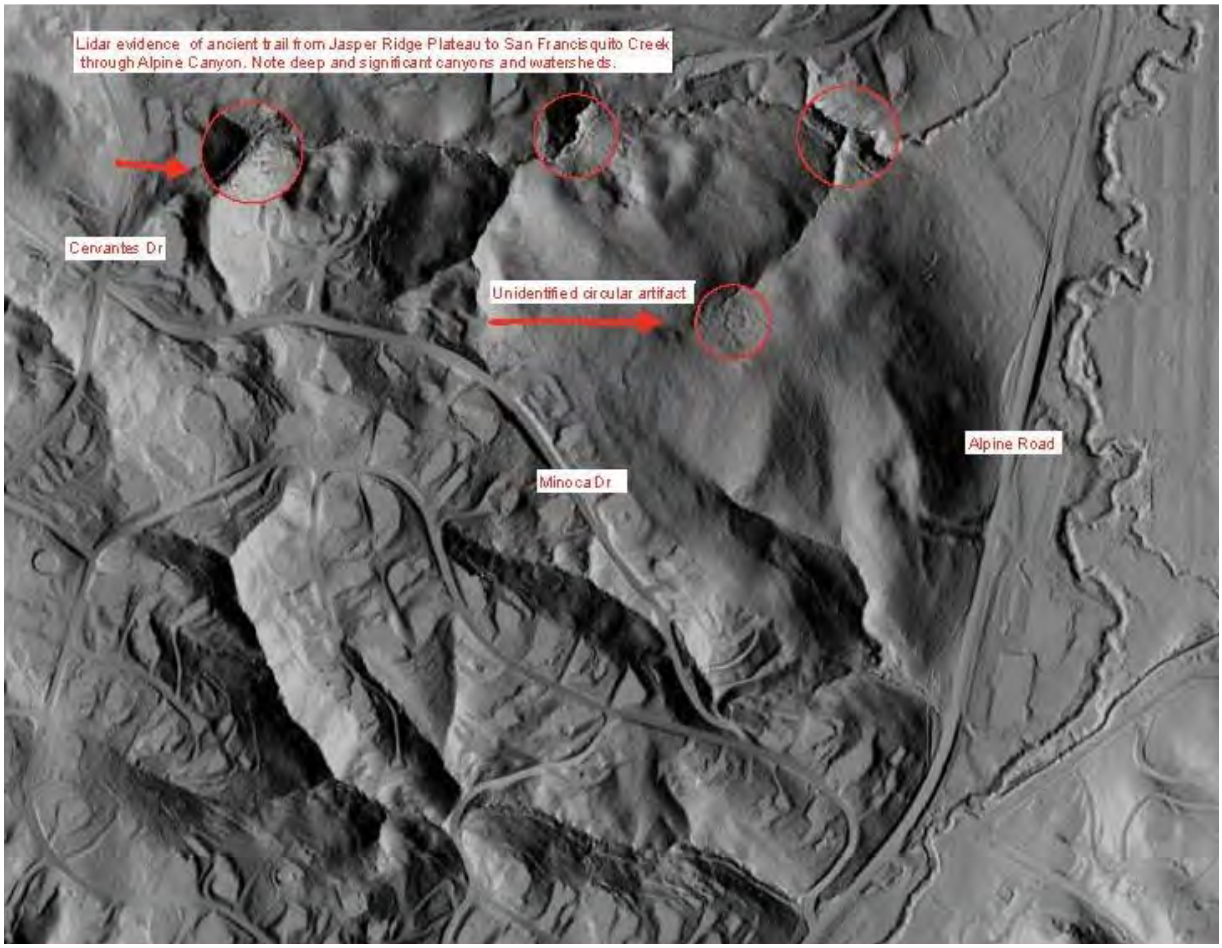


Figure K lidar maps showing possible archeologic artifacts and prehistoric trail patterns



From: Ckeckstein [redacted]
Sent: Friday, May 13, 2022 8:12 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Cc: Ckeckstein [redacted]; [redacted]
Subject: My family is strongly opposed to the Stanford "Wedge Project"

To the Portola Valley Town Council, Town Staff, and Stanford decision-makers-

I am a life long Portola Valley resident (I have lived here 48 years and attended the local schools of Ormondale and Corte Madera in the 1980's), and I cannot believe that the Town I have grown up in and loved is considering building high density housing. The charm of Portola Valley is its natural beauty of scenery and wildlife, and this is the primary reason why most residents of Portola Valley choose this town to call home. The dispersed, single-family homes that currently exist in town blend into the landscape and allow for wildlife movement, native species of plants and animals, and enables people to enjoy the natural beauty of the scenery with very limited human impact. The enjoyment of the green-space and outdoors Portola Valley offers is not only enjoyed by the residents of Portola Valley, but by the more urban communities around Portola Valley who drive out to our town to go for hikes, biking, horseback riding, etc. The use of Portola Valley's green space is a treasure that should be protected for the enjoyment of all residents of the Peninsula and Bay Area.

By building the Stanford Wedge project, the Town of Portola Valley would be setting a precedent that future, high density developments would be allowed and welcomed in Portola Valley, and the rural nature of this Town will slowly be eroded away. Not only would valuable native landscape of Oak forests and grasslands be forever destroyed, you would also be adding a major development with many extra people who would further clog our roads in the case of a natural disaster if all the Town's residents were required to flee the town.... namely a forest fire is the main safety concern. It is troubling that the Town of Portola Valley and Stanford would jeopardize the safety of the residents in Town to build this questionable development far from the main Stanford Campus. Trust me, if anyone were to every be injured or die due to this development and accompanying population concentration in town, both the Town and Stanford would be liable for countless damages putting development before peoples' safety. Affected citizens would rightly sue and bankrupt both entities if this development occurs. Also, I object that Stanford would build this housing for its employees who would have no affiliation to our town. Why should our town house Stanford's employees when Stanford owns thousands of acres closer to their campus which could be developed for their employees. Stanford should use its own land and resources to house its employees and not bully and pressure small towns, like Portola Valley, to house its employees and develop land that the residents of Portola Valley overwhelmingly prefer to stay untouched.

Please find an alternative site for Stanford's development closer to campus so that we can preserve the Oak forest at the Wedge for wildlife and the Town of Portola Valley residents to enjoy. The risks of fire coupled with the lack of evacuation routes could prove tragic for this Town if this development is built.

btw- I thought Stanford prided itself on its environmental stewardship? It baffles me that Stanford would want to cut down Oak forests to house employees and have these employees drive personal cars long distances to work rather than develop housing on their campus where these same employees

would have access to public transportation or could even walk/bike to work. If Stanford moves forward with this development, it proves that Stanford does not deserve the title of being conservationists, and they are just as bad as any big, for profit corporation that puts their personal interests ahead of nature and wildlife. Stanford would be no better than Chevron or Exxon.

My family implores all of you to stop this development and save the rural nature of this town for future generations including my own four children.

Sincerely,

Craig and Camilla Eckstein (and Tindra, Karl, Noelle, and Axel)
206 Wyndham Drive
Portola Valley, CA 94028

[redacted]

From: **Kristi Corley** [redacted]]
Date: Fri, May 13, 2022 at 8:12 PM
Subject: Comments on the DEIR
To: <StanfordDeir@portolavalley.net>

[no text, attachment only]

Laura Russell, Planning and Building Director
Town of Portola Valley
Planning and Building Department
765 Portola Road
Portola Valley, CA 94028
Stanforddeir@PortolaValley.net

Dear Ms. Russell,

Subject: Comments on the Draft Environmental Impact Report for the Stanford Wedge Housing Project (SCH# 2020010203/ 3530 Alpine Rd)

Thank you for the opportunity to comment on the Stanford Wedge DEIR. I appreciate the opportunity to submit the following comments on the Stanford Wedge housing Project: Draft Environmental Impact Report (DEIR). Project related comments are below.

Introduction-

- *Any promises and covenants need to be put into an enforceable renewable document.*
- *The town needs to develop conditions, covenants, and Restrictions (CC & Rs) for the Stanford Subdivision.*
- *Examples of restrictions: Will residents be able to keep more than 2 cars onsite?*
- *Examples of restrictions: Can a professor rent out a room of their house to a student? Where will that extra be parked, on the street, at Ford Field, Ladera shopping center? What will happen with subdivision overflow parking?*
- *Resident input on the conditions, covenants and restrictions is encouraged.*

"EIR is intended to be objective and impartial" is written in the introduction.

- *This EIR seems bias as many important findings are claimed to be "insignificant" when in fact many findings are significant, and some analysis topics are inadequate, inconclusive, or omitted. It also seems tricky in the fact if a significant or insignificant finding is not found, then how can we ask for mitigation? For that reason, I find areas of this DEIR incomplete.*

- *The author of this EIR seems to evaluate the environmental impacts minimally rather than maximally.*
- *All aspects of this DEIR need to address the cumulative effects of this subdivision and future developments totaling 304 units in the next 8 years due to the RHNA(Regional Housing Needs Assessment) allocation for Portola Valley. We need to plan for development in all the years to come not just this 8-year cycle of development*
- *The residents want to ensure environmental protections and safety while living in this town now and in the future.*
- *Great precautions need to be taken for fire mitigation and prevention during the building process and for years to come. These annual precautions and fire mitigation are due to this subdivision location which is below a major canyon in town and the location is at the end of our one of our two fire exits to HWY 280. Portola Valley has similar terrain the town of Paradise where 85 residents died in the "campfire" due to one street exit. This one exit out for many residents is Alpine Road. This development is on Alpine Rd.*

"It would remain in University ownership and preserved as open space through an enforceable covenant or other mechanism," as written in the DEIR introduction.

- *The remainder of the 68 acres should be preserved as open space through an enforceable covenant which should be written, completed, and signed prior to permitting. This agreement should remain in place for "in perpetuity" and not expire. This agreement should be made available to the public as a part of the Final EIR.*
- *Neighbors, adjacent landowners, municipalities- many individuals and entities can seek to enforce covenants if established for the public to review and view completed documents.*
- *Generally, if a restrictive covenant is less restrictive than an applicable zoning regulation, the zoning law prevails. If restrictive covenant is more restrictive, it prevails over the zoning regulation. The Portola Valley residents need to be aware of this, if true.*

TABLE 2.1: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Impact Air-1: Construction Period Dust and Emissions.

I have a few requests from a Portola Valley resident point of view. Please add more requests from the Portola Valley resident point of view in the Final EIR.

All below Omitted in the DEIR.

- *The allowed construction time of day and days of the week is omitted from the DEIR which is concern to the residents. The construction times and feedback should be an ongoing process over 3 years with adjustments made accordingly and scheduled in agreements with the town, not only done in the first year. Many development projects are projected to be on or affecting Alpine Road for construction in the next 8 years and this is of concern to the residents! (Ford Field area, Glen oaks, fire house, Nathorst Triangle/behind and next to Roberts, Ladera Church, Willows Commons- all located on Alpine Rd)*
- *Development projects-Staggered projects will be desirable to the Portola Valley residents for safety reasons (evacuation & exit on one of two roads to Hwy 280) Natural hazards/risks must be taken into consideration in planning large construction projects in the same area. I've noticed Stanford is doing projects during the night on El Camino Real to eliminate traffic issues during the day.*
- *If there were to be a hazard (fire, earthquake, landslide) in town, what is the plan of action from Stanford standpoint with trucks, fuel, equipment. (Omitted in DEIR)*
- *Residents' driving to schools, medical appointments and work must have minimal delays on Alpine Road (not more than 10 minutes.)*
- *Flag employees are required to be present with wait times no more than 10 minutes on Alpine Rd.*
- *Mitigation and agreements with the town were omitted in the following statements. The waiting trucks prior to their workday are not allowed to park at the Ford Field Parking lot or at corner of Westridge/Alpine or in the Alpine Inn parking lot or anywhere in town where residents would be disturbed in their homes.*
- *If the staging area is on the newly formed fire road on the Wedge close to the Golden Oak Drive loop residents, how will the residents on the East side of Golden Oak Drive be affected by the noise and 50 foot clearing on either side of the road? It seems to me the noise and emissions would be greater for Golden Oak residents on the East side of the looped road. Do the residents desire vegetation management into their property? Please make sure these residents get a 2-week notice with the ability for a full discussion. These considerations should also apply to Westridge, Minoca residents and those along Alpine Rd.*
- *All properties within 1000 feet should get a 30-day notice prior to the start of construction.*
- *All residents should get a 30 day notice of the start date of construction.*
- *The residents of Portola Valley requests Stanford/Portola Valley staff to provide similar construction email updates/delays/detours as Stanford currently gives it's University campus personal and students.*

- *Announcements should go out to the residents as to the start day of construction/vegetation management/tree removal at least 2 weeks prior not 2 days prior.*
- *No work should be done on Red Flag days.*
- *Construction work rules: no smoking outside of vehicles and butts/trash must be taken away as trash by the smoker, not left on roadside. The fine is $1000 if employee does not comply. Fire Concerns in the area. (for example smoking issues have occurred at 2 construction sites in town in the past year so this is a serious request!)*
- *Please elaborate on more rules regarding fire prevention measures during construction: require a certain amount of water on site to put out a fire, etc.…*
- *One mitigation Time of Day the trucks are allowed to utilize Alpine Rd to start and end their work? Approximately 4700 people live in town and approximately 1800 homes and probably half the population drives out of Portola Valley on Alpine Road, therefore stoppages and blocked roads need to be clearly communicated to the resident population*.

Deed Restriction on the 68 acres remainder of Wedge.

- *The 55-year deed restriction is too low and inadequate. This town can change the deed restriction to be greater in length. An "In perpetuity" deed restriction allows the town to ensure the remainder of the dangerous canyon will never be built upon and will remain open space therefore less of a fire hazard cumulatively over the years for town residents.*
- *The remainder of the property of 68 acres should remain open space and be deed restricted forever or "in perpetuity."*

Deed Restriction on the 12 (or less) affordable units

- *A 55-year deed restriction on the affordable housing units is inadequate and needs to be lengthened to "in perpetuity." We care about affordable housing on the 12 units or future revised number of units forever not just for 55 years!*
- *Fifty-five-year deed restricted on the affordable housing 12 units is not long enough to ensure affordable housing forever in Portola Valley.*
- *Consider increasing the deed restriction to 99 years or in perpetuity for the affordable housing units.*

Larger vs small units in the development

If the development maintained the current application size and number, I have the following questions below and appreciate your comments.

- *Please comment on the idea of providing 6 larger family units vs 12 smaller units for the affordable housing in 3 apartment buildings.*
- *Twenty-seven Stanford professors are provided the option of nice larger homes and the 12 affordable units are not comparable in size (3-4 bedroom vs 1-2 bedroom) for a family.*
- *We should provide equitable housing for the 12 affordable units. The affordable units are reduced in the size dramatically from the professor options for housing. We have Portola Valley teachers, Firefighters, Sheriff, Town Staff who would appreciate a comparable unit closer to the 27 unit size Stanford is offering the professors families. We have families who need affordable family rentals in our community.*
- *Please provide your rational for only providing smaller units for the affordable housing.*
- *Does Density bonus law encourage this inequality in size for affordable family housing?*
- *Can the Stanford Wedge 12 affordable housing units include a 3-4 bedroom, 1300 square foot condo, duplex or townhome?*
- *Who requested the size and number of affordable units? The public is not clear how these unit sizes were developed? We were told what size of the affordable units would be without public input.*
- *Did Stanford set the affordable housing 12-unit reduced size and increase the number of units?*
- *The size of the affordable housing units needs to be equitable to the other houses within the subdivision in my opinion. There are dramatic unit size differences in the affordable housing units compared to the larger units, is this an equitable building development for the affordable housing within the small subdivision?*
- *Consider multi living group houses of the same size so families and others share a home is an alternative idea?*
- *These 3 buildings of 6 units each were <u>moved from parcels in the back against the canyon in the initial architectural unit drawings to the front along Alpine Road in later drawings.</u>*
- *In moving the 12 affordable housing units to the <u>less desirable location where there is increased noise, car headlights and increased greenhouse gas emissions</u> for the 12 affordable units close to Alpine Road. Noise is an issue even with the 75-foot setback.*
- *The less desirable location for affordable housing was <u>not</u> the intent of high-density bonus law to put low-income housing in the worse locations within the subdivision. Please comment.*

- *Stanford should do a sound decibel study at the 3 affordable buildings sites along Alpine Road vs a sound decibel study at 3 parcels at the back of the subdivision? The Portola Valley decibel requirements in town are more stringent than most decibel noise requirements of other towns probably due to our peaceful nature. This sound study would be conclusive and should be conducted at peak traffic hours of 7:30-9am and 3:30-6pm. Please answer and comment?*
- *Please comment on location of affordable unit changes within the subdivision regarding multiple editions of architectural drawings. The locations of affordable housing should be commented upon and mitigated in the DEIR. The reasons for the affordable housing location change needs to be discussed in the EIR.*

- *Should the 3 affordable apartment building which house 6 units each be dispersed within the homes that are 3-4 bedroom homes? This solution would be more equitable. Please discuss response in the EIR.*
- *Could the size of the affordable housing units be enlarged (from 1/2 BR to 3/4BR) which would accommodate families with a central living room and kitchen to provide communal style units? Therefore 1-2 families could live in each of the 3 similar houses of the 27 homes. The same number of rooms of 12 would still be provided to the community yet it adds a family option. Please comment in the EIR.*
- *Could the 3 affordable housing apartments be three 3-4 bedroom units for affordable housing rentals? Three 4 bedroom homes could be available to families while still housing 12 people.*

<u>Fire mitigation and Location and Number of Units</u>

I believe this subdivision development should be no more than 12 units or parcels. So, with density bonus law, Stanford could build 10 homes and the affordable housing would be 2 units, 15% affordable. This idea was omitted in the DEIR. Without utilizing bonus density law, Stanford could build 12 houses for their workforce. If Portola Valley and Stanford really care about affordable "family" housing, housing can be done on a smaller scale with 10 homes and 2 affordable homes/units while preserving the safety of the current residents and respecting the risks and hazards of this location.

- *The subdivision is located at the bottom of dangerous fire canyon which increases the fire safety concerns for the current residents.*
- *How will Stanford mitigate the fire hazard of this canyon thoroughly and effectively? What date each year will vegetation management occur? I've noticed this year vegetation management has not been implemented on the wedge. (please comment in DEIR)*

- *My suggestion is building less units on the 7 acres. Twelve units/1 parcel each is what our general plan will allow on this site and this number should be adhered to accordingly. Each parcel is allowed more units due to state laws.*
- *Each unit has the potential of increasing density on each parcel according to building desires of the owner.*
- *If Portola Valley residents only have 2 roads out of the town in Portola Valley, this Wedge subdivision (39 units and 100+ cars with multiple trips a day) negatively adds "fuel to the fire" should there be a fire or earthquake in town. Portola Valley sits on the San Andreas fault. Earthquakes can cause fires.*
- *This 39-42 unit Wedge development adds to the towns fire hazard and fire risk below a major canyon and this concern is significant not insignificant. Your fire mitigation plans are not adequate. Each home and vehicle add many fuels to the landscape and home development fuels are way beyond the fuel of 177 trees and horses.*
- *I think the homes should be further apart from each other as heat increases with the closer proximity between homes. These home distances should at least follow the current building codes of single-family homes in this town and there should be no concession given due to the WUI nature and slope of the canyon behind this development. The founding fathers of this town planned for resident safety while developing building, zoning codes and the general plan. House separation building codes were purposeful in the building codes of this WUI town of Portola Valley.*
- *This town zoning has a long-vetted planning process over many years which includes the input of ALL residents.*
- *Do not give up our Portola Valley zoning, building codes and throw away portions of our general plan due to the recent audited HCD and RHNA allocations and potential punishments.*
- *This town is giving the applicant too many concessions as I counted at least 7 concessions, variances, waivers from our regular building codes*
- *Stanford and the town of Portola Valley, please list all the concessions, variances, and waivers Stanford was awarded by the town of Portola Valley for the Stanford Wedge Application. This information is not in the draft EIR?*

- *<u>The campfire in Paradise was caused by the failure of a worn and neglected piece of Pacific Gas & Electric equipment on a transmission tower.</u> We still have many older towers in our Portola Valley which put our town at risk for fire as well.*
- *Stanford should underground the PGE poles ALL along Alpine Road? Mitigate this known fire ignition issue and make comment please in the Final EIR regarding this request.*
- *Did Stanford or Portola Valley do a Total assessment of all the PGE towers in Portola Valley prior to adding large subdivision development or many developments? We need action with an evaluation of ALL PGE towers and transformers prior to the fire season of 2022. We are a 9x9 square mile town, we can do this! If we don't do this, the existing residents (PV Ranch- furthest back on*

Alpine Rd, 250 residents, Corte Madera students, Corte Madera Rd, Echo Lane, Golden Oak, Hillbrook Dr, Nathorst Triangle, Applewood, etc…) might be at greater risk than the newer PGE undergrounded developments at the border of Portola Valley. Please provide mitigatation options and comment on this issue.

- *Is the town of Portola Valley considering undergrounding the main corridors (Portola Rd, Alpine Rd, Westridge) and main arterial roads as a start? Action needs to be taken now.*
- *Should the town do an EIR on all the PGE towers and transmitters in our town? It seems to me this action item is a must for Portola Valley. The town can learn from the Paradise fire ignition source and act. We are far away from getting our own power grid! Eighty-five people died in the Paradise fire with one road out and I don't want to be one of the 85 who die in the Portola Valley fire with two roads out of town.*

Traffic Comments- mitigate and comment on all below. Inadequate comments in DEIR.

- *Since 100 +cars are added to Alpine Road at the end of our 1 fire exit for most of us, this could displace the Ranch residents (250) and Nathorst triangle, Corte Madera School, Golden Oak, Westridge, Hillbrook, Corte Madera Rd just to name a few) from good traffic flow during an evacuation by placing many developments (Ladera Church, Stanford Wedge, Ford field area, Glen oaks Nathorst triangle-3 sites) on the PV border at Ladera. The current residents suffer the consequences of the newer developments, and they are pushed more into a more risky situation with fire evacuation and road issues. What can Stanford and Portola Valley help mitigate this? How will Stanford mitigate the increased traffic and increased VMT. Inadequate response*
- *LOS "D" ratings at the end of Alpine Road situation (La Mesa/Alpine and La Questa/Alpine?) Inadequate response.*
- *LOS needs to be performed at the 4 way stop (in the county) at Alpine/280. This traffic study needs to be current and completed. Please comment. Inadequate traffic study.*
- *Good mitigation would be for Stanford to underground PGE poles all along Alpine road going all the way to Corte Madera School? Please comment.*
- *Stanford should mitigate with undergrounding larger portions of Portola Valley if they plan to increase their development in town (Glen Oaks? other locations?).*
- *Undergrounding PGE poles only in front of the Stanford wedge is inadequate for the current residents now and over cumulative years. A subdivision with condensed population and higher density is very different than single family homes and there are many complexities are involved in this location including adding to current traffic issues of driving to 280 and current risks/hazards(San Andreas fault) in town. Please keep in mind the safety element in town has not been updated yet.*
- *Portola Valley has multiple earthquake fault locations in town which can put the PGE towers and transformers at risk for fire as well. Portola Valley is unique in*

many ways and all hazards and risks must be taken into consideration while selecting safe building locations.

- *This subdivision does not solve the entire risk and hazard problem for current residents in town. Stanford subdivision adds traffic, undergrounds PGE for themselves, evacuates more quickly and then Stanford pushes the hazards and risk more to the current residents down the road who are stuck with a 35 yr old PGE towers and transformers. So adequate mitigation would be to underground the entire Alpine Road completed by Stanford. So much time and energy has been put into the development that some of these other undergrounding PGE issues have been put on the back burner. Please comment. Inadequate response and needs further mitigation.*
- *Does Portola Valley need new drainage pipes and culverts? Yes? Can Stanford pay for that as subdivisions send more drainage into the bay through our aged culverts and rusted old pipes. Should Stanford replace a whole section of culverts/pipes on Alpine Rd, probably. Please comment and respond. Omitted information and inadequate response.*
- *The town of Portola Valley gives concessions, and we ask for concessions from Stanford in return! It's called land value. It's called good negotiation and good mitigation planning for our town. Stanford is increasing their land value and Portola Valley should improve their infrastructure through good negotiation strategies with each developer.*
- *What will happen to our current WIFI with new developments? Will the current residents WIFI slow down? Will the current residents need to purchase bigger and better WIFI systems? What is the Stanford plan? Please respond? Omitted information.*
- *It's a win-win for town to gain infrastructure benefits, it's not about just high-density housing benefits for the town. We need to consider what are the cumulative affects to our town 20 years from now? We deserve more than 12 small housing units as the town gives up so much more over time. We must negotiate and be strong in our convictions to protect the environment, humans, and wildlife.*
- *Should the focus be on the creation of under grounding all wires in Portola Valley so if a fire comes through our town, we have greater survivability of homes and people? Please comment. How can Stanford help?*
- *How can Stanford help PV with that goal of undergrounding wires in more areas of Portola Valley? This is a priority discussion. Does the town require Stanford participation financially to assist with undergrounding Alpine Rd since this is our first larger subdivision on this road? This discussion is omitted from your comments, please comment.*
- *How will Stanford mitigate for putting our current residents at greater risk for greenhouse gas emissions, noise, evacuation and daily traffic, light spill on our main corridor of Alpine Rd? Not adequate answer in the DEIR.*

- *The Scenic Corridor will not be a scenic corridor anymore with many homes being seen from the road as we drive along Alpine Road. Inadequate response. Please mitigate further.*
- *How can Stanford conduct better traffic studies of traffic flow and directional locations and road improvements and congestion on the entire Road of Alpine and all the way to Stanford University? We must look at the whole route the professors would drive from Stanford Wedge to Stanford so we know where the LOS "D" and "F" ratings will be. The entire routes to Stanford from Portola Valley and Stanford to Portola Valley must be explored in traffic studies at high volume times. Inadequate solutions in DEIR and mitigations must be addressed.*

Infrastructure Support for Portola Valley

How can Stanford be a partner in upgrading certain pieces infrastructure which the homes will certainly benefit from now and in the future?

- *If Stanford is a town "partner" it needs to be in sharing infrastructure costs as well: culverts/pipes to the bay improved all along Alpine Road is a mitigation request? 175 trees removed causes more storm drainage to our drainage system so a mitigation would be to fix our culverts and pipes <u>all along Alpine Road</u>? The entire water system and flow from the entire Wedge property.(75 acre canyon) must go somewhere and water still flows to the Bay! Please provide further mitigation. Inadequate response.*
- *Is the wedge the safest site you own in Portola Valley or would the Glen Oaks site (which Stanford owns) be a better location for this development. Therefore, the canyon is not behind 39 units on 3 acres with homes concentrated close together.. Please respond as this is a question.*

- *<u>Evacuation Plan</u>: Lack of information in the DEIR. Please answer the following questions.*
- *We know this Stanford Wedge location is at the end of our evacuation route on Alpine Rd. Did this DEIR evaluate the Corte Madera and Ormandale school evacuation and number of children? Did this Deir comment on the Ranch evacuation plan and number of residents? Do we know number of residents which will evacuate on Portola Rd vs Alpine Rd? Have we projected the minutes/hours it would take to evacuate all the town residents if an earthquake occurred without warning? What additional exits could be built in town to increase the number of exits out of town? All inadequate answers in the DEIR, please respond.*

<u>Traffic: VMT & LOS reports & Traffic Hot Spots</u>

<u>C/CAG TDM Policy</u>

As of January 1, 2022, the C/CAG TDM Policy requires that the local jurisdictions in San Mateo County notiey C/CAG of any new development project within their purview that the estimated to generate at least 100 + Average daily trips (ADT). Previously, the threshold for local jurisdictions to notisfy C/CAG of new development projects was 100 net peak hour trips, or those proposed as part of a General Plan Amendment(GPA).

It is noted that an addition of 343 trips per day will occur due to this project. Therefore the greenhouse gas emissions should be calculated from 343 trips per day. Keep in mind, 343 trips per day is an average and this community could actually experience more trips per day and up to the maximum trips per day based on how many cars each unit is actually driving a day.

For example, if a 4 bedroom home actually has 4 cars or a 3 bedroom home actually has 3 cars or if a 2 bedroom home actually has 2 cars then the average VMT goes up to the potential of maximum VMT and trips per day. The community should be aware that maximum VMT is a possibility and would affect the need for increased road maintenance, change road patterns, increase traffic VMT and increase traffic congestion.

I think "local trip generation surveys" should be utilized as a first choice or trip generation data published by the Institute of Transportation engineers. Using trip length data does not consider the changes to the roadway network or to traffic congestion, or the projects potential effects on the overall traffic patterns."

How can you accurately predict the % of professors who preform remote work vs drive to Stanford to teach classes? Since this remote number equates to reduced VMT, it's important that your predictions are accurate if you are lowering VMT and trips per day per car. Accuracy for VMT is important to get correct for increased emissions to a community. The "average" VMT = increased greenhouse gas emissions. Will VMT be average or above average for this area and occupations of the desired Stanford Wedge population. It seems to me predicting remote work of occupants is impossible in a pandemic and we should assume they are working at Stanford so this remote adjustment should not be used. This subdivision of possibly 39 units would be in our community for a long period of time therefore assuming remote work forever may not be accurate assumption if thought of for in cumulative years. Please explain in detail in the DEIR.

Omitted in DEIR

I believe LOS traffic reports should be administered at the following key locations below for the reasons above, roadway network issues, traffic congestion and potential effects of traffic patterns. Traffic patterns and roadway network issues need to be fully evaluated at well. Traffic congestion should be studied with LOS studies in locations discussed below for a more thorough traffic assessment.

