

**From:** [Mary Sylvester](#)  
**To:** [Planning Commission](#)  
**Subject:** Please Do Not Reconsider Condition 22 of the Castilleja School Project  
**Date:** Wednesday, November 18, 2020 2:57:36 PM

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Dear PTC Commissioners,

I am writing to request that you NOT reconsider your November 4th, 2020 vote on Castilleja's Expansion Project, Condition 22 as requested November 17th by the school's attorney, Ms. Mindie Romanofsky, which caps the school's total daily car trips at 1198.

The Castilleja School Expansion Project originally requested a TDM of 1477 trips.

This 1477 number represents a substantial intensification of use of narrow neighborhood streets as well as City arterials, primarily Embarcadero and Alma, which serve the school. Such an increase in car trips contribute to community traffic congestion as well as green house gas pollution on those streets utilized by Castilleja-affiliated drivers. Additionally, such a growth in traffic further erodes residential quality of life and only heightens the safety risk to pedestrians, cyclists and neighborhood resident drivers who must use these streets to exit and enter the neighborhood

Castilleja has relied on creative metrics to spread their original request of 1447 daily car trips around the school's borders to maintain the appearance of a non-significant impact on the neighborhood. The fact remains no matter how the trips are apportioned out by block, this impact is too large for narrow residential streets. Environmentally, the neighborhood surrounding Castilleja is going to bear years of significant ramifications from heavy construction to build the new campus as well as the continued use of neighborhood streets for school traffic while Castilleja continues to operate the during the building period. Such operations will impact the neighborhood for years and needs to be considered in the cumulative impacts of this project on the environmental well-being of Palo Alto! Anything that can be done to reduce the long term environmental consequences (e.g. air quality, noise, and visual) of this project on the neighborhood and connecting arterials is important to serve the best interests of our City as a whole!

Both the DEIR and the FEIR failed to adequately evaluate what neighbors of Castilleja have been asking for since 2015, a mandatory shuttling program for those who would otherwise arrive by private car to the school. Castilleja and the City have refused to consider such an option. Notre Dame School for Girls in San Jose as well as Archer School for Girls in Los Angeles both have such programs, which reportedly are effective for both families and school neighbors.

One last point on the environment impact of this project is it's underground garage, which will have significant negative permanent consequences on this community. I ask the Commissioners to seriously consider once the school's above ground parking is eliminated, will the environment costs of an underground cement bunker to hold cars be justified for only a net of 22 new parking spaces?

Thank you for your consideration of my letter.

Sincerely,

Mary Sylvester

Melville Avenue  
43 yr neighbor of Castilleja, 150 ft away

**From:** [Margaret Lane](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja School Proposal  
**Date:** Wednesday, November 18, 2020 1:24:25 PM

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Dear Planning and Transportation Commission,

I want to add this letter to the many that have been sent in support of Castilleja's proposal to gradually increase enrollment and modernize campus. I live two blocks from campus, and I am a near neighbor who supports this project, and I hope that you are noting that I am not alone. There are many of us who want to see Castilleja update campus and enroll more high school students - all while following the guidance of the FEIR to avoid any impacts on the neighborhood. As you work on this proposal and determine the conditions of approval, I hope that you will use the FEIR as a guide because the data there leads you to conditions that will not have impacts. Most of all, as you work through the questions that this proposal presents, I hope that you remember that you are representing me, a close neighbor who wants a new campus with a few more students. This can be done without impacts, so there is no reason to delay it or deny it. While PNQL has been vocal and has clearly influenced members of your commission, I implore you to listen to the many supporting voices from immediate neighbors. Your decision making should be based on facts, not undue influence from one very vocal group who does not represent all neighbors.

I also want to speak out in support of the garage. I know through the terms of the proposal that the garage will not bring more cars to campus, but I am happy that it will move cars below ground. I know there are some neighbors who are opposed to the garage, but I am one who is not. I support the garage because it will improve aesthetics and remove cars from our streets. More importantly, though, as someone who lives close to campus and walks on Bryant regularly, I can see for myself that moving that street parking below ground will increase safety along the Bike Boulevard.

Thank you,

Margaret Lane  
1500 Bryant Street

**From:** [Alan Cooper](#)  
**To:** [Planning Commission](#)  
**Cc:** [Alan Home](#)  
**Subject:** Castilleja: 3 simple requests  
**Date:** Wednesday, November 18, 2020 9:42:41 AM  
**Attachments:** [PurpleAir example near Castilleja.pdf](#)

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Dear Commissioners,

In your deliberations tonight, I ask that you consider 3 simple requests

1. Require that Castilleja relocate to a temporary campus during the entire construction process.
2. As suggested at your last meeting, limit enrollment to 450 students until Castilleja has proven that they can meet the "No New Trips" requirement of their TDM.
3. Require that construction would be temporarily halted if air quality declines to red=150: EPA PM2.5 AQI dangerous-to-health level, as monitored in real time around the school via measurements displayed at purpleair.com

Thank you,

Alan Cooper  
270 Kellogg Ave (across the street from Castilleja)

**Notes:**

**Item 1:** This idea was succinctly described and outlined at the last ARB meeting, to assure safety and health of students during construction...recognizing that there will be extensive traffic, noise and dust throughout the entire construction period. Finding a temporary site is realistic, perhaps Cubberly or other nearby school site (or Stanford?)

**Item 2:** Employ the "Reward" philosophy (as outlined in my email for the last PTC meeting) and allow more than 450 students if they are able to do even better than "No New Trips". Take the risk out of the situation, and replace it with reward!

**Item 3:** I sent PTC a detailed outline of this Air Quality suggestion with attached graphic on Oct 26, 2020, and I include that letter and graphic here for your reference:

October 26, 2020

Dear Planning Commission,

I have lived across the street from Castilleja for 34 years. If the Castilleja project is approved, I seek a guarantee that the air quality during construction will not be injurious to my health and that of my neighbors.

I propose a simple, straightforward and openly accessible way of continuously monitoring air quality, to assure that EPA safety standard for healthy air is achieved.

1. The City install at Castilleja's expense 2 to 4 Purple Air ([www.purpleair.com](http://www.purpleair.com)) air quality monitors\* around the school construction site and link these monitors to the web for everyone to see online (see attached example).

2. If air quality deteriorates and reaches the red=150: EPA PM2.5 AQI dangerous-to-health level, then construction at the Castilleja site would be temporarily halted until air quality improved to levels below red=150.

3. The project manager would be required to stop construction activities if he is notified by anyone that the purple air values around Castilleja exceed the red=150: EPA PM2.5 AQI level.

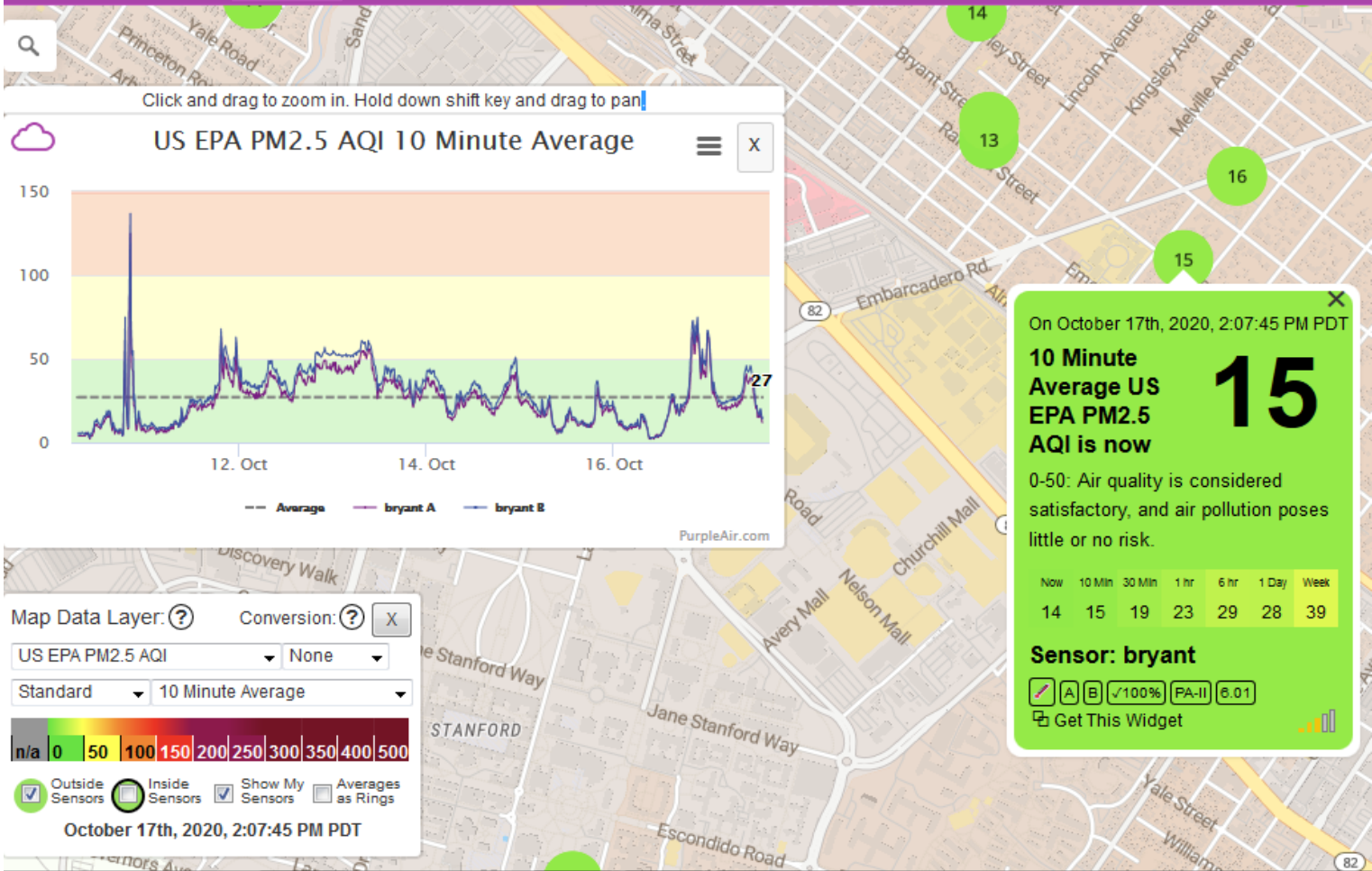
This method provides a relatively inexpensive (i.e., less than \$1K) way to assure and mandate that the construction project is NOT causing air quality and resultant health problems for the surrounding neighborhood.

Many of us that are adjacent to Castilleja's campus have homes built around 1910 and do NOT have air conditioning. Thus, our only ventilation is open windows. In the past, when Castilleja has re-roofed the Kellogg buildings or constructed the recent gymnasium, particulate matter was constantly in the air and in our homes. Now that Castilleja plans to demolish approximately 80% of its campus, I would ask that the city mandate the necessary procedures to measure and eliminate all particulate matter emanating from this massive demolition. Particulate matter is of great concern especially to the elderly as was evidenced in the recent fallout from the massive fires we experienced this past summer."

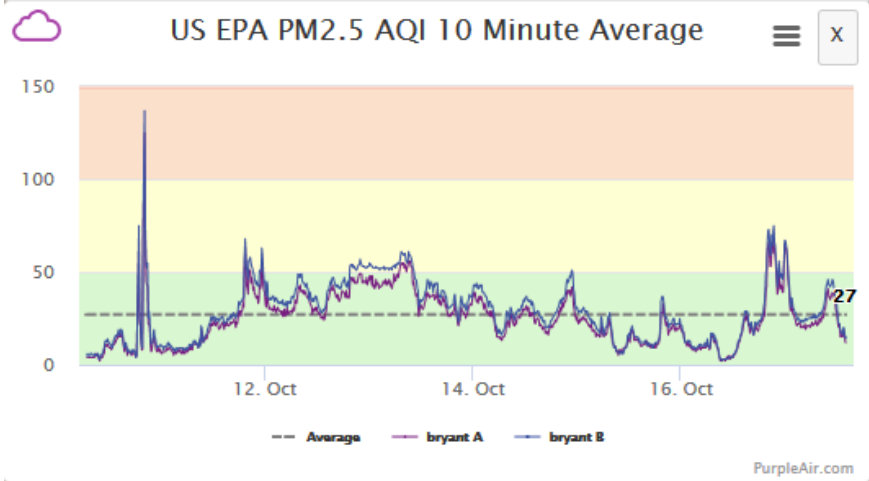
Thank you

Alan Cooper  
270 Kellogg Ave  
650-321-3644

\*The attached graphic is an example of the online map of purple air sensors and the continuous "real time" measurements of EPA PM2.5 AQI values. The device of choice in case of legal challenge would be model PA-II-SD which has an internal recording capability.