<u>Omitted in DEIR:</u>

Did you study the Westridge/Alpine and Arastradero/Alpine Rd traffic with LOS reporting? I think it's needed in the DEIR as these two roads are major arterials off Alpine Rd. and very close to the Wedge development. Please answer all my questions as many of these comments were omitted in your DEIR.

- *Does Stanford need to put in a roundabout at Westridge/Alpine Rd? Mitigation needed at this location.*
- *LOS traffic reports would be more complete if conducted at Westridge/Alpine Rd, Golden Oak Dr/Alpine Rd (Study both sides of Golden Oak as road makes a U off Alpine), Arastradero/Alpine Rd.*
- *I believe Westridge/Alpine Road and Arastradero/Alpine will need to be mitigated with possibly a roundabout and in need of LOS studies.*
- *Arastradero/Alpine has increased traffic (bike and car) due to the revised restaurant- Alpine Inn parking off Arastradero Rd. Traffic is elevated at Alpine Rd/Arastradero and needs to have a traffic study, LOS. The Portola Valley Town manager reports the increased tax revenue from Alpine Inn which can also be proof that the cars have increased going to Alpine Inn on Alpine Rd.*
- *Ford Field game days should be LOS evaluated as well. The Alpine Rd/Ford Field parking lot (within ½ mile of Wedge)entry/exit as bike collision with cars happens as cars exit and bikes riding East on Alpine Rd.*
- *What time of day did you study the traffic? Is there a better time/s to study the traffic in Portola Valley?*
- *Do the county or country or USA data on VMT accurately evaluate and determine the proper VMT for our small town?*
- *What other VMT data can you utilize which would produce more accurate data?*
- *How can the traffic report be redone to evaluate VMT more accurately for our town? You cannot assume all professors work from home, please show proof.*
- *Should Portola Valley do a more thorough traffic report? Since the 27 families will be using all our roads, many traffic patterns need to be evaluated. (i.e.: Wedge to Ormondale, Wedge to Corte Madera, Wedge to Woodside, Wedge to Stanford University though 4 way stop signs)*
- *Was each arterial street off Alpine Rd and Portola Road evaluated for traffic flow, congestion (LOS) and VMT? If not, why not?*
- *Did you think the traffic report properly evaluated the critical traffic times of a day and selected critical days of the week for an accurate overall assessment?*
- *Can you do your traffic report (Alpine Rd) on different days of the week, Monday 8-9 AM, Monday 3-6 Saturday 9-11, before school gets out from Corte Madera?*
- *I think an alternative traffic assessment is needed including LOS (level of service-A-F=traffic exceeds the amount that can be served-LIKE 4 WAY STOP to Stanford University) traffic reports as well as VMT traffic reports, please provide LOS reports.*

- *Often towns utilize both reports (VMT and LOS) to get a more complete traffic assessment of their town. Complete and updated LOS traffic reports are needed for Portola Valley and are missing in this report.*
- *Why have you chosen not to include LOS reports?*
- *The LOS reports were omitted and additional LOS reports for Portola Valley are needed in multiple locations.s*
- *https://www.smcgov.org/publicworks/alpine-road-traffic-corridor-study*
- *We have a bottleneck at the 4 way stop by 280/Alpine Rd. right now at many times in the day. This location continues to be a traffic issue currently. The Stanford professors who will live at the Wedge would need to drive along Alpine Rd to the University or hospital and go through the 4 way stop signs where bottleneck of cars occurs currently (prior to subdivision development.)*
- *So this subdivision only adds vehicles to the bottleneck at 280/Alpine Rd. This 4 way stop sign area at 280/Alpine Rd must be addressed through this DEIR traffic reports and the past San Mateo County traffic report of Ladera/Alpine Rd must be attached to this DEIR for further investigation. Many action items and findings were not completed from the Ladera/280 traffic report and should be completed and required as a part of this DEIR. The 4 way stop at 280/Alpine Rd causes idling cars and cars stopped.*
- *This intersection at Alpine Rd/280 was not evaluated for traffic flow, emissions and accidents, it should be done immediately. Please mitigate. Information not available.*
- *This hot spot traffic stop should be considered a priority! Everyone in this area (Portola Valley, Menlo Park, Palo Alto, Stanford University, Stanford Mall) knows 4 way stop is problem area and adding many vehicles from future developments (304 units) to this problem area is a traffic nightmare. Please comment and mitigate, omitted.*
- *I had a car totaled at this location with my daughter in the care and a woman was killed on a bike at this location of 280/Alpine Road. There are many accidents at the 4 way stop signs at Alpine Rd/280!*
- *If this DEIR ignores this Alpine Rd /280 intersection in their traffic report, then the Town of Portola Valley, San Mateo County and the State of CA are ignoring the enormous traffic problem that currently exists without even adding the Stanford Wedge subdivision to the town of Portola Valley.*
- *It's in the best interest of Stanford University to work with the county and with the Town of Portola Valley and Ladera to solve this traffic hot spot at 280/Alpine Road and all Hot spots down to Stanford as it's a parking lot at many times of day even in the pandemic.*
- *Someone already dropped the ball in completing the traffic report recommendations (roundabouts at both La Mesa/Alpine Rd and La Questa/Alpine Rd) from the Alpine Rd/Ladera/280 location.*
- *If Portola Valley, Menlo Park, Palo Alto and Stanford University add building units for RHNA cycle 6, all the new cars from the new units will funnel to that 4 way intersection at 280/Alpine Road which will cause a bottleneck.*

- *After the 4 way stop Alpine Road goes from 2 lanes to one lane which causes the bottleneck of cars. Fixing the road at this location 280/Alpine is critical for traffic movement in our area prior to ANY UNITS added to surrounding areas.*
- *Solutions of the above traffic report were never implemented.*

- *Stanford plans to add 4000 students in the coming years.*
- *This population increase will cause traffic to exit Stanford University and move towards the 4 way stop sign area continuing on Alpine Rd to the Wedge or enter HWY 280 to the South or North. Alpine Road is utilized by all vehicles from the 4 surrounding cities (Portola Valley, Ladera, Menlo Park, Palo Alto, Stanford University) which goes through the 4 way stop sign prior to getting on Highway 280.*
- *The 4 way stop on Alpine Rd/280 is a "Mess Traffic Area Right NOW" PRIOR to the application of the subdivision of the Stanford Wedge. Stanford needs to solve this self-imposed traffic problem through increasing its population and utilizing arterial roads by exiting the University to 280 Highway.*
- *What is Stanford University staff solution to increased population and the self-imposed mess of traffic utilizing the one lane Road named Alpine Road?*
- *Stanford must first solve the current traffic problem and not add vehicles from the Wedge to the 4 way stop sign and traffic on Alpine Rd where a current LOS -F traffic problem currently exists! What's Stanford's solution to the current problem I've stated? Portola Valley residents desire Stanford to answer this question before creating more traffic issues, increased greenhouse gas emissions and VMT on Alpine road in Portola Valley and at Alpine Rd/280 and at the 4 way stop sign in the San Mateo County jurisdiction.*
- *Solutions for this major traffic issue(280/Alpine Rd) was omitted in the DEIR and not acted upon from the county traffic study(Alpine Rd/Ladera to 280) or in the Portola Valley traffic study for this area (the Ladera/Alpine Rd/280 traffic study.) Ladera borders Portola Valley in the last 1/3 of Alpine Rd so the county traffic study findings and solutions must be implemented prior(and were never implemented) to future development or you Stanford could add deaths to the current traffic issues at 280/Alpine Rd.*
- *The increased evacuation time on Alpine Rd could be life or death for Portola Valley residents should an unknown hazard happen to our town quickly. Stanford must comment on my previous statement and mitigate this traffic situation even if it's County area that all residents drive through daily. The border of Portola Valley and the town of Ladera intersect on Alpine Road should not be considered outside this DEIR mitigation area of concern.*
- *Alpine Rd is a continuation of the Road to Stanford University therefore this area (traffic nightmare) must be mitigated, how will Stanford mitigate this "F" LOS traffic problem prior to approval of this development?*
- *Van rides only? Less cars in the development? Less units built at the Wedge development (12 units for example vs 39 units which matches our general plan and building codes)*

- *We, the residents of Portola Valley demand San Mateo County and Stanford fix these 4 way stop sign area once and for all, with mitigation measures for traffic on Alpine Rd.*
- *The past traffic study (Alpine Rd/Ladera/280) in the county traffic report recommendations must be implemented prior to this development. The traffic study (Alpine/Ladera/280) findings have been ignored by Portola Valley, Stanford University and San Mateo County while further development continues to be approved in Santa Clara County and San Mateo County. Alpine Rd acts as a funnel to 280 Highway for many cities (Menlo Park, Palo Alto, Ladera, Portola Valley and Stanford University) utilize the funnel road of Alpine Road to HWY280.*
- *Has Stanford considered a no car development with margarite buses or vans only with the thought of conservation of natural resources and continued use of alternative transportation strategies that limit automobile congestion?*
- *Have you considered alternate transportation programs for the Stanford Wedge?*
- *Does every house of 27 need a garage? Maybe not! Vans are fine to get to work.*
- *Should the CC&Rs of the development should say a "2 car maximum for the 27 homes?" If every unit has 1-2 extra cars there will be extra cars parked elsewhere in Portola Valley which is not desirable, and we will not allow.*
- *How to prevent extra cars parked throughout Portola Valley?*
- *Should Stanford utilize the van services only, for all units? No cars.*
- *Should Portola Valley allow only one car in the subdivision CC& R's per unit?*
- *Should Portola Valley make this a no car development or cut in half the number of cars due to increased VMT and increased greenhouse gas emissions?*
- *Quote: "Stanford plans to continue to meet the goal of generating not net new automobile commute trips to campus, even as it adds new space. Stanford has had great success over the years in developing alternative transportation programs."*
- *"Stanford populations "vehicle miles traveled" will fall well below regional averages. The campus also will meet and exceed the efficiency factor needed to meet the state's goal of reducing green house gas emissions to 40% below 1990 levels by 2030."*

Accidents in Portola Valley and along Alpine Rd- Inadequate information in this area.

- *The sheriff should provide these reports. Inadequate in DEIR.*

Traffic, pedestrian, bike and horses.

Inadequate in the DEIR, please comment on all below.

- *Did the DEIR address the Hot areas traffic, pedestrian, bike, horse accidents in the Town of Portola Valley for the last 5 years?*
- *Where are the multiple accidents on Alpine Road?*
- *Where is the accident hot spots on Alpine Road and Portola Road?*
- *Please report these findings in the DEIR. Can you list them?*
- *What can be improved around at the accident areas?*
- *If we add 304 more units to our town over the next 8 years or possibly 600-1000 cars to our town with further development and minimum 6 trips a day how will that effect the current flow of cars? The VMT needs to be evaluated and planned mitigations for long term not development by development.*
- *Our town is 9 square miles, will accidents go up or down? Accidents will probably go up.*
- *Are our roads prepared properly?*
- *Do we need sidewalk improvements as we have dirt trails in many locations now?*
- *Do we need a master plan for roads, traffic, bikes, pedestrians and horses with the future development of 304 units? Example: Alpine Rd/Los Trancos has many accidents. Omitted comments.*
- *A child would use Alpine Rd to drive, walk, ride bike to Corte Madera middle school.*
- *If we add 39 more units on Alpine Rd, the children biking or walking to schools (Ormondale/CM) on Alpine Rd and Portola Rd will go up. How can we implement the "safe routes to school" in PV? "Safe Routes to School" was never officially voted upon in PV. Mitigate this and omitted comments.*
- *More building developments are being planned for the edge of town (50 units next to Ford Field) and 39 at Stanford Wedge and Ladera Church, Glen Oaks, Nathorst Triangle- 3 sites, etc…. It seems building unit vehicles are concentrated on Alpine Rd which only adds to congestion on one exit, Alpine Rd. I participated in the evacuation drill a resident put together and the 200 cars that participated had a bottle neck at Westridge/Alpine continuing down to 280. There was road work with trucks on the on ramp to 280 which would have really been a problem if it was a true evacuation. Omitted comments.*
- *The added vehicles and VMT (vehicle miles traveled, how many trips a car makes a day= increase emissions in our town) have negative effects to the people in our town and it's significant. Omitted comments on emissions increased.*
- *The Wedge subdivision vehicles has cumulative effects of VMT from the Wedge and future housing with 304 units planned for PV over the next 8 years is a cause for concern. The ability for residents to evacuate efficiently goes down with each additional unit and cars attached to that unit. This report should evaluate not only the average vehicles per unit, but our town should also realize there is a maximum vehicle per unit as well. Will a 3 bedroom unit have 3 cars? Will a 4*

bedroom unit have 4 cars. Your VMT report only says those each of those units will have

- *The Alpine Road traffic studies are inadequate and do not consider the previous County traffic study at La Mesa/Alpine and La Questa/Alpine with Roundabouts recommended at both sites. The recommendations from the county traffic study (PV border on Alpine Rd to 280 on Alpine Rd) regarding Alpine Rd were not implemented therefore Portola Valley residents will hit a traffic jam at La Mesa and La Questa while evacuating in an emergency. The full recommendation of this previous county traffic study on Alpine Rd was not considered in your DEIR report. This fact cannot be ignored that Alpine Road is ONE road connecting at the Portola Valley town borderline with the Ladera and Ladera residents coming down onto Alpine Road. Therefore, the two traffic reports (Portola Valley and Ladera/County) needs to take into consideration Alpine Rd in its entirety. Residents don't fly up in the air half way down Alpine Road to make their exit, residents remain on the street to get to the exit North or South on 280. We cannot stop an important traffic report at the borderline of Portola Valley on Alpine Road. The Alpine road traffic report from the county must be solved by looking at the previous traffic report and I am requesting a more accurate traffic report utilizing LOS traffic report and an updated county traffic report to accurately make recommendations for the evacuation safety on Alpine Rd. The town traffic report is inadequate and the previous report from the County on Alpine road has been ignored and action not taken to keep Portola Valley residents safe for evacuation.*
- *With Ladera residents coming down off of La Mesa and La Questa, it forces the current Portola Valley residents coming down Alpine Road to be in a traffic jam at Westridge and Ladera shopping center waiting to get on to HWY 280.*

Location of Wedge

- *Move the location of wedge south 50 feet to accommodate a wildlife corridor and dangerous traffic issue at the Alpine driveway entrance and exit.*
- *Turning lanes in both directions on Alpine Rd Stanford pays for, not the town of PV.*
- *A waiting lane at the entrance and exit is a must for mitigation agreements with the town.*
- *Culverts, drainage pipes are replaced on all of Alpine Road by Stanford even those which go under the road.*

Roads

- *The loop main road in the development should be a minimum of 20 feet as that is the state road width recommendation. Twenty-foot road width is the California State law. Please confirm road width of development and reasons fs proposal*

includes a narrower loop road. I don't think PV should give a concession with road width as it's a safety issue for all in Portola Valley.(fire issue)

- *Stanford needs to provide wider turn lanes off Alpine Rd for safety and a waiting lane similar to La Questa waiting lane by the Chevron gas station in Portola Valley to eliminate the potential of the Wedge traffic accidents at the entrance and exit at Alpine Rd. Please mitigate the turn lanes coming off of Alpine Rd, please give 3 options to the Portola Valley staff for Alpine Road traffic mitigation at the entrance and exit areas of the Wedge loop. I continue to propose 12-unit development vs 39 units therefore decreasing the car accident potential at the entrance and exits. The entrance and exit @ Alpine Road mitigation needs to offer 3 options for the pedestrian, horse, and bikers as well.*
- *Move entire development 50 feet South due to the turn in Alpine Road and the added potential of Alpine car accident danger due to the blind turn in the road. Please mitigate this as well.*
- *Another reason to move the development 50 feet South is to allow for the Animal and Pedestrian and horse trail to continue to be offered to the PV residents from Cervantes Road down to Alpine Road through the Wedge property. Our general plan says to maintain the connectable trails for the use of residents whenever possible. We have more miles of trails in this town over even roads. I encourage the County and State officials to visit this town prior to making any major approvals as our town is the smallest and most rural unique in San Mateo County out of 19 cities/town. Portola Valley has 2 grocery stores, one hardware store, two restaurants and multiple small businesses. We enjoy our small rural town.*

Trees: Inadequate comments on trees and mitigation. Comment on all below.

1. "Trees and natural growth should be preserved and increased." This is a statement from the Portola Valley general plan. Your housing plan of 39 units decimates all the trees on the 7.4 acre site now which shows little respect for the scenic corridor or the Portola Valley general plan.

The elimination of 175 trees is unnecessary. Not adequate to save the scenic corridor.

- *This loss of trees decreases the natural view from the scenic corridor. Need to mitigate further. Not adequate.*
- *The trees which are planted, or replacements must be of significant size and not a small size which provides very little screening. This is a mitigation measure.*
- *This decimation of trees is against our general plan and our conservation plan. I am requesting a subdivision of 12 houses and request the requirement of leaving trees around the development while consulting with the conservation committee. If trees need to be replaced the trees must be of a significant size*

- *Trees are increasingly recognized for the importance in managing runoff. Their leaf canopies help reduce erosion caused by falling rain. They also provide surface area where rainwater lands and evaporates. Roots take up water and help create conditions in the soil which promote infiltration.*
- *Large canopies of trees help prevent soil erosion by reducing the impact of rain onto the ground. The water drains down the leaves and branches and soaks into the soil rather than forcefully hitting the ground, which decreases the amount of soil that is washed away with the rain.*
- *Tree roots hold the soil in place, reducing erosion. In these ways, trees lesson the force of storms and reduce the amount of runoff into sewers, streams, and rivers, improving water quality. One hundred mature trees can intercept about 100,00 gallons of rainwater a year.*

Biology. Please comment on omitted information below.

- *The following are located on the Stanford Wedge property: bats, nesting birds should not be disturbed during nesting months, wood rat dens have been thrown away in some cases (please take better care of endangered species woodrat dens), Mt lion & dens, coyote & dens, turkeys, turtles, deer.*
- *Wood rat nest by the bathroom on horse site on the was gone one day a couple years ago. How do you explain that?*
- *Wood rat nests were thrown in the large trash can in 2020 when the vegetation management tractors came to do fire prevention measures on the wedge. Larger trees which remained were damaged by the tractors, insert pictures. Larger trees were taken out which were greater than 7 inches which the permit allowed.*
- _____*woodrat den pictures in trash here (can be submitted if needed)*
- _____*tree damaged pictures here. (can be submitted if needed)*
- _____*larger trees were cut (can be submitted if needed)*
- _____*Tractors went up the hill and branches were supposed to be manually brought to fence line. (pictures if needed)*
- _____*Vegetation management large 3-4 day project was done on a red flag smokey day and the date should have been postponed for fire safety reasons. (now due to our requests, no build on Red Flag days)*

- *What is Stanford's designated procedures for the woodrat nest removal? Past visuals of your care for the woodrat had not been careful and thorough in my opinion. Pink ribboned sticks for woodrat dens were found in the large trash bin.*
- *If an animal den is seen on the property, how is it protected? What is your plan of action?*
- *How will you protect nesting birds? Please comment.*
- *Biologist should be present during all clearing of brush, vegetation management and looking closely prior to tractors. This includes the building of the fire road as*

well. The residents should be notified if vegetation management will occur on the site at least 1 week prior and not last minute. Please comment.

- *Tractors and fencing contractors should be aware of riparian setbacks and respect creeks with care with no tractors going through creeks. Please comment.*
- *A Native American Representative should also be present all days of preparing the land for development to make sure nothing is disturbed of significance. Please comment.*
- *Riparian Corridor should be 100 feet from any creeks or winter springs on Wedge property rather than 55 feet in our building code now? Please comment*
- *If Stanford causes a visual view change for any known Portola Valley neighbor and resident, Stanford should offer brush/tree replacements to camouflage the new development or fire road. Flyers should be put in mailboxes of those houses effected with a generous offer of proper screening not to exceed 8 trees. Stanford should be proactive in screening tree offers to residents who areaffected with visual changes from their property.*
- <u>Parking</u>
- Parking needs increase in PV due to the Stanford Wedge. We need to consider the minimum, average and maximum effects of increased parking and VMT to our town.

From: Karen [redacted]
Sent: Saturday, May 14, 2022 1:55 AM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Draft EIR for Stanford Wedge

Below is a copy of the letter written by Mr. Bob Turcott. I am only attaching a copy of it only to let you know I have read it and agree. I have been following the emails written for the past several months and have come to believe that the plan as currently proposed does not adequately deal with the primary issue and comes at too great a cost for the town of Portola Valley.

Karen Slocum

To: Portola Valley Town Council
Cc: WFPD Board of Directors, Fire Marshal Bullard, Fire Chief Lindner
Re: Draft EIR for Stanford Wedge Project
From: Bob Turcott
May 12, 2014
"The protection of the public safety is the first responsibility of local government"
- CA Constitution Art XIII, Sec 35
Dear Council Member,
An Environmental Impact Report (EIR) is intended to be an unbiased and objective assessment of potential impacts of a project so that an informed decision can be made.
The draft EIR for the Stanford Wedge is not that kind of document. Rather, it reads as if the decision to approve has already been made, and all that is needed is a rationalization to support that approval.
Consider just a few of the draft EIRs flaws:
• The draft EIR ignores significant violations of best practices as defined by multiple fire safety authorities, rather than highlighting the violations and characterizing their impact on public safety.
• The draft EIR uses a contrived methodology, intentionally or unintentionally, that misleadingly understates the ignition potential associated with human activity in the proposed development.
• The draft EIR models fire behavior using uninformatively benign weather conditions — 90th percentile conditions that are identified by the modeling software as representing the low end of the "high" severity range. In fact, decreasing by an additional point to the 89th percentile would put the conditions in the "moderate" range, according to the definitions of the modeling software. But the draft EIR misleadingly informs the reader that "extreme" fire weather conditions were modeled.
• The analysis of the draft EIR relies on an "Evacuation Plan" that is nothing more than an uncompleted template for a plan, created 7 years ago by Woodside Fire Protection District for the Town of Portola Valley to complete and approve. Apparently this was never done.
Calling moderate/high conditions "extreme" does not make them so, any more than calling a template an "Evacuation Plan" makes it a plan.
See my attached comments on the draft EIR for more details.
The residents of Portola Valley expect and deserve a decision about this project that is adequately informed about its potential impacts, particularly with respect to safety.

May 12, 2022
In order to fulfill your "first responsibility", you need an objective, unbiased, and scientifically sound assessment of the hazards and risks that the built environment the developer seeks to create will impose on the thousand of residents who will live in and around it.

If the current consultant is unable or unwilling to provide an objective, unbiased, and scientifically sound assessment, I urge you to hire a consultant who will.
In the end, since the Town of Portola Valley is the lead agency for the EIR, the responsibility for the quality of the EIR lies with the Town Council, not the consultant or the developer.
Thank you,
Bob Turcott

From: ward vercruysse [redacted]]
Sent: Saturday, May 14, 2022 2:55 AM
To: stanfordeir <stanfordeir@portolavalley.net>
Cc: Sofie Vandeputte [redacted]]
Subject: EIR Comments: Stanford Wedge Housing Project

Dear committee

With respect to the Stanford Wedge EIR, I do want to raise a tangential concern.

The EIR states that the Stanford project will not significantly affect the evacuation. The summary In appendix J states:
"the addition of 60 cars to the current condition of an estimated 3884 cars in the area is likely to be inconsequential, because of the small incremental volume of cars as well as the inherent uncertainties in the traffic accumulation model"

While I agree it is a small incremental volume, making the argument that it is inconsequential because the model is too crude says more about the model than about the impact such a change in volume would have.

And that brings me to my main concern. This document implies that without the Stanford project we have a good understanding of the evacuation challenges and that we are prepared and I don't think that is true:

1) For the evacuation study outlined in appendix J, only a static tool was used to estimate thevolume of cars and the routes these cars would be on. There is plenty evidence that an actual evacuation is a chaotic event and a much more detailed analysis is needed.

2) The "Evacuation Plan for the Town of Portola Valley" document that the Woodside Fire Protection District keeps on file is not a plan. It is a good plan for a plan, but when a crisis hits, this document will not be useful. It is also undated and has no revisions so one has to wonder how this document fits in town planning.

Respectfully yours,

Ward Vercruysse & Sofie Vandeputte
405 Cervantes Road
PV

PS Only 50 cars at Alpine Inn are counted in your study. With an overflowing parking lot and parking on Arastradero road, any one who regularly drives by will agree that is a gross underestimation during all opening hours.

From: Kristi Corley [redacted]]
Sent: Monday, May 16, 2022 3:25 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Subject: Confirmation DEIR comments received?

Please confirm you received my comments for the Stanford Wedge DEIR?

All the best,

Kristi Corley
[redacted]]

From: Mary Page Hufty [redacted]]
Sent: Monday, May 16, 2022 6:23 PM
To: stanfordeir <stanfordeir@portolavalley.net>; Laura Russell <lrussell@portolavalley.net>; Town Center <TownCenter@portolavalley.net>
Cc: sarah wernikoff [redacted]]; Maryann Derwin [redacted]]; NIcolas Targ [redacted]]; Craig Taylor [redacted]]; Jeff Aalfs <JAalfs@portolavalley.net>; Craig Hughes <chughes@portolavalley.net>; Jeremy Dennis <jdennis@portolavalley.net>
Subject: Webinar on Portola Valley Wildland Heritage link as promised.

Dear Laura,

I promised you the link to the Webinar we did on Portola Valley's Wildland Heritage in 2001. And I finally found it. Unfortunately Chairman Lopez's powerful land blessing that he shared with us on beginning our work for the wild lands around us, was cut out by the editor when we separated the different segments, but I think you will find that the entire webinar takes a deep look at the issues that have inspire so much feedback around the Wedge development abnd should be considered as we move forward with our housing plan. Please do not narrow your evaluations to ignore the value and risks of developing wild lands.

I personally think a look at this webinar would be useful for anyone who is grappling with the challenge of maintaining Portola Valley's Rural character. I hope you enjoy it. Valentin Lopez a is a hero for the Amamutsun people and for the lands of the central coastal ranges. and wild lands in terms of indigenous land management and restitution.

It is a look at the history of earth day, seismic safety, indigenous people here, including native representation and the point of view of a broader group of non conflicted archeologists.There is no particular point of view presented just a recounting orf history old and new.

It is part of public records so it is part of any complete EIR. Thank you for all the hard work and for taking on the steep learning curve of this process with all of us

https://www.lastlink.us/content/wildlandsheritagewebinar

Mary

A thing is right only when it tends to preserve the integrity, stability, and beauty of the community, and the community includes the soil, waters, fauna, and flora, as well as people. — Aldo Leopold

From: Lynda Brothers [redacted]]
Sent: Thursday, May 19, 2022 12:15 PM
To: stanfordeir <stanfordeir@portolavalley.net>
Cc: Lynda L Brothers [redacted]]
Subject: 2022-5-12 -DEIR comments final

I found these in my 'drafts' unsent file on my laptop. I believe my comments were sent on May 12th, (as noted on the attached), but if not there apparently was some computer glitch. Either with my xfinity or your web site. Please confirm receipt.
Regards, Lynda Brothers

LYNDA BROTHERS – 30 BEAR PAW, PORTOLA VALLEY, CA

COMMENTS ON DRAFT EIR STANFORD WEDGE PROJECT

1. **The DEIR fails to fully analyze the impacts of the Proposed Project**.

   The DEIR omits much important information, and fails to provide a substantial analysis of numerous issues. As such, the DEIR must be rejected in favor of either a substantially revised DEIR under CEQA or the Proposed Project must be terminated. There are many omissions. For example, the number of significant trees to be removed has not been determined. The fire mitigation section fails to address the hundreds of households in the PV Ranch, Corte Madera and Los Trancos neighborhoods who have no alternative means of escape if they face evacuation. The Proposed Project blocks our egress for medical, commercial as well as evacuation events. (The vague reference in the DEIR to a PV Town Fire Evacuation Plan is an error: there is no such plan and if there were, it has not been widely reviewed by the public or adopted by relevant agencies.) The DEIR fails to address many expected traffic impacts including those at the middle school on the upper (dead end) of Alpine Road; will parents of the new homes in the Proposed Project be forbidden to drive to pick up their kids? The many omissions (those briefly noted here and many others) result in an inadequate DEIR with unsupported analysis of potential impacts. Without full explantion, analysis is suspect and necessarily incomplete. With these omissions (and others) the DEIR fails to accurately determine significance of identified impacts and fails to recognize many substantial and foreseeable impacts. For this reason alone, the DEIR must be revised or the Proposed Project terminated. Absent

a complete analysis with accurate and substantial discussion of all potential environmental impacts, and meaningful description of the Proposed Project and project objectives, the document fails to provide an adequate and complete bases for public comment. If a DEIR revision is undertaken, it is imperative that additional public comment be obtained. CEQA Guidelines require that any findings be supported by substantial evidence, with the numerous omissions, it is clear the DEIR fails to meet that standard.

2. **The Project Description Chapter fails to provide a meaningful, specific project objective and fails to evaluate or support the need for the proposed project**.

   The Project Objectives are generic, speculative, and to some extent a mere affirmation of Town code provision. The given objectives do not establish a purpose, need or objective for THIS SPECIFIC PROJECT and have not been substantiated, even were they deemed valid. First, the listed stated objectives have not been substantiated. The first objective ("Maximize single-family housing opportunities in an area the Town has studied and identified for housing") is merely asserted and not substantiated. How does this objective trigger or undergird the Proposed Project? This seems more like a patronizing assertion to a small town than a project objective. There is no evidence here or anywhere in the DEIR that additional housing is necessary, needed or advised and it is certainly not supported at this location. There are other assumptions in the Objective section none of which have been substantiated for the Proposed Project.