Click and drag to zoom in. Hold down shift key and drag to pan



On October 17th, 2020, 2:07:45 PM PDT
10 Minute Average US EPA PM2.5 AQI is now 15
0-50: Air quality is considered satisfactory, and air pollution poses little or no risk.
Now 10 Min 30 Min 1 hr 6 hr 1 Day Week
14 15 19 23 29 28 39
Sensor: bryant
[edit] [A] [B] [100%] [PA-II] [6.01]
Get This Widget

Map Data Layer: US EPA PM2.5 AQI
Conversion: None
Standard: 10 Minute Average
Legend: n/a 0 50 100 150 200 250 300 350 400 500
October 17th, 2020, 2:07:45 PM PDT

**From:** [Kimberley Wong](#)  
**To:** [Planning Commission](#)  
**Cc:** [Architectural Review Board](#); [Council, City](#); [Shikada, Ed](#); [Lait, Jonathan](#); [French, Amy](#)  
**Subject:** Comments re: Castilleja plans for the November 18, 2020 Planning and Transportation Commission meeting  
**Date:** Tuesday, November 17, 2020 9:45:46 PM

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Dear Planning and Transportation Commission,

During the last Architectural Review Board meeting on November 4, 2020 I heard loud and clear concerns regarding the garage plans and how it is a main sticking point with the neighbors regarding impact of traffic generation, traffic flow and construction of the garage yet there was no discussion at all by the ARB board members of the garage plans. Castilleja attorney Mindie Romanowsky mentioned that the garage architects were present to answer questions, but it puzzles me why none of the board members thought to call them forward to explain how they planned to build the garage, to create smooth traffic flow, and funnel the students up from under a sewer system and into the campus. They were more than eager to discuss about the massing of classroom buildings but never mentioned how a garage entrance or exit would look from the street or blend into the neighborhood.

Many questions by the public were asked on why these plans were completely overlooked in any of the previous meetings discussing the Castilleja Proposal by the Architectural Review Board the Planning and Transportation Commission. Never were the garage architects allowed to present their plans to either the ARB or the PTC. How curious that these garage architects who designed the garage, a huge portion of the the project, planned to be built in phase 1, were never asked to present the details of the garage or answer to the ARB or PTC boards.

I and many of my neighbors would like to know how plans to a project can be approved without sufficient discussion on a major portion of the plans that Castilleja is proposing. The garage is a major and very significant part of the Castilleja plans that I believe have not been given thorough consideration. I hope that these plans will be tabled until further discussion of the garage plans by both commissions in detail. Board member Hirsch also brought up a good point about where students would be studying during the many years of construction, also. The inconvenience to staff, students and neighbors must be clearly laid out before any plans are approved. Don't we owe it to the many students and parents who rely on the great education that Castilleja provides to be sure that the construction does not interfere with the operations of the school and the education that the girls will be receiving for such an extended period of their schooling?

Castilleja supporters, staff and board members have to understand that supporting the merits of the school should NOT be a carte blanche support of plans which will disrupt the well being of neighbors, schooling of Castilleja students, and fabric of the neighborhood and Palo Alto forever. Please be considerate of what is being asked and realize that should these plans be approved, this will set a precedence of projects that can occur in any neighborhood right next door to you, affect the students as they move on higher education and impinge on the school's culture and reputation in the future.

Thank you working to keep the unique Palo Alto residential feel which many cities are quickly losing to development and expansion in cities surrounding us and throughout the Bay Area.

Kimberley Wong,  
Longtime resident of Palo Alto

**From:** [Derek Gurney](#)  
**To:** [Planning Commission](#)  
**Subject:** In support of sub-division of 922 College Ave  
**Date:** Tuesday, November 17, 2020 9:20:45 PM

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I'm writing in support of the 2nd agenda item for the Nov 18, 2020 meeting: the division of 922 College Ave into two parcels.

This change is simply recognizing what is *de facto* in place already. From the street, no one would know that 922 College Ave and 2160 Cornell St aren't, legally, two separate parcels. Substandard lots are the standard in College Terrace, so subdividing 922 College actually preserves neighborhood character. More importantly, it allows for two single-family homes where only one would exist otherwise. We need to increase Palo Alto housing stock, not decrease it.

Yours truly,

Derek Gurney  
2052 Cornell St

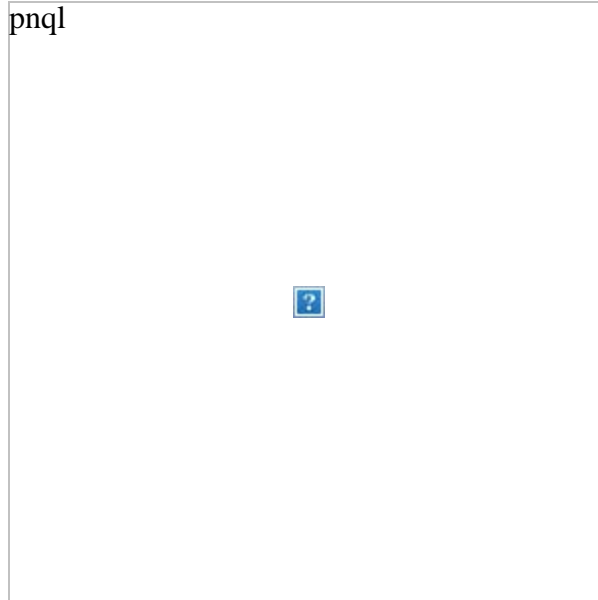


**From:** [PNQL-Now](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja Misinformation; See Attached  
**Date:** Tuesday, November 17, 2020 8:01:03 PM  
**Attachments:** [Enrollment Graph Sept 2020.pdf](#)

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## Castilleja Enrollment History: Chart Attached

Dear Commissioners,

Thank you for keeping up your hard work on this project.

We would like to address an item that needs clarification for your further discussion at the Nov 18 meeting.

Commissioner Roohparvar, at the November 4 meeting, expressed that she was moved by current Head of School Ms. Kauffman's stating that, as soon as she found out about over-enrollment in 2012, Ms. Kauffman went to the City to let them know. **However, Ms. Kauffman became Head of School in 2010, and the largest leaps in enrollment happened from 2010 to 2012.** The public found out in July 2013.

Many neighbors over many years put together the attached history chart. The school originally agreed to reduce, slowly, until they got down to the maximum allowed enrollment. However, the school chose to stall reducing enrollment after 2 years, and only when PNQL's attorney wrote a letter in 2017, did City Manager

Keene insist they go back to their original agreement and begin reducing again.

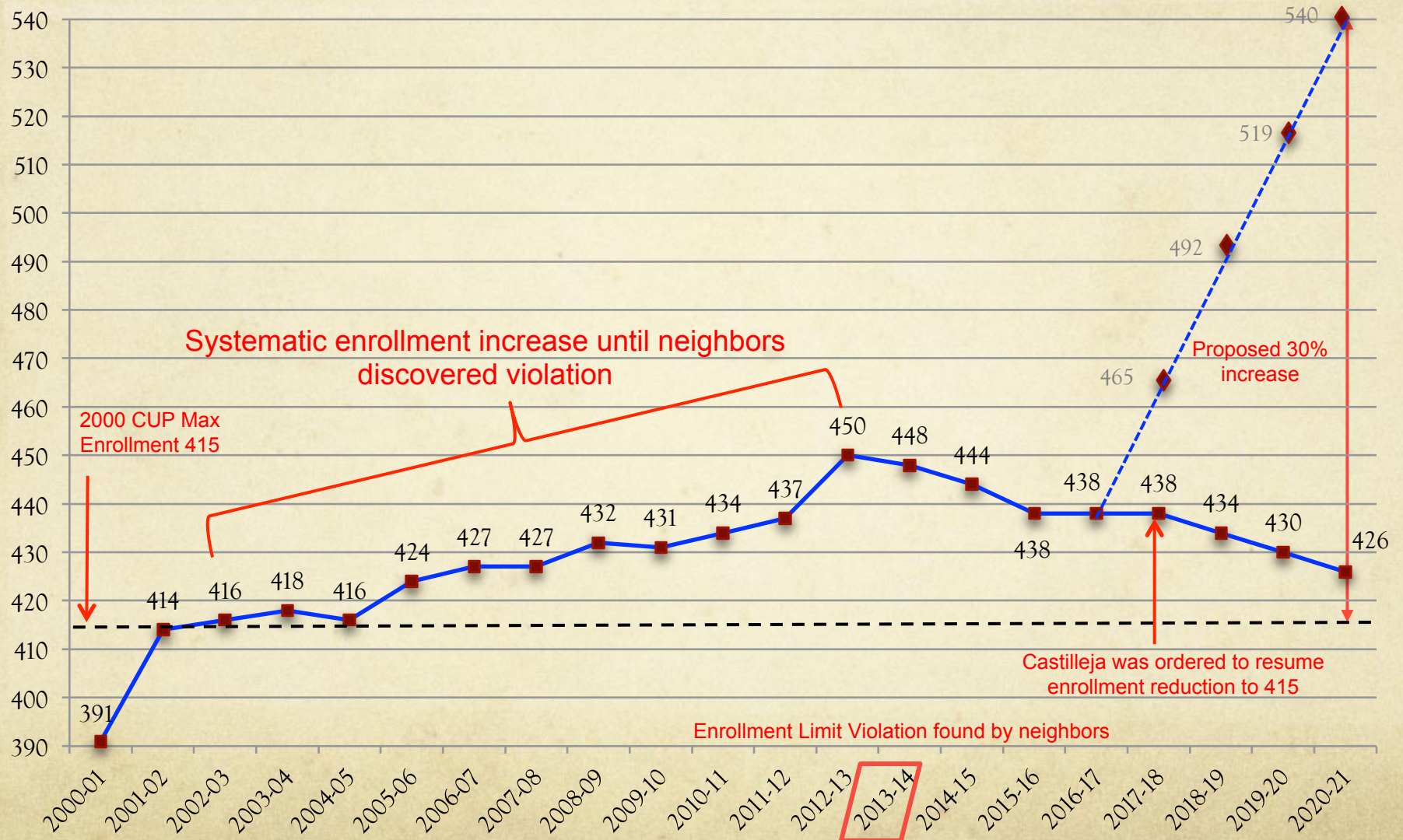
What would have happened if they reduced, as agreed, until they got down to 415 (current CUP max)? Today, they would be at 415 and applying for an increase without this discussion being constantly brought up. Why didn't they just comply? Past history would seem to indicate business decisions supersede the need to honor agreements.

We look forward to the school submitting a compliant project and moving on to re-build and modernize their facility.

Regards,  
PNQL

# Castilleja Enrollment History

## 19 Years of Enrollment Limit Violation



**From:** [Carolyn Steele](#)  
**To:** [Planning Commission](#)  
**Subject:** My Support For Castilleja's Master Plan  
**Date:** Tuesday, November 17, 2020 1:04:56 PM

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Dear Planning and Transportation Commission,

Thank you for the opportunity to share my support for Castilleja's Master Plan. I have been a resident of Palo Alto for 30 years and for 11 of them, I have been a math teacher at Castilleja.

I know that some critics highlight the fact that Castilleja educates students who do not reside in Palo Alto. That is true, but Castilleja also has educated generations of students who DO live in Palo Alto. They enjoy walking and biking to the school that they have realized is the best place for them to learn. I also want to point out that many residents of Palo Alto, like me, work at Castilleja. I can fulfill my professional goals, riding my bicycle to and from work at the school that is the best place for me to teach. I hope you will see the many ways that Castilleja contributes to the strength of our City as you review these plans.

I would also like to emphasize how thoughtful, inclusive, and extensive the planning process for this project has been. For the last eight years, Castilleja has met with its neighbors, environmental experts, architects, elected leaders, and other development experts to arrive at a project that will have a less than significant impact on the neighborhood. There are some who hope to spread the misinformation that this project is an expansion that will be a burden on the neighborhood. Instead, the variance is for a reduction in above ground square footage; and the FEIR proves noise will be reduced, traffic can remain level, and the sustainability measures are better for the environment.

Respectfully, I believe that Castilleja and the community it serves has waited long enough. Please join hundreds of supporters - neighbors, students, employees, parents, and communities - who are waiting to see construction on a new campus begin.