   And second Objective ("Include sufficient affordable housing to make progress toward the Town's fair share of low --income housing needs under

the Housing Element of the Town's General Plan, enable a density bonus, and comply with the Town's inclusionary housing ordinance") is similarly marginal and unsupported but further it is also speculative. The reader must not be expected to take personal notice, or judicial notice of other on-going activities in the Town. The DEIR does not provide any further analysis of this issue. Were the DEIR to delve into the Housing Element, it would affirm that such is not required until the end of the year and that amendment to the Housing Element is triggered by the state law, not the usual zoning framework and as such likely subject to substantial legal challenges. To speculatively "offer" to help the Town on this speculative, unresolved issue is insufficient as an objective for the Proposed Project! It is speculative, non-binding (even were it a meaningful objective it is not enforceable as required by the Housing Element rules) and, when presented as an "Objective" it is clearly not enforceable or a mandatory part of the Housing Element. Such an assertion also leaves the Town with no control over, or negotiating rights with that proposed objective. These two of the so-called Objectives for the Proposed Project are not project-specific and as such do not substantiate the Proposed Project. Any project subject to CEQA must establish the need for the project and a meaningfully provide the project objectives, purpose and need. The DEIR fails to do so. By so failing, the alternatives analysis (later in the DEIR) cannot be meaningful since there will be no objectives against which to evaluate the alternatives.

Notwithstanding the rationalization set forth as Objectives in the DEIR this entire section fails to directly support the proposed project. The discussion is inadequate. Please provide information as to whether this is a typical

housing development where the developer (Stanford here) will build and sell houses and in so doing enhance Stanford's coffers and add to the property tax basis of the County. Or rather, is this a proposal to develop private housing that will be maintained, owned and transacted by Stanford. And if that's the case, why must the Proposed Project impact the Town of Portola Valley, why not build it on campus. And if not, what are the financial considerations and/or the real estate valuation figures that underlie the proposed project? Please explain the objective of the proposed project in terms of supplying housing, to whom, why and for what reason. Only in knowing the real objectives of the Proposed Project can a proper analysis of alternatives be completed. The DEIR must, per CEQA guidelines focus on a "project" (see CEQA Guidelines $21065) and the proponent must truthfully and completely describe the proposed project. Neither the public nor the DEIR itself can evaluate a proposed project without this important, required information. Such vague, speculative, inexact, objectives provided in the DEIR are inadequate. And I'll note in passing that the Project description itself is also completely inadequate for failure to evaluate the questions posed herein.

3. **The Alternatives Chapter fails to fully evaluate alternative against the project objective and does NOT include an alternative location**.

   The DEIR fails to set forth appropriate, specific project objectives in Chapter 4. Failing to do so makes it impossible to conduct a meaningful analysis of alternatives in Chapter 20. The current discussion of Alternatives is inadequate. The DEIR asserts that the proposed project is specific to the location, yet fails to provide financial information, land ownership

information or housing controls information to support that assertion. Absent such baseline information the alternatives cannot be and are not fully evaluated. The DEIR omits or inadequately discusses the Proposed Project and hence the impacts. Because of these inadequacies, all the CEQA requirments that are built thereupon, such as cumulative impacts, off-site impacts and discussion of alternatives logically and necessarily fall short. What about an analysis among Stanford's many owned properties, or an alternative location for the proposed project in, for example Palo Alto or on-campus? Any observer will note that other Stanford properties have many fewer off site adverse impacts in that they will likely NOT be located on the only road serving much of the community of Portola Valley. For example, numerous other Stanford properties are not located on Alpine Road which is the only Road reasonably available to many existing residents of town of Portola Valley for access to medical help, commercial areas and of course evacuation in the event of an emergency.

The analysis of the Reduced Unit Count is inadequate because the comparison is to the Proposed Project which the DEIR evaluates inadequately with numerous omissions. Were the discussions of the DEIR Proposed Project more robust or at least adequate, at least such an alternative could be meaningfully evaluated. Such is not the case in this DEIR.

Portola Valley website online form submission

Chris Pouliot
[email and street address redacted] Portola Valley, CA 94028

3/30/2022 10:47

"I'd like to see an option, with a larger setback from Alpine Rd. When the limited storypoles where up, I thought it was too visible from the scenic corridor. I think people like the recent Priory housing because it is so far away from Portola Rd.

Also I'd like Stanford to explore 20 units/acre, so the town can qualify this housing for low income housing per RHNA."

Portola Valley website online form submission

Harry Yip
San Mateo County
[email and street address redacted] Redwood, CA 94063

3/30/2022 14:25

"Please include in your study, the transportation impacts of construction vehicle traffic on Alpine Road in San Mateo County as well as the impact of the traffic on air quality and noise. Show truck all routes. No truck traffic allowed on Alpine Road between Sand Hill Road and I-280."

3/30/2022 14:41

"Per OPR quoted below, the use of 15% below City residential VMT/capita baseline requires conformance with the MTC's Sustainable Communities Strategy. Please show City is in conformance with SCS.

""Residential development that would generate vehicle travel that is 15 or more percent below the existing residential VMT per capita, measured against the region or city, may indicate a less-than significant transportation impact. In MPO areas, development measured against city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the population or number of units specified in the SCS for that city because greater-than-planned amounts of development in areas above the region-based threshold would undermine the VMT containment needed to achieve regional targets under SB 375."""

Portola Valley website online form submission

Roy Johnson
[email and street address redacted] Portola Valley, CA 94028

3/30/2022 15:29

Looks good to me. Let's get it done. We need the housing!

Portola Valley website online form submission

William Kelly
[email and street address redacted] Portola Valley, CA 94028

3/30/2022 23:13

While I am fully in support of the project, I am disappointed that the EIR has such a cursory discussion of the opportunity to make this development a bike transportation showpiece for the town and the county. The development is a couple of relatively flat miles from the Stanford campus: an easy bike ride in both directions. I realize that we live in a car-centric area, but it would be a big win for the environment and for traffic flow if the stated goal was to have one-car households: e.g. by limiting parking.

Portola Valley website online form submission

Harry Turner
[email and street address redacted] Portola Valley, CA 94028

4/4/2022 18:30

"I have read significant sections of draft EIR. Risk mitigations all are credible. Wild fire mitigation analysis is credible.
Town's mitigations authorities on the site without a project are inferior to its authorities with a project is a fire risk mitigation benefit of theproject receiving permits.

Long ago PV put in place for increasing housing density for institution employees up to a possible max of 79 units. Stanford's goals include affordable housing for the Town's Sequoias community employees with much fewer, 39, units. Noting that a large proportion of The Sequoias residents are PV retirees, these people and their service employees will be mutually benefited by the Project. "

Portola Valley website online form submission

Delle Maxwell
[email and street address redacted] Portola Valley, CA 94028

4/5/2022 13:48

I'd like to provide observations on mountain lion habitat in the Wedge area. Our property abuts the Stanford Wedge, and we find that there is a great deal of wildlife activity. I'll direct my comments specifically about mountain lions--they are active here. In March, I discovered a fresh kill of a deer where our property meets the Wedge. My neighbor emailed me a bit later and said that he had seen a male mountain lion and that he had seen the deer kill on our property. I personally saw a mountain lion under my back window in October 2020, and alerted my other neighbor about the sighting. We have frequent deer kills here, so I assume we have an active predator and scavenger community.

Portola Valley website online form submission

Laura Birss
[email and street address redacted] Portola Valley, CA 94028

4/7/2022 12:32

In the traffic section, I believe the EIR is incorrect in that it says that there is no parking on Arastradero Rd. This is either incorrect or is not posted nor enforced as overflow parking for Alpine Inn often extends from Alpine Rd to SP McClennahan's tree service and to the parking/turn out by Palo Alto University. In addition, pre-pandemic, traffic during rush hour, especially if 280 has issues, would frequently back up from Alpine to Palo Alto University, and it could take 10 to 15 minutes to get up to to Alpine Rd. I raise this because Santa Clara County residents along Arastradero Rd (including in those areas impacted by traffic backups) depend upon Emergency vehicles like Fire and Ambulance that come up Arastradero Rd. The Arastradero Rd/Alpine intersection is already marginal especially with the Alpine Inn driveway so close to the intersection (often cars turning left out of Alpine Inn block traffic the turns from Alpine to Arastradero Rd. As the EIR notes, adding additional traffic due to the Stanford Wedge will increase traffic and make these situations worse. I think a traffic study or a traffic simulation (to understand peak traffic patterns once the pandemic is over) should be done and I think a roundabout, or 3 way stop signs, or a light are warranted.

Portola Valley website online form submission

Eric Denys
[email and street address redacted] Portola Valley, CA 94028

4/26/2022 19:53

Our comments on the DEIR are attached. Thank you. Eric Denys & Sonja Declercq

[attachment omitted - already included in emailed letter from Eric Denys on 4/28/2022]

Portola Valley website online form submission

Thomas Buckholtz
[email and street address redacted] Portola Valley, CA 94028

4/28/2022 13:48

"Aesthetics (re DEIR chapter 4) - comment number 1

The discussion of “aesthetics related to visual character” on DEIR pages 4-14 through 4-15 is inadequate because the project proposes – from the standpoint of views from along the trail that parallels (and lies on the west side of) Alpine Road – approximately 650 horizontal feet of visually-essentially-continuous building. (To see the path of the trail, see Figure 4.2 on DEIR page 4-11. To estimate the linear footage, see Figure 4.2 on DEIR page 4-11. The visual height would generally vary from “at least 17 feet” (where there is only one structure and a low point of the roof for such a structure) to presumably “more than 30 feet” (where there is one structure behind another structure). This project would (to use words from the “thresholds of significance” stated on page 4-8) “Substantially degrade of [sic] the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from a publicly accessible vantage point.).” For example, the public would lose views of vegetation and hillsides behind the 650 horizontal feet times an average of at least 20 vertical feet. Public views would occur from the trail on the west side of Alpine Road, from Alpine Road, and from the trail on the east side of Alpine Road. The loss of views of hillsides might generally exceed amounts that one might estimate based solely on the above estimated vertical heights, because the ground-levels for the buildings generally exceed ground-levels pertaining to viewers. Mitigation should not include vegetation that increases risks related to fire. Mitigation should not include vegetation that diminishes safety for pedestrians, horse riders and horses, bicyclists, and vehicle drivers. (Mitigation that would include use of dirt [from the site or from elsewhere] or walls to block views [from the paths and road] of the buildings would add to the blocking of views of hillsides.)"

4/28/2022 13:51

"Aesthetics (re DEIR chapter 4) - comment number 2

The presence of Figures 4.3a, 4.4b, 4.4a, and 4.4b and the absence of similar figures related to other views suggest significant incompleteness (in the DEIR). The report should include enough pairs of views (for which one view assumes no vegetation [or other view-blocking] and one view assumes realistic [with respect to fire risks] vegetation or other view-blocking) that span the gap between Photograph Viewpoint 1 and 50 feet south of Photograph Viewpoint 2 (as shown in Figure 4.2)."

4/28/2022 13:53

"Aesthetics (re DEIR chapter 4) - comment number 3

Discussion related to Figures 4.3a, 4.4b, 4.4a, and 4.4b does not describe assumptions that underlie the development of Figures 4.3b and 4.4b. The vegetation might provide undo risk regarding spreading fire. Mitigation should include – regarding trees – appropriately sparse density of trees and appropriate clearance between tree leaves and the ground."

4/28/2022 13:55
"Aesthetics (re DEIR chapter 4) - comment number 4

Discussion related specifically to light and glare (for example, on DEIR pages 4-15 through 4-18) and generally to visual character is inadequate because the project proposes – from the standpoint of three neighboring residential lots that are generally to the north of the project – at least seven residential buildings for which each building has a side that lies close to the boundary with at least one of the neighboring residential lots. Each of the buildings would have two stories, as seen from neighboring residential lots. Three of the buildings face one lot. The DEIR seems not to discuss visual character, light, or glare that people would see from those lots. Mitigation should remove buildings, move buildings significantly farther away from the boundaries with neighboring lots, include visual-screening vegetation that is on Stanford's property and is [per fire protection guidelines] at least 30 feet [and, possibly, at least 100 feet] from the buildings [and that does not overhang neighboring properties], ensure that no or few windows or glass doors face north, and/or reduce the heights of buildings to one story."

4/28/2022 13:57

"Other CEQA Considerations (re DEIR chapter 19) – comment number 1

Topic: Town residents, business license holders, and property owners.

Discussion regarding "other CEQA considerations" omits relevant topics. (See pages 19-1 through 19-3.) The DEIR does not discuss possibilities – regarding such topics – for "impacts that are ... cumulatively considerable" (Mandatory Findings of Significance, item 2; page 19-1), for "substantial adverse effects on human beings either directly or indirectly" (Mandatory Findings of Significance, item 3; page 19-1), or for cumulatively considerable impacts on human beings either directly or indirectly. Regarding the above-stated topic, the report should discuss each of "impacts / effects / concerns", mitigation (including activities that would produce the mitigation and who would be responsible for the doing of the activities), and aspects that studies indicate are not adequately impactful to need mitigation.

Impacts include quality of life, availability and costs of insurance, services from utilities (including indirect services via fire hydrants), services by police and fire-protection agencies, services by public schools, services by governing agencies, property values, taxes and tax rates, risks during emergencies or evacuations, and so forth.

Mitigation needs to be appropriate regarding each and every affected entity."

4/28/2022 13:59

"Other CEQA Considerations (re DEIR chapter 19) – comment number 2

Topic: Town evolution and character.

Discussion regarding "other CEQA considerations" omits relevant topics. (See pages 19-1 through 19-3.) The DEIR does not discuss possibilities – regarding such topics – for "impacts that are ... cumulatively considerable" (Mandatory Findings of Significance, item 2; page 19-1), for "substantial adverse effects on human beings either directly or indirectly" (Mandatory Findings of Significance, item 3; page 19-1), or for cumulatively considerable impacts on human beings either directly or indirectly. Regarding the

above-stated topic, the report should discuss each of “impacts / effects / concerns”, mitigation (including activities that would produce the mitigation and who would be responsible for the doing of the activities), and aspects that studies indicate are not adequately impactful to need mitigation.

Impacts and concerns include the following. This project would be the only Portola Valley dense housing visible from a major road. This project might lead to precedent-setting changes to town vision, plans, zoning, and so forth. This project might lead to precedent-setting regarding Stanford’s development west of I-280.

Mitigation needs to be appropriate regarding each and every affected entity."

4/28/2022 14:01

"Other CEQA Considerations (re DEIR chapter 19) – comment number 3

Topic: Traffic hazards.

Discussion regarding “other CEQA considerations” omits relevant topics. (See pages 19-1 through 19-3.) The DEIR does not discuss possibilities – regarding such topics – for “impacts that are ... cumulatively considerable” (Mandatory Findings of Significance, item 2; page 19-1), for “substantial adverse effects on human beings either directly or indirectly” (Mandatory Findings of Significance, item 3; page 19-1), or for cumulatively considerable impacts on human beings either directly or indirectly. Regarding the above-stated topic, the report should discuss each of “impacts / effects / concerns”, mitigation (including activities that would produce the mitigation and who would be responsible for the doing of the activities), and aspects that studies indicate are not adequately impactful to need mitigation.

Concerns include the following. Vehicular egress (from the project) northward and ingress (to the project) from the south will be dangerous at each of the two “project-roadway plus Alpine Road” points. (Observations regarding similar activity regarding the intersections “Westridge Drive at Alpine Road,” “La Mesa at Alpine Road” [in Ladera], and “La Cuesta at Alpine Road” [in Ladera] indicate such dangers.) Pedestrian activity at the two points will be dangerous. (Observation regarding the three extant intersections indicate such dangers.)

Mitigation would likely require three new pairs of left-turn lanes – with each pair facilitating each of entering and exiting Alpine Road. (New pairs would be two for the development and one for Glenoaks Equestrian Center.) Mitigation would likely require pedestrian crossing lights at (at least) two places – Westridge and one of the roadways into the Stanford property. Mitigation might require additional capacity to handle school-related bus stops – related to children getting to schools – and additional capacity regarding parents keeping children in cars until buses arrive. (Usage of and activities related to bus stops might include activities by more than just Wedge residents. Usage related to a bus stop near the Alpine Hills Tennis and Swimming Club indicates needs for non-bus parking.) Mitigation would likely require administration and enforcement regarding parking along the side of Alpine Road and regarding parking of trucks in middle-of-Alpine-Road areas. Mitigation may require more removal of dirt than Figure 4.4b suggests."

Portola Valley website online form submission

David Smernoff
[email and street address redacted] Portola Valley, CA 94028

5/2/2022 16:06

"Dear Planning Commissioners -

Attached is a two page summary of ideas supporting carbon negative development of the Stanford Wedge Housing project. I recognize that these ideas do not fit neatly into the CEQA mitigation and EIR process. My comments reflect the urgency of addressing climate change and managing wildfire risk. They broach a number of areas not directly related to the project and thus reflect a need to integrate these solutions with a broad spectrum of our community. I offer these suggestions to stimulate conversations and hope that some elements may provide mitigation opportunities or broader community-oriented activities to address multiple social dilemmas. These ideas are solely my own. Thank you."

5/13/2022 16:04

"Tribal Cultural Resources:
Add an additional Cultural Resource
Cultural-5: Include a land acknowledgment, including acknowledgment of present day tribal cultural resources regarding ancestral knowledge of the land, biological resources and management tools that were effective in managing a fire prone landscape.

Acknowledgment that Incorporating the wisdom and traditional knowledge of the original stewards of the land is key to building resilience back into our local ecosystems.

Mitigation-5: Include indigenous tribes in landscape management to prevent a substantial adverse change in the significance of a tribal cultural resource, (e.g. wisdom, historical knowledge.

Wildfire 2a Mitigation Measures:
Subsection i: Consideration of less thinning of the oak woodland canopy cover than the 40% thinning proposed in the VMP.

Include consideration of multiple oak woodland canopy thinning strategies including restoration of perennial native grasses and other fire resilient native species to mitigate for oak removal and thinning, and to increase overall landscape fire resilience.

Include a component to incorporate Indigenous land management practices by consultation with local indigenous tribes recognizing that their land management resulted in much lower oak density and fire resilient landscapes over long periods of times.

Could include easements, contracts and other mechanisms to provide local tribes on-going access to, and management of ancestral lands. "

Carbon Negative Development

The Stanford Wedge Housing project offers a timely and important opportunity to meaningfully mitigate environmental impact by demonstration of carbon negative development.

One of the most challenging impacts to mitigate is the increased fire danger posed by any new development in the wildland urban interface. Because most of us agree that wildfire danger is driven by climate change, a key element of mitigation must be removal of carbon from the atmosphere. It is the only mitigation that addresses the source of the problem.

Vegetation management, and fire resilient infrastructure and buildings are all important elements of protecting the development and surrounding community from wildfire. By integrating measurable soil carbon sequestration into the project we can truly address the climate crisis even as we provide much needed housing.

How might this be possible?

Sequestration of carbon in soils is recognized as an important strategy in drawing down atmospheric carbon dioxide. It is low tech, well-understood and under-utilized. The most recent IPCC report emphasizes the importance of this tool. The solution to climate change is literally under our feet.

Our community, in cooperation with Stanford University, is in an exemplary position to demonstrate how soil carbon sequestration can be part of mitigating development in fire prone areas. The Alpine Rock Ranch area, and perhaps portions of Webb ranch, could be converted into no-till, organic agriculture which sequesters lots of carbon. The project could be funded in part using Beet Coin (https://beetcoin.org/), community supported agriculture and private donations. The produce could be used in campus food service and sold locally at both adjacent supermarkets and through an on-site farmers market. Some percentage of the harvest should be donated to local food banks to address the scourge of hunger in children in our County. The farm could be operated as a non-profit and managed by a cooperative business model run by climate refugees seeking a new life. One can envision that a group of families with agricultural experience could be provided housing on site in below market rate units supported by local housing agencies, the Town and the County. This could partially support the Town's housing element. By providing an opportunity for climate refugees to start a new life and be integrated into our community, we can address the global injustice caused by climate catastrophes and war.

Research at Stanford already addresses the intersection between agriculture and climate change at the O'Donohue Stanford Educational Farm (https://earth.stanford.edu/farm) and Stanford is a leader in understanding soil carbon sequestration. Building on this research and documenting the carbon uptake of the Alpine Rock farm would be an important demonstration to share with the world to encourage carbon neutral or carbon negative development and ignite broad interest in this important tool.

David Smernoff May 2022 david@grassrootsecology.org

The second element of this plan would be to create a conservation buffer zone around Jasper Ridge Biological Preserve. Jasper Ridge is a globally recognized biological preserve that would benefit from a buffer zone that protects the ecological integrity of the Preserve. Furthermore, integrated land-management plans for protected areas surrounded by other land uses requires cutting edge research on the ecological interactions between a core preserve and adjacent undeveloped lands. It is well-known that native perennial grasslands sequester large amounts of carbon, in much the same way as no-till organic agriculture. The lands to the north and east of Jasper Ridge could be dedicated to intensive native grassland restoration efforts while supporting research to more fully understand the complex nature of soil carbon sequestration (https://news.stanford.edu/2021/03/24/one-earths-biggest-carbon-sinks-overestimated/).

These restoration efforts could and should engage local Indigenous tribes. Local tribes and tribal groups could be granted conservation easements to conduct long-term grassland research and restoration in conjunction with Stanford/Jasper Ridge scientists and the broader community. Stanford research supported the Muwekma Ohlone in their federal recognition efforts and (https://news.stanford.edu/2022/03/21/genomic-analysis-supports-ancient-muwekma-ohlone-connection/) in renaming landmarks to redress historic injustices. (https://news.stanford.edu/2019/11/06/stanford-prepares-rename-jane-stanford-way-honors-relationship-muwekma-ohlone/). Working together with local tribes, we can re-learn the cultural land management practices that Indigenous people used for centuries on this very land and take a step toward redressing the harms of the past while addressing the demands of the future.

John Muir said that "When we try to pick out anything by itself, we find it hitched to everything else in the Universe."

This proposal extends this paradigm to solving complex social issues. When we look at any one problem we find that it's connected to all other problems. By developing integrated solutions we can address historic and current injustices, draw down carbon from the atmosphere, address housing, wildfire and social inequity in our community and inspire others to do the same.

It is important to note that these projects directly benefit the educational and research missions of Stanford and their community relations goals. I want to be clear that these suggestions are not intended to suggest Stanford should be required to undertake any of these as CEQA mitigation, unless appropriate and in lieu of other mitigations. Given the tremendous urgency of addressing the climate crisis and other compelling social challenges, these activities must be supported by the broader community using the scientific, financial and creative human resources unique in the Valley of Hearts Delight. Stanford can supply the soil and make necessary internal policy decisions, the rest of us need to work together to change the narrative on how we deal with our collective problems.

Portola Valley website online form submission

LYNDA L. BROTHERS
[email and street address redacted] Portola Valley, CA 94028

5/4/2022 14:50

I will submit a more in depth set of comments supporting this conclusory observation. The DEIR is an embarrassment; it is incomplete, fails to adequately evaluate the impacts, without technical support finds most of the impact insignificant, fails to set for the need or substantiate the need for the project. In addition, it would border on irresponsible to approve such a project with it's huge numerical impact on our town at this time, prior to completion of the Housing Element revisions and the evacuation plan. the reference to teh House Element issues in the DEIR is totally NOT substantiated, not enforceable, and useless as speculative. A DEIR cannot be based upon speculation.

5/12/2022 15:31

See attached pdf.

[Attachment omitted - already included in emailed letter from Lynda Brothers on 5/19/2022.]

Portola Valley website online form submission

Leonie Walker
[email and street address redacted] Portola Valley, CA 94028

5/5/2022 8:01

It is premature to evaluate and/or permit this project before the area-wide Evacuation Plan is completed later this year. The proposed project will impact me negatively because of the added traffic on Alpine Road.

Portola Valley website online form submission

Susan Miller
[email and street address redacted] Portola Valley, CA 94028

5/5/2022 17:22

Due to fire safety, water shortages and general visibility of this project on the Scenic route into PV, this project needs to be scaled back considerably or cancelled all together. This does not add anything to our town except more traffic and draining resources. It is also not close to the campus so more cars will be in PV to add to traffic congestion and will a light be needed? This goes agains the general plan of Portola Valley.

Portola Valley website online form submission

REBECCA PICKART
[email and street address redacted] Portola Valley, CA 94028

5/6/2022 8:22

"Traffic is the primary concern for me along Alpine Rd.
I would like to see the flow of traffic prioritized, and fully support round-abouts to achieve this purpose. Anyone who has lived (me) or visited European cities knows they do work well. And they come in all sizes!"

Portola Valley website online form submission

John Brew
[email and street address redacted] Portola Valley, CA 94028

5/6/2022 8:38

I would like to see this project downsized or eliminated. The dense housing is inconsistent with rural beauty of the Town; we are in a severe drought; and building more structures in a wildfire prone area seems shortsighted.

Portola Valley website online form submission

maria southgate
[email and street address redacted] Portola Valley, CA 94028

5/6/2022 10:23

"Regarding The Wedge options:
I believe the project should be shifted away from the neighbor's property line.
Thanks for your consideration, Maria"

Portola Valley website online form submission

wynn white
Ladera Community Association (LCA)
[email and street address redacted] Portola Valley, CA 94028

5/6/2022 17:02

On behalf of the community of Ladera, the Ladera Community Association wishes to comment on Draft EIR for Portola Terrace (aka Stanford Wedge Housing Project), Stanford University's proposed 39 housing units comprising 27 houses and 12 apartments to be located on Alpine Road in Portola Valley.

The community of Ladera, comprising 535 homes, is located in the Sphere of Influence of Portola Valley and is accessible by only two streets, La Cuesta and La Mesa Drives. Both of these streets intersect Alpine Road via T intersections with one-way stops for exiting onto Alpine. These intersections are less than a mile from the proposed Portola Terrace site, and are situated between the site and access to Interstate Highway 280.

Alpine Road would be the primary corridor for the proposed Portola Terrace project. This corridor has become increasingly congested over the years, as detailed in the 2017 Alpine Road Corridor Study performed by Kimley-Horn on behalf of San Mateo County (https://www.smcgov.org/media/41141/download?inline=), causing egress from Ladera to become more and more difficult. There are frequent delays at these intersections and especially at peak periods which coincide with the drop off and pickup times of the 300 students at Woodland School (located at 369 La Cuesta). Woodland School does not provide buses for its students. At these times there are daily queues of more than ten cars waiting their turn to turn left onto Alpine leading to multi-minute delays. In addition to poor egress, there is a high incidence of traffic accidents at both intersections due to the speed and high volume of cars on Alpine Road.

The draft EIR's Traffic Impact Analysis erroneously concludes that Portola Terrace would have a less than significant impact on existing traffic and therefore, no mitigation is required. This conclusion is based on the Traffic Operational Analysis rates at these intersections which were measured to be LOS D at La Cuesta Drive and LOS C at La Mesa Drive signifying "long traffic delays" and "average traffic delays" respectively. These measurements were conducted by Hexagon Transportation Consultants which purportedly measured peak hour intersection turning-movement volumes in November 2019.

We believe the Traffic Impact Analysis to be inadequate in the analysis of the traffic at these important intersections because either Hexagon did not conduct their measurements when Woodland School was in session or erred in another manner. Either way, the Traffic Impact Analysis results do not reflect current conditions. A separate resident conducted turning-movement count on April 7, 2022 between 7:50 and 8:50 am showed morning peak hour traffic to have a median wait time of 50-51 seconds signifying "extreme traffic delays" and resulting in a LOS F rating (see Appendix summary of these measurements along with a link to photos). Woodland School is now back in full session, with 300 students, but fewer families car-pooling than in November 2019 due to COVID concerns.

The community of Ladera has significant concerns that the increased traffic resulting from the proposed Portola Terrace project will only further exacerbate the already difficult and dangerous traffic congestion conditions at La Mesa and La Cuesta. In addition, with the increased incidence and severity

of wildfires in California, the restricted egress and traffic conditions for our community that would require evacuation during a fire or other emergency, is of great concern not only to Ladera but also Portola Valley residents.

We request that the DEIR be revised with updated traffic counts and analysis that reflect the actual peak hour delays at the La Mesa and La Cuesta intersections with appropriate mitigation measures. We also respectfully request that the Town of Portola Valley include in any Development Agreement with Stanford a provision for sharing of costs to implement intersection improvements, including any necessary land requirements, necessary for the La Mesa/Alpine and La Cuesta/Alpine intersections.

Sincerely yours,

Wynn White
President, LCA

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Appendix

Resident Conducted Turning-Movement Counts – April 7, 2021

Ladera volunteers counted/timed vehicles leaving Ladera April 7, 2022 at the La Mesa and Alpine Road intersection. This is the intersection that the DEIR's Traffic Operational Analysis rated as a C signifying "Average traffic delays" (15-25 secs delay/vehicle). Despite traffic at the intersection being considered lighter than normal (Menlo Atherton High School starts late on Thursdays), the results were as follows:

Between 7:50 am and 8:50 am, volunteers counted vehicles from La Mesa Drive turning onto Alpine Road:
- 227 vehicles turned Left from La Mesa onto Alpine Road

- 24 vehicles turned Right onto Alpine Road

- 29 vehicles turned Right into the Wells Fargo/Stanford Health Center parking lot and exited onto Alpine Road as a shortcut to avoid the queue at La Mesa

- 4 vehicles exited the Ladera Shopper/Bianchini's parking lot to turn Left onto La Mesa then Alpine

- 3 vehicles turned Left into Ladera Shopper/Bianchini's lot from La Mesa, thought to be for queue avoidance

Total: 287 motor vehicles

Vehicle Delays: from La Mesa Drive turning Left onto Alpine Road 7:50-8:50 am

Number of cars sampled = 44
Mean time waiting to exit onto Alpine = 61 seconds
Median time = 50-51 seconds
Shortest time = 12 seconds (no back-up)
Longest time* = 2 minutes 38 seconds (9 cars in back-up)

While this effort was conducted for one hour, this sample would conclude that the LOS for this intersection should actually be rated an "F" which few Laderans are unsurprised by. According to the DEIR's Traffic Operational Analysis, the turning-movement counts were conducted in November 2019, prior to Covid-19. This should have accounted for Woodland School Traffic, but we strongly suspected it did not. This intersection is a mess twice daily for 9 months of the year, primarily due to Woodland School morning drop-offs and afternoon pickups, and also during the summer months when Woodland School hosts summer classes and camps.