Thank you,  
Carolyn Steele  
3938 Nelson Drive, Palo Alto

**From:** [Janet L. Billups](#)  
**To:** [Planning Commission](#)  
**Cc:** [Shikada, Ed](#); [Lait, Jonathan](#); [Yang, Albert](#); [French, Amy](#); [Kathy Layendecker](#); [nkauffman@castilleja.org](mailto:nkauffman@castilleja.org); [Mindie S. Romanowsky](#)  
**Subject:** Castilleja School [16PLN-00258] [SCH#2107012052] ("Project") Request for a Motion to Reconsider Amended Language for Condition #22  
**Date:** Tuesday, November 17, 2020 12:26:30 PM  
**Attachments:** [PTCConditionsReTrips.Ltr.11.17.2020.pdf](#)

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Dear Palo Alto Planning Commission,

Please find a letter submitted by Mindie Romanowsky, on behalf of Castilleja School, which requests reconsideration of the motion made at the November 4, 2020 PTC meeting regarding Condition of Approval No. 22.

Kind regards,

**Janet Billups**, Legal Assistant to  
Mindie Romanowsky  
Jorgenson, Siegel, McClure & Flegel LLP  
1100 Alma Street, Ste. 210  
Menlo Park, CA 94025  
Ph. 650-324-9300  
[jlb@jsmf.com](mailto:jlb@jsmf.com)

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BRITTNEY L. STANDLEY

OF COUNSEL  
KENT MITCHELL  
LEIGH F. PRINCE

RETIRED  
JOHN D. JORGENSEN  
MARGARET A. SLOAN  
DIANE S. GREENBERG

DECEASED  
MARVIN S. SIEGEL  
(1936 - 2012)  
JOHN R. COSGROVE  
(1932 - 2017)

November 17, 2020

SENT VIA EMAIL: [Planning.Commission@CityofPaloAlto.org](mailto:Planning.Commission@CityofPaloAlto.org)

City of Palo Alto  
Planning and Transportation Commission  
250 Hamilton Avenue  
Palo Alto, CA 94301

RE: Castilleja School [16PLN-00258] [SCH#2107012052] (“Project”);  
Request for a Motion to Reconsider Amended Language for Condition #22

Dear Members of the Planning and Transportation Commission:

This letter is written on behalf of my client, Castilleja School, the applicant for the above referenced Project and is intended to formally request that the Planning and Transportation Commission (“PTC”) reconsider the motion made at your recent PTC meeting on November 4, 2020 regarding Condition of Approval No. 22 (“Condition 22”) for the Project. At the start of deliberations (which began approximately 4 hours into the meeting), Commissioners began by discussing *how* to proceed regarding the Draft Conditions. The procedural discussion took approximately an hour with PTC members expressing a range of procedural preferences – from voting on specific text edits to the Draft Conditions, to whether to take final action at the meeting and/or whether to provide direction on the conditions with an opportunity to review and take final action at a future meeting. The first vote (taken approximately 5 hours into the meeting) addressed only a few noncontroversial Draft Conditions. The next vote to modify Condition 22 was taken quickly with little discussion, despite (i) the complex subject matter regarding calculating the number of average daily and morning peak hour trips and, (ii) the disagreement among Commissioners. Immediately after the vote on Condition 22, given the late hour, the PTC moved to continue the hearing.

Castilleja School is concerned with the PTC’s hasty motion to modify Condition 22, which has the effect of reducing trips below what was required by the traffic analysis and without substantial evidence to support such reduction. As modified, Condition 22 is NOT roughly proportional to the transportation impact, as further articulated in this letter. Therefore, Castilleja School respectfully requests that the motion to modify Condition 22 be reconsidered and Condition 22 be restored to its original language, as drafted and recommended by City staff and the transportation consultants for the Project.

**The PTC can move to reconsider its vote on Condition 22.**

Robert's Rules of Order allow for a motion to reconsider. As explained in Robert's Rules of Order Section 37, Reconsider, the purpose of any reconsideration is to permit correction of a hasty action or to take additional information into account. A motion to reconsider can be made by anyone who voted, with the prevailing side ( i.e. any of those who voted affirmatively on the motion) and may be seconded by any member of the Commission. See Robert's Rules of Order Section 37(c)(4).

As many Commissioners acknowledged on the record, the PTC hearing took place the day after the General Election and many Commissioners were up late the night before. The November 4<sup>th</sup> PTC hearing extended late into the evening and Commissioners expressed, on the record, that they were tired. While there was over an hour of deliberation on whether to provide specific text edits to a condition or general direction, by contrast, there was very little discussion and deliberation on the technical and complex issue of daily and peak trip limitations and the details and calculations that went into the professional City and consultant staff recommendations for Condition 22. Thus, it would appear the PTC vote on Condition 22 may have been taken hastily given the lateness of the hour.

In addition, since the November 4<sup>th</sup> meeting, Castilleja School engaged TDM Specialists, Inc. to comprehensively consider the record. They were tasked with reviewing Castilleja School's Transportation Demand Management ("TDM") program and the Project's Environmental Impact Report ("EIR") mitigation measures and Draft Conditions. This independent professional analysis provides additional substantial evidence in support of Condition 22 as originally drafted, which implements EIR Mitigation Measure 7a, that should be taken into account.

Based on the foregoing, Castilleja School respectfully requests that any of the Commissioners who voted to approve the modification to Condition 22 move to reconsider and give the PTC the opportunity to more fully consider and deliberate this matter.

**Substantial evidence supports the adequacy of Condition 22 without modification.**

Any decision, whether on a specific condition or the use permit as a whole, and the legal findings bridging the gap between the evidence and the decision, should be supported by substantial evidence in light of the entire record. *Breakzone Billiards v. City of Torrance* (2000) 81 Cal. App. 4th 1205, 1244; *Topanga Ass'n for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 511. Substantial evidence is where enough relevant information and reasonable inferences from this information allows for a fair argument to be made in support of a conclusion, even though other conclusions might also be reached.

Substantial evidence in the record for the Project evidences that Condition 22 as originally drafted (without the hasty PTC modifications) mitigates the traffic impacts and achieves the no net new trips goal the school set out to achieve. This is evidenced in the EIR that the PTC already voted to recommend that the City Council certify as compliant with the California Environmental Quality Act. The EIR includes Mitigation Measure 7a that mitigates daily and peak trips to a less than significant impact on the neighborhood. This mitigation measure is reflected in Condition 22. The evidence supporting the EIR includes not only materials submitted by Castilleja School's professional transportation consultants, but also the City's professional transportation and environmental consultants. Condition 22 was prepared by the City's professional transportation staff in an effort to make Mitigation Measure 7a clearer, and in some respects, more restrictive.

The testimony of a few members of the public that they don't believe Mitigation Measure 7a mitigates the impacts and achieves no net new trips is not substantial evidence on which to exact from the school a requirement in Condition 22 for even fewer trips. See *Nollan v. California Coastal Comm'n* (1987) 483 US 825, 834 requiring a relationship between the exaction and the impact of the project. A condition that requires a reduction in trips beyond what was identified in Mitigation Measure 7a and Condition 22 is not roughly proportional and does not bear a reasonable relationship to the impact of the Project.

### **No net new trips explained based on substantial evidence.**

Confusion has developed around what it means for Castilleja to have "no net new trips," which is understandable given the complexity of the issue. The substantial evidence provided over the past four years, some of which is summarized below, supports Condition 22. With all these detailed numbers and calculations provided by expert transportation engineers, this may be a case where members of the public and decisions makers could miss the forest for the trees (and why reconsideration and more deliberation is necessary).

On June 9, 2016, Nelson Nygaard submitted a memo providing data on school vehicle trips to support Castilleja's application. Nelson Nygaard's memo clarified that in 2000, the school generated 511 morning peak hour trips. That number of trips has been continuously declining since 2013 as the school has implemented more and more substantial TDM measures. The memo explains that the school's goal of generating no net new trips with its Project, is based on an average of trip counts from 2013-2016 which equates to 0.81 trips per student. The transportation information was independently analyzed by the City's transportation and environmental consultants who determined the significance of the impact and the necessary measures to mitigate the impact to less than significant. From Mitigation Measure 7a in the EIR, the City's professional staff prepared Condition 22. All of this information and the analysis led to the requirement of no more than **440 morning peak hour trips (and 1,296 daily trips)** as the appropriate number to achieve the twin goals of (i) no net new trips and (ii) a less than significant environmental impact.

Most recently, on November 3<sup>rd</sup>, Fehr & Peers provided a letter explaining the details of the per student trip generation rates and how with an increase in enrollment, the trip generation rate would decrease from a high of 1.18 trips per student to a low of 0.80 trips per student. Note, this is actually below (by 0.01) the trip generation rate identified in previous memos. The letter explained how the trip generation rate translates to morning and daily trip numbers and how Castilleja School's aggressive TDM program has improved existing conditions. Modification of Condition 22 to further reduce allowable trips would fail to give the school credit for the significant improvements, reducing trips by 25-30%, they have already made during this lengthy entitlement process. There is little to no evidence, other than the complaints of a few vocal neighbors, to support requiring a further reduction in trips.

City' staff addressed neighbor concerns about the school's ability to mitigate transportation impacts by building into the conditions language where if the school is unable to meet the stringent limitations, enrollment will NOT be allowed to increase, and may be required to be reduced. This is in addition to other limitations on school operations like a reduction in the number of events. The TDM program and monitoring are the strictest ever put in place by the City. Castilleja School is being held to the highest standard and due to the monitoring and reporting conditions, there is full transparency as to their success.



Finally, submitted concurrently with this letter, is another analysis by another expert transportation consultant Elizabeth Hughes with TDM Specialists, Inc. adding to the already voluminous record of substantial evidence supporting Condition 22 without modification. In fact, if the PTC modifies Condition 22 to require “no more than 398 morning peak trips (and 1,198 daily trips),” this modification would actually require less than no net new trips. This exceeds both what is required to achieve project objectives and to mitigate the impact of the Project. Indeed, should the PTC fail to reconsider Condition 22, the modified condition will equate to the City holding the School to an unreasonable and higher standard than the City would require of any other project and could serve to paralyze the school’s ability to use their property and to grow in a meaningful way.

Based on the foregoing, please reconsider your motion regarding Condition 22, based on evidence in the record.

Sincerely,

*Mindie S. Romanowsky*

Mindie S. Romanowsky

Attachment:

Letter from Elizabeth Hughes, TDM Specialists, Inc., dated 11/16/2020

Cc: Ed Shikada (via email [Ed.Shikada@CityofPaloAlto.org](mailto:Ed.Shikada@CityofPaloAlto.org))  
Jonathan Lait (via email [Jonathan.Lait@CityofPaloAlto.org](mailto:Jonathan.Lait@CityofPaloAlto.org))  
Amy French (via email [Amy.French@Cityofpaloalto.org](mailto:Amy.French@Cityofpaloalto.org))  
Albert Yang (via email [Albert.Yang@Cityofpaloalto.org](mailto:Albert.Yang@Cityofpaloalto.org))  
Nanci Kauffmann (via email [nkauffman@castilleja.org](mailto:nkauffman@castilleja.org))  
Kathy Layendecker (via email [klayendecker@castilleja.org](mailto:klayendecker@castilleja.org))

November 16, 2020



Ms. Kathy Layendecker  
Associate Head of School  
Finance and Operations  
Castilleja School  
1310 Bryant Street  
Palo Alto, CA 94301

5150 Fair Oaks Blvd.  
Ste.101-264  
Carmichael, CA 95608-5758

(408) 420-2411

www.tdmspecialists.com

RE: CASTILLEJA SCHOOL, CITY OF PALO ALTO [[16PLN-00258]  
[SCH#2107012052] ("Project");  
Determination of Viability and Success of TDM Measures to Ensure  
Compliance with Trip Reduction Goals

Dear Ms. Layendecker:

Thank you for the opportunity to review Castilleja's comprehensive Transportation Demand Management (TDM) programs as they relate to the pending Project under consideration by the City of Palo Alto.

As TDM planning and implementation professionals, TDM Specialists, Inc. is uniquely qualified to evaluate Castilleja's TDM program viability and performance projections for the Project. Our firm has completed 25 TDM plans for approved projects in Palo Alto and hundreds throughout the San Francisco Bay Area and Sacramento Region. As practicing managers of commuter programs at 20 active project sites, our team expertly implements, manages, and monitors TDM programs **to ensure compliance with trip reduction thresholds.**

TDM Specialists' President Elizabeth Hughes has 20+ years of trip reduction experience and a keen perspective on how past behavior is a prologue to future TDM performance. Elizabeth and the firm reviewed Castilleja's current and enhanced TDM programs to understand whether the requirements outlined in the Draft Conditions of Approval (Conditions) for the Project would ensure compliance with Mitigation Measure 7a. and ensure that a gradual enrollment increase to 540 students would not bring significant impacts.