To get a sense of the morning backup, please see some photos shared at https://drive.google.com/drive/folders/1UEdD5ijVNNYcls3b5YXsTMrmDyM3CmvE?usp=sharing. In particular, take a look at the video as this gives the best sense of the daily traffic experienced at this intersection. Keep in mind, this is considered a "light traffic" day.

[Attachment omitted - duplicate of above text]

Portola Valley website online form submission

Edward Holland
[email and street address redacted] PORTOLA VALLEY, CA 94028

5/6/2022 17:25

"I am a resident of Portola Valley, and am extremely concerned by the application submitted for building on the site known colloquially as ""The Wedge"". I would encourage the Town of Portola Valley to reject the Draft EIR as incomplete, inaccurate and unsuitable for purpose.

I have reviewed the Draft EIR and find the report and the planning application unacceptable on the follwing terms.

Traffic and safety impact
The report makes an estimate for impact on traffic and the additional journeys that would result if the development were in place. This estimate makes no allowance for the timing of such journeys, nor does it count traffic generated by non residents in the new dewllings. The location of the proposed entrance and egress from the development on to Alpine Road are of limited sight lines due to curves in the road and changes in gradient. Moreover this stretch of road has a higher speed limit, and is travelled by a diverse range of road users.
Traffic impact considerations do not take account of time of day or ""Rush Hour"", and the high transient traffic levels that will be generated, adding to busy conditions on one of only two Town access and egress routes available to residents.

Environmental impact

It is to be lamented that the development is proposed for an undeveloped ""green field"" site. The location presently forms a green space for wildlife, and forms part of an interlinked network of undeveloped land that allows free movement of natve fauna. It is my opinion that this should be preserved with the highest priority - once it is gone, it is gone.

Wildfire Safety

This is a close-spaced building development, located within a high risk wildfire area, appears to show little concern for its residents safety in an emergency. Spread of fire, and ease of evacuation would appear to be compromised. Moreover, adding significant new housing along one of the two only available paths to safety open to PV residents is a serious compromise to the safety of all.

Planning guidelines

Portola Valley has long prided itself for maintaining a rural character. The development as proposed makes no attempt to meet this desirable attribute. Indeed, the name ""Portola Terrace"" mocks it. The visualisation of close spaced Town Houses are entirely unsympathetic to the natural landscape in which they are proposed to be built.

Failure to address low cost housing needs

The development as proposed is chiefly a commercial one. Most units are to be sold, with only a minimal gesture towards affordable housing, and that, with no assured futre. This is entirely at odds with local needs, pressures from the state to ease the housing situation. It is also unnecessary profiteering by a wealthy institution.

Loss of facilities

The location proposed for the development already provides a local amenety which is in harmony with the environment. Horse boarding and an arena for training and excercise exist which are available to animal owners of modest means. This same, low impact, operation also provides employent for animal custodians and site services.

In closing, I can only recommend again that at the minimum, the development be rejected as initially proposed, and preferrably declined outright. Land, especially undeveloped green space is a scarce resource and its consumption must be considered with extreme care."

Portola Valley website online form submission

Nicole Amundsen
[email and street address redacted] Portola Valley, CA 94028

5/10/2022 10:57

The Stanford Wedge is poised to replace heritage trees, with housing that can be built elsewhere, closer to mass transit. The Foundations of this community is built on our long term vision to protect trees, habitat and natural environment. Removal of the oak woodland surrounding the proposed development is irreplaceable. The impact of wildfire risk with denser development only increases the poor choice of this location for housing. And aesthetically, this is the grand natural entrance to our environmental gateway to the foothills, the oak forest that is the mental health equivalent to staring at the ocean when you drive into Portola Valley will be eradicated. Our General Plan is the grand vision we should adhere to or we see the slippery slope of dense development, and the end of this rural enclave and its consumption into dense sprawl. Our elected leaders need to protect the natural environment its residents have fought for since our inception.

Portola Valley website online form submission

Sue/Gene Chaput
[email and street address redacted] Portola Valley, CA 94028

5/10/2022 13:01

"Concur with all factors challenged by CEQA. The Project would result in immediate and significant negative impacts. Simple as that. This project will produce disastrous effects and is not essential nor necessary for the success of Portola Valley.

- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Geology and Soils
- Hydrology and Water Quality
- Wildfire"

Portola Valley website online form submission

Christine Sherry
[email and street address redacted] Portola Valley, CA 94028

5/10/2022 14:22

"I think the EIR is insufficient in several key respects.
First, it asserts that there will be no significant impact of the project on traffic in terms of emergency considerations (including fire). There does not seem to be any evidence of analysis of that concern. Perhaps when the project was initially conceived, there was not the level of concern of wildfire risk that now exists, but this analysis is at best conclusory and I see no evidence of any analysis.
There also seems to be no analysis of the impact of the development of homes close to one another for wildfire risk and mitigation.
Most surprisingly, there is no discussion of alternative sites for housing for Stanford. Since the pandemic started, there has been a glut of newly available housing all along the El Camino corridor and indeed throughout Silicon Valley. Studies by RAND and others show the housing concerns in California could be ameliorated by conversion of existing real estate and other commercial stock. Nowhere does the EIR articulate any analysis of housing availability anywhere else in Silicon Valley. To presume just because Stanford owns the land that there would be no negative consequences from building new sites in effectively virgin land when it would be better long term for transportation and urban planning uses to consider conversion of existing buildings along major existing traffic corridors and nearer to the University is in my mind completely inconsistent with CEQA. There should at least be an analysis of what other existing building stock could be converted at less risk to the environment both short and long term, and that would serve the long term urban planning needs of the region more effectively. All signs point to prudent communities looking to use existing stock, not build new housing when the opportunities for conversion are right amongst us. "

Portola Valley website online form submission

Janet Mountjoy
[email and street address redacted] Portola Valley, CA 94028

5/10/2022 14:43

"My opinion mirrors exactly that of Valerie Baldwin. I agree with everything she says.
Public Comment on Stanford Wedge Draft EIR dated March 2022 by Valerie Baldwin, 243 Echo Lane, PV.
[phone number redacted]

[duplicate text from Valerie Baldwin's emailed letter of 5/11/2022 omitted]

Portola Valley website online form submission

Rusty Day
[email and street address redacted] Portola Valley, CA 94028

5/11/2022 6:17

"Please see my separately uploaded documents which include pdf copies of a 5/11/2022 letter to Laura Russell, an October 6,2020 letter to Jeremy Dennis and an October 4, 2020 Report of Michael Angell on the Hermit fault."

5/11/2022 6:22

Please see my separately uploaded documents which include pdf copies of a 5/11/2022 letter to Laura Russell, an October 6,2020 letter to Jeremy Dennis and an October 4, 2020 Report of Michael Angell on the Hermit fault.

2 of 3

5/11/2022 6:29

"Please see my separately uploaded documents which include pdf copies of a 5/11/2022 letter to Laura Russell, an October 6,2020 letter to Jeremy Dennis and an October 4, 2020 Report of Michael Angell on the Hermit fault.
3 of 3"

[attachments omitted -- already included in emailed letter from Rusty Day on 5/11/2022]

Portola Valley website online form submission

Herbert Schilling
[email and street address redacted] Portola Valley, CA 94028

5/11/2022 13:04

[no text, attachment only] [first attachment submitted by H. Schilling omitted per request below]

5/11/2022 13:22

Please replace previously submitted docuement "Environmental Report #3" with the attached "Environmental Impact Report-Final".

May 10, 2022

Comments: Regarding **Stanford Wedge Housing Project Draft Environmental Impact Report** – by Portola Valley resident Herbert Schilling

I believe the above reference draft Environmental Impact Report is **deficient** in the following areas.

In the Subsection of **WILDFIRE – Weather Conditions**, the report states "The most Important influence of fire behavior is wind. …Aloft winds… can carry embers and firebrands downwind."

In a subsequent paragraph, the Report notes "In the region, the wind normally blows west but the most severe fire conditions occur in association with strong north and northwest winds in the vicinity of the Project site, which are common in the fall." The report then seems to dismiss this possibility by stating the Project would not "necessarily experience this type of wind" for several reasons. The Report does rule out this very dangerous possibility.

Additionally, there is nothing in the **WILDFIRE** subsection addressing the significance of the steep slope near the Project as this relates to enhanced fire danger. This may be due to the common understanding that fire always burns uphill. However, as a July 2018, PBS Newshour report entitled, "California wildfires are breaking the rules by burning downhill fast", as was case in 2018 Carr wildfire in Redding, CA. At the time, a California Fire spokesman Scott McLean noted "Fires are burning almost as fast downhill as they are uphill." The 2017 Wine Country and 2021 Napa wildfires also involved fire burning downhill. High winds contributed to the December 30, 2021, fast moving, downhill burning fire near Boulder, Colorado that destroyed over 500 closely packed residential homes in a matter of hours. One thousand homes were destroyed before the fire was completely contained.

A downhill burning wildfire would have devastating effects on the Project's initially planned densely concentrated homes. In a downhill burning fire, wind would propel burning embers and firebrands downhill with enough force to break glass doors and windows and ignite the combustible materials inside the Project's densely-packed homes. The resulting fire would send a cloud of smoke and fire across Alpine Road effectively closing off one or three escape routes for Portola Valley residents.

The fact that under the right conditions, wildfires can and do burn downhill, is a compelling argument for rejecting the construction of the entire Wedge project.

If the Project is allowed to be built despite this obvious danger, then at least require a minimum one-acre parcel for each home. The number of homes allowed on the property should also be reduced in the interest of wildfire safety.

The Subsection **TRANSPORTATION** has the following **deficiencies**.

The tiny two-lane Alpine Road that fronts the Project is inadequate for the current traffic load. The proposed Project, especially during the initial construction phase is likely to result in gridlock several times a day. When combined with additional projected ADUs,10 this gridlock would be extended over longer periods of time.

The Report tends to focus only on traffic flow on Alpine Road going into and out of the Project. It does not address the current problem of traffic entering Alpine Road from the Ladera shopping center and business park, Westridge, Arastradero and nearby Golden Oak (across from the Alpine Inn). All of these entrances to Alpine Road, will have longer wait times because of the added traffic going and coming from the Project and additional projected ADU housing. At times, it is currently difficult to turn left from Golden Oak (across from the Alpine Inn) as there is no middle lane. With additional Project traffic going towards Portola Road this situation will be exacerbated.

The projected number of daily trips to and out of the project seems to be greatly underestimated. Students attending school in Portola Valley, tend to make multiple trips to school and extracurricular activities each day. I suspect the total number of daily trips into and out of the Project will be at least double what is projected as parents take their kids to school, go shopping, or to work.

If the Project goes forward, Alpine Road should be widened to four lanes with two legal bike lanes from the intersection of Highway 280 to Portola Road in anticipation of more ADUs.

If the project goes forward without widening Alpine Road, stop lights should be installed at Westridge and Arastradero to break up the flow of traffic so that it is easier to exit from Westridge, Golden Oak Drive and Arastradero. However, it is noted that Portola Valley has been famous for having no stoplights.

With the addition of two new intersection on Alpine Road, the speed limit is certainly going to be reduced from 40 MPH to 35 MPH. If no middle lane is added in front of the Project, I suspect the speed limit will need to be further reduced to 30 MPH due to traffic safety consideration.

Portola Valley website online form submission

Ronald Eastman
[email and street address redacted] Portola Valley, CA 94028

5/12/2022 0:26

[no text, attachment only]

Ronald Eastman
5 Applewood Ln
Portola Valley, CA 94028
11 May 2022

Planning Commission
Town of Portola Valley
Portola Valley, CA 94028

RE: Review of Stanford Wedge Project DEIR

I am going to focus on the part of the Draft Environmental Impact Report (DEIR) which discusses how the project impacts hazards and risks associated with wildfire (Chapter 18 and Appendix J). I will start out, up front, by saying that this DEIR is entirely inadequate with respect to it's description of how the project, as described, will affect the fire ecology of the area, it's mitigation or enhancement of wildfire hazard, and the risks it presents to the neighboring residences.

As is noted in the DEIR, the project site sits adjacent to some of the most severe very high fire severity zones (VHFSZ) in Portola Valley. This was noted by consultant Ray Moritz in 2008 when he was hired by The Town to map out The Town's fire risk. As Woodside Fire Protection District (WFPD) Fire Marshall Don Bullard told The Almanac in February 2020, "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." The previous Fire Marshall, Denise Enea, expressed a nearly identical opinion: "[E]ven 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."

The most glaringly obvious problem with the wildfire "analysis" presented is that it ignores structural fuels. A typical habitable structure contains several thousand times as much fuel than is present on an acre of vegetative fuels. As we saw most vividly with the Marshall Fire in December 2021—where a wind-fed grass fire reached the high housing density communities of Superior and Louisville Colorado, spread structure to structure, and destroyed over 1000 homes—structure to structure fire spread is a real and significant mode of fire spread in the Woodland-Urban Interface. Unfortunately, the science of wildfire propagation is only now coming to terms with the combined effects of increasing rural development, years of fire

suppression and climate change, and the standard-of-practice models used to forecast and predict fire behavior do not take into account structural fuels, either in their estimation of fire intensity, or of rate of spread.

It is one thing to not know how to model a significant risk factor. It is quite another thing entirely to pretend it doesn't exist, or worse, to pretend that your development is a non-combustible fire break that is going to dampen the intensity or rate of spread. Which is what this study does. Houses and cars are treated as non-combustible. Only if Stanford University were to construct the houses of cinderblock would they be non-combustible. Automobiles present a special hazard because they are easily ignited by embers (Merinhides et al, NIST TN-2205, 2022), which then ignite the structure beside which they are parked. There is no suggestion given as to how Stanford will make the vehicles ember resistant, and therefore no reason to conclude that no structures will ignite in a wildfire ember storm.

Radiant heat studies of fiber cement board covered exterior structures (V. Colonel, University of Alberta Masters Thesis, 2019) show that when exposed to a radiant heat flux of 50 kW/m2, such assemblies will ignite within 18-22 minutes, on the *inside*. At close distance, a house fire can generate in excess of 100 kW/m2. Conduction is efficient at transferring heat from the outside to the inside. Also, any windows facing such a structure would likely fail in even less time, again resulting in fire spread. This DEIR does not address that.

The DEIR's definition of "wildfire risk" is arbitrary and meaningless. They define it as a weighted sum of wildfire hazard analysis (50%), a potential ignition sources analysis (25%), and the assumed wildfire suppression response (25%). No justification is given either for the weighting or for the choice of factors. Why pick these three factors? Why the weighting? In Appendix J they acknowledge that they could have chosen not to use weighting, but no rational or justification is given for their choice. As to the factors they chose: why is flame intensity included (something they predict will be reduced), but rate of spread (something they predict will be increased) not included? That is not right.

Figures 31 and 44 of Appendix J show that, as a result of their fuel management plan, the rate of fire spread will increase. But as described above, the DEIR's definition of "wildfire risk" ignores it. Their vegetation management plan would decrease the amount of fuel in certain zones, so they *do* include fire intensity in their analysis. That is dishonest.

The DEIR shows us nothing in the way of any kind of sensitivity analysis. For instance, would their conclusions be different if they had assumed a lower moisture content than had been present during the selected 5 day period in October 2019? How much variation is there in October, from year to year, and what is the trend resulting from climate change? Also, I am not an expert, but from the little I do know there is a certain amount of subjectivity in the choice of fuel models assigned. How would their results have changed if, for instance, instead of 19% GS1 and 5% GS2, they had assumed 19% GS2 and 5% GS1 as described in Table 1, pg 16 of Appendix J? Note: GS2 has a higher fuel loading than GS1. Although I am not a fire dynamics

expert, I *am* a retired computational astrophysicist, and I know that when there is uncertainty in your inputs, you do a sensitivity analysis to determine how much the uncertainty affects the results. Nothing of the sort has been presented in this DEIR.

Finally, the DEIR assumes only the 90th percentile wind conditions, meaning that 10 percent of the days, or 36 days of the year, conditions are less favorable than assumed. I believe that means they've left off the entire month of October. I believe that makes this DEIR's wildfire analysis worthless.

Sincerely

Ronald Eastman

Portola Valley website online form submission

Victor Anderson
[email and street address redacted] Portola Valley, CA 94028

5/12/2022 7:15

"Build the homes on the current Glenoaks horse facility site.
Move the Glenoaks horse facility to the site of the departing horse facility, where Stanford currently intends to build new homes.
Much safer to build homes surrounded on two sides by roads (Alpine and Arastradero) and a creek. "

Portola Valley website online form submission

Phillip Palmer
[email and street address redacted] Portola Valley, CA 94028

5/12/2022 15:55

"The EIR betrays a pro-development bias and suggests that the Town of Portola Valley is ready to bow down before Stanford's desire to develop the Wedge.
The EIR lists impacts to flora and fauna but regards them as "less than significant with mitigation." What gives us the right to interfere with flora and fauna that we share the earth with? We must listen to the voices of the plants and animals that will be negatively impacted by this project.
The EIR cites increased wildfire ignition risk but puts its faith in mitigation. Why do we continue to expose ourselves to more wildfire risk? Don't we remember the recent CZU fire?
The EIR admits that trees, including "Significant Trees," will be removed, but cavalierly dismisses this impact as "less than significant." Once these trees are removed, they are gone forever.
If we have a major wildfire event in Portola Valley, evacuation is going to be a challenge, but the EIR minimizes the impact of increased evacuation traffic generated by Stanford Wedge.
The EIR admits that there is an "environmentally superior" alternative, the "No Project Alternative." The Town of Portola Valley should pay attention to its own analysis and disapprove the Stanford Wedge project and go with the No Project Alternative.
Portola Valley has already expanded too much, negatively impacting the environment and increasing the danger to residents. Don't make things worse by approving Stanford Wedge! Tell Stanford to develop housing on their campus. How about using the golf course?"

Portola Valley website online form submission

Anne Ashmead
[email and street address redacted] Portola Valley, CA 94028

5/12/2022 18:32

"There is always an impact on a community when dense housing is built. The best plan to have no impact on the environment and the town would be to build the Stanford housing closer to the campus or on the campus. There are closer options and Stanford could build taller buildings within their own campus that could accommodate the professors. Why they want to have more people driving on Alpine Road and into Palo Alto is beyond me. Why would Portola Valley agree to this type of development? Animals will be displaced, trees cut down, increased light in the night sky, increased traffic, increased impermeable surfaces affecting runoff and the destruction of Portola Valley's scenic corridor. Stanford should keep their housing on their campus or adjacent properties.

This development does not conform to the Portola Valley Town plan that states that structures are to ""complement and be subordinate to the natural surroundings"". These two-story, densely-built structures will not be conforming nor complement the natural beauty of that property which is along Portola Valley's scenic Alpine Road and do not conform to the square footage limits per acre that most of Portola Valley requires.

The related light spread and glare from this development will be more than stated in the EIR. It would not even be safe to have a development as large as that if it is poorly lit. We were so limited to our lighting when we did our remodel years ago, and I can't imagine a development with that low level of lighting. 39 homes and related parking areas will be lit and will have a dramatic effect on the light spread and glare, not to mention the additional cars lighting up the area.

I saw reference to the removal of at least 114 trees and this will have more than a small effect on the natural aesthetics of the area and on the biome. Plants and animal species will all be affected and some destroyed. All of the species that live there should be protected. This should not be down played just to house professors that should be located closer to Stanford's campus. People from all over the Bay Area come to Portola Valley to enjoy nature and destroying this natural beauty will be a loss not just to the residents of Portola Valley but to all that visit here to walk and to bike.

The addition of 39 homes will have a dramatic impact on the traffic in the area. We are not even at pre-Covid traffic levels yet and the Alpine corridor is extremely busy. Before the pandemic, the back-up trying to get from Portola Valley into Palo A lot/Menlo Park was backed up into Portola Valley on Alpine Road during the morning and afternoon/early evening hours. The report seems to downplay the additional car trips and miles driven, and this study reviewing these numbers should be evaluated. People drive and I can't imagine that the Stanford staff will bike and take public transport to work as listed in the report. Also, it is unlikely that the low -income units will have people that work in Portola Valley living in them.

In summary, I think the entire EIR downplays the changes that will come with this type of development. Increased traffic, increased light, habitat destruction, species destruction, scenic beauty destruction will all be significant. The EIR downplays all of this and it will be a shame to move forward with this development. Stanford should evaluate alternate sites and let us know what other sites could work."

Portola Valley website online form submission

Lisa Lovazzano
[email and street address redacted] Portola Valley, CA 94028

5/12/2022 20:55

" I am concerned about many items in the EIR.
1. ""if lands are developed in the future"" Item 29-I thought I read the remaining lands would be kept as open space now there is a change to the wording it says ""if possible""
2. The Ad Hoc Housing Committee list ""the potential for additional units at Stanford Wedge (would be separate and incremental vs.the scope in the current EIR)
Could you please explain this.
3. With all the increased vehicle, bicycle and pedestrian traffic will the town put in new traffic safety controls such as traffic lights and street lights at the corner of Westridge, Alpine road and Portola Road?
4. I appreciate Stanfords views on protecting the Riparian Forest.
5. Will there be a new comprehensive Fire mitigation plan now that there are new multiple housing units on Alpine Road?
Thank you for all your hard work on this project.
Sincerely,
Lisa Lovazzano"

Portola Valley website online form submission

Nancy Bovee
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 7:03

I don't think the EIR projections regarding traffic/transit are anywhere near correct. The current impact of cars turning onto Alpine rd is already at near maximum. I don't think any left turns onto or off Alpine Rd. should be allowed along this stretch of the road. Increasing impatience of drivers creates an additional hazard. Please consider a better plan for the many automobile trips turning onto and off Alpine Rd.

Portola Valley website online form submission

Bruce Lovazzano
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 7:59

"Below is Stanfords proposal. Now they have changed that proposal to ""open space -if possible"" Please explain this. Also will the Fire Safety elements and the Traffic/ Evacuation Plans be checked and tested thoroughly?
Thank you,
Bruce Lovazzano

Stanford University has submitted an application to the Town of Portola Valley to develop a portion of University property often referred to as the “Stanford Wedge.” They propose to develop 27 single-family residences for Stanford faculty and 12 workforce housing units that would be available for below market rate rents. Approximately 7 acres would be developed and the remainder of the 75-acre site owned by Stanford would be preserved as open space. The proposed development would be clustered on a small portion of the property along Alpine Road, which is the flattest portion of the site. The entire site would be subject to a Vegetation Management Plan to address fire safety."

Portola Valley website online form submission

Frederick Hull
Mountain Lion Foundation
[email and street address redacted] Sacramento, CA 95812

5/13/2022 8:46

[no text, attachment only]

We are writing today to request changes or augmentation to the Stanford Wedge Housing Project Draft Environmental Impact Report to correct an oversite. In particular, the report fails to address the impact of the project on the local mountain lion *(Puma concolor)* population.

On April 21, 2020, the California Fish and Game Commission accepted for consideration the petition submitted to list an evolutionarily significant unit (ESU) of mountain lions *(Puma concolor)* in southern and central coastal California as threatened or endangered under the California Endangered Species Act *(Petition to List Mountain Lion as Threatened or Endangered Species under CESA (ca.gov)*, at the meeting they provided notice *(Notice of Findings on the Petition to list southern and central coastal California ESU of Mountain lions)* that the Southern California/Central Coast ESU of mountain lions is a candidate species as defined by Section 2068 of the Fish and Game Code.

The following excerpt from the petition is relevant to the impact of development on our threatened Central Coast mountain lions:

> *Although low effective population sizes standing alone are cause for conservation concern for Southern California and Central Coast mountain lion populations, there are other human-caused factors that further limit their long-term persistence. Habitat loss and fragmentation due to roads and development have led to extreme levels of isolation and high mortality rates. With low genetic diversity and high risk of inbreeding depression due to genetic isolation, vehicle strikes on roads, increased conflicts with humans that lead to depredation kills, high levels of intraspecific strife likely due to limited space and lack of connectivity, rodenticide and other environmental toxicant poisoning, and impacts of more frequent human-caused wildfires and climate change, the small isolated mountain lion populations of Southern California and the Central Coast will likely not persist without the restoration and enhancement of functional connectivity between populations and large blocks of heterogeneous habitats.*
>
> *Loss of mountain lions in Southern California and the Central Coast would be devastating not just for the mountain lions themselves but also the many species that directly and indirectly rely on them. These top predators are important ecosystem engineers that facilitate healthy ecosystems and allow biodiversity to thrive (Ripple and Beschta 2006; Ripple and Beschta 2008; Ripple et al. 2014; Ruth and Elbroch 2014; Barry et al. 2019; Elbroch and Quigley 2019). As keystone species mountain lions help support plant recruitment in riparian areas, stabilize stream banks, and sustain healthy habitats for a myriad of aquatic and terrestrial species, including plants, invertebrates, fish, amphibians, reptiles, birds, and mammals (Ripple and Beschta 2006; Ripple and Beschta 2008; Ripple et al. 2014). Their kills are also an important source of food for multiple terrestrial and avian scavengers (Ruth and Elbroch 2014; Barry et al. 2019; Elbroch and Quigley 2019).*
>
> *Existing laws and regulations have proven to be inadequate to protect Southern California and Central Coast mountain lions. Although the California Wildlife Protection Act of 1990 (Proposition 117) prohibits hunting of mountain lions and has funded the acquisition of important habitat for preservation, the Act alone does not ensure that core habitats and connectivity are protected from development, highways, or other threats. Moreover, numerous mountain lions are killed each year pursuant to depredation authorizations issued under this regime, and there is no limit to the number of depredation permits a property owner can requestor any limit to the number of depredation permits which can be issued for any population. And while CDFW has proactively issued a bulletin detailing a new depredation policy*

for mountain lions in the CC-S and SAM that requires property owners to first implement non-lethal measures prior to being issued a kill permit, this policy does not apply to other vulnerable populations.

Other environmental laws also are insufficient. State and local agencies continue to interpret the California Environmental Quality Act (CEQA) as allowing for the construction of highways and other development in mountain lion habitat and essential corridor areas without adequate mitigation despite severe impacts of such projects on mountain lions. Agencies likewise have generally interpreted CEQA and the federal National Environmental Policy Act as not requiring implementation of connectivity measures when projects fragment or destroy mountain lion habitat. And perhaps most importantly, Caltrans lacks a clear affirmative mandate to design,build, or improve crossings for mountain lions on existing highways, despite the undisputed role of transportation infrastructure in preventing connectivity and gene flow.

Future human population growth and associated development will further diminish and fragment remaining mountain lion habitat, driving Southern California and Central Coast mountain lions closer to extinction and undermining any chance of recovery. Should state and local agencies continue to build and expand roads and highways and permit construction in wildlife habitat and corridors without ensuring adequate habitat connectivity, the genetic health of mountain lion populations will continue to decline while the number of mountain lions killed by vehicle strikes and other human activity will increase.

Ultimately, without a reversal of these trends, mountain lions will disappear from Southern and Central Coastal California in the coming decades, representing a loss of the species from a significant portion of its range in the state. Nevertheless, most of the threats facing mountain lions can be halted or sufficiently reduced if CDFW is provided with adequate resources and all relevant state and local agencies sufficiently prioritize mountain lion conservation in their decision-making. Legal protection of mountain lions under CESA, along with the attention and resources that such listing will generate, can help ensure the long-term survival of this iconic and ecologically significant species in Southern and Central Coastal California.

Mountain lions are not discussed nor included in the Draft EIR Mitigation Measures and are relegated to Appendix D without discussion beyond:

> *"The mountain lion (Puma concolor), which is a candidate for state listing, could potentially occur on the site on occasion. However, this species is unlikely to den on the site given the extent of human activity in the adjoining residential areas, and no take of this species, as defined by CESA, is expected to occur as a result of Project activities."*

Mountain lions, as large carnivores, have a large home territory and will occasionally appear at any location in their territory, this does not diminish their need to have access to all of the territory. Further, the Draft EIR makes no mention of the method used to determine the actual frequency or presence of mountain lions on the site.

A female mountain lion, after giving birth to kittens, will not use a fixed den but will move them frequently among various crevices, caves and dense brush. They have been known to place kittens under houses or in overgrown yards. The Draft EIR makes no mention of the method used to determine the suitability, or lack thereof, of the site for caching kittens, nor does it address how increasing the

density and human activity would not have a negative effect on raising kittens on the remainder of the site if we accept the premise that mountain lions avoid human development and activity.

The Draft EIR states that there are mule deer on the project area which are a primary source of food for mountain lions.

The subject property is part of an open space between other potential habitats or home ranges, what is the effect of the development on dispersing young lions.

How would the change from a day time agrarian use of the property to 24 hour residential affect the deer population (food) or avoidance (disbursal) will increased traffic increase mountain lion vs car accidents or possible human mountain lion conflicts or depredation incidents?

Once these questions are addressed and mitigations discussed in an updated Draft EIR it will be possible to comment on the merits and possible solutions. Until then this version of the Draft EIR is avoiding an entire species that is currently a candidate species as defined by Section 2068 of the Fish and Game Code.

We also direct your attention to the Town of Portola Valley General Plan which includes goals and objectives relevant to the environmental factors potentially affected by the proposed Project, including the following:

> 4427 Goal: Living Environment - Protect the natural environments for plants, animals and humans.
> Objectives
>
> 1. To protect the interdependent plants and animals that together comprise a balanced ecosystem in our forests, grasslands, chaparral areas, and creek systems.
> 2. To protect extensive areas of native vegetation that support wildlife.
> 3. To protect forests and forms of vegetation that help contribute to air quality by absorbing carbon dioxide.
> 4. To protect the creek systems in the town.
> 5. To promote rehabilitation of ecosystems.
> 6. To control, reduce and eliminate invasive species.

Certainly these goals are consistent with fully considering the effect of this project on the Town of Portola Valley's mountain lions.

Thank you.

Fred Hull
Acting Director
Mountain Lion Foundation

Portola Valley website online form submission

Peter Chargin
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 9:02

See my comments in the uploaded document

May 13, 2022

Comments on DEIR for Wedge Development

Thank you for the opportunity to provide input on the Draft Environmental Impact Report.

My comments are below.

Visual impact and Aesthics

1. General
   Generally, the impact to the visual character of the Alpine Road scenic corridor would be irrevocably damaged.

   Specifically, Impact-Aesthetics-2 is flawed as follows. The view from Alpine Road for the entire length of the project would be changed and would be breaking the spirit of the Town General Plan and the specific sections of the plan 3.c, 3.d, 3.h, 4.d and 16.

   Please look at page 4-11, Figure 4.2. Due to fire danger, it will be impossible to completely screen the development with a thick vegetation screen like trees or thick bushes.

The five structures on the northeast section of the driveway (circled below in red) will necessarily be visible from Alpine Road, especially on foot or horseback as you progress along Alpine in either direction. Additionally the other structures on the north side of the development will be visible (circled in blue)

igure 4.2: Viewpoint Locations
urce: Environmental Vision

2. Lighting
   Impact-Aesthetics-3 is flawed as follows.
   The section concentrates on outdoor lighting. However, there is also the question of interior lighting spilling into the outdoors.

   The project would place more than 39 units in a small area.

   Even if all outdoor lighting follows the spirit and letter of the town code (low wattage, downward facing), the interior lights of 39 families will by necessity spill somewhat into the outside. Overall, the impact of all 39 units together will light up the area like a lighthouse.

Unless you mandate blackout shades be drawn at all times, I can't imagine any other outcome from such a dense configuration of houses.

Multiply figure 4.6b by 39 times, and add in all the exterior lighting that is required for safety, to understand the impact that the entire group of dwellings would have on the surrounding area.

3. Visual impact
   The photos 4.3 and 4.4 (a and b) seem to me to be inadequate and potentially are purposely misleading. They show a single point view that is unreasonably positive.

   As you drive or walk along Alpine Road or the trail, you will inevitably look up the streets (which are called driveways in the captions) which will need to be wide enough for two cars (is the code for that width forty feet?) and see the bulk of the housing development. There is simply no way that the character of the area will not be changed to be in direct opposition to the general plan and to the feel of the area.

Transportation and Traffic

1. Additional Vehicle Crossings Across Alpine Road Trail.
   There will be 39 families leaving the property in the morning at approximately the same time - and likely with many of them having two earners leaving - and then again returning in the afternoon. That would be 78 vehicles exiting and entering the property during those times.

   Certainly some of them will be in a hurry.

   These people will be looking for traffic on the road and not traffic on the trail.

   Over the course of a year or more, the chances of a collision between a vehicle exiting the property and a pedestrian or equestrian on the trail, is very high. The idea that a sign will be effective in changing behavior in this case is silly. After just a few days of entering and exiting, drivers literally will not even see the sign, especially one that says "Stop here. Look for Trail users. Stop Again at Road." I'm sure you've seen the video which documents the experiment of selective attention, in which participants do not see a gorilla. See video here http://www.youtube.com/watch?v=vJG698U2Mvo, the followon video here https://www.youtube.com/watch?v=IGQmdoK_ZfY and the explanation here https://www.livescience.com/6727-invisible-gorilla-test-shows-notice.html

2. Haz-2
   There are two problems with Haz-2 that deals with evacuation traffic.

Evacuation traffic is a sore point with many residents within the town, since there are only two reasonable exits from the area in case of a fire. The most congested would be Alpine road, and this housing development would clearly impact that exit route. There has been no published work on evacuation traffic to my knowledge.

The first problem with the DEIR is that it does not show us what modeling has been done of evacuation traffic. I would love to see that evaluation.

The second problem is that it states that the development would slow fire spread (I believe that when it says “show” in the following sentence it actually means “slow” “Proposed site improvements and vegetation management would additionally **show** fire spread across the Project site and therefore provide more time before area roadways including Alpine Road would be affected by fires.” (emphasis mine) This is from page 2-28). There is no clear analysis that shows this. Since densely packed houses tend to increase fire danger and fire intensity, having clear analysis would be helpful here.

Additionally, if there is a fire that starts within the housing development, because the development is so dense, I believe it is likely that the exits would be blocked, impairing the ability of the residents to leave.

Trees

1. The housing development calls for the removal of a very large number of trees. This is inescapable and is noted as Bio-14.

   However, this removal will increase global warming, as trees are a significant remover of carbon dioxide from the atmosphere. This is not called out in the DEIR.

   So not only will it increase the amount of CO2 emitted because of the increased traffic, it will decrease carbon reduction. This is, as they say, a “double whammy”

   One potential mitigation is that a large number of high growth trees be planted in a different part of town, but I don’t know where that could be without increasing the fire risk of that area. Another potential mitigation would be the annual purchase of high quality carbon removals, but they are very expensive and very difficult to obtain (note that $7.50 carbon credits are considered “low quality” due to the chance of leakage and low durability. I am happy to discuss in more detail.)

2. Another issue with the removal of a very large number of trees is that it will certainly impact the rural nature of the town. The town will inescapably become closer to a high density suburban area. There is no way you can remove this number of trees without that happening.

Portola Valley website online form submission

John Donaoe
Stanford University
[email and street address redacted] Redwood City, CA 94063

5/13/2022 9:31

[no text, attachment only]

May 12, 2022

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

Re: Stanford University Comments on Draft Environmental Impact Report for Stanford Wedge Housing Project

Dear Ms. Russell:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Stanford Wedge Housing Project. We have reviewed the DEIR and appreciate its thorough and extensive analysis of the environmental impacts of Stanford's proposed project.

The following comments request minor technical corrections and clarifications for the Final EIR.

Chapter 4, Aesthetics

1. Page 4-10, third paragraph: Please correct "split rail fence" to "wood post and wire fence."

Chapter 7, Biological Resources

2. Pages 7-23 - 7-29: Mitigation measures for impacts of the project's Vegetation Management Plan use the term "mechanical support" but do not define that term. From the context and based on the Biological Resources Report (DEIR Appendix D), we conclude that the term "mechanical support" refers to the use of masticators, chippers and tillers. We request that this be clarified, particularly because several mitigation measures apply to "ground-disturbing activities," which would include tilling but would not include masticating or chipping. Based on this understanding, we suggest the following text changes for the Final EIR: Page 7-23, Mitigation Measure Bio-2a(i): Insert "or use of mechanical support for vegetation management" after "initial ground disturbing activities" because, as indicated in the DEIR, use of masticators, chippers or tillers within 100 feet of riparian areas could cause impacts to red-legged frogs.

Real Estate
415 Broadway, 3rd Floor, Redwood City, CA94063 T 650.723.8902

- Page 7-23, Mitigation Measure Bio-2a(iii): Insert “or use of mechanical support for vegetation management” after “other construction activities.”

- Page 7-25, Mitigation Measure Bio-3: Insert “or use of mechanical support for vegetation management” after “initial ground disturbing activities.”

3. Page 7-27, Mitigation Measure Bio-5a: The beginning of this mitigation measure indicates that it applies to “vegetation management activities involving off-road mechanical equipment.” We suggest the quoted language be replaced with “vegetation removal activities” for consistency with the rest of the mitigation measure. As the DEIR indicates, woodrat nests may be impacted by vegetation removal that does not involve off-road mechanical equipment.

4. Table 2-1 and Page 7-28, Impact Bio-6: For consistency with the impact analysis, we suggest that the first sentence of Impact Bio-6 be revised to read: “Construction in or demolition of buildings, or removal or modification of trees, could result in destruction of maternity roosts, hibernacula, day roosts, and/or night roosts of bat species, including pallid bat.”

5. Page 7-29, Mitigation Measure Bio-6: This measure indicates that it applies to “vegetation management activities involving off-road mechanical support.” However, the DEIR correctly states that any removal or modification of trees that provide suitable bat roost habitat could impact a bat roost, regardless of whether “off-road mechanical equipment” is used. We suggest substituting “removal or modification of trees” for “vegetation management activities involving off-road mechanical equipment.”

6. Pages 7-29 - 7-30, Mitigation Measure Bio-6(i): This mitigation measure does not include an initial habitat assessment to determine which trees provide potential bat roost habitat and should therefore be subject to the two-day removal process. We recommend that Mitigation Measure Bio-6 be revised to indicate that a qualified bat biologist will assess trees to determine which ones are subject to Mitigation Measure Bio-6(i) so that unsuitable trees are not bound by the two-day removal process.

7. Table 2.1 and Page 7-39, Impact Bio-13: For consistency with the impact analysis and mitigation measures, we suggest that the first sentence in the description of this impact be revised to: “The removal of trees and vegetation, demolition of existing structures, and construction activities during the

February 1 to August 31 breeding season could result in mortality of nesting avian species if they are present."

Chapter 9, Geology and Soils

8. Page 9-5, first sentence: Please substitute "western" for "eastern" to match Figure 9.2.

Chapter 12, Hydrology and Water Quality

9. Page 12-1, second bullet: Please note that updated hydrology calculations were issued on August 24, 2021 to respond to NV5 comments and are also available as part of the Project files.

10. Page 12-7, first paragraph: Please correct the third sentence to reflect Project plans to collect open space runoff in a vegetated swale rather than concrete v-ditches.

11. Pages 12-7 and 12-13: Please change "4,342" to "5,391" to reflect increased total square footage of the bio-retention treatment areas.

Again, Stanford appreciates the opportunity to provide comments on the DEIR and is available to respond to any questions that may arise concerning these comments or the proposed project.

Sincerely,

John D. Donahoe
Senior Director, Planning and Entitlement

Portola Valley website online form submission

Raymond Willias
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 12:50

"The Draft EIR does not fully discuss the impact of the project; on the Town of Portola Valley and its residents. It does not address the impact of removing a large number of trees including many oak trees. The Draft EIR does not discuss the impact on wildlife and the modification of habitat or removal. Nor does it provide an analysis of evacuation due to fire or natural event. In one sense developing the Wedge places a barrier to traffic on Alpine Road and further the consequences of an emergency evacuation. Alpine Road is the only Road in the vicinity of the project.
It does not appear that the Draft EIR adequately provides analysis and conclusions related to the proposed project. Mitigation measures included are not adequate/
The Town Council can not approve the project when adequate, full disclosure has not been provided."

Portola Valley website online form submission

Teresa Godfrey
Woodside Highlands Improvement Associati
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 13:19

The draft EIR ignores significant violations of best practices as defined by multiple fire safety authorities, rather than highlighting the violations and characterizing their impact on public safety.

• The draft EIR uses a contrived methodology, intentionally or unintentionally, that misleadingly understates the ignition potential associated with human activity in the proposed development.

• The draft EIR models fire behavior using uninformatively benign weather conditions — 90th percentile conditions that are identified by the modeling software as representing the low end of the “high” severity range. In fact, decreasing by an additional point to the 89th percentile would put the conditions in the “moderate” range, according to the definitions of the modeling software. But the draft EIR misleadingly informs the reader that “extreme” fire weather conditions were modeled.

• The analysis of the draft EIR relies on an “Evacuation Plan” that is nothing more than an uncompleted template for a plan, created 7 years ago by Woodside Fire Protection District for the Town of Portola Valley to complete and approve. Apparently this was never done.

Calling moderate/high conditions “extreme” does not make them so, any more than calling a template an "Evacuation Plan" makes it a plan.

To me, it is totally inadequate and comes to an incorrect conclusion--there are grave consequences that will happen if this plan goes forward.

Thank you for listening.

Portola Valley website online form submission

Julia Shepardson
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 13:53

The 2018 Paradise fire reminds us in Portola Valley how vulnerable our rural community is. Portola Valley has two exit routes in the event of fire. Global warming conditions warrant updated fire safety measures in Portola Valley. Gratefully, Bob Turcott's May 12th comments on the Draft EIR for the Stanford Wedge Project highlight shortcomings and inaccuracies. To protect the Portola Valley community, workers, firefighters and visitors, additional planning is needed. If a fire begins in central Portola Valley, what are the escape plans? There are solutions that need to be decided before approving the Stanford project.

Portola Valley website online form submission

Jim Sansbury
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 14:06

"We agree with all of Herbert Schilling's comments in his May 10, 2022 communication regarding the Stanford wedge project. We are also concerned about a rumored $24M concession to Stanford, but we aren't familiar enough with the details to comment. We would like to note the obvious, which other people have pointed out: given Stanford's wealth, it is surprising that they would need any concessions. A wiser option would be to resolve the current traffic safety issues in Portola Valley.

Longtime PV residents,
James and Maureen Sansbury"

Portola Valley website online form submission

Nan Shostak
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 15:03

[no text, attachment only] [first attachment submitted by N. Shostak omitted per request below]

5/13/2022 16:01

The attached file is a revised comment on Chapter 9 of the DEIR. Please delete the comment I submitted earlier.

Comment on Chapter 9 of the Stanford Wedge Draft Environmental Impact Report (revised)

Nan Shostak
25 Larguita Lane
Portola Valley, CA 94028

May 13, 2022

Purpose

The purpose of this report is to comment on the Stanford Wedge Draft Environmental Impact Report (DEIR), Chapter 9: Geology and Soils, for their proposed development at 3530 Alpine Rd, Portola Valley, CA 94028.

I am a 34-year resident of Portola Valley, a geologist and member of Portola Valley's Geologic Safety Committee, and a retired faculty member from the Department of Geology at San Jose State University. I am qualified to comment on Chapter 9 of the DEIR: much of my research involves Quaternary alluvium in the San Francisco Bay Area, and in particular the San Francisco Peninsula.

Flaws in Chapter 9 of the DEIR

The conclusion in the DEIR that **Impact Geo-1** (surface rupture hazard) and **Impact Geo-3** (seismically induced ground failure) are "***less than significant***" (DEIR, Chapter 9, p. 9-12 and p. 9-14) is flawed because the DEIR fails to consider alternative interpretations of the reported trenching and borehole data and because the sole report on which these conclusions depend either ignores or omits important data.

For geotechnical information on the Project site, the DEIR relies entirely on the 2021 trenching report issued by Stanford's geotechnical consulting firm, Cornerstone Earth Group ("Cornerstone"). This report, reproduced in Appendix G of the DEIR, presents the results of two Project site investigations carried out by Cornerstone in 2017 and 2021. The DEIR accepts Cornerstone's interpretations and conclusions without question or further investigation. Although Cornerstone concludes there is no active faulting or seismically induced ground deformation at the site, ***their interpretation either ignores or omits critical data***. My independent review of the data in the Cornerstone reports, given in detail below, shows the opposite—that ***there is a significant likelihood of active faulting at the Project site, and surface fault rupture and seismically induced ground deformation are significant hazards at the site.***

For this analysis, I have used only results from the 2021 Cornerstone report and a set of photographs I took myself. Two of the photographs were taken outside Stanford's Project site, and two were from locations on the site. I am a fellow horse-owner and friend of several of the equestrians who board their horses at Alpine Rock Ranch located at the Project site, and have, over the course of years, made a number of trips to visit my friends and their horses there. I took the two photographs at the site during a visit to Alpine Rock Ranch this spring.

Summary

Apparent tectonic deformation of the ground surface and underlying young alluvium at Stanford's Project site along Alpine Road in Portola Valley indicates that further geologic investigation of the site is needed before approval of the proposed development should be considered. The features discussed in this comment present the real possibility that a potential for future fault-driven deformation at the site in association with continuing movement of the nearby San Andreas fault does exist.

Two separate, but probably related, geologic features are involved. An anomalous, linear step in the ground surface trends across the site, as is evident on the ground and in high-resolution, LiDAR-based elevation data, and this feature requires geologic explanation. The feature is not of depositional or erosional origin, as indicated both by its linearity and map orientation and by concordant warped layering in the underlying young alluvium mapped by Cornerstone in a trench that crosses the step; those layers of young alluvium are folded together with the ground surface.

Farther north in the trench, distinct folding of alluvial layers that is not shown in the trench log is clearly evident in the single photograph of the trench wall that is included in the Cornerstone report. That folding occurs above an anomalous bedrock structure that can be interpreted as a tectonically driven local upthrust.

Both of these features are consistent in orientation and style with the kind of geologically young tectonic shortening that has been documented in this area adjacent to the San Andreas fault by geologic mapping, and that was observed to occur in association with the 1989 Loma Prieta earthquake, with the latter effects extending as far north as the Stanford Linear Accelerator (Wentworth, 2020).

Tectonic Setting

Figure 1 shows the Project site on the Stanford Wedge property, on Alpine Road in Portola Valley, which lies within a belt of northwest-trending thrust faults in the foothills of the Santa Cruz

Mountains. This belt bounds the northeastern side of the Santa Cruz Mountains and the western Santa Clara Valley, and it extends from near Loma Prieta in the southeast to Daly City in the northwest. The thrust-belt faults are all related to the San Andreas fault to their west and south, into which most of them dip, connecting to the larger fault at a depth of several miles.

These thrust-belt faults are weak planes in the Earth's crust that are vulnerable to being triggered into sudden, sympathetic movement by ruptures of the nearby San Andreas. All the faults, even if they cannot rupture independently, are capable of sympathetic movement that can deform the ground and damage people and the built environment. (Graymer and others, 2006, Kennedy and Hitchcock, 2004, Hitchcock and others, 1994).

The Monte Vista-Shannon fault zone is one of the longest of the foothills thrust faults, stretching ~28 miles from Portola Valley in the northwest to near Calero Reservoir in the southeast (U.S. Geological Survey, n.d.). In the north it is named the Monte Vista fault. Immediately to the north of the Monte Vista fault lies the Hermit fault, which was most recently mapped by Pampeyan (1993) and is currently included the U.S. Geological Survey's Quaternary Fault and Fold Database of the United States (Bryant, 2017). As mapped, the Hermit fault starts directly to the north of the Monte Vista fault at the northern terminus of Arastradero Road, crosses Alpine Road, and trends northwest across the Project site (Bryant, 2017).

Depositional Environment

The Project site lies on a paleo-alluvial fan with an important source at Coal Mine Ridge on upper Alpine Road in Portola Valley, on the northeastern flank of the Santa Cruz Mountains. The abundant, distinctive, Mesozoic conglomerate cobbles and boulders in the alluvium at the Project site (see Photo 1) were sourced from Pleistocene deposits on Coal Mine Ridge. Streams flowed from the mountainside down this fan in a northerly direction, more or less along today's Alpine Road corridor. Stream flow varied greatly, with coarse materials (gravel, cobbles and boulders) carried during times of high rainfall and energetic stream flow, and only finer materials (clay, silt, and sand) during drier times. The fan would have had stream channels that regularly changed course on the surface of the fan, depositing new layers of coarse materials on top of older fine materials and *vice versa*. For that reason, fan deposits are not laterally continuous but instead tend to be lenticular. Eventually the climate dried, the supply of coarse sediment decreased, and the main stream channel of the fan became entrenched off the Project site, near modern-day Los Trancos Creek. Later deposits at the Project site came mainly from local sources (e.g., slope wash down the canyon), and parts of the surface began to erode.

Age of Deposits

The age of the alluvial deposits at the Project site is critical to the discussion of active seismic activity there. The 2021 report by Cornerstone offers a single ^{14}C date from its trench through alluvium at the site: the uncorrected age of 16890 +/- 50 yr BP, corrected to 20531-20279 cal yr BP (calendar years Before Present). The sample yielding this age was a bulk sample (i.e., handfuls of sediment with some dispersed, datable bits of detrital carbon) labeled N13 on Cornerstone's trench diagram. This sample was collected at trench stations 131-132, from the basal cobble-bearing layer of alluvium deposited in contact with Ladera Sandstone (Cornerstone, 2021, Figure 6). The carbon in the bulk sample must primarily be fine, particulate carbon from varied sources in the upstream drainage from which the sediment is derived; no datable bits of charcoal or twigs were reported. The coal on Coal Mine Ridge—the source area for the Mesozoic conglomeratic cobbles and boulders—is also known as an upstream source for old carbon (McLaughlin, 2002); that coal is far older than the maximum of ~55 ka for ^{14}C dating and was likely included in the bulk sample. The date of ~20k yr at N13 must, then, be treated as a maximum for the true depositional age of the sample.

The age of bulk sample N13 may be much younger than ~20k yr. Taken alone, the date of N13 cannot be used to indicate an age for the deposit any older than the Holocene age assigned to the stream alluvium bounding Los Trancos Creek at the Project site by Witter and others (2006) in their delineation of Quaternary deposits in the central San Francisco Bay region. It is possible that the entire depositional sequence at the Project site is Holocene. More ^{14}C dates are needed to resolve this critical question.

The climate model for the San Francisco Bay Area of Wentworth and Tinsley (2005) and Wentworth and others (2015) provides support for the idea of younger, rather than older, alluvium at the Project site. During the last glacial stage, vegetation on the upland slopes primarily consisted of conifer forest, and sediment was stored in place by large tree roots. As conifer forests gradually gave way to oak grassland and chaparral, the sediment stored on the upland slopes during cold, wet times was quickly released. The change in vegetation occurred soon after the climate minimum ~18 ka, as defined by the global marine oxygen isotope record of Lisiecki and Raymo (2005). In the Santa Clara Valley, Wentworth and Tinsley reported discrete pieces of wood, in a coarse interval, carbon-dated as old as 17.2 ka (calibrated), a time soon after the climate reversal.

At the Project site, the basal alluvium records deposition from upstream drainage systems as the climate rapidly warmed following the most recent glacial maximum. Coarse sediment was deposited in

the early warming period and formed lenses of gravel, cobbles and boulders; finer sediment was deposited later and over a much longer period of time. The deposits at the site can be divided into a lower, generally coarser, interval and an upper, generally finer, interval. The first coarse material must have been deposited no earlier than 18 ka, and the change from coarse to fine must have occurred not long after. Thus ~18 ka, not ~20 ka, can be considered the maximum age for the upper, fine interval.

Cornerstone identified a two-fold textural division of the section they trenched; they called the upper, fine-grained division "Holocene" and the lower, cobble- and gravel-bearing division "Pleistocene", based on properties of samples and stratigraphic relationships in their trench. Stratigraphically beneath the lower division of alluvium, they found bedrock, which they identified as Upper Miocene Ladera Sandstone over the full length of the trench. In this paper, we shall use Cornerstone's assignments of "Holocene" and "Pleistocene" for the "upper" and "lower" intervals of alluvium, but if tectonic deformation is recognized, those age assignments will need to be demonstrated more specifically than is done in Cornerstone's report.

Analysis of Data

All data used in the analysis for this comment come from Cornerstone Earth Group's 2021 trenching report (Cornerstone, 2021) as reproduced in Appendix G of the DEIR, or from photographs taken personally.

Figure 2 is a Google Earth image of the Project site showing the locations of Cornerstone's 2017 boreholes, their 2021 trench, the locations of Photos 1-4, and cross section line A-A'. This line of cross section stretches across nearly the entire Project site ~575 ft from borehole EB4A to EB1.

Figure 3 is a cross-section plot of Cornerstone's trench and borehole elevations of the ground surface, the top of the Pleistocene surface, and the top of the bedrock surface. The cross section is anchored by borehole EB4A in the south and EB1 in the north, and between the two boreholes, elevations at eight trench stations are projected orthogonal to A-A'. At the scale of this figure, several observations can be made: (1) from borehole EB4A to trench station ~75, the ground and Pleistocene surfaces are subparallel and dip gently north (depth to bedrock was not reported for EB4A); (2) from station 183 to station 75, all three surfaces are mostly parallel and gently dipping; (3) a steeper dip to the north in the bedrock surface begins near station 75 and continues to station 50, while the subparallel ground and Pleistocene surfaces continue a moderate down-fan dip; (4) the northward dip in the bedrock surface is steepest between stations 50 and 25; and (5) for all three surfaces, a gentler, down-fan slope beginning at trench station 5 continues northward across the Project site to borehole EB1.

Key Areas of tectonic Deformation

This comment on the DEIR focuses on two areas of likely tectonic deformation, a 300-ft linear step across the Project site, which crosses the trench at stations 50-70, at the top of the dip mentioned in #3 in the previous paragraph, and a steeper dip with bedrock bulge observed in the Cornerstone trench at stations 25-50 (#4 above). Both features show evidence of tectonic shortening in the bedrock and in the overlying alluvium.

1. Linear Step

The linear feature, which appears as a step down or marked drop in elevation to the north, is well expressed by topography across the Project site. Photos 2, 3, and 4 (see Figure 2) help to constrain the map location of this linear feature, and Cornerstone's trench drawing provides subsurface confirmation of the feature where it crosses the trench. Photos 2 and 3 were taken from the public Alpine Trail along the eastern edge of the Project site (along Alpine road). Photo 4 was taken during a visit to friends who board their horses at Alpine Rock Ranch on the Stanford Wedge.

The highest point in elevation of the topographic step down to the north at the Project site occurs at Alpine Road, near the eastern boundary of the site (Photos 2 and 3). In Photo 2, with a view to the west, an *in situ* deposit of cobbles and gravel is visible in the road cut along the west side of Alpine Road. The topographic step down to the north begins near the tree in the photo (white arrow). The top of the exposed cobble/gravel layer is ~2 ft below the elevation of the ground surface, which in the photograph is stepped back to the west from the road cut. Photo 3 is a south-facing view of the Alpine Trail above the road cut in Photo 2. In this view of the surface, the cobbles and gravel seen in the road cut form the foot bed of the trail, and they crop out on the walking surface of the trail. The step down in elevation is to the north, toward the photographer.

Cornerstone's trench data between stations 50 and 70 (Cornerstone, 2021, Figure 6) also show the step down to the north of the cobble layer observed at Alpine Road. The single—therefore uppermost—layer of large cobbles here, as recorded in the trench drawing, lies ~2 ft below the ground surface at station 70 and dips to ~7 ft below ground at station 50. Shortening is indicated here by a double, concentric fold in the ground surface and the top of the Pleistocene alluvium. Figure 4 shows these parallel folds in the two surfaces—evidence of tectonic folding or warping of Holocene deposits—directly above the step down in the basal cobble deposit. Deformation of this nature cannot be depositional or erosional; it must be tectonic. The folding is shown in Cornerstone's trench drawing but omitted from the trenching report. No photographs of this trench segment are available in Cornerstone's report.

The third location of a step down to the north can be seen in Photo 4, in a view to the southwest. In a reversal of stratigraphy, the cobbles and gravel of the coarse interval of alluvium are exposed on the high side of the topographic step. Their highest elevation is under the horse shelter in the photo (south end of the paddock), but the fine-grained upper interval of alluvium is at the surface only on the low side of the step, ~2 ft behind the photographer, to the north.

Connecting these three locations—the high point of the downward step at Alpine Road, the step down at trench stations 70-50, and the step down at the cobble-lined horse paddock—produces a distinct linear feature that trends northwest from Alpine Road 300 ft to the center of the Project site (Figure 5 and images from LiDAR data in Figures 6 and 7). This linear feature as it crosses the Project site is near and at a low angle to the trace of the Hermit fault as mapped by Pampeyan (1993) and identified as the Hermit fault in the U.S. Geological Survey's Quaternary Fault and Fold Database (Bryant, 2017). Suggesting a continuation of the linear feature to the east, and therefore closer to the Monte Vista fault, the LiDAR image in Figure 7 faintly shows the feature east of Alpine Road, near the bank of Los Trancos Creek. East of the creek, the LiDAR shadow of the feature is lost in an area mechanically leveled for human use.

Cornerstone observed from LiDAR data that this 300-ft linear feature was "arcuate in that it arcs from a westerly direction as it enters the site [near Alpine Road] and bends toward the north [north of the horse paddocks?] within the site. It is not linear and therefore is more consistent with an abandoned and backfilled channel of the ancestral Los Trancos Creek." (Cornerstone, 2021, p. 7). Furthermore, Figure 4 in Cornerstone's report, reproduced in the present report as Figure 8, purports to show this "arcuate" feature, but the feature described on page 7 in their report cannot be seen on their Figure 4. The evidence presented in this report shows that the easternmost 300 ft of this feature is, in fact, linear (Figures 5, 6, and 7). Cornerstone's LiDAR feature (invisible in their Figure 4) that "bends toward the north" may or may not be related to their westerly trending linear feature. Furthermore, a fault, especially a reverse fault, forms bends along its length; its trace as expressed topographically cannot be expected to follow a straight line for a great distance.

2. Bedrock Bulge

Between stations 25 and 50, the bedrock surface steeply steps down to the north and bulges outward in a fan-shaped extrusion of bedding and fractures between stations 25 and 38. Figure 9 juxtaposes Cornerstone's trench drawing at stations 25-45 with their photograph of stations 35-40 in the southeast trench wall (Cornerstone, 2021, Figure 6 and Photo Plate 2). In both pictures, the yellow star

annotation marks the same reference point, a local high point on the bedrock surface. This photograph was the only one Cornerstone included in its 2021 trenching report.

Cornerstone investigated this section of trench for evidence of faulting. They concluded (1) the ~3-ft step down to the north starting at station 38.6 was produced by "scouring" of the bedrock by fluvial processes; (2) there was no evidence of shearing at fracture N3 between the basal alluvium and bedrock; and (3) "there was no evidence of offset or warping of the overlying Terrace deposits" above N3 (Cornerstone, 2021, p. 9).