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By looking at Castilleja's TDM track record and drawing upon institutional knowledge of other players in and around Palo Alto, this memo is aimed to provide the necessary context to demonstrate why the City of Palo Alto should feel confident that the promulgated Conditions, and in particular, Condition #22, would ensure compliance with the trip reduction goals required by MM 7a. of the Environmental Impact Report (EIR).

Our background review included an understanding of MM 7a., the Condition implementing MM 7a., as well as the City's Zoning Code. We also took a deep dive into Castilleja's existing and planned/enhanced TDM programs and measures to provide a peer review and professional opinion about Castilleja's demonstrated compliance with TDM programs to ensure the requirements of MM 7a. would be met (such as no significant impacts with a maximum enrollment of 540 students).

**Documentation and study review included the following materials:**

- City of Palo Alto Zoning Chapter 18.52.060 Parking Assessments and TDM
- 2012 Fehr & Peers memorandum – Existing Transportation Analysis for Castilleja School in Palo Alto, California
- 2012 Fehr & Peers memorandum – Campus Expansion: Transportation Analysis for Castilleja School in Palo Alto, California
- 2016 Nelson Nygaard – Castilleja School Transportation Demand Plan
- 2016 Urban Fabrick, Inc. - Master Plan, Sustainability Road Map – Castilleja School
- 2018-2020 City of Palo Alto Sustainability Implementation Plan, Key Actions – Mobility Section
- 2019 Dudek - Castilleja School Project Draft Environmental Impact Report
- 2019 Fehr & Peers – Castilleja School TDM Monitoring Counts
- 2020 Castilleja School – TDM Program Overview, Communication Materials, and Third-Party Traffic Monitoring Data (Compendium)
- 2020 W-Trans EIR - Traffic Impact Study for Castilleja School Expansion
- 2020 City of Palo Alto Planning & Transportation Commission, Special Meeting Report and Castilleja project Conditions of Approval

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### **Summary Opinion**

Outcomes from our review allowed us to assess the effectiveness of Castilleja's existing TDM programs and evaluate past trip reduction performance as a basis for predicting future success.

As explained in the analysis below, Castilleja's TDM programs have proven successful through consistently reduced vehicle trips over time. The many data reports demonstrated behavior, coupled with our knowledge of TDM best practices and precedent in Palo Alto (and beyond), gives us a high degree of confidence in Castilleja's ability to maintain their trip reduction rates as they gradually increase enrollment. The findings below support our determination of Castilleja's strong ability to comply with the ongoing trip reduction goals and requirements described in MM 7a., and as further articulated in Condition of Approval #22.

In our professional opinion, Castilleja's plans to enhance its TDM programs to reduce additional daily and peak-hour trips are entirely consistent with EIR Transportation Mitigation Measure recommendation 7a. A modification of Condition #22 requiring "no more than 398 morning peak-hour trips and only 1,198 daily trips" would exceed what is necessary to mitigate the Project's impact since the TDM conditions are robust and ensure compliance.

When the school gradually increases its enrollment to 540 students, TDM Specialists' is confident that Castilleja's existing and enhanced TDM programs would ensure that average daily vehicle trips do not exceed 1,296 AM peak-hour trips do not exceed 440.

### **Analysis**

#### **Daily and Peak-hour Trip Caps.**

TDM Specialists, Inc. concurs with Fehr & Peers' November 3, 2020 letter (attached) regarding Castilleja Trip Cap and Trip Cap Monitoring. Based on seven years of trip monitoring data, Fehr & Peers appropriately evaluated a baseline of 440 AM peak-hour trips as an appropriate trip cap. We also reviewed and agreed with the EIR Traffic Impact Study's average daily trip calculations of 1,296 as feasible and appropriate mitigation thresholds.

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For your consideration, we compiled a TDM Summary Matrix, attached as **Exhibit A**, which shows the existing and enhanced TDM program for the school as a means for communicating the comprehensive list of existing, planned, and entitlement-required TDM measures for the Castilleja project. When implemented, these measures will serve as a check and balance on the trip caps required by MM 7a. to ensure the average daily AM peak-hour trips will not exceed 440 and average daily trips do not exceed 1,296.

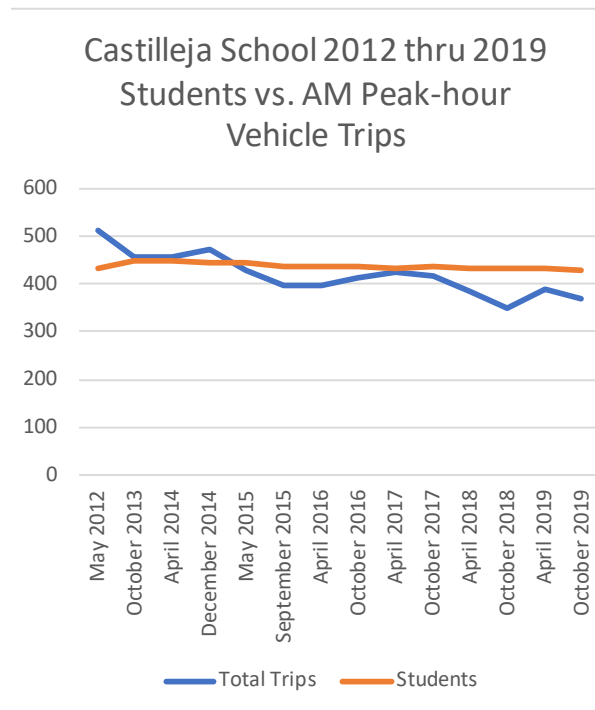
In our experience, the TDM program and monitoring proposed for Castilleja's Project are the strictest ever put in place by the City of Palo Alto. The robust nature of the proposed TDM program (which includes electronic monitoring and the other detailed checks, balances, and penalties like enrollment reductions for failure to comply) will all serve to ensure compliance with MM 7a.

### *Historical Overview of Castilleja's TDM Program and Performance*

#### Student Rideshare Performance

Vehicle trip data was collected between 2012 through 2019 and showed a trending reduction in AM trips. Pictured at the right is a graph showing the trend line. The seven years of historical data indicate that the Castilleja School maintains appropriate transportation programs and consistently meets their trip reduction goals.

The transportation programs and TDM measures currently implemented by Castilleja are the reason for this stable performance. Castilleja uses TDM best practices to manage their transportation programs.



Source: Fehr & Peers Annual Memorandum

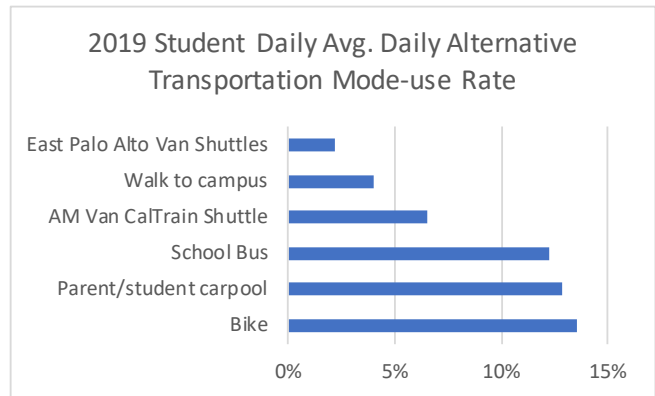
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More than half of Castilleja's students utilize alternative transportation options for travel to school; less than half of the students (and their parents) drive alone to campus or use a non-carpool vehicle.

Robust use of biking, carpool, and transit/shuttles are prominent student travel choices. Student survey data indicates transportation programs are widely embraced among students and parents.

2019 Avg. Student Transportation Modes	Avg. Daily Percent
Bike	14%
Parent/student carpool	13%
School Bus	12%
AM Van CalTrain Shuttle	7%
Walk to campus	4%
East Palo Alto Van Shuttles	2%
<b>Total Student Alt. Transportation Rate</b>	<b>51%</b>

Source: Castilleja School Counts Aug 23, 2019 thru Sept 30, 2019



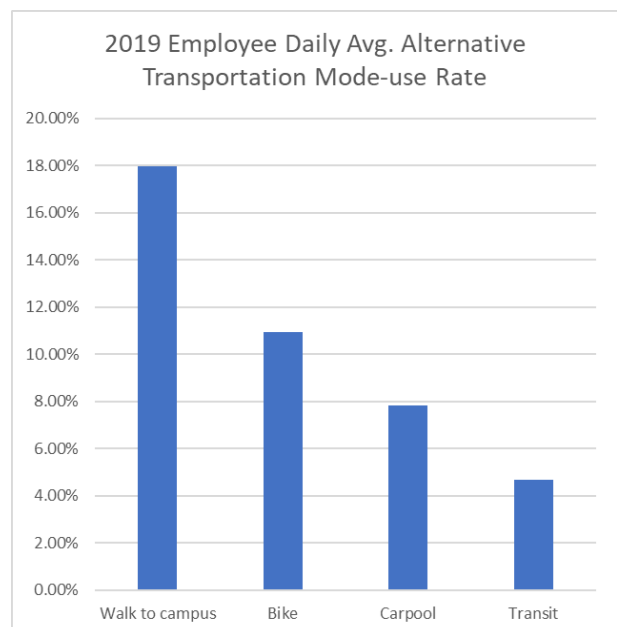
Source: Castilleja School Counts Aug 23, 2019 thru Sept 30, 2019

Faculty and Employee Rideshare Performance

Castilleja employees achieved a 41.4 percent alternative mode-use rate. Very few employment sites (like offices and retail) in the Bay Area do as well.

2019 Avg. Daily Employee Modes	Avg. Daily Percent
Walk to campus	17.97%
Bike	10.94%
Carpool	7.81%
Transit	4.69%
<b>Total Employee Alternative Transportation Rate</b>	<b>41.41%</b>

Source: Castilleja School Counts Aug 23, 2019 thru Sept 30, 2019



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The Castilleja employee mode-use rate is 14.3 percent better than employees at other Palo Alto sites, including Rubrik, SAP Labs, and VISA. Shown below is a summary of the employee commuter survey outcomes for these Palo Alto organizations. Castilleja's employee commuter program participation is excellent.

	Rubril	SAP	VISA	Castilleja
<b>Palo Alto Employee Commuter Modes Survey</b>	<b>2019 Percent</b>	<b>2018 Percent</b>	<b>2019 Percent</b>	<b>2019 Percent</b>
Public Transit	8.34%	9.20%	17.89%	4.69%
Company shuttle	n/a	0.73%	9.53%	n/a
Carpooled	7.19%	8.00%	5.75%	7.81%
Ridehailing (Uber/Lyft)	5.60%	0.66%	n/a	n/a
Teleworked	3.08%	9.61%	1.96%	n/a
Vanpooled	2.22%	0.86%	0.00%	n/a
Biked	1.42%	2.90%	0.51%	10.94%
Walked	0.93%	0.13%	0.00%	17.97%
Motorcycled	0.33%	0.44%	0.00%	n/a
Day off/compressed week/other	0.76%	1.60%	0.58%	n/a
<b>Alternative Transportation Mode-Use Rate</b>	<b>29.9%</b>	<b>34.1%</b>	<b>36.2%</b>	<b>41.4%</b>

#### Comparative Data between the Palo Alto Community & Castilleja

As a community, Palo Alto City residents achieve a 36.2 percent alternative mode-use rate. The Castilleja historic employee mode-use rate is 14.3 percent better than the Palo Alto community at large.

The City rate includes teleworking, which is not an option for Castilleja employees. Removing telework from the community mode-use list reflects a citizen mode-share rate of 27.3 percent. The Castilleja employee commuter rate is significantly better than the adjusted Palo Alto citizens rate (without telework).

<b>Transportation Modes</b>	<b>Palo Alto Residents Percent w/o Telework</b>	<b>Palo Alto Residents Percent with Telework</b>	<b>Castilleja</b>
Car, truck, or van -- carpooled	7.2%	7.2%	7.81%
Public transit (excl taxicab)	5.2%	5.2%	4.69%
Walked	4.7%	4.7%	17.97%
Other means	10.2%	10.2%	10.94%
Worked at home*		8.9%	n/a
<b>Alternative Transportation Mode-use Rate</b>	<b>27.3%</b>	<b>36.2%</b>	<b>41.4%</b>

\*Note: Work at home/telework was not included to be consistent with commuter modes used by schools.