The bedrock step at station 25 differs from the other relatively large steps (at stations 37, 80, and 163) in the pattern of fracturing mapped in the bedrock, which at station 25 fans upward and outward, rather than remaining ~ parallel to the subvertical bedding shown over most of the trench. That pattern is consistent with the fanned rock having been extruded upward due to thrusting, crushing and shortening of the bedrock. The step downward from station 38.6 to station 36 here is interpreted to be erosional (or scoured), in agreement with the Cornerstone report, but the bedrock bulge between stations 25 and 36 is most likely a fault.

Figure 10a, a reproduction of Cornerstone's Photo Plate 2 showing trench stations 35-40, provides additional evidence of tectonic shortening over the bedrock bulge. This photograph shows folding or warping of Pleistocene and possibly Holocene deposits between stations 35 and 40. Figure 10b repeats the photo, with annotations of the folds and fractures in the alluvium. Uniform, nearly sinusoidal, folding or warping with wavelength of ~3.5 ft occurs throughout most of this section of alluvium. Areas with flattened gravel and cobbles that were originally deposited nearly horizontally are tilted, upstream side up, at an angle of ~45°, consistent with the curvature of the folds. Such arrangements of pebbles and cobbles do not occur under conditions of normal, downhill flow on a shallowly sloped alluvial fan. Fine fractures in the alluvium that radiate upward and outward from Fracture N3 cut the folds in the alluvium; the fractures, then, are younger than the folds. Cornerstone does not provide any other photographs of the trench wall, and there is no reason to think folding or warping stops at the sides of their photograph.

The interpretation is that deformation—folding or warping—of the alluvium above the bedrock bulge must have been caused by a compressive tectonic force. It cannot be explained by a depositional process such as soft-sediment deformation or scouring by water flow or debris flow, and the folded sequence of deposits is thick, with uniform folding throughout the thickness. The trench photograph (Cornerstone, 2021, Photo Plate 2) that clearly shows folding or warping of the Pleistocene alluvium is out of focus in its upper part, but a few better-focused spots in that upper part suggest Holocene

deformation. The expression of tectonic thrusting—the bulging in bedrock and warping in overlying alluvium—may be older than the step down at trench stations 50-70, which clearly shows shortening in Holocene soil, but Holocene tectonic activity at stations 25-50 cannot be ruled out.

Interpretation

Two key features investigated in this paper—the northwest-trending linear topographic feature with downward step to the north and the bulge in bedrock at trench stations 25-50—both strongly support a tectonic source of ground deformation. Shortening of the alluvium noted both at the intersection of the linear feature with the trench (stations 50-70) and above the bedrock bulge is strong evidence of tectonic movement at the Project site in the recent past and earlier.

Because the ages of deposits have not been well constrained and basal deposits in the region may have an age as young as ~18 ka, a Holocene age for most, and perhaps all, of the alluvium at the site is possible. If so, the folded and warped alluvium associated with both of the key features may be Holocene. The linearity of the topographic step strongly suggests this feature is young and is tectonic, not depositional. If it were depositional (as Cornerstone interprets this feature) and older than Holocene, its topographic scarp would have experienced substantial erosion over at least 10k yr. Instead, it has retained a prominent, little-eroded profile. Parallel folding or warping of the youngest deposits above this step in the trench clearly indicates Holocene ground deformation. The bedrock bulge at trench stations 25-50 is probably older, because it is deeper in section and the overlying warped alluvium may be no younger than Pleistocene. At the bedrock bulge, faulting can be accomplished by strain distributed throughout the rock mass, and such mass deformation can result in shattering or crushing of the rock, as recorded there in Cornerstone's trench log.

The interpretation of the evidence presented is of a buried reverse fault dipping to the south (verging north). There is no clear fault offset of the upper deposits. The clear fault offset is below the depth of the trench, but as this offset migrates upward, it manifests as bulging, fracturing, crushing and folding. Slip is absorbed in warping and fractures as the fault makes its way toward the surface. Above a reverse fault, one would not expect to see clear evidence of shearing and faulting; one would expect to see fractures and deformation. The deformation recorded at the Project site is not unusual for the surrounding area. Continuing shortening approximately approximately normal to the axis of the Jasper Ridge anticline is consistent with deformation in the Foothills thrust system in secondary association with the San Andreas fault (Wentworth, 2020).

Conclusion: Mitigation

Cornerstone's data show definite evidence of tectonic shortening in the Holocene. Because the DEIR depends solely on Cornerstone's report, which has flaws—demonstrated in this report—in its interpretations and conclusion that the site does not show evidence of faulting***, the recommended mitigation is additional, thorough, geotechnical investigation***. The firm chosen for this investigation should not have previous ties with the Project applicant, and the Town's consulting geologist should review the results of the new investigation. A very strong recommendation is to require a photomosaic of both trench walls, well cleaned and well scraped, to preserve details and more accurately interpret the findings from trenching. Additionally, ^{14}C samples should be collected throughout the alluvial section for more accurate estimation of the ages of the deposits.

As a final point, it is worth remembering the result of the 2005 trench investigation of the Monte Vista fault at Alpine Hills Tennis and Swim Club, ~1 mi south on Alpine Road from the Project site. The depositional environment of the two sites is similar—they lie on the same paleo-alluvial fan and have the same upland source at Coal Mine Ridge. Trenching at Alpine Hills revealed faulting in bedrock and fractures in the overlying alluvium, but the fractures were not found to extend upward into Holocene deposits. Out of caution and concern for possible future fault movement, the decision was made to relocate—to set back from the fault trace—a new structure planned to be built directly on the trace of the fault. Faults are weak areas in the earth's crust. Any fault, regardless of its rupture history, has the potential to be triggered to move sympathetically with a strong earthquake on a nearby fault.

Acknowledgement

My tremendous thanks to Carl Wentworth, USGS Emeritus and expert in local geology, for his comments and suggestions that have greatly improved this paper. I am also extremely grateful to Carl for creating several figures, used here to illustrate important points of the paper.

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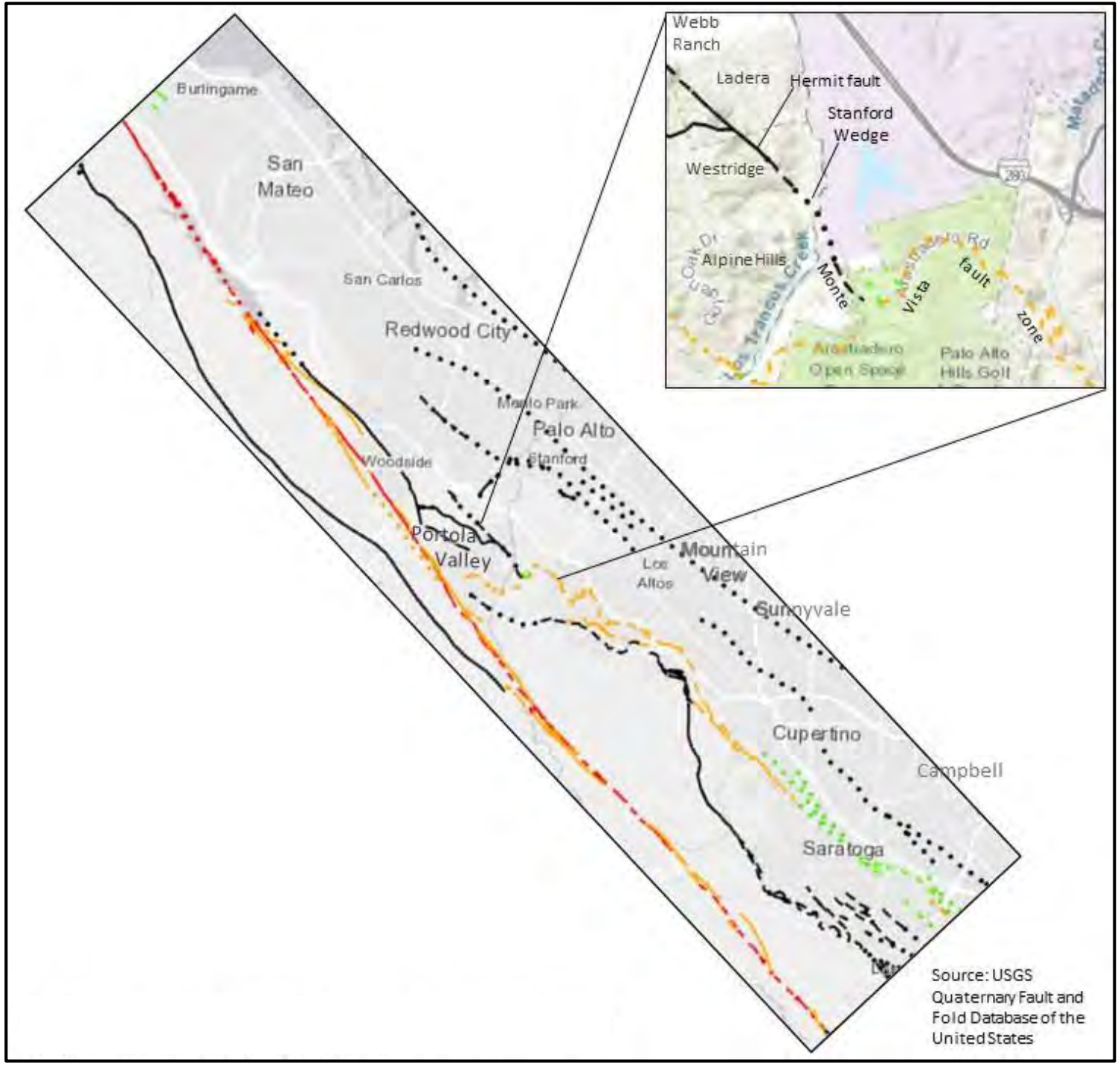


Figure 1. Location of Portola Valley and the Stanford wedge in context of the Foothills thrust fault belt. Insert shows detail for Northeastern Portola Valley, the Monte Vista fault zone, and the Hermit fault. Base maps and all faults are as mapped on the USGS Quaternary Fault and Fold Database of the United States.

Figure 2. Project site with locations of Cornerstone's trench and boreholes, cross section line A-A', and photos.

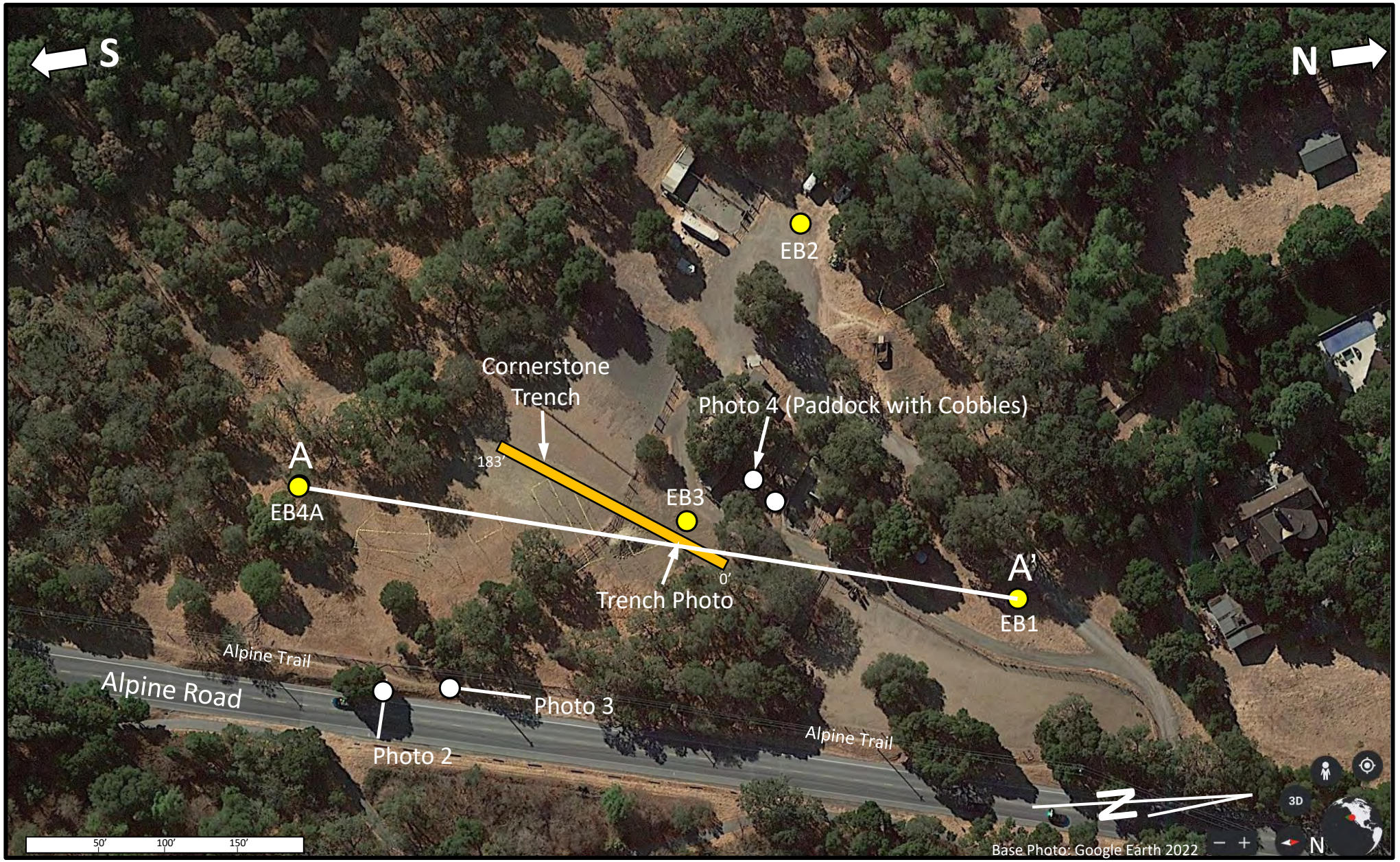


Figure 3. Elevations of ground surface, top of Pleistocene, and bedrock surface. All elevations are measured from Cornerstone's drawing of the south trench wall and boreholes.

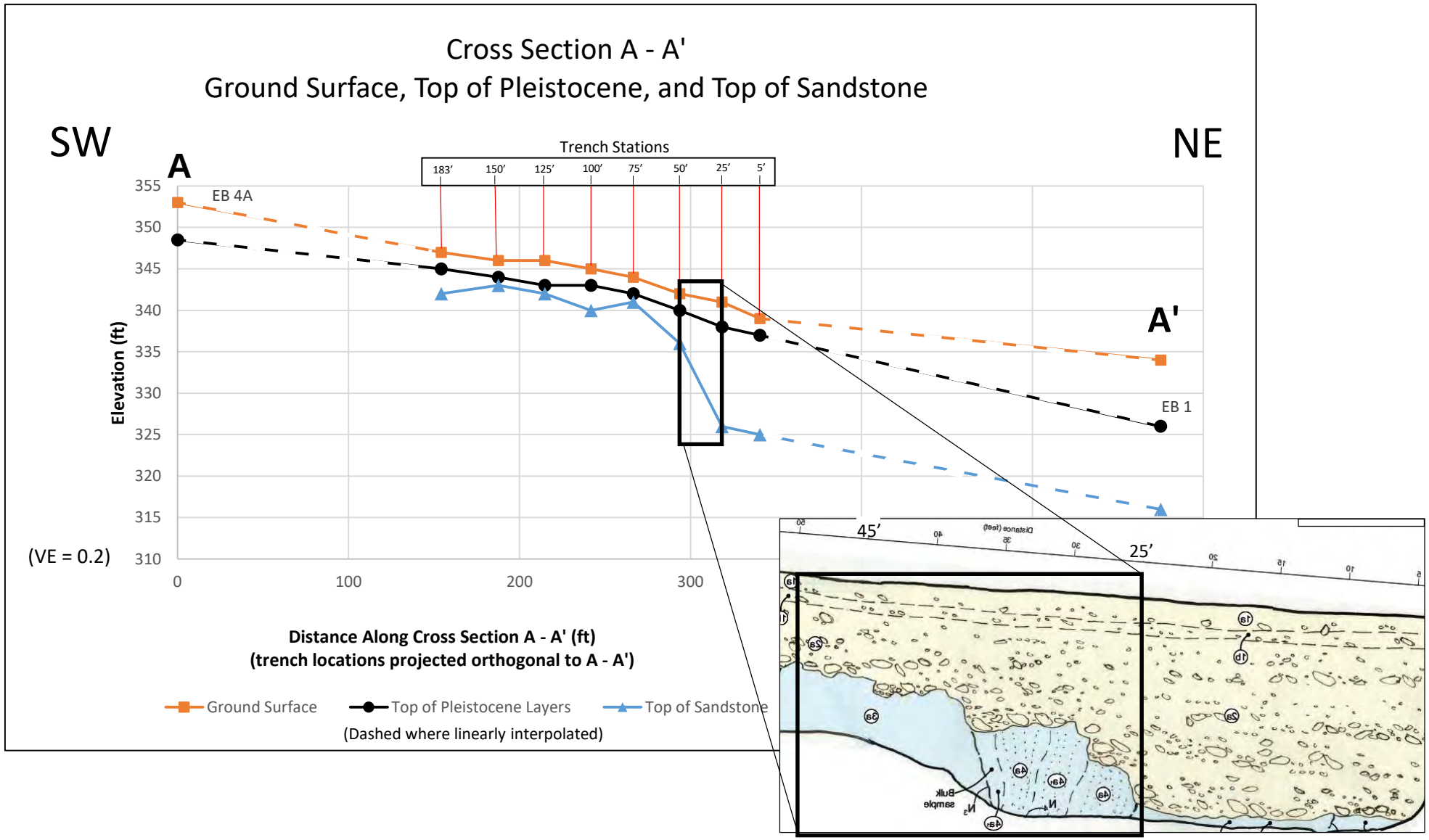
Between trench stations 183 and 70, the elevations of the ground surface, top of Pleistocene, and top of bedrock slope gently down the alluvial fan and are mostly parallel.

Two steps down in elevation are of likely tectonic origin:

1. Dip in bedrock between trench stations 70 and 50. See Figure 3 for folding of young deposits above this section of the trench.
2. Sharper dip in bedrock between trench stations 50 and 25, with likely tectonic bulge indicated by the fan-shaped array of fractures and bedding. Figures 5a and 5b show folding or warping in the alluvium above bedrock between stations 35 and 40. This deformation is not shown at the scale of the trench drawing (inset).

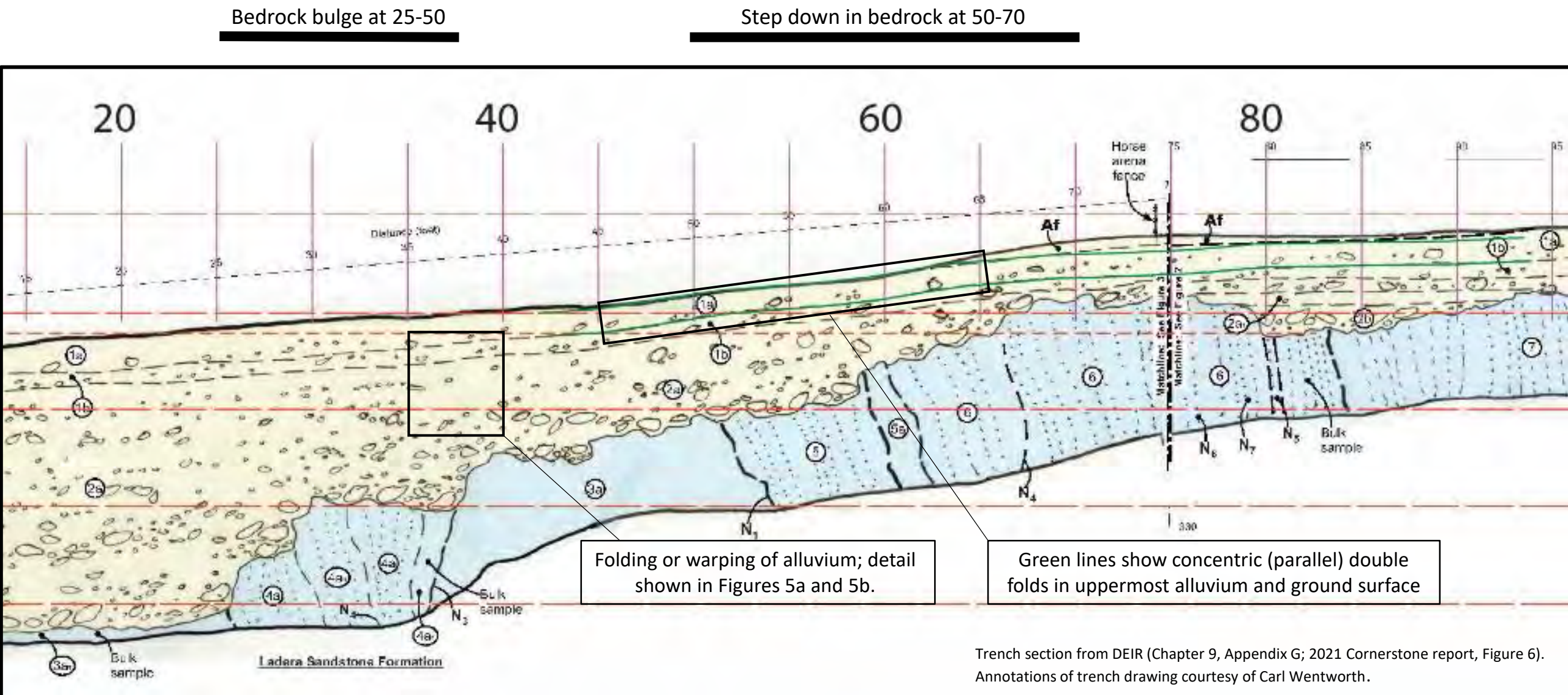
Dashed lines indicate linear interpolation of elevations where data are not available.

Trench drawing, trench elevation data, and borehole elevations are from the DEIR (Appendix G; 2021 Cornerstone report, Figure 6 and Appendix C).



Enlargement of trench sketch is reversed to align with cross section A-A' (see Figure 1). Box encloses stations 25-50 on SE trench wall.

Figure 4. Fractured bedrock and deformed alluvium at two locations in the trench indicate tectonic activity at the Project site. 1. The step (down to the north) in bedrock at trench stations 50-70 is accompanied by shortening of young overlying alluvium; green lines below show parallel concentric (parallel) double folds at ground surface and top of Pleistocene. 2. At trench stations 25-50, fan-shaped fractures form a bulge in bedrock at a steeper step down, also to the north. Folded or warped alluvium, indicating tectonic shortening, overlies the likely tectonic bulge. Warping of the alluvium at stations 35-40 is shown in detail in Figures 6a and 6b.



Trench section from DEIR (Chapter 9, Appendix G; 2021 Cornerstone report, Figure 6). Annotations of trench drawing courtesy of Carl Wentworth.

Figure 5. Collinearity of the high points, or tops, of three steps down to the north (yellow line): at the road cut, trench station 70, and cobbles in the horse paddock. Trench station 25 marks the base of the upward bulge in the Cornerstone trench (stations 25-38). The step down north of the yellow line and the step down with bedrock bulge at stations 25-50 are likely to have a compressive tectonic origin. The blue line is the USGS trace of the Hermit fault as mapped through the Stanford Wedge in Google Earth Pro (Bryant, 2017).

Figure 6. The high points, or tops, of three steps down to the north are collinear (yellow line): at the road cut, at trench station 70, and at the cobble-lined horse paddock.

Trench station 25 marks the base of the second dip in bedrock at stations 25-50 and upward, fanning-outward bulge at stations 25-38. The line traced by the three collinear downward steps and the bulge are likely to have a tectonic origin. The blue line is the USGS trace of the Hermit fault as mapped through the Stanford Wedge in Google Earth Pro.

The faint linear trace on the LiDAR image confirms the geomorphic feature: it is in the same location and orientation as the line through the three steps down to the north.

The LiDAR image was prepared from a 3-meter elevation grid available online from the U.S. Geological Survey National Map database.

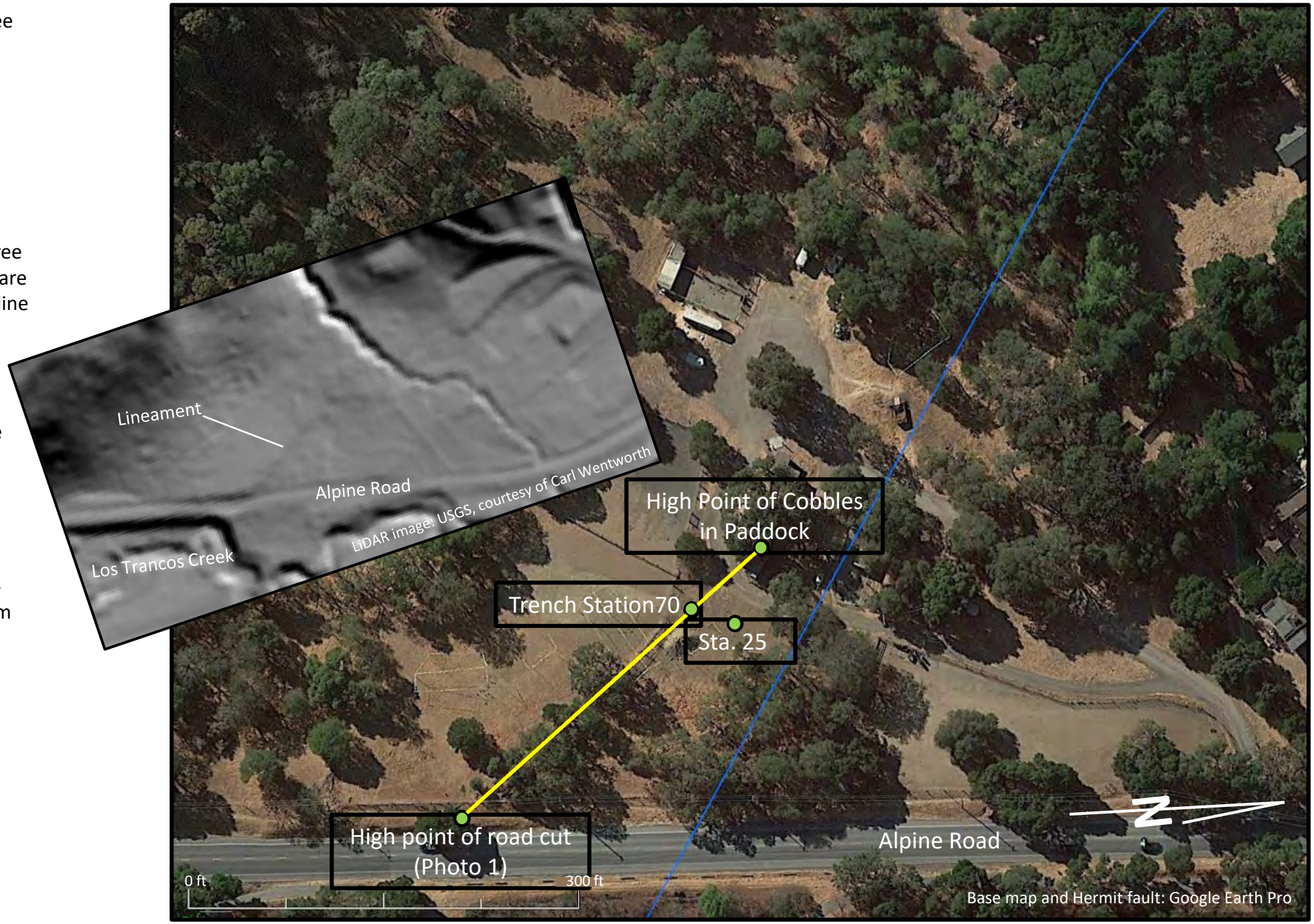


Figure 7. Lineament (A-A') in a LiDAR-based shaded relief image of the Project site area marks the linear step in the ground surface. Line labeled F is the fault mapped by Pampeyan (1993) between Whiskey Hill formation (Tw) and Ladera Sandstone (Tl); adjacent vertical bedding attitude measured by Pampeyan in Ladera Sandstone; S - ephemeral stream at northwest end of topographic step; W - Westridge Drive.

The LiDAR image was prepared from a 3-meter elevation grid available online from the U.S. Geological Survey National Map database. Image courtesy of Carl Wentworth.

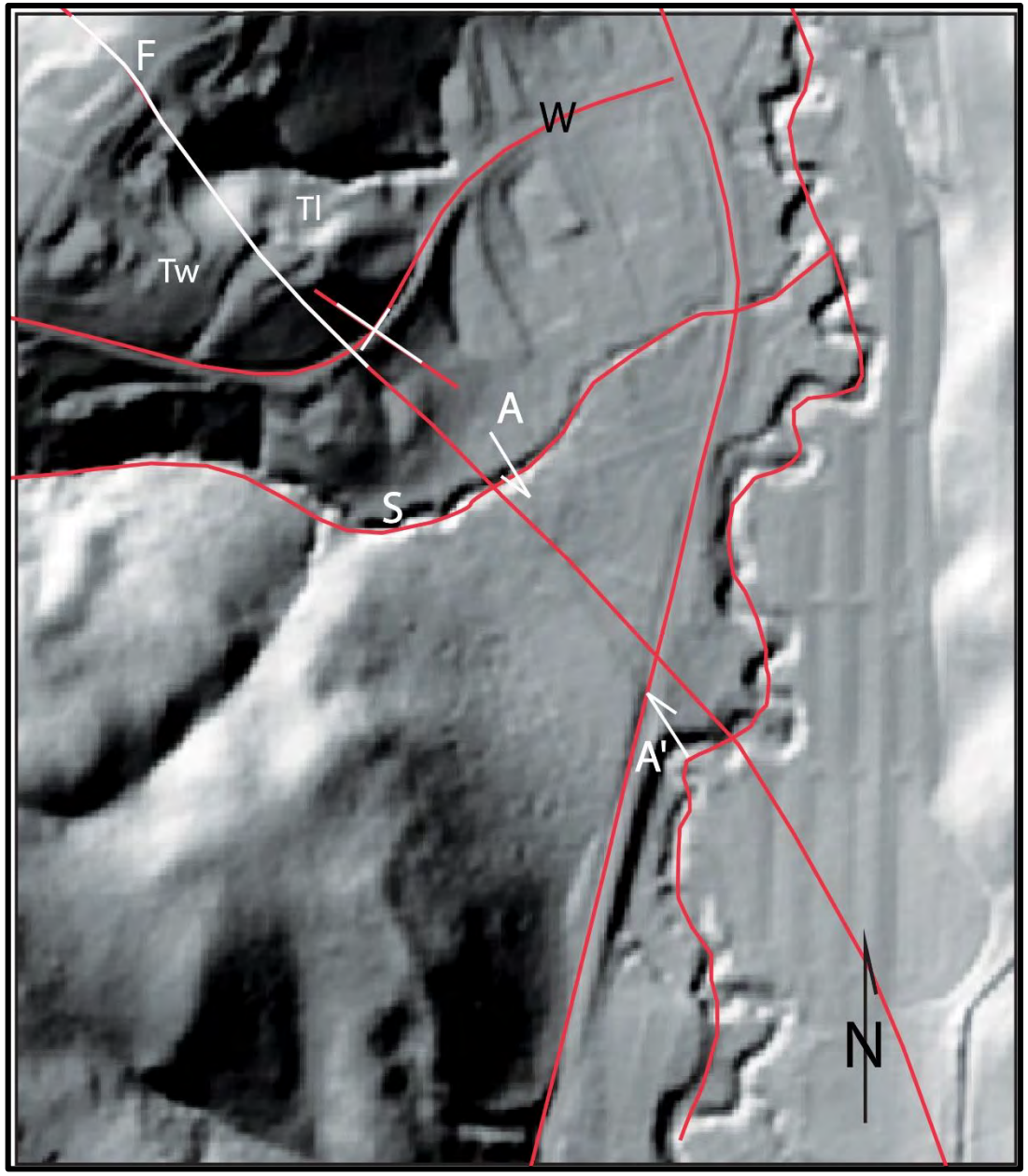
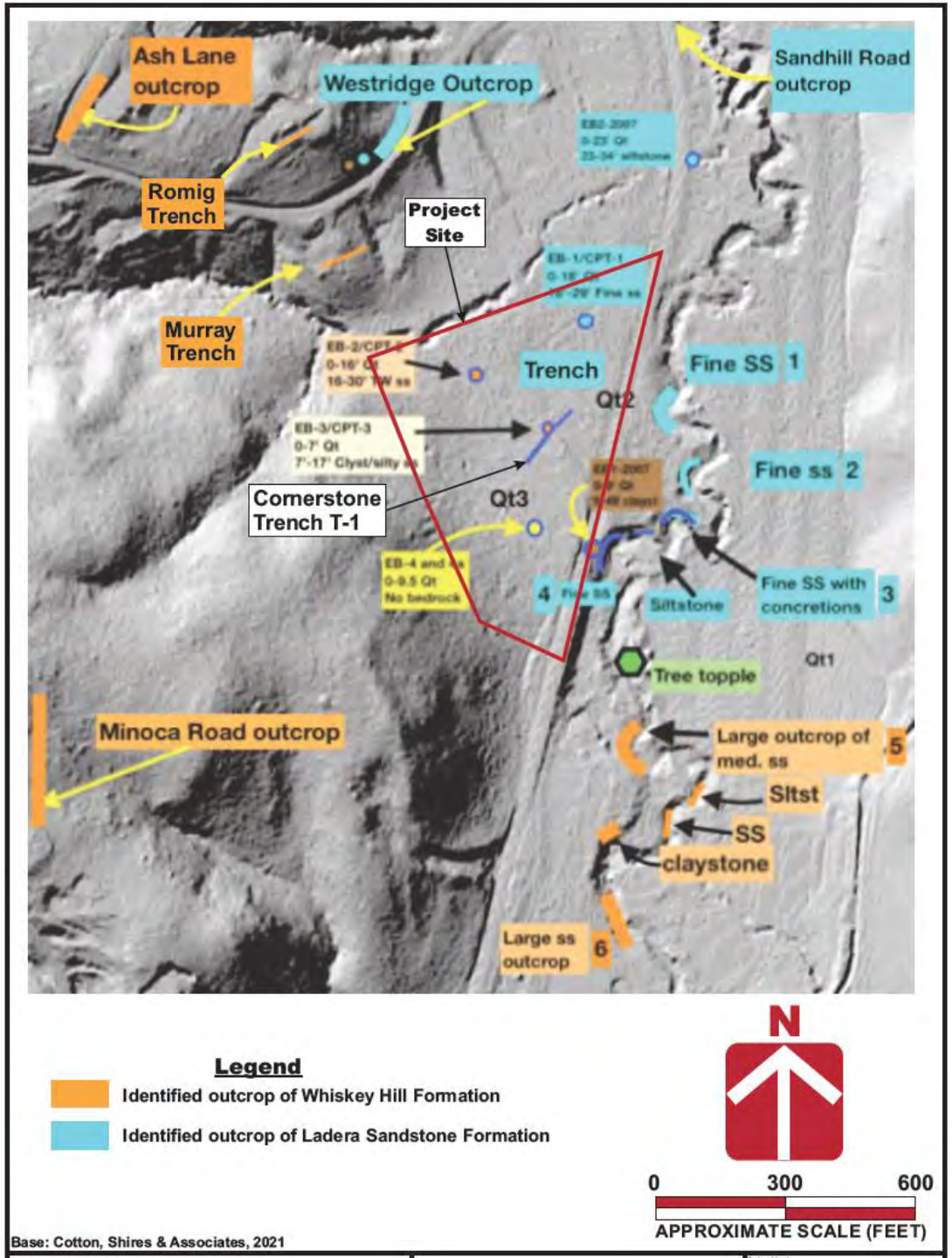


Figure 8. This LiDAR-based image of the Project site, Cornerstone's Figure 4, is given as the basis for their assertion that an "arcuate" geomorphic feature trends westerly and then northerly through the site. This image does not, however, show any evidence of such a topographic feature trending through the Project site. Compare this image with Figures 7 and 8 in the present report, which clearly show the linear feature.

This figure is reproduced from the DEIR (Chapter 9, Appendix G; 2021 Cornerstone report, Figure 4). Cornerstone credits Cotton, Shires and Associates with providing the LiDAR base map from 2021 LiDAR data.



NE

Direction of Stream Flow

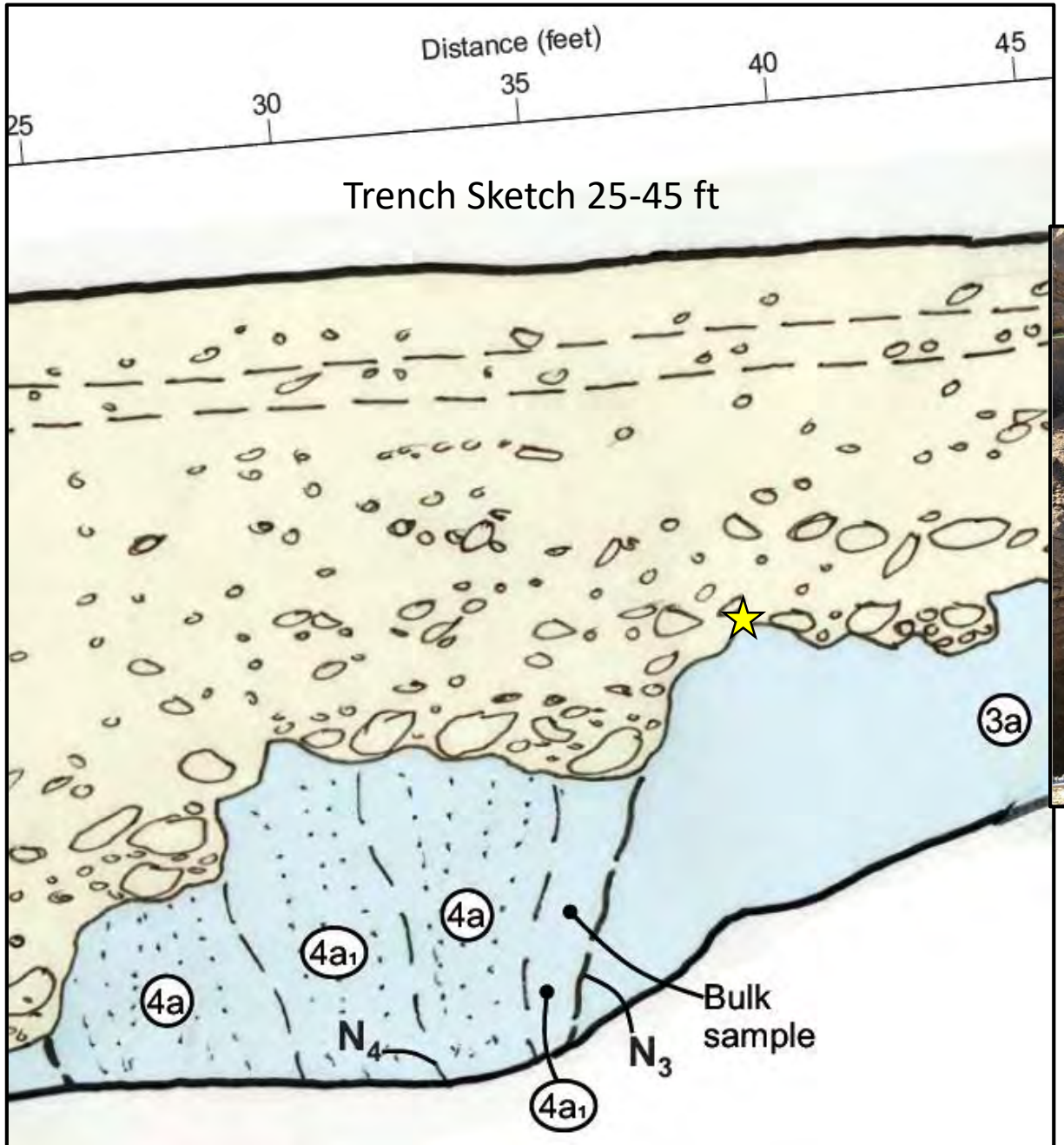
SW

Figure 9. Trench drawing at stations 25-45 and photo at stations 35-40 on the southeast wall of Cornerstone's 2021 trench.

The green ribbon marks Cornerstone's Pleistocene/Holocene boundary.

The yellow star at trench station 38.6 marks the local high point of the sandstone bedrock before the start of a ~3-ft step down to the north. Cornerstone ascribes the formation of this step to scouring. The step down between stations 38.6 and 36 does appear erosional but also is likely tectonic; the fan-shaped bulge in bedding and fractures at stations 25-30 is consistent with tectonic extrusion. The trench phot show alluvium folded or warped between the two stanchions for shoring.

Figures 6a and 6b show detail of folding in the alluvium at stations 35-40.

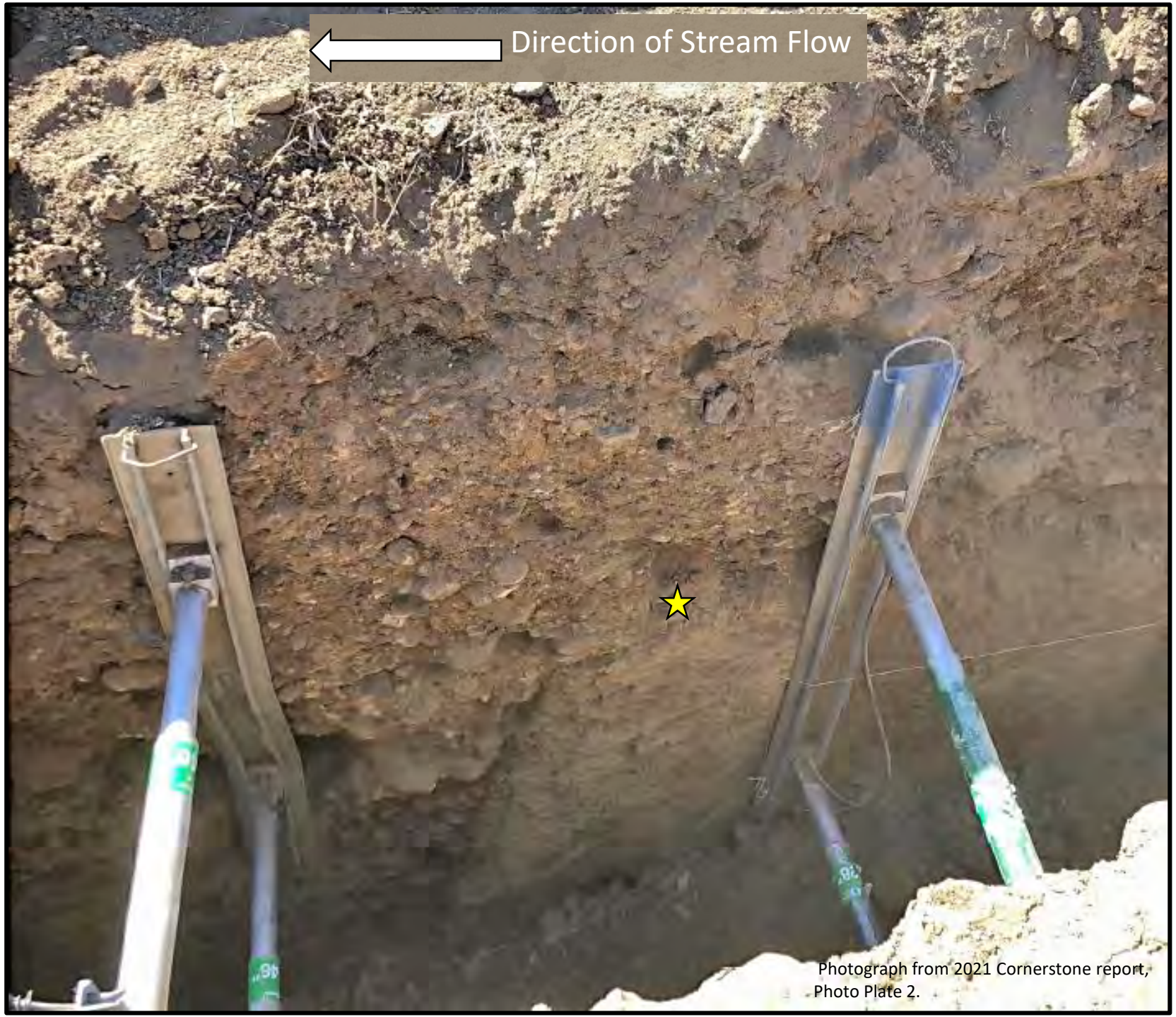


Trench Sketch 25-45 ft

Trench Photo 35-40 ft

Trench drawing and photograph are from the DEIR, Chapter 9, Appendix G; 2021 Cornerstone report, Figure 6 and Photo Plate 2.

NE



SW

Figure 10a. Deformation in alluvium between trench stations 35 and 40 seen here is consistent with the likely tectonic bulge starting at station 25 (Figure 3).
This enlargement of the Cornerstone photo of the southeast trench wall illustrates shortening—folding or warping--in the lower interval of alluvium overlying bedrock (Cornerstone 2021, Photo Plate 2). Only the portion of the trench wall below the bench is shown here; the upper part of the photo was out of focus. See Figure 10b for annotations of folding and warping.

The yellow star marks the highest elevation of the sandstone bedrock (at station 38.6), at the contact with overlying Pleistocene, before the sharp step down to the northeast.

NE

Figure 10b. Shortening in alluvium at trench stations 35-40 is consistent with the bedrock bulge at stations 25-38. Annotations have been added to Cornerstone's Photo Plate 2 to show folded and warped deposits. Only the portion of Cornerstone's photograph is shown here.

The white lines outline folded or warped bedding in the lower interval of alluvium (labeled "Pleistocene" in Cornerstone's report). Similar folds occur throughout the thickness of this section.

The blue oval encircles large, flattened pebbles and cobbles that were originally deposited nearly horizontally and later tilted up to the right at an angle of ~45° to the original bedding. The wave length of folds appears to be approximately 3.5 ft.

SW

The yellow star marks the highest local elevation of the sandstone bedrock (at station 38.6), at the contact with overlying Pleistocene, before the sharp step down to the northeast.

The black line approximates Fracture N3 noted in the Cornerstone report. Cornerstone found no indication of shearing on this fracture.

Photo 1. Boulder of distinctive Mesozoic conglomerate remaining on the surface at the Project site after Cornerstone's trench was filled. These rocks are common on Coal Mine Ridge, a major source area for sediment at the site. The pen, shown for scale, is 5.6 in long. The photo was taken during a visit to friends who board their horses at Alpine Rock Ranch, at the Project site.

Photo : Nan Shostak

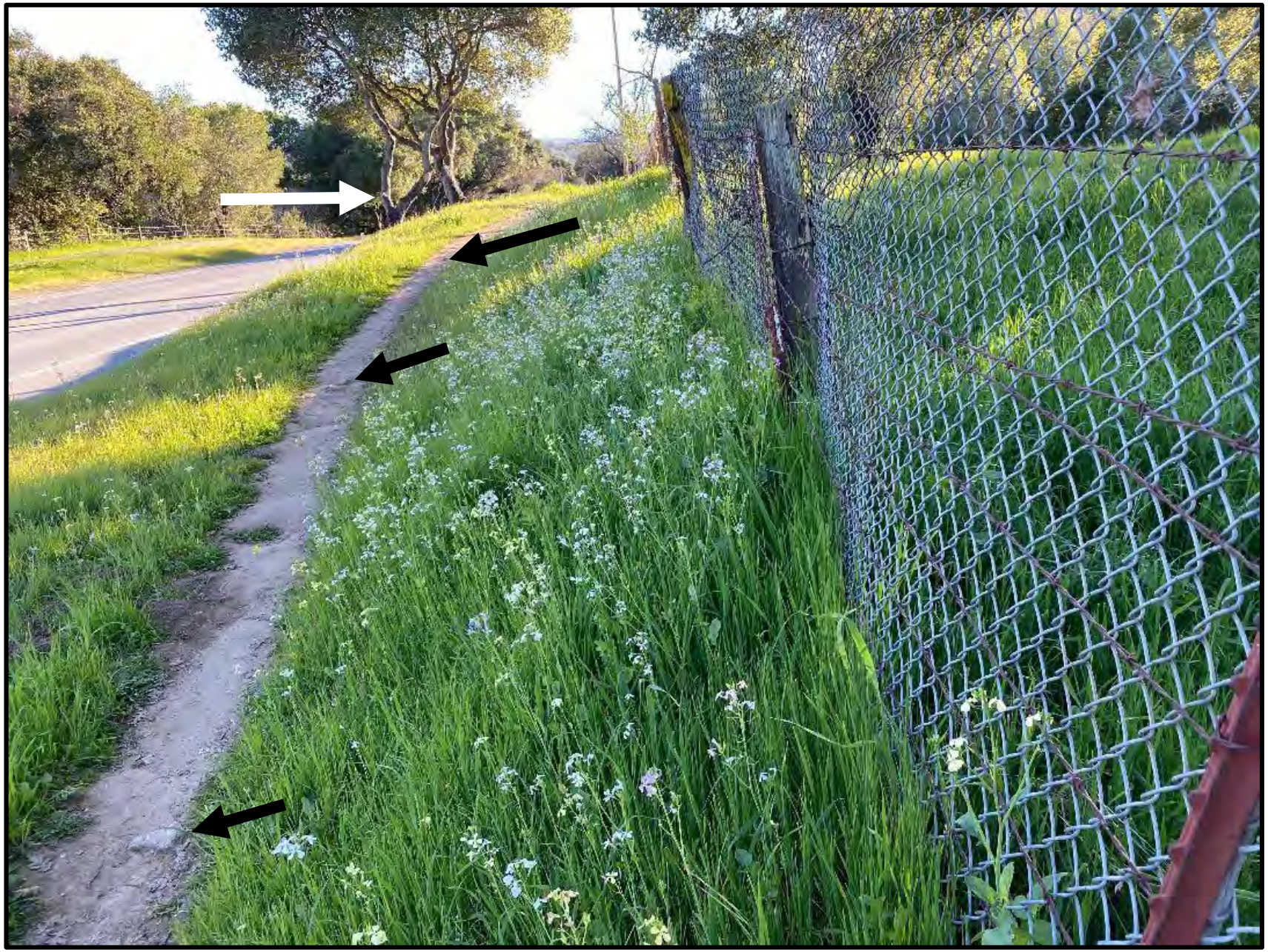
Photo 2. High point of a step down to the north along Alpine Road. Large cobbles and pebbles in the road cut along the west side of Alpine Road are exposed where the surface of the ground starts to step down toward the north. The fence separates the Stanford Wedge property from the public Alpine Trail (green grass above road cut) and Alpine Road. Note the forked tree at the white arrow. The topographic step down to the north begins near this tree.

Black arrows point to a few of the in cobbles *in situ* that are exposed in the road cut. Some of the cobbles are distinctive Mesozoic conglomerate.

Photo : Nan Shostak

Photo 3. Cobbles crop out on Alpine Trail, on the west side of Alpine Road. The view is toward the south. Cobbles form the solid footing of the trail and occasionally crop out at the surface (black arrows). The white arrow points to the same forked tree and high point of the step down in topography as seen in Photo 2. The Stanford Wedge property is the on right side of the fence. The step down is to the north, toward the photographer.

E



W

Photo : Nan Shostak

Photo 4. Reversal of stratigraphy. Cobbles form the footing of one horse paddock in the center of the Project site. View is toward the southwest.

The horse shelter in the background was built at the high point of a step (down to the northeast) in the lower part of the alluvial section at a cobble-bearing layer. The finer-grained upper part of the alluvial section is exposed only on the low side of the step, in the paddock ~6 ft behind the photographer.

This photograph was taken on a visit to friends and their horses at the horse boarding facility at Alpine Rock Ranch (at the Project site). The horse insisted on being photographed.

Photo : Nan Shostak

Portola Valley website online form submission

caroline Vertongen
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 15:04

"To Portola Valley Town Council,
Portola Valley Staff,
and Stanford,

The Housing Element of our Portola Valley (PV) General Plan was adopted on January 14, 2015. Item 2412d confirms: " Stanford University has expressed no interest in developing the Stanford Wedge parcel and staff has been told that there are currently no plans for the parcel"

The proposed site of this Project is located in a high fire and earthquake zone and will , despite the proposed mitigation, severely impact not just the neighbors above and around the property, but also the whole community. This project will severely impact those who live here, those who work, and those who visit Portola Valley.

This project will take away the equestrian center which contributed to Portola Valley's tranquil rural character. This project will change our community for ever.

I do not agree with the DEIR results prepared by Town Staff and consultants stating the "project" would potentially pose significant impact and less than significant impact with proposed mitigation.

I do not agree because 1) this Project as planned does not abide by the guidelines of our PV General Plan and 2) the proposed mitigation uses vague words like "proposed", ""if were implemented", "expected" and "approximately"….etc. These words create uncertainty, 3) previous experiences with other Stanford projects and Stanford in general raises many questions if they will keep their promises and properly execute any mitigation proposal 4) our experiences of the last few years show several projects built with conditions and promises that are not kept, outsourced responsibility and deferred oversight, inconsistent code enforcement and preferential treatment …. these policies and practices have created a level of mistrust.

Stanford is a a multi-billion enterprise that does not keep its "advertised promises" (e.g. When Stanford first promised its expansion it promised access to its tennis courts, playing fields, and even concert hall…..but now the General public not affiliated with Stanford have no or very limited access.

Time limitations only allowed me to provide this brief summary of comments regarding the DEIR and proposed mitigation.

1) impact aesthetics:

The "clustering" of housing is not acceptable and should be replaced by standard single homes with larger setbacks and any other guidelines as stated in our General plan.

- the views toward this Project from Alpine Road as seen in Figures 4.2, 4.3a, 4.3b, 4.4a and 4.4b visually modeled only show lighting impact from 1 housing structure. The cumulative impact was not addressed.

The DEIR does not reflect consideration for Portola Valley's light and noise ordinance.

2) Impact on our Scenic corridor, traffic and public safety

- Portola Valley is not a "city" but a town with rural character and a General Plan carefully designed to preserve its rural and unique character while planning anticipated growth.

-the exit and entrance sites are limited to 2 and will not only cause major traffic problems but will add to the existing traffic problems.
The DEIR report should add additional solutions e.g. one entrance, one exit, and only exit to the right, and no left turns from Alpine.

One way to solve the traffic issues created by this Project and solve many other traffic problems on Alpine is creating roundabouts; they slow traffic and they promote safe circulation eliminating unnecessary signs which are restricted as per guidelines of our General Plan.

- the mitigation offered to mitigate "safe trail crossings" again assumes that Stanford faculty and staff will obey the stop sign. To provide public safety for bikers, equestrians, and pedestrians who use the trail, Portola Valley should demand one entrance, one exit, only right turns and prohibiting left turns.

3) impact of Hazardous materials:
Portola Valley has many big construction projects in progress - they all utilize fuels and oils in construction equipment that are hazardous and use hazardous materials - all developers are using "subcontractors" and many workers drive in adding to the amount of hazardous materials.

The amount of hazardous materials and greenhouse gases for this Project alone will be significantly bad for our community.

4) impact of hydrology and water quality.

Town council agenda and minutes of the last 4 years confirm the concerns and complaints from many PV residents regarding our water infrastructure, water pressure, and water quality.

Our General Plan adopted in 2015 had reports from the Water district confirming the ability to supply enough water and maintain high water quality, and adequate water pressure until 2022. Unfortunately our personal experiences shared with Town Council and staff as well as with CalWater demonstrate there are problems and they need to be fixed.

California State Law demand annual updates on our housing projects, but the last update we saw was in 2017 under Planner Cassidy. In 2012 our Senior Planner was able to lower the RHNA numbers from 74 to 64 because she understand the existing risks and because she consulted our General plan and resources like the Moritz Map.
Town staff confirmed in 2018 we reached our 64 RHNA numbers.

Many housing projects were built after 2018 and they are all impacting our water supplies and its infrastructure. This Project will add more problems to existing problems.

New building code require fire sprinklers which also lower our water pressure.

The Project need to ensure that no other residents are impacted especially those who reside on higher elevation.

The 2020 letter from West Bay Sanitary district stated the following:

- requested that the proposed project comply with all current District Regulations and standards

- The 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 facilities may be required.

Any new district sewer mains not within the Right of way will require a dedicated easement confirming to district standards

a separate and independent sewer building 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

Portola Valley needs to ensure that this Project does not affect anyone else in Portola Valley and should demand that Stanford contribute to improving our infrastructure not just for this Project, but the community as a whole.

5) Land Use & Planning Wildfire.

WFPD has made a recommendation to increase the spacing between structures to 100'.
The General Plan emphasizes low density housing. The Project proposes "clustering" therefore does not abide by our General Plan.

Stanford owns many properties and we continue to ask why Stanford chose to build in a high fire zone within a canyon that poses not only risks for next-door neighbors and neighbors above the canyon, but also for the rest of Portola Valley who needs to use Alpine as an exit road.

Former Fire Chief Enea confirmed this in her letter of September 1, 2019.

This Project will add to existing fire and wildfire risks, earthquake risks, and will add more cars and people to be evacuated. Risks Portola Valley has known for over a decade, but sadly overlooked.

6) Population growth- we do not know if this Project is consistent with the Town's general Plan because Town staff has failed to update its records.

This Project add over 100 people, but this in addition to existing population growth not reflected in our data and the population growth created by the many projects built and in progress after 2018. Portola Valley is adding an additional 290 housing units to comply with the RHNA numbers for cycle 6.

- This Project will add the demand of water, electricity, sewer ….and the Town of Portola Valley is so behind on upgrading its existing infrastructure and preparing for increased demand.

-This Project will add the demand for recreational use - in addition to the demand already created by the other projects built or in progress, yet not counted.

-This Project will add more cars in addition to all the additional traffic created by big housing projects and projects approved for Woodside Priory, the Willow Commons, Portola Valley School district, and the new Fire Station.

Conclusion: Portola Vally will need to address and solve all existing issues before allowing this Project and any future housing project. "

Portola Valley website online form submission

janet davis
[email and street address redacted] Menlo park, CA 94025

5/13/2022 15:09

"Biological Section:

I had hoped that the Committee for Green Foothills replied to this highly flawed DEIR, but have not yet seen any response from them. One species that the authors discounted was the bat. However, there is a recent scientific article whose author is a Stanford scientist working on the nearby Jasper Ridge reserve in Portola Valley who explains their importance to the community, to agriculture and the environment, and who stresses the need for preserving their habitat.
https://news.stanford.edu/news/2001/march14/bats-37.html

Nursing mother bats can eat 4500 insects such as mosquitos and other harmful insects in one night. Mosquitos spread Lyme Disease, West Nile Virus, and Heart worm. Bats reduce this risk without the deleterious effect of toxic substances or expense of fumigating. Ms Evelyn explains what bats need to survive. What Stanford plans to do would wipe out most of this beneficial population.

I have no scientific credentials but dispute many of the findings of the preparers of the Biological section of the DEIR from my own experience. You absolutely cannot judge what does or does not live in an area based on a few visits. I have lived in the same place since the 60s but have only rarely spotted e.g. garter snakes, Western Pond Turtles and tarantulas. We have been visited by a bald eagle, a king snake, a mountain lion, wild bees, numerous birds, butterflies, lizards, salamanders, rabbits and many other animals. I only recently, after working in the garden most days for nearly 60 years, discovered several Dusky Footed Wood Rat nests, so I dispute the purported findings in the DEIR.

Fallen oaks provide much needed cover and habitat for many animals and are not as flammable as grasses. Some should be left in place to decompose.