Source: U.S. Census Bureau, American Community Survey, City of Palo Alto

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**TDM Best Practices: A ranking of Castilleja's TDM measures indicates a strong ability to reduce vehicle trips**

**Exhibit B**, attached, shows a list of TDM measures appropriate for a middle and high school campus. Ranked measures indicate their ability to engage commuter program participants and reduce trips. Rankings of "Best" and "Platinum" are considered most likely to reduce trips. A

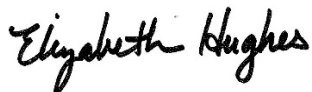
TDM Measures	Rank	Not Pursued	Percent Implemented/Planned
Basic	26	5	80.8%
Better	26	4	84.6%
Best	15	4	73.3%
Platinum	13	7	46.2%

A careful review of Castilleja's current program, along with proposed supplemental TDM measures (highlighted in teal of the Exhibit), confirms that Castilleja will be doing 75 percent of all the actions listed. These measures will further strengthen Castilleja's ability to reduce vehicle trips.

TDM Specialists' is confident that Castilleja's enhanced TDM programs, once implemented, will increase the alternative transportation mode-use rate and ensure that average daily vehicle trips do not exceed 1,296 and that AM Peak Hour trips will be 440.

Thank you for the opportunity to prepare this letter of opinion. Please call me at (408) 420-2411 if you have any questions.

Sincerely,



Elizabeth L. Hughes  
 President

**Attachments & Exhibits**

Fehr & Peers' November 3, 2020 letter-Castilleja Trip Cap and Trip Cap Monitoring  
 Exhibit A – Castilleja School TDM Summary Matrix  
 Exhibit B – TDM Measure Ranking, Basic, Better, Best, and Platinum





November 3, 2020

Kathy Layendecker  
Associate Head of School  
Castilleja School  
1310 Bryant Street  
Palo Alto, CA 94301

**Subject: Castilleja Trip Cap and Trip Cap Monitoring**

Dear Ms. Layendecker:

This letter addresses recent questions on how the Castilleja School AM peak hour trip cap was established and our comments on the proposed daily trip cap monitoring procedures outlined in the City of Palo Alto's conditions of use. As you are aware, Fehr & Peers began working with Castilleja School in May 2012 to monitor the school's AM peak hour traffic volumes. We have conducted vehicles counts twice a year, each fall and spring. The following section describes how the school arrived at its baseline AM peak hour volume and their commitment to a no net new trip goal.

**AM Peak Hour Trip Cap**

Castilleja prepared their master plan application for submission to the City of Palo Alto in 2016. By that time, Fehr & Peers had conducted six monitoring counts. The first count was conducted in Spring 2012 prior to the implementation of their original Transportation Demand Management (TDM) plan. The other five counts were conducted after the school initiated the TDM program to reduce peak hour trips. In May 2012, the school was generating AM peak hour trips at a rate of 1.18 trips per student.

Over the first 2 ½ years of the TDM program's implementation, the school reduced the AM peak hour trips to an average rate of just over 1.00 trip per student. The school enrollment in September 2015 was 438 students; therefore, the school set a baseline of 440 AM peak hour trips. Assuming this baseline for the AM peak hour, the school set a new TDM goal to reduce AM peak hour trips by an additional 20% to a rate of 0.80 trips per student. Based on the baseline volume and the improved TDM performance, the future maximum enrollment target was set at 540 students assuming they could achieve their TDM goals.

In the time period since 2016 when the application was submitted for processing, the school has continued to improve their TDM program and reduce peak hour trips. When the traffic counts were collected by the city's consultant for the traffic analysis in 2017, the AM peak hour trips had been reduced to 352 trips, which is an average trip rate per student of 0.82 trips per student. Therefore, the school was nearing their proposed trip rate that would result in 440 trips at the

Leigh Prince  
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proposed maximum enrollment of 540 students. Therefore, Castilleja was achieving the TDM goal needed to add no new trips based on their decision in Spring of 2016.

### **School Daily Trip Caps & Monitoring**

Fehr & Peers has prepared hundreds of traffic studies for schools. These studies generally focus on the AM peak hour traffic conditions and the effect on local roadways. The afternoon school peak hour typically occurs before the evening commuter peak and is less intense than the morning; therefore, afternoon conditions may not be studied. We have also conducted operational studies of school loading areas during the peak hours to evaluate queuing when passenger loading and unloading takes place. We are normally not required to assess daily traffic conditions for a school since off-peak traffic volumes are low and there is minimal roadway congestion. Several of the school studies we have been involved in have included ongoing AM or PM peak hour monitoring of roadway conditions primarily to avoid queuing problems. None of the studies have included daily trip caps or daily trip monitoring.


We were recently made aware of two Bay Area schools that do have daily traffic monitoring requirements including Hillbrook Elementary school in Los Gatos and Sacred Heart High School in Atherton. Hillbrook has a single driveway with one lane in each direction and Sacred Heart has eight driveways. Hillbrook is using a relatively simple electronic monitoring system, while Sacred Heart is monitored for only three-days each year using temporary counters. Both schools produce an annual monitoring report that is submitted to the towns.

We would note that the City of Palo Alto's proposed monitoring program for Castilleja will be a quite complex monitoring system, which the school will be responsible to operate. It will require eight or more monitoring devices mounted in the driveways. These devices will connect via WiFi or Bluetooth to a central server that will store the data. Typically, customized software is required to process and summarize the data collected from the monitoring devices. Our experience with similar monitoring systems has shown that maintaining these systems requires a substantial effort and cost. In addition, the systems will need to be calibrated on a regular basis to ensure an accurate count. Castilleja will have to commit ongoing financial and human resources to the monitoring program and equipment maintenance.

If you have any questions regarding the information provided above please feel free to call.

Sincerely,

FEHR & PEERS



Robert H. Eckols, P.E.

Principal

Type	TDM Plan Measure	2019 TDM Monitoring Report & Existing Measures	Planned TDM Measures (2016 Nelson/Nygaard)	City Zoning Ordinance 18.52	Conditions of Approval	2020 Final EIR - Traffic Study Recommendations
Infrastructure Measures	Pedestrian Connections	√				
	Bicycle Connection	√				
	Bicycle Parking (bike racks) - 108 req'd, 140 provided = 30% greater than code	√	√	√		
	On-site amenities (showers, cafeteria, vending, fitness center, etc.)	√				
	Priority carpool drop-off and pick-up zone	√				
	Multiple drop-off and pick-up zones	√				
	Off-site employee parking - Gamble Gardens curbside (14 spaces) & First Presbyterian Church (27 spaces)	√				
	Designated parking program (student, employee, visitor)	√			√	
	Priority Carpool/Vanpool or "Green" Vehicle Parking		√	√		
Programmatic and Operational Measures	<b>Carpool Programs</b>					
	Carpool information and facilitation	√				
	CastiCommutes carpool matching system	√				√
	Expanded carpool matching and trip planning		√			√
	Employee carpool incentive program		√			
	<b>Outreach, Marketing, Communications</b>					
	Transportation Coordinator	√				
	Employee TDM Policy - mandatory participation	√				√
	Employee TDM Pledge - 3x days per week minimum	√				
	Employee TDM Presentation	√				
	Employee campaign - "1-day-a-week"	√				
	New employee TDM Packet	√			√	
	\$50 annual employee reimbursement for TDM expenses	√				
	Castilleja Commuter Resource webpage	√			√	
	Castilleja commuter program information - available to the public		√			
	Letters, Email and newsletter communications (incl event info to other schools)	√				
	RideAmigos employee commuter platform and Trip Calendar	√				
	Castilleja TDM Video	√				
	Transportation Commuter Kiosk/use the app (RideAmigos)					√
	Family notices regarding limiting school traffic and to consider walking, biking or using free shuttle	√			√	√
	<b>Mandatory student ridesharing - not appropriate</b>				√	√
	Student/Parent Traffic Reduction Policy (Handbook - updated annually)	√			√	
	Develop a comprehensive incentive program for faculty, staff and students for carpooling and using alternative means of transportation		√		√	
	<b>Bicycle and Walk</b>					
	On-site Bike-share program - Zagster (e-scooter)			√		√
	Safe routes for biking to school	√				
	Provide bicycle safety education	√				
	Bike tune-up day and on-site repair station(s)			√		√
	Safe routes for walking to school	√				
	Walking School Bus program			√		
	<b>Guaranteed Ride Home Program</b>					
	Guaranteed Ride Home Program (employee-oriented)			√		√
	<b>Shuttle, Van and Transit</b>					
	Free School Bus service from Woodside, Portola Valley and several Menlo Park areas	√				
	Free School Bus service from Los Altos region	√				
	Two Free School Van services from East Palo Alto	√				
	3-4 Free last-miles shuttle Vans from Palo Alto Caltrain station	√			√	
	Free Palo Alto City Embarcadero Shuttle from Palo Alto Caltrain	√			√	
	Employee transit pre-tax benefits	√				
	Pre-tax transit benefit option - employee only	√				
	Transit subsidy program - employee only			√		√
	Additional Shuttle Bus routes			√	√	√
	Late-afternoon Shuttle departures (creating round-trip service)			√	√	√
	Off-site drop-off/pick-up area (Gamble Garden)			√	√	√
	<b>Other TDM Measure</b>					
	Special event TDM measures	√			√	
	The School to provide TDM information on its website to serve as a resource to nearby residents			√	√	
Vehicle registration and permitting - students, faculty and staff	√			√		
On-site Car-share program (or Lyft program)			√		√	
Register in Bay Area Commuter Benefits Program	√					
Prepare a TDM Plan within 60 days of Council's action (with a trip cap and average daily trip monitoring)				√		
<b>Traffic Management</b>						
traffic monitoring at drop off and pick up locations and during events	√					
Staggard bell schedule	√				√	
Satellite employee parking within walking distance	√					
No left turns allowed in or out of campus	√					
Designated no Castilleja parking in neighborhoods	√					
Monitoring of Castilleja parking in neighborhoods	√					
Event overflow parking on athletic field	√					
Parking Management	√					
Limit school enrollment in the event trip caps are not met			√			
Off-site parent drop-off			√			
Traffic Management	√					
Monitoring and Reporting Measures	Online Employee Commute Survey -prior to the start of each new school year	√				
	Consequences for violation of TDM rules (students, teachers)	√				
	Bi-annual Peak-hour trip audits (with peer review) report to city	√				
	Install Permanent driveway counters at all driveway entrances and exits				√	
	AM Peak-hour Trip cap at 440			√	√	
	Average Daily Trip cap at 1,296			√	√	
	Permanent vehicle counter devices at entrance/exit of drop-off locations, surface parking lots & garages				√	
	Install temporary vehicle counter devices in public right of way at locations determined by director (to use for TDM plan adjustments to minimize neighborhood impacts)				√	
	Monitoring Report delivered to City 3x per year - shall include:				√	
	Driveway volume counts in 15-minute increments				√	
	total average weekday AM peak trips and average weekday daily trips (not appropriate)				√	
	total average daily weekday trips and AM weekday peak trips during the weeks the campus frontage street segments are evaluated				√	
	average daily weekday traffic volumes on campus frontage city street segments				√	
	the dates and # of times average weekday daily trips and/or AM weekday peak trips exceeded limits, including exceedance threshold and special circumstances				√	
	Mode-use rate assessment				√	
	parking conditions report				√	
	bicycle parking counts (including date and time)	√			√	
	student drop-off/pick-up location counts and percentages by driveway				√	
	all raw data provided in report appendix				√	
	TDM Plan goals and measure targets				√	
	Detailed explanation of pick-up and drop-off process				√	
	# of daily onsite traffic attendants				√	
	Parking area map	√			√	
	City penalties for non performance				√	
	Deposit \$15,000 w/ the City to cover all city costs associated with annual review of school's compliance				√	

Best Practices - TDM and Commuter Programs//Strategies/Benefits/Services	Instructure	Basic Commuter Program	Better Commuter Program	Best Commuter Program	Platinum Commuter Program
<b>EXISTING INFRASTRUCTURE &amp; RESOURCES</b>					
Bicycle connections, routes and lanes	yes		1		
Bicycle Parking Facilities (bike racks) - 108 req'd, 140 provided = 30% greater than code	yes	1			
On-site amenities (showers, cafeteria, vending, fitness center, etc.)	yes	1			
Pedestrian Connections	yes	1			
Transit Trip planning tools (google, Waze)		1			
Bicycle trip planning tools (google, Strava)		1			
511.org online bicycle resources		1			
<b>PARKING FACILITIES &amp; MANAGEMENT</b>					
Priority carpool drop-off and pick-up zone	yes		1		
Multiple drop-off and pick-up zones	yes	trip deflection			
Priority Carpool/Vanpool or "Green" Vehicle Parking	yes	1			
Designated parking program (student, employee, visitor)		parking mgmt.			
Parking area map		parking mgmt.			
Off-site drop-off/pick-up area (Gamble Garden)		trip deflection			
Those who live within .75 miles - not allowed to drive alone to school (walk, bike or carpool)					1
Restrict grade 10-11 students from driving (or driving alone) to school					1
Require 12 grade students to carpool or pay for daily parking					1
All parking is paid (daily paid parking is best - \$2 or \$5 per day)					1
Electric Vehicle Charging Facilities - <b>not a trip reduction strategy</b>	yes	GHG reduction			
<b>BICYCLE FACILITIES &amp; RESOURCES</b>					
On-site Bike-share program - Zagster (e-scooter)			1		
Safe routes for biking to school program			1		
Provide bicycle safety education			1		
Bike mobile tune-up day and on-site repair station(s)			1		
Bicycle parking counts			1		
Back to School Bike Safety Event/Bike Safety Orientation			1		
<b>PEDESTRIAN FACILITIES &amp; RESOURCES</b>					
Safe routes for walking to school program		1			
Walking School Bus program			1		
<b>CARPPOOL BENEFITS</b>					
Carpool information and facilitation		1			
CastiCommutes Student carpool matching system			1		
Expanded carpool matching and trip planning			1		
Employee carpool incentive program			1		
<b>TRANSIT FACILITIES &amp; BENEFITS</b>					
Proximity to transit, shuttles and van services			1		
Free School Bus service from Woodside, Portola Valley and several Menlo Park areas					1
Free School Bus service from Los Altos region					1
Free Palo Alto City Embarcadero Shuttle from Palo Alto Caltrain			1	1	
Two Free School Children Van services from East Palo Alto					1
Free student and employee last-miles shuttle Van service to/from Palo Alto Caltrain station				1	
Employee transit pre-tax benefits				1	
Transit subsidy program - employee only			1		
Additional Shuttle Bus routes					1
Late-afternoon Shuttle departures (creating round-trip service)				1	
<b>COMMUTER SERVICES, RESOURCES, OUTREACH, &amp; PROGRAMS</b>					
Transportation Coordinator		1			
Employee TDM Policy - mandatory participation				1	
Employee TDM Pledge - 3x days per week minimum			1		
Employee TDM Presentation		1			
Employee campaign - "1-day-a-week"		1			
New employee TDM Packet		1			
\$50 annual employee reimbursement for TDM expenses			1		
Castilleja Commuter Resource webpage		1			
Castilleja commuter program information - available to the public		1			
Letters, Email and newsletter communications (incl event info to other schools)		1			
RideAmigos employee commuter platform and Trip Calendar			1		
Castilleja TDM Video			1		
Transportation Commuter Kiosk/use the app (RideAmigos)			1		
Family notices - limit school traffic and consider walking, biking or using free shuttle		1			
Parent and student online commuter survey - prior to the start of each new school year			1		
Student TDM Pledge - 3x days per week minimum					1
Parent TDM Pledge - 3x days per week minimum					1
Mandatory student ridesharing ( <b>not recommended</b> )					1
Student/Parent Traffic Reduction Policy (Handbook - updated annually)			1		
Develop a comprehensive incentive program for faculty, staff and students				1	
Special event TDM measures				1	
Engage Student Transportation programs with Green Club			1		
Integrate TDM messaging with Sustainability programs/curriculum			1		
Future TMA Participation				1	
Expand Special Event TDM strategies				1	
TDM As-built report				1	
Provide TDM information on its website to serve as a resource to nearby residents		indirect			
Vehicle registration and permitting - students, faculty and staff		parking mgmt.			
On-site Car-share program (or Lyft program)					1
Register in Bay Area Commuter Benefits Program		1			
Prepare a TDM Plan within 60 days of Council's action (AM & average daily trip monitoring)				1	
Castilleja commute/transportation resource flier		1			
Commuter events, promotions, competition, training, prizes, rewards, outreach, and marketing		1			
Apply for the national Best "site" for Commuters award			1		
Apply for the Bicycle Friendly Business (School) - League of American Bicyclists				1	

Best Practices - TDM and Commuter Programs//Strategies/Benefits/Services	Instructure	Basic Commuter Program	Better Commuter Program	Best Commuter Program	Platinum Commuter Program
<b>TRAFFIC MANAGEMENT AND TRIP DIVERSION MEASURES</b>					
Traffic monitoring at drop off and pick up locations and during events		traffic mgmt.			
Staggard bell schedule				1	
Satellite employee parking within walking distance		trip deflection			
No left turns allowed in or out of campus		traffic mgmt.			
Designated no Castilleja parking in neighborhoods		1			
Monitoring of Castilleja parking in neighborhoods		traffic mgmt.			
Event overflow parking on athletic field		traffic mgmt.			
Limit school enrollment					1
<b>GUARANTEED RIDE HOME PROGRAM</b>					
Guaranteed Ride Home program			1		
<b>TDM PERFORMANCE MONITORING &amp; SURVEYING*</b>					
No expiration of TDM Plan		1			
Consequences for violation of TDM rules (students, teachers)		1		1	
City penalties for non performance		1		1	
Bi-annual Peak-hour trip audits (with peer review) report to city					
Daily average trip counts (not necessary)					
Annual Employee Commute Survey -prior to the start of each new school year		1			
Annual peak-hour driveway hose/trip count assessment		1			
		<b>26</b>	<b>26</b>	<b>15</b>	<b>13</b>

\*Note: This list of TDM Performance measures does not include all traffic management conditions listed in the COA.

**From:** [Evelyne Nicolaou](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja project  
**Date:** Tuesday, November 17, 2020 12:04:03 PM

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Dear Planning and Transportation Commissioners,

I hope this letter finds you well. I'm writing today to ask you to support Castilleja's master plan, a project that will provide more educational opportunities for young women in Palo Alto. I am a teacher at Castilleja and a parent of a graduate, and I believe that expanding access to education in our community benefits us all.

I heard some commissioners mention in the last session that this needs to be a gradual process. *It already is!* Any growth would only be a few students each year. This isn't a rush to 540. The very earliest the school would reach 540 is in maybe 2026 or 2027. And that is only if traffic does not exceed the cap. If traffic goals are not met, the school may never exceed 450. There isn't a need for the PTC to limit the enrollment pacing because the application already does that.

And please, please, please, do not set up a format that this has to happen again in two years. That is not a workable suggestion. The master plan will offer more students the opportunity to study at Castilleja, and receive the excellent education they provide. Castilleja's mission is "to educate young women to become confident thinkers and compassionate leaders to effect change in the world." And I can't think of a mission that better represents the values of our community than that.

I hope that you take into account what's best for our community when considering this project for approval, and I hope we can count on your support. Thank you for taking the time to read my letter.

Best,  
Evelyne Nicolaou  
Magnolia Drive, Palo Alto

**From:** [Emil Lovely](#)  
**To:** [Planning Commission](#)  
**Subject:** Re: Castilleja Community Project  
**Date:** Tuesday, November 17, 2020 10:51:32 AM

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Dear Planning and Transportation Commission

I am writing to express that I hope you will vote to support Castilleja's master plan. I have lived in Palo Alto and raised my children here. Although my own three daughters did not attend Castilleja, I am grateful that the school is a resource for girls in the City and the surrounding areas.

Palo Alto is a wonderful place to grow up, but we have to admit that the pace and the stress take a toll on our children, perhaps particularly our girls in an area where our main industry, tech, is dominated by men. That is one reason that I especially value Castilleja as a choice for girls who don't feel our excellent public schools are the best environment for them. Allowing Castilleja to enroll more girls in the high school will make more space for girls from Palo Alto to have that choice.

Having followed the project for years now, I can speak to how attentive, adaptable, and creative the school has been in working with the community, resulting in a plan that works for all of Palo Alto. Specifically in response to concerns regarding noise and events, Castilleja was proactive in making key changes, like ensuring events will not be held on Sundays or after 8 PM, and staging and managing construction to be completed within three years so as not to overburden the surrounding area. The school has created a thoughtful project that will not create impacts. I sense that opponents are eager to mistrust that assertion, but the FEIR and years of study and data prove them wrong. We can trust the experts who found no impacts.

And I believe we can trust the school that they will not fall out of compliance again.

Castilleja is an important part of the Palo Alto community, and it's time that their thoughtful plan is allowed to move forward. I hope after review the PTC approves the project.

Sincerely,  
Emil Lovely, Lincoln Avenue

|



**From:** [Mike Anderson](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja Traffic-So much has been accomplished  
**Date:** Tuesday, November 17, 2020 10:39:53 AM  
**Attachments:** [Ltr Castilleja Transportation.pdf](#)

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Attached is my letter.  
Mike

**Michael Anderson  
858 Fielding Ct.  
Palo Alto, CA 94303**

November 17, 2020

Dear Planning and Transportation Commission,

Thank you for your service. My name is Mike Anderson, and as a long-time Palo Alto resident, I am writing in support of Castilleja School's proposal to update its campus and increase enrollment in the high school.

My daughter attended and graduated from Castilleja and during the time she was there, I was the parent volunteer who served as the traffic liaison. In that role, I helped support communication with parents, new initiatives in the Traffic Demand Management program, and education in the larger community about the importance of reducing daily trips to campus. As you know, the school has invested heavily in the TDM program. In the form of resources, the school now has a fleet of electric vans that shuttle students to and from East Palo Alto and University Avenue for the Caltrain. They also provide morning bus service from Los Altos, Woodside, and Portola Valley. In the form of policies, they limit the number of times that employees can drive to campus per week and employees also support pick up and drop off processes so that cars move smoothly and quickly. During my daughter's time at Castilleja, I watched the school culture transform, and car trips decreased by 25–31 percent. The school investment and the community buy in is enormous and impactful.

Since the FEIR finds no significant impacts at the trip levels it evaluated, I see no reason to impose deeper limits in your conditions. This school has a proven record and all you need to do is to listen to the opposing neighbors. Even they admit that traffic is under control now. Yes, they are imagining the worst for the future, but they agree that conditions are truly improved and very good right now. With that successful baseline from the very harshest critics, is it really necessary to cut below what the FEIR recommends (and the critical neighbors accept as very good)?

Thank you for considering my informed perspective,

A handwritten signature in black ink that reads "Mike Anderson". The signature is written in a cursive, flowing style.

Mike Anderson

**From:** [Sonal Budhiraja](#)  
**To:** [Planning Commission](#)  
**Subject:** In Support of Castilleja  
**Date:** Tuesday, November 17, 2020 9:11:48 AM

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Dear PTC Members,

I am a resident of Palo Alto. I am writing today to express my support of Castilleja's overall proposal, and I want to highlight two aspects that are especially important to me.

First of all, the variance for the FAR is a must. This is a variance that will allow the school to rebuild with fewer above ground square feet than they have now. Opponents who call this an "expansion" have really gained traction in a city climate that is cautious about growth. And they have gained that traction by misrepresenting the facts. This is not an "expansion" this is a modernization that results in a Floor Area Ratio that is lower than current conditions because—as I said—the above ground square footage for the new building is less than what is on campus now. The variance will allow the school to shrink, not expand. This ought to be very easy to approve.

Next, I want to speak in support of the underground parking. Once again, I fear that a few opposing voices have skewed the narrative around the parking facility with misleading presentations that show photos of huge commercial lots. This parking solution is single-lane entry and single-lane exit. It will be disguised behind gentle landscaping. In my opinion, it will be an improvement on the surface lot we see on Emerson now. Ultimately, I agree with the Comprehensive Plan and the members of your commission who have already stated that when possible, parking should be below ground.

Finally, I want to express that I feel concerned when I hear you, as commissioners, refer to this proposal as an "expansion." As I stated, this is a reduction of above-ground square footage and when I hear that term, I begin to sense an underlying bias in your process. If you have found yourself using terms that don't apply, I hope you will slow down and begin to think carefully about whether those terms prevent you from seeing this proposal clearly. The variance is for a reduced FAR, and the underground parking is nothing like those presentations. It will be an improvement.