The DEIR states that the fiddleneck flower is rarely seen on the Wedge. However a nearby resident photographed one in flower and several dead ones right there, which goes to show that the author of that section of the DEIR was unobservant or negligent to say the least.

Inline image

The dense collection of steel roofs proposed could also have a negative effect on wildlife in addition to humans. See the scanned 1997 photos of the north side of the structure next to our property that replaced illegally removed oak trees. The 25 year old photos do not do justice to the blinding effect at certain times of the day which would be a severe annoyance to neighbors, birds and perhaps even some aircraft.

Inline image

Inline image

Even if the evacuation routes proposed actually existed, they all end up at Alpine or Sand Hill Road, both of which are beyond saturation point, and in the event of a catastrophe would be full of other residents from W. Menlo Park, Ladera and Stanford Weekend Acres. Given that Portola Valley is “horse country” there is no plan on how to evacuate the many horses in the vicinity of the Wedge. Several years ago there was a major fire along Arastradero that killed several horses. There was another huge fire at the Dish decades ago that threatened everybody in the vicinity and blackened large areas of that property. Earlier this year an eminent Stanford professor died on the golf course: perhaps because the emergency vehicles got stuck in the mud and could not access the man via Rural Lane. Emergency access is critical for survival in this area, and the Wedge development would increase this peril for everybody and it should not be built.

The DEIR document was a deceptive, sloppily produced document with several typos, the most egregious of which was the inaccurate address to which responses should be sent. This resulted in my initial objection being sent back to my spam file. Given this major error the deadline for responses should be extended. There is nothing in the Wedge proposal that has any benefit to Portola Valley: rather it would be a danger to those residents, and to surrounding neighborhoods.

Stanford has many sites on campus for housing and Portola Valley needs to find other ways to fulfill its Housing Element obligations and that should not be as a dense development that violates so many of the Portola Valley ordinances and the General Plan. There is a basic flaw in the ABAG requirements in that while one jurisdiction such as Menlo Park, can build large commercial structures requiring many employees, much of the responsibility for housing them falls on rural residential communities such as Portola Valley. The bottom line is why is the Portola Town Council Is even considering the proposal when there is absolutely nothing that benefits its citizens and it appears that a substantial number of residents oppose the project on clear scientific grounds. Even San Mateo County is raising objections, and I hope that Woodside and Santa Clara County also find many faults with the project that could negatively impact their jurisdictions.

The clear response is NO PROJECT"

Portola Valley website online form submission

Mary Hufty
WASC
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 15:16

[no text, attachment only]

WESTRIDGE
WESTRIDGE ARCHITECTURAL SUPERVISING COMMITTEE
Charles Zaffaroni, Co-Chair; David Strohm, Co-Chair;
Mary Hufty, Trails; Patty Dewes, Secretary; & Walli Finch, Treasurer
3130 Alpine Road #288, PMB 164, Portola Valley 94028
secretary@westridge.us - www.westridge.us

DEIR Comments from the Westridge Architectural Supervising Committee

Dear Ms. Russell,

As Trail representative for the Westridge Architectural Supervising Committee, I am writing comments on the trail element of the Stanford Wedge Environmental Impact report (Chapter 3).

Figure 3.9 of the DEIR Trail Plan reflects two important additions of the trail system on the Wedge as presented on the Portola Valley General Plan. These will be an important asset to the greater Portola Valley community and its flora and fauna (although better if they are connected with the PV Trail plan – see comments below) as well as adding to our fire safety. However, there is a third and critical component of the plan which the DEIR fails to recognize or provide mitigation to protect: the historic and current Alpine Canyon Trail. It is easy to see that this trail adjoins the Stanford Trails and is present on the Portola Valley General Plan along the North east border between Westridge properties and the proposed new development (Figure A).

Background on Alpine Canyon Trail

WASC has ascertained the legal existence of easements for bridle paths and walking trails on all the Westridge lots from Cervantes to the Stanford border. I personally can attest and document that the Alpine Canyon Trail has been lightly used and has been maintained biannually and seasonally by Westridge and Portola Valley volunteers for the last 30 years.

Water bars and culverts are present in many locations and lidar maps (Figure C & D) show the indentation of the trail indicating the long-term presence and usage. The trail most likely dates back to prehistoric times. It has been defended legally by the easements which encumber all the lots along its route since the formation of Westridge Subdivision No 1 in 1947.

As you can see from the accompanying Westridge Trail Map (Figure B) a gate was present at the juncture between Westridge properties and Stanford lands. This has recently been removed without Westridge permission. Therefore, currently, there is open access from Stanford Lands on to the lands of the Westridge Subdivision No. 1.

The proposed development has no set back from the property line and no recognition of the animal corridor. A set back is required for wildlife and trail access along the northeast border of the Wedge property and structures, as seen on the Portola Valley General Plan and previously shown on the Westridge maps. We believe this is a critical wildlife corridor. The natural features of the canyon are conducive to wildlife and to a wilderness experience and should therefore be accessible. Public access should be permissive, not invited as there is need for seasonal and conditional closure and maintenance.

Westridge Architectural Supervising Committee is in the process of evaluating the trail for maintenance and is considering minor rerouting. The construction costs and long-term maintenance budget for an improved and mutually acceptable trail will be carefully weighed and cooperation from the developer will be greatly appreciated.

<u>Impact of Project on Alpine Canyon Trail</u>

(1) The historic Alpine Canyon Trail and its critical connections to our community assets, as well as its historic value to Stanford, are clearly shown in the GPS mapping of the trail (Figure C). The animal corridor traverses Westridge lands and the lands of Stanford. The break created by the Stanford development will damage the natural canyon, the historic Alpine Canyon Trail, and the wildlife corridor.

(2) Furthermore, Westridge would appreciate consideration of the impact of travel along the trail which is the responsibility of the Westridge Architectural Supervising Committee. Our community is dedicated to our green spaces and our trails, as well as the fauna and flora that inhabit the lands we custody. We cherish the permission we grant to the general public to use the trails in our community in compliance with the CC&R's of Westridge properties.

(3) Exit from the Alpine Canyon has for the last 75 years been through the entrance to the horse facility off of Alpine Road. (The current driveway and the small equestrian gate to the east of the driveway.) This is a critical

safety and efficiency component for Westridge Subdivision 1. Yet the proposed development will break this significant safety link for residents.

(4) There is no actual connection proposed by the development plans to connect to the PV trail system, nor to the recreational facilities at Ford Field.

(5) Emergency access to the Westridge easements for maintenance, public utilities and other public uses on the Westridge properties is blocked as the current development is presented.

(6) At advice of counsel, should the project be developed, we expect the developer to add signage where appropriate as follows:

> "You are entering a network of dirt and/or rocky trails. Enter at your own risk. Irregular, steep, or slippery surfaces and falling rocks or trees may be present. Users shall comply with closure and warning signs. There is absolutely no smoking on these trails and bicycle use is prohibited under the Westridge CCNR's. The Westridge Architectural Supervisory Committee permits access pursuant to Civil Code § 846".

To address the points above, WASC strongly supports the recommendation that the Stanford Wedge Development be situated further South, relative to the currently released plans at least to the level of set-back noted in the Larger Set-back Option. This is a top priority for the Westridge Architectural Supervising Committee. The larger set-back option should include the Alpine Canyon Trail and a Alpine Canyon Wildlife Conservation setback with appropriate directional fencing, crossing signs, and a discussion of trail and wildlife over or under passage to the other side of Alpine Road.

Sincerely,

Mary Page Hufty
Trails Chairman, WASC

Attachments Below

Figure A. Detail from Portola Valley General Plan Trail Map

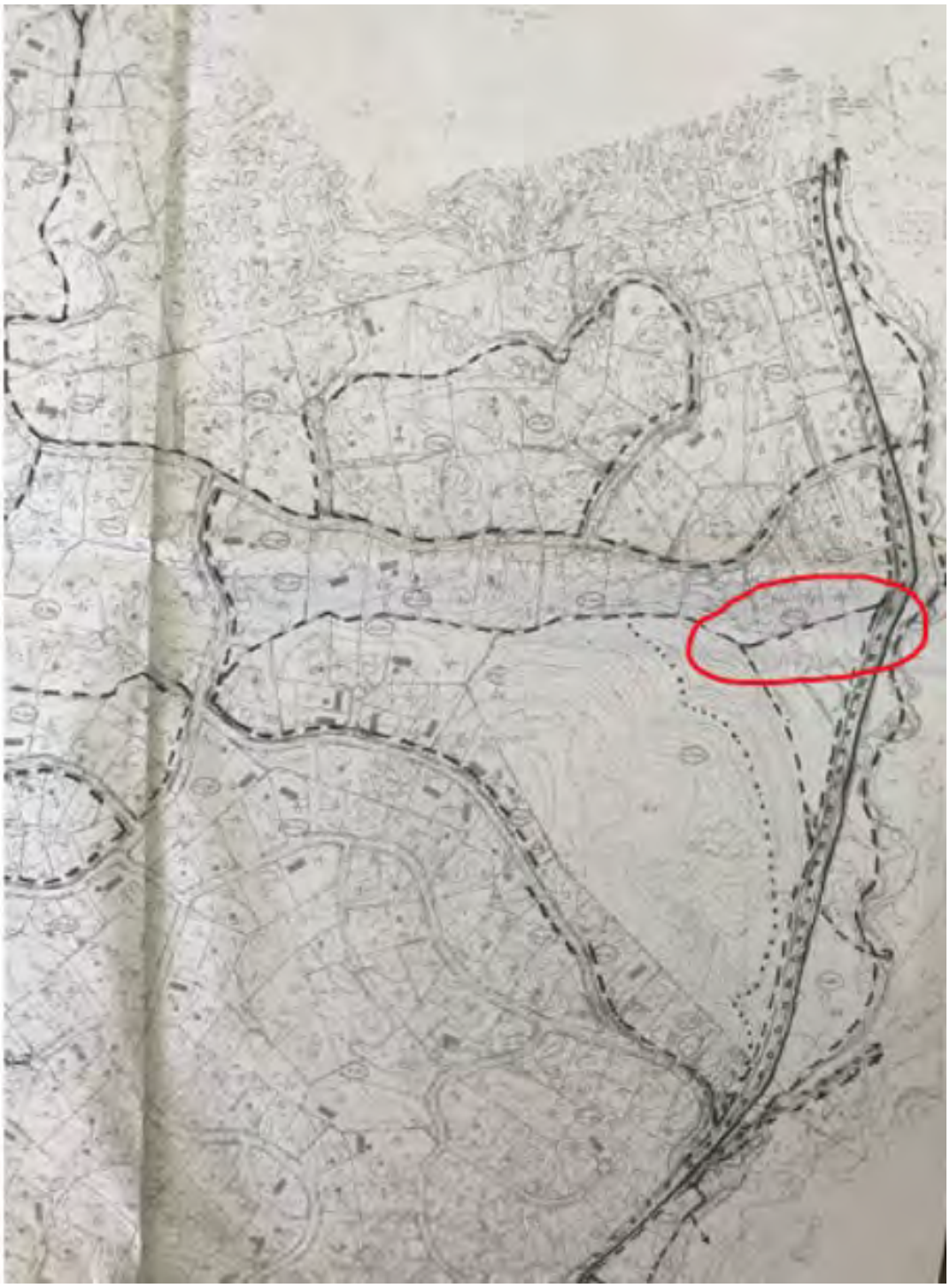


Figure B. Westridge Trail Map 2022

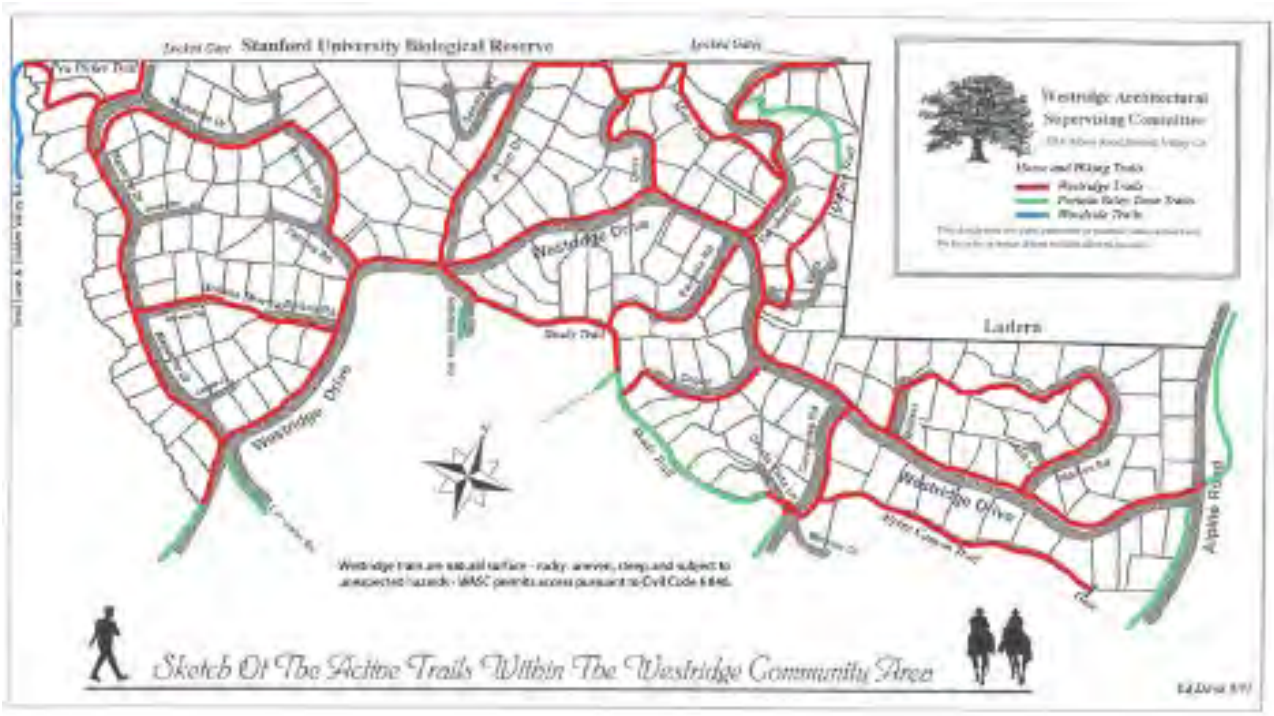


Figure C. GPS Map Stanford University- the Bill Lane Center for the American West

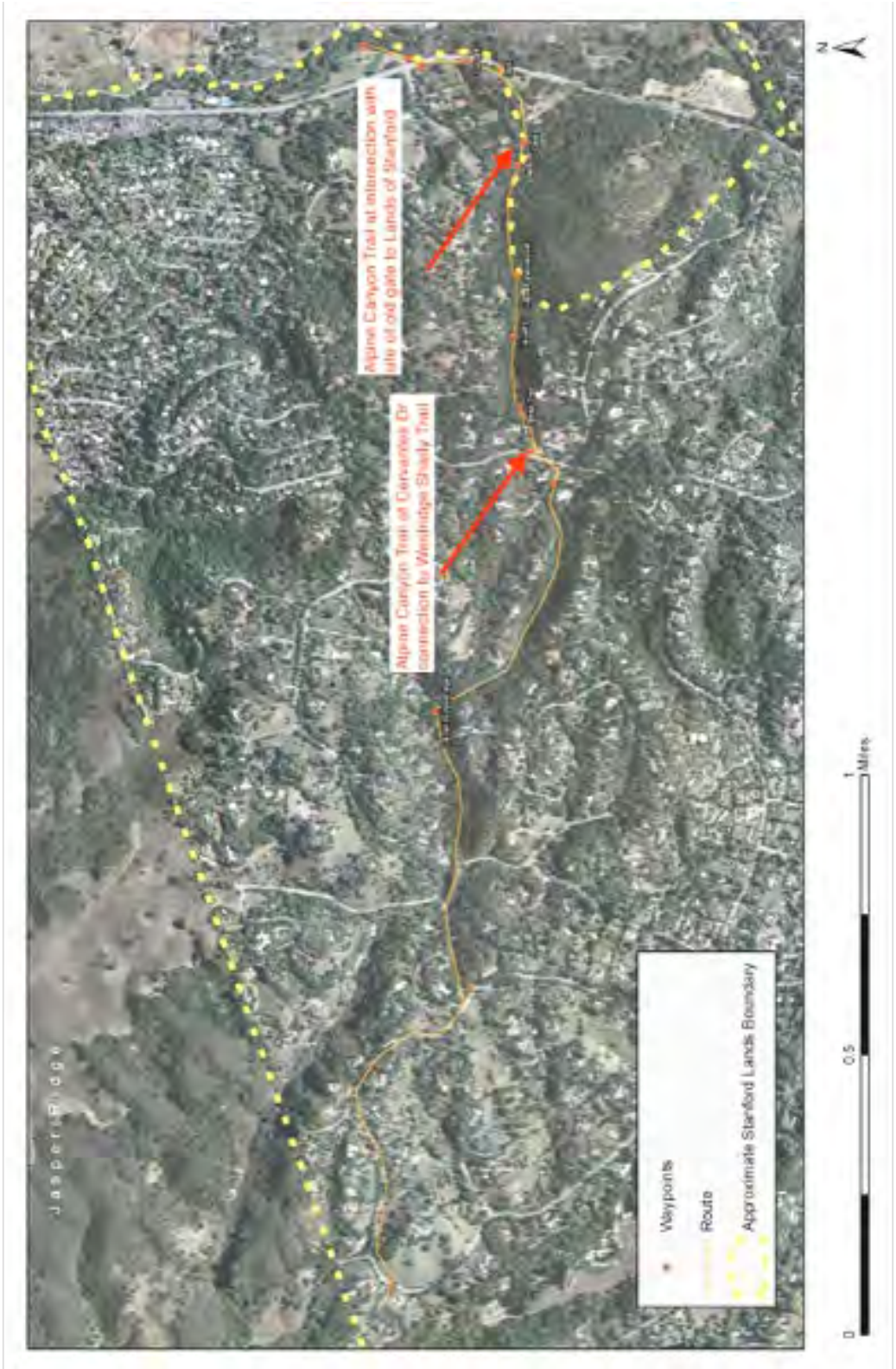
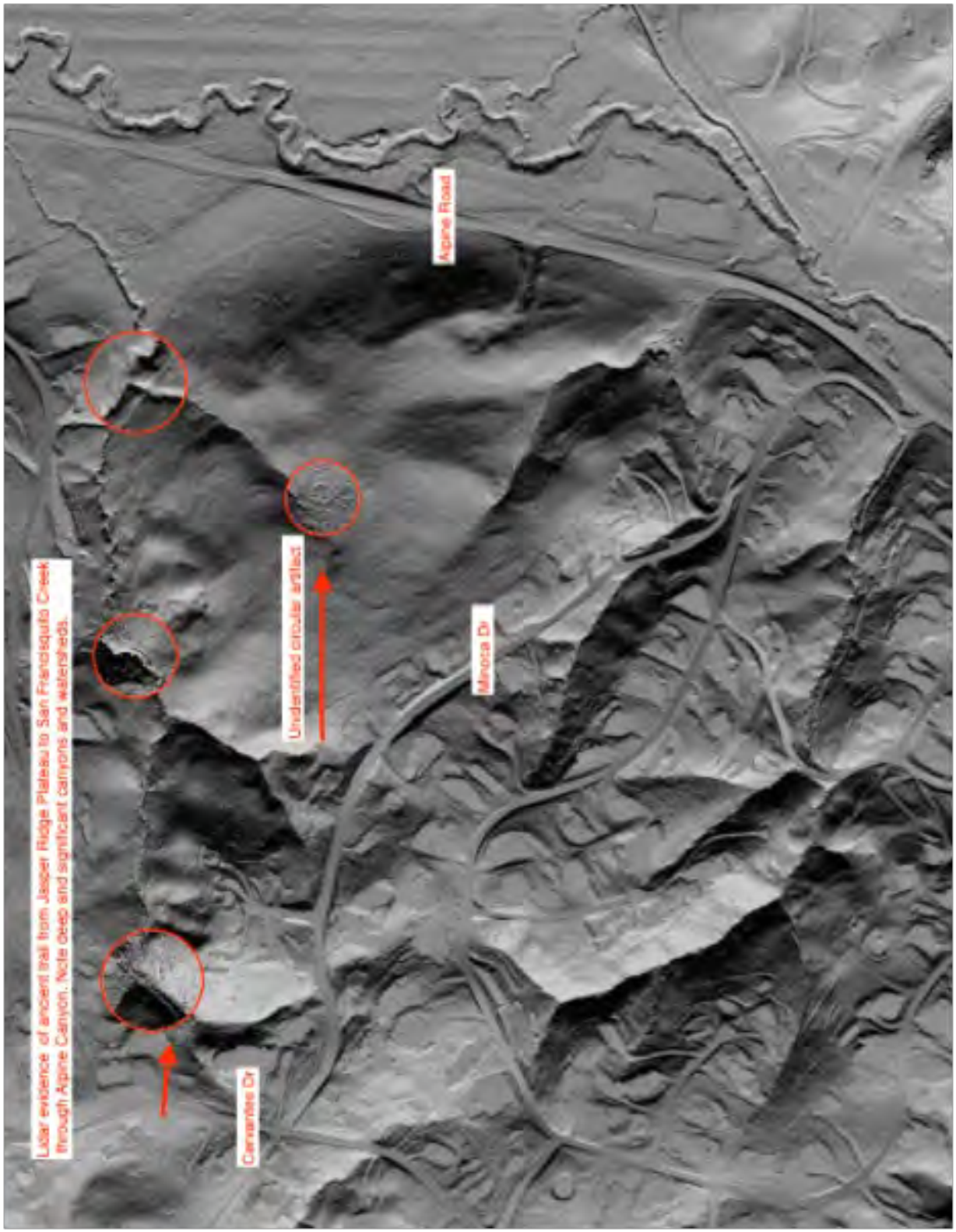


Figure D. Lidar evidence of Alpine Canyon Trail imprint with magnifications



Portola Valley website online form submission

Rita Comes Whitney
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 15:33

"I have emailed my statement but I want to make sure that it has been received since others have had problems submitting.

Rita "

[Attachment omitted - already included in emailed letter from Rita Comes Whitley on 5/13/2022]

Portola Valley website online form submission

Kenneth Reisman
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 16:099

"My thanks to the town for conducting a thorough EIR and making the drafty available for comment.

As a resident of Portola Valley I have several concerns:

1. The draft EIR does not take into account reasonable alternative scenarios in Chapter 20, including No Project but with a comprehensive vegetation management plan. This scenario would potentially be the safest from a wildfire standpoint and minimize negative impact to the environment. By omitting this alternative the EIR, perhaps without proper foundation, makes the project appear as the safest alternative.

2. In the executive summary (2-27) on impact to aesthetics the draft EIR states without objective support that the project ""would not represent a substantial degradation of visual character. The impact of the Project with respect to visual character would be less than significant."" This appears to be taking the subjective opinion of the EIR authors and stating it as fact. Yet, in the opinion of this resident (and likely many others in Portola Valley) the project would dramatically alter and impair the visual character of Portola Valley.

3. Many heritage oak trees would be uprooted as a result of this project."

Portola Valley website online form submission

Lital Levy
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 16:21

I am a full time resident of Portola Valley. Here below are my concerns about the proposed housing project.

1. In the draft EIR, there is no option for No Project combined with a comprehensive vegetation management plan. This scenario would potentially be the safest from a wildfire standpoint and minimize negative impact to the environment. By omitting this alternative the EIR makes the project appear as the safest alternative.

2. In the executive summary (2-27) on impact to aesthetics the draft EIR states without objective support that the project "would not represent a substantial degradation of visual character. The impact of the Project with respect to visual character would be less than significant." This appears to be taking the subjective opinion of the EIR authors and stating it as fact. Yet, in the opinion of this resident (and likely many others in Portola Valley) the project would dramatically alter and impair the visual character of Portola Valley.

3. Over 150 heritage oak trees would be uprooted as a result of this project. This would have a significant impact on both the visual character/ appearance and local environment and wildlife.

Portola Valley website online form submission

Jon Else
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 16:33

I support the Stanford Wedge Housing proposal and find the EIR satisfactory.

Portola Valley website online form submission

Edith Collin
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 17:21

I am concerned that the DIER does not adequately address the fire risk to much of the community.

I am concerned that the town is not respecting the Fire Departments direction as to where to build and how to safely separate the buildings involved.

I am concerned that the increase in traffic will be substantial, and that the safety along the Alpine Corridor will be more dangerous as a result.

I am concerned that the town council is not understanding these

threats to the people who live and work in our town.

I am concerned that Stanford is not concerned about what these buildings will do to this town.

If it is true that Stanford is getting a sizable tax credit, or money forgiven in any form so that they can build these buildings, then I am properly disgusted. Stanford has both the land and the money to build on their own land next to their school and hospital and mall.

I am concerned that the General Plan that the town developed when it incorporated is being ignored so that a small number of people can do quite a bit of environmental (trees removed, land reformed) damage to mitigate a large problem with a very small intrusion into our town.

Portola Valley website online form submission

Matthew Muffly
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 21:41

This high density housing project is located in the scenic alpine corridor, within 25 feet of a seasonal creek, within a riparian nesting area, an oak woodland, and mountain lion habitat. The environmental impact to the watershed, the flora, fauna, and noise/air pollution would be significant. Building high density housing in the scenic alpine corridor significantly diminishes what makes Portola Valley special. There are ways for Stanford and the Town to work together to lessen the environmental impact of this project and to protect the safety of the citizens of the town.

Portola Valley website online form submission

Gary Hanning
Representing myself, not the Trails and Paths Committee
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 22:12

The EIR did not consider the impact of the loss the horse boarding facility on the local equestrian community.

The EIR did not consider the impact of the proposed trail system for the wedge as specified in the Trails and Paths Element of the Portola Valley General Plan.

The EIR did not consider the impact of noise from Alpine Road vehicle traffic on users of Alpine Trail as proposed by the applicant. A better location/mitigation would be to move the trail inward and away from Alpine Rd.

The EIR did not consider the impact of the inevitable widening of Alpine Road and the subsequent impact on Alpine Trail and the screening of the views of the new homes and apartments from Alpine Road/Scenic Corridor.

The EIR did not consider the impact that traffic entering and leaving the wedge would have on equestrians using Alpine Trail.

The EIR did not consider the impact that noise and other hazards the new homes would have on equestrians using Alpine Trail.

I support Alternative b "larger setbacks".

The analysis of Alternative C "no clustering" incorrectly assumes that no trails would be constructed and that no comprehensive vegetation management program would be implemented. Page 20-12.

Portola Valley website online form submission

Trevor Oliver
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 23:12

Why is Stanford choosing to create non-market rate housing rather than paying its employees a living wage? This creates a system of dependence rather than providing economic opportunity.

Portola Valley website online form submission

Susanna Chenette
[email and street address redacted] Portola Valley, CA 94028

5/13/2022 23:37

With our climate crisis, Stanford could be leading the world in demonstrating options for sustainable, high-density, low-emissions, low-impact development that does not impinge on biodiversity or cause the premature deaths of hundreds of mature carbon-sink trees. Instead, Stanford ignores reality and proceeds with a sprawling, concrete-heavy, tree-destroying, wildlife-harming development that will be completely car-dependent. Stanford does this to provide its employees with housing -- instead of paying them salaries on which they could afford housing in the area. Stanford's proposed development is ill-conceived, short-sighted, ignorant of climate science, ignorant of the ongoing biodiversity loss on our planet, and demonstrates either Stanford's ignorance of science or Stanford's gross disregard of having a habitable planet in the future. Furthermore, it shows that Stanford would rather destroy carbon-sinks, generate elevated emissions, increase traffic, decrease air quality, avoid property taxes, harm wildlife, and harm ecosystems than pay sufficient salaries for employees to live close to Stanford.

In it's DIER, Stanford concludes that its proposed project will not significantly impact greenhouse gas emissions or air quality because it is but one small project that may fall within our legislative framework for regulating emissions. Thus, its impact, which includes destroying over 100 mature old oak trees and lining their habitat with concrete (one of the most polluting and environmentally harmful substances in existence), is acceptable. The issue with this logic is that no single project, no single entity, no single country, no single corporation acting alone is responsible for the catastrophic consequences of our current climate catastrophe. However, if we are to avoid the worst impacts of our current climate catastrophe, then not only does every single entity, regardless of size, have to stop polluting immediately, but also we must drawdown the amount of CO2 and CH4 currently in our atmosphere. Climate science is clear on this point - this is not a subject of debate, it is our current reality.

For some reason, Stanford ignores the dire warnings of climate scientists and instead looks to building guidance from legislative bodies that are years behind incorporating the scientific truths into policy. Stanford ignores the IPCCs projections. Stanford ignores climate scientists' warnings. Stanford ignores our climate crisis. We cannot continue to allow any entity - individuals, legislative bodies, judicial bodies, non-profits, educational institutions, or corporations - to do this. If we want any hope to avoid a four degree C increase and to have a habitable planet in the future, then we need every single person and entity - government, non-profit, corporate, and otherwise - to stop emitting greenhouse gases and to stop cutting down trees and pouring concrete over natural spaces.

If this project goes through, it will only demonstrate Stanford's ineptitude to understand complex scientific realities - much like most of the world. Now is the time for institutions like Stanford to be leading figures. If every entity with undeveloped land (on which it is paying essentially no property tax) behaved towards its holdings the way Stanford proposes to do here, we will soon be without any significant natural, undeveloped, open land.

Stanford is wealthy enough to be a leader on climate change. Stanford is wealthy enough to pay

employees fair living wages for the area so they dont need new subsidized housing. Stanford is wealthy enough to hire educated climate scientists and to listen to their conclusions about how in modern developed society, there is no place for new housing developments that destroy over a hundred trees, impact wildlife, and add car traffic -- we must be drawing down CO2, not adding more.

Please think about future generations and our climate crisis before moving forward with this project.