Thank you,  
Sonal Budhiraja (1607 Hamilton Avenue)

**From:** [Theresia Gouw](#)  
**To:** [Planning Commission](#)  
**Subject:** letter in support of Castilleja from a direct neighbor  
**Date:** Tuesday, November 17, 2020 8:05:40 AM

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Dear Planning and Transportation Commission,

My name is Theresia Gouw. My home is at the intersection of Kellogg and Bryant, directly across the street from Castilleja School. As someone who lives on both Kellogg and Bryant, I am in the rare position to be able to speak to traffic impacts from the Bryant doors and the Kellogg doors. Neither flow impacts my life. Castilleja's TDM measures have really improved the neighborhood feel. It is clear that the school has changed its culture, and that the employees who volunteer for traffic duty keep the cars that do come in the morning and the afternoon quiet and quick. I enjoy living next to a school, especially one as considerate and thoughtful as Castilleja.

Just like the negative reports about excessive traffic, the complaints about too many events also mystify me. I understand that there are 90 events in a regular year, but the vast majority of them must be very small gatherings because I am not aware of their impact. Yes, the first day of school and graduation are busy. So are opening garden days at Gamble Gardens and football games at Stanford, but no one is trying to eliminate those.

I urge you to listen to my feedback, as well as that of my neighbors on Bryant, Kellogg, Emerson, and Melville who have voiced their strong support for this project. Please recognize that PNQL represents only a small subset of opposing neighbors, and many of us support the findings of the FEIR. Castilleja can increase its enrollment and modernize its campus without negatively impacting this neighborhood. In fact, in many ways, this project will enhance the neighborhood, including removing cars from neighborhood streets and dramatically improving the visual appeal of the campus. I ask you to vote in favor of the project, as laid out in Alternative 4 in the FEIR, and advance it to City Council.

Thank you,  
Theresia Gouw  
Kellogg Avenue, Palo Alto

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[theresiar@gmail.com](mailto:theresiar@gmail.com)

**From:** [Suzanne Keehn](#)  
**To:** [City Council](#); [Planning Commission](#); [Shikada, Ed](#)  
**Subject:** ITEM NO 9  
**Date:** Monday, November 16, 2020 3:33:29 PM

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To the Palo Alto City Council,

Though the focus of item no. 9 seems to be about the very large project at 788 San Antonio, with commercial space and 102 units of housing. Including 2 levels of underground parking. However, it also changes our Comprehensive Plan, with the adoption of zoning ordinances that affect the whole city. It increases the definitions of gross floor area, and retail preservation and MORE.

Each of these items need their own hearings, not part of a hearing for ONE development. It reeks of what's happening in D.C.. Let's be a model for good governance, and have public hearings for each of these proposals and not rush something through now because you can. We are in a crucial time now, and if we say we wish to protect our environment, let's do so with sustainable building. As you know many are leaving the area we do not need market rate development, but Below Market Rate, there must be a way to do it with all the smart people on the council.

Sincerely,

Suzanne Keehn  
94306

**From:** [DavidandGlowe Chang](#)  
**To:** [Planning Commission](#)  
**Subject:** WE SUPPORT CASTILLEJA'S INCREASED ENROLLMENT PLAN AND REMODEL.  
**Date:** Monday, November 16, 2020 2:51:27 PM

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Dear Planning and Transportation Commission,

Thank you for allowing me to speak during the Oct 28th meeting. Several of you have mentioned that the recent hearings have helped you understand the broad support for Castilleja among the immediate neighbors. We are delighted that our voices have finally been heard!

Despite this new sense of balance in the public conversation, we still notice that the phrase “the neighbors,” is often used as shorthand to refer to the small group of vocal neighbors who oppose the project. It is inaccurate to say that you spoke to “the neighbors” when you have met with PNQL. It is also inaccurate to say that you are listening to “the neighbors’ concerns” when you consider complaints about traffic and events. There are many, many close neighbors, just like us, who have no issues with traffic and no issues with events. We 3 residents on Bryant St, neighbors and friends, all support the school. This extremely contentious issue has pitted neighbor against neighbor for over 8 years. We have even had our lawn sign stolen! The PNQL group complain that their street is filled with cars from the school. Street parking is public domain and homeowners do not have the right to street parking. As a result the school made homemade “No school parking” signs, which is not legal and proposed the garage. The other issue I have is that one of the most vocal opponents of the new profile and roof line and tree count happens to own several unkept properties with trash strewn along his unlandscaped areas. The school will beautify our neighborhood, unlike his dilapidated rental units. The opponents have not been fair in their demands and responses to the school’s plans.

As one of many neighbors directly across the street who support Castilleja, we are worried about bias in this review process when we hear commissioners suggest that “the neighbors” are a vast and unified body in opposition to Castilleja. We are not. We are a varied and thoughtful community with a broad array of opinions about everything, including Castilleja. There are so many of us that support the updates and the increase in enrollment, and we deserve to be honored and valued in this process. Please be mindful of that moving forward.

Thank you for your service.

Glowe and David Chang  
1345 Bryant Street

**From:** [Xenia Hammer](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja School - in support  
**Date:** Monday, November 16, 2020 11:50:51 AM

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Dear Planning and Transportation Commissioners,


I am grateful that you have begun to move forward with conditions of approval for Castilleja's proposal. In particular, I want to voice my support for the variance. My stance is based on the fact that this is a reduction from current circumstances. I have followed the discussion closely as both a Palo Alto Resident and a teacher at Castilleja.

During your last hearing, I especially appreciated the fact that as a group you began to focus on the impacts rather than the numbers with regard to enrollment. If the school can operate with no added impact on noise or traffic -- as the FEIR says that the school can do with 540 students, 90 events, and 1296 car trips - then, as a commission, you will have served the community well by approving those numbers. You will be protecting the neighborhood against heightened impact.

As far as FAR (Floor Area Ratio), my support is built on the same line of thinking. The application for the variance is only needed because there are new codes. But the current FAR already exists and replacing it (at a slightly lower number, actually) does not create new impacts. The buildings are now a certain number of above-ground square feet. Replacing them at a slightly smaller number of above-ground square feet will not create an impact. The variance is a technical issue that should be very easy to support. It simply allows the school to replace aging and unsound structures.

Thank you again for the time and energy you have put into listening to all voices and recognizing the potential for a positive resolution for all parties that includes a new campus and more educational opportunity.

Xenia Hammer  
Sharon Court



**From:** [Carol C. Friedman](#)  
**To:** [Council, City: Planning Commission](#)  
**Subject:** Support for Castilleja School  
**Date:** Monday, November 16, 2020 11:14:21 AM

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November 16, 2020

Dear City Council,

Dear Planning and Transportation Commission,

I am a neighbor of Castilleja School, and I support their project. **I will say it again: I am a neighbor of Castilleja School, and I support their project.** I know that a handful of my neighbors oppose the project. I think everyone in Palo Alto knows about them by now with their aggressive signs and their inability to:

1. Live in the present and realize that Palo Alto is more dense than decades ago, and that change is not caused by Castilleja
2. Move beyond the over-enrollment issue, which the school self-reported and has worked to remedy by meeting every City-mandated reduction since
3. Admit that Castilleja is a SMALL project with lower FAR and no significant traffic impacts

The small group of people who have devoted night and day to opposing this project have been very effective at making their voices heard. But they never acknowledge the rest of us, the many, many more people in our neighborhood who treasure Castilleja as a good neighbor and an asset in our community. It has been a skewed conversation led by negativity and I hope this letter begins to address that issue. I am very positive about the school, and **as a voter, I will be disappointed and frustrated if they are not granted permission to modernize and accept more students** (without creating traffic).

Finally, I want to assert that I am an advocate for slowing growth in Palo Alto and for thinking carefully about the future of the City. As such, I want to point out that this project is thoughtful and is NOT AN EXPANSION. The building footprints will be smaller than what they have now. And honestly, the visual improvement is long overdue. The buildings that currently line Kellogg, Bryant, and Emerson are dated and unappealing. On top of that, I want to assert that this is a THOUGHTFUL update with no significant impacts.



Residentialist leaders should support this project as a role model in our community, a way to modernize and create sustainable spaces without increasing FAR or creating traffic impacts.

I hope you will see me among “the neighbors” and address my concerns fairly in this review process.

Thank you,  
Carol C. Friedman  
465 Lowell Avenue  
Palo Alto

**From:** [priya.chandrasekar](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja modernization , let do whats right .  
**Date:** Monday, November 16, 2020 8:59:13 AM

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Dear Planning and Transportation Commission,

I want to commend Castilleja for developing an environmentally friendly project that cements Palo Alto as a leader in sustainable growth and development. The FEIR findings represent the culmination of the past eight years of community-driven planning resulting in a project that will be a great asset to our community once completed. I am a concerned citizen and Palo Alto resident, and I'm pleased to support Castilleja's project plan and look forward to seeing it come to fruition.

I was very interested in the facts shared last week about events at Serra High School in San Mateo. For some time, I have suspected that Castilleja was being held to an unfair standard, and that information confirmed my feelings. It seems from the hearing that Castilleja is amenable to accepting limits on events with a compromise at 74. This is in a context with a local boys' school in a residential neighborhood that had NO LIMITS on parallel events. I applaud Castilleja for going to the table to accept a compromise, but I do understand Commissioner Alcheck's concern about this decision because it does seem unfair. In addition, it's not justified by the findings in the FEIR, so what is the reason for making those cuts?

As I said, it seems Castilleja is able to make that compromise, so maybe there is no need to address that extra reduction. However, the same thing happened with daily car trips. The FEIR suggested one level and the commission voted to cut below that level. The analysis in the report gives a number that works without impacts. It feels strangely spiteful and punitive to cut below that limit. Sometimes I think it is important to remember that this is a SCHOOL, a school that has a positive impact on our community. Yes, the leaders of the school made a mistake 12 or 13 years ago. They know that. They have consistently proven they can and will do better, especially with regard to traffic reductions. Why are we imposing these extra-heavy limits now?

Given the FEIR findings, I hope Castilleja can count on your support with reasonable and justified limits on traffic. The FEIR grants conditions that fulfill the goals of the project, and I wonder whether these added limits betray that goal.

Thank you,  
Priya Chandrasekar  
649 Seneca Street

**From:** [Jane McConnell](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja School plans- support  
**Date:** Monday, November 16, 2020 8:59:12 AM

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Dear Planning and Transportation Commissioners,

I am a homeowner in Palo Alto. I attended Castilleja. I now teach at Castilleja, and my niece recently enrolled at Castilleja. The role that the school has played in my life cannot be overstated.

First, I benefited from the education. I am one of those girls' school graduates who pursued science, and I have a Ph.D. in developmental genetics.

Now, my professional life centers around Castilleja, where I teach biology, biotechnology, bioethics, and sustainability to engaged and curious girls who feel the all girls setting is the best place for them. I also care for the Castilleja gardens, where I work with students to grow vegetables and flowers and harvest food and seeds.

My niece is the second generation in my family to join the Castilleja community. I know there are critics who say that Castilleja doesn't do enough for students in Palo Alto. I have to disagree. Throughout my life, Castilleja has been a crucial part of a fulfilling life for me in my hometown.

I hope you will allow more girls to benefit from this unique education. I agree with the commissioner who mentioned that 540 isn't just a number. It refers to real girls who will be able to grow and change and learn in the way that suits them best. Right now over 125 girls at Castilleja live in Palo Alto. Allowing the upper school to grow will open more space for Palo Altans and other girls' whose community schools are not as strong as ours.

The FEIR proves that this can be achieved without impacts and that should be all the evidence you need to support this important project.

Thank you,  
Jane McConnell  
Harvard Street, Palo Alto

--

**Jane McConnell, PhD '81**

*She/her/hers*

Science Department

**Castilleja School**  
[1310 Bryant Street](#)  
[Palo Alto, CA 94301](#)

**P** (650) 470-7883

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[www.castilleja.org](http://www.castilleja.org)

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*Women Learning. Women Leading.*

**From:** [Karen Harwell](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja  
**Date:** Monday, November 16, 2020 8:01:00 AM

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Dear Planning and Transportation Commission,

I hope this note finds you well. I am writing today to share my support for Castilleja, and the work they are doing to modernize their campus and expand enrollment opportunities for potential students. I would specifically like to speak to Castilleja's current enrollment.

When Castilleja voluntarily disclosed an over-enrollment in 2013, the school reduced its enrollment to meet a modified City-mandated enrollment cap. The school has been in compliance with further reductions to this cap since then, and any accounts to the contrary can unfortunately be attributed to what I hope is a misunderstanding. And due to regularly-required audits, the school will be required to continue this adherence if an enrollment increase is granted.

I fully support the growth to 540 because I know that is the number the school needs to broaden its programs, and I also know that the FEIR shows it can be done with traffic staying at current levels. Castilleja is a school, and as such, it is a valuable asset in our community. I believe that if there is a way that you can vote to strengthen their programs while not causing impacts (the FEIR proves both are possible) then it is your duty as city leaders to do so.

Castilleja is committed to being a good neighbor, which means continuing to adhere to any enrollment cap that is set. Thank you for your consideration, and, as a long-time resident of Palo Alto who values education, I hope I can count on you to support this project.

Sincerely,  
Karen Harwell  
Dana Avenue, Palo Alto

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**From:** [jfpetrilla@gmail.com](mailto:jfpetrilla@gmail.com)  
**To:** [Council](#), [City](#); [Planning Commission](#); [Sheldon Ah Sing](#)  
**Subject:** Housing Incentive Program Expansion and 788 San Antonio Road Mixed-Use Project and Final Environmental Impact Report (EIR)  
**Date:** Sunday, November 15, 2020 9:48:45 PM

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November 15, 2020

To: Palo Alto City Council  
[Planning.Commission@CityofPaloAlto.org](mailto:Planning.Commission@CityofPaloAlto.org)  
Sheldon Ah Sing [SAhsing@m-group.us](mailto:SAhsing@m-group.us)

From: John Petrilla  
Palo Alto, CA 94303  
777 San Antonio Rd #138

Subject: Housing Incentive Program Expansion and 788 San Antonio Road Mixed-Use Project and Final Environmental Impact Report (EIR)

Dear Mayor Fine, City Council members, Planning Commission members and Mr. Sing

Please find below comments for your consideration regarding the Housing Incentive Program Expansion and 788 San Antonio Road Mixed-Use Project and Final Environmental Impact Report (EIR) at the upcoming November 16, 2020, City Council Meeting.

I can support higher density housing in Palo Alto, even in my neighborhood, providing sufficient steps are taken to ensure the result is a success and does not yield a Palo Alto version of Cabrini Green. I'll define success as an outcome with which the Project residents, neighbors, developers and the City Council are happy, if not proud.

From Response 8.1, page 54 of the Final EIR, I conclude that the 788 San Antonio Rd Project will be the first project of its scale and density in Palo Alto since requested examples were not provided (e.g. street numbers were not provided; without an address one cannot visit the site to see the impact on the neighborhood). Statements that there are higher densities in Downtown area aren't helpful without scale information, i.e. number of units. While this is not an argument regarding the 102 units 788 San Antonio Rd Project, it's a serious concern regarding an 800+ unit Program.

It should be apparent that the 788 San Antonio Rd project will be the model or showpiece for the Program. Unless it's done well, it will become increasingly difficult to convince Palo Alto residents to accept new high-density housing in their neighborhoods. Those with experience in product development would not likely finalize a design until the test results from the prototype, alpha and beta units were reviewed. As I understand it, the 788 San Antonio Rd project is our prototype model.

Several objectives (e.g. decreasing VMT and/or Greenhouse Gases) for the Project and Program are dependent on the residents of the Project and Program adopting public transit and/or bicycles for commuting. The Project location does not currently serve commuters well with public transit or bike

lanes.

From Appendix A: Transcript of Planning and Transportation Commission Hearing Comments, page 149,

“Commissioner Lauing: I think that right now it’s not really a good bicycle area. I think it was Council Member Filseth said in the last Council meeting about I don’t know half a dozen times that this is a car-centric location. And if the aspirational goal is to turn it into a bike-centric location then we’ve got some work to do because there are jobs around there, there are grocery stores close, there’s a gym at the JCC, so there are some amenities there, but getting there is just to start with just not safe ... if Council decides to move forward with some version of this and we have to commit to it at the same time and that means we have to fund it alternative to what else we’re doing. It’s just flat out not safe. I mean parking a car there as I did to look at the site, I was kind of worried to get back into my little car unless all the traffic had already passed so it’s a serious problem.”

Repeating from my comment #4 on the Draft EIR

“From South Palo Alto Enhanced Bikeways, "Palo Alto parents note that the current state of bicycle infrastructure (unprotected bike lanes) on these high speed and/or heavily traveled corridors limits growth in the bicycle mode share for school commutes. Parents are unlikely to bike with their children next to multiple lanes of fast-moving traffic (Fabian Way) or in congested school zones (East Meadow Drive) without the protection of buffer zones or physical barriers such as bollards."

It will take more than designating a lane on an a busy arterial, i.e. San Antonio Rd, as a Class III bike lane for commuters to get out of their safer and more convenient cars and start commuting via bicycles. Not only must the bike option be convenient; it must look safe. While safety may not be in the domain of EIR or in the definition of a Class III bike lane, the success of the Project depends on it.

Regarding public transit, the Final EIR states (page 71) in Table 1.3-4 Project Consistency with S/CAP Consistent ‘The project itself would not expand transit options; however, it is within approximately one-half mile of two bus stops servicing two VTA routes. The project would place residences and retail in a transit-accessible area, improving the viability of transit as an option for travel to services in Palo Alto.’ Similar statements regarding transit bus stop locations occur throughout the Draft and Final EIRs. As with bike lanes, the ability to check off an EIR item may not be sufficient to result in the desired outcome. If there’s not a sufficient adoption of public transit by the Project’s residents, the increase in population will only exacerbate traffic issues.

From page 58, “As described in Section 4.6, Transportation, of the Draft EIR, the VTA bus routes 21 and 40 can be accessed from the program area. Bus stops for route 21 are located at the intersection of San Antonio Road and Middlefield Road, immediately bordering the study area. The bus stop for route 40 is located about 0.5 miles away at the intersection of Leghorn Street and Rengstorff Avenue. These stops are all within walking distance of the parcels within the program area.” Depending on VTA for public transit may be problematic, e.g. Response 8.14, page 58, states, “the VTA bus routes 21 and 40 can be accessed from the program area. Bus stops for route 21 are located at the intersection of San Antonio Road and Middlefield Road, immediately bordering the study area.” However from the VTA website, <https://www.vta.org/go/routes/21#weekday-eb>. VTA route 21 East Bound the stop is at Middlefield & Charleston (E) and the West Bound stop is at Middlefield

& Mayview (W). From Google Maps these are now walking distances of 0.7 mi and 1.0 mi, respectively. Since Palo Alto has little influence with VTA, perhaps Palo Alto should develop its own public transit option. While such an issue may not be in the domain of EIR, the success of the Project may depend on it.

Regarding Response 8.14, page 59, "While the project itself would not expand transit options, it is within walking distance of bus stops servicing VTA routes. Moreover, while a route that provides access to shopping and downtown Mountain View may not be used by many commuters, it provides access via public transit for residents of the area to nearby shopping and services." If the number of trips from and to the Project is dominated by commute trips, the number of other trips may not be sufficient to counter the additional commuter trips and provide a beneficial effect.

If zoning is changed to permit higher density housing, the housing density should be kept to a level that enables a successful project for the new residents. The building should have features that yield a pleasant interior even though the building is on a busy street at a congested intersection. The building design should not be a source of frustration by having insufficient space for parking, deliveries, etc.

Finally, what's in it for the neighborhood besides construction noise and more traffic? There should at least be projects to improve traffic flow and provide better public transit and bicycle options than currently exist. It would be best if such a plan is in place before the Program proceeds and additional housing is approved. A piecemeal, project-by-project approach is more likely to produce unsatisfactory rather than optimum results.

If new high-density housing is approved there should be a mitigation plan with high priority given to its development and implementation. This should certainly address traffic (transit and bike options) but would do well to consider schools, parks and recreation. Instead of just approving the project, moving on to the next project proposal and hoping for the best, we should try to have a successful project: One where the new residents are happy with their housing and neighborhood and where the current neighborhood residents do not feel ignored or thrown-under-the-bus.

Thank you for your attention to this message.

Respectfully,

John Petrilla  
777 San Antonio Rd #138  
Palo Alto, CA 94303



**From:** [neva yarkin](#)  
**To:** [Planning Commission](#); [Council, City](#)  
**Subject:** from neva yarkin  
**Date:** Sunday, November 15, 2020 8:45:07 PM

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Nov. 16, 2020

Dear Planning Commission and City Council,

I live **600 feet** away from Castilleja.

My family, has owned this property on Churchill for over 60 years, when Castilleja was a boarding school.

Some of the following issues with Castilleja expansion need to be reexamined.

Palo Alto has a tree ordinance. Coast Live Oaks, Oaks, and Coast Redwoods are protected. (Ordinance 4568 preservation of trees).

Trees remove the CO2 from the atmosphere.

Why have a tree ordinance in Palo Alto if it is not going to be followed?

We have major traffic problems already.

By adding another 125 students to Castilleja, the daily **car trips** will go from the current 1,198 to **1,477** with the expansion. (Traffic Study, Table 15, June 2020).

Building a parking garage for a total of 22 spaces is absolutely crazy.

Also, it is not environmentally friendly and the school should be using some kind of major satellite shuttling for the 75% of the students who live outside of Palo Alto.

A parking garage with an entrance off of **Embarcadero/Bryant** and exit **Emerson/Embarcadero** will only add to traffic congestion.

The parking garage will be also cutting into the **Palo Alto Bike Boulevard** that is on Bryant.

**Safety issues** need to be considered. Castilleja wants to use Temporary Buildings while construction for the expansion is going on. Construction could take 3 to 5 years to complete. So you will have students, bikers, pedestrians, cars, and neighbors, all trying to navigate a construction zone. How safe will that be? (Chapter 2, FEIR July 2020).

What about the Paly students riding bikes to school on the Bryant Bike Boulevard?

This could be a lawsuit waiting to happen if a construction truck hurts or kills someone.

I would like to point out that when Stanford was rebuilding Student housing on campus, their construction zones were closed off to **everyone. Everyone!** Enrollment should **not**

**be** increased beyond 415 till all the construction is **finished**.

**Future projects** in Palo Alto need to be analyzed for traffic flow and how this will impact the whole city. Remember, 75% of Castilleja students come from outside the city limits.

Please consider the above issues and **make Trees, bikes, and environmental issues our core values for the future**.

Thank you for your time and consideration.

Sincerely,  
Neva Yarkin  
Churchill Ave.

**From:** [Andie Reed](#)  
**To:** [Planning Commission](#)  
**Subject:** City Documents Reveal Castilleja Overstating Existing Floor Area by 16%  
**Date:** Sunday, November 15, 2020 8:30:21 PM  
**Attachments:** [EX A - 2006 CUP.PDF](#)  
[EX B - 2016 CUP app R-1 compliance.PDF](#)  
[EX C - 2017 R-1 compliance doc.PDF](#)  
[EX D - 2020 Zoning compliance.PDF](#)

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Dear Commissioners:

Although the agenda item for the Nov 18, 2020 PTC meeting states that you will be deliberating a **Variance to Replace Campus Gross Floor Area**, it will actually increase the site's floor area significantly above the 99,831 square feet allowed by Castilleja's 2006 Conditional Use Permit.

No city approval was ever issued for the 16% increase in floor area from 99,831 square feet to the 116,297 square feet claimed as current, existing floor area.

Four attached documents demonstrate EXISTING floor area numbers that significantly increased over the last 4 years:

- EX A: In 2006, Castilleja was allowed to maintain 99,831 square feet of existing floor area when they replaced the gym floor area.
- EX B: In 2016, Castilleja claimed 99,679 square feet of floor area existed (after subtracting 6,021 square feet for the two existing houses on Emerson parcels proposed but ultimately not included in school floor area)
- EX C: In 2017, Castilleja claimed 113,877 square feet of floor area existed (again subtracting out the houses), despite there being no construction on the site over the prior year
- EX D: In 2020, Castilleja now claims 116,297 square feet of floor area exist, which is 16% higher than authorized in 2006.

From 2006 to the present, Castilleja was never granted permission to increase floor area beyond 99,831 square feet. The higher floor areas numbers in the 2017 and 2020 applications may stem from counting attics, equipment enclosures, and other spaces, but these were not permitted as floor area and thus cannot be included. It is in fact illegal to convert non-floor area into floor area under the 2006 Conditional Use Permit, so if Castilleja's floor area actually has increased, that excess floor area should be removed.

Please discuss the actual **EXISTING** floor area, and that in order to "replace" floor area, **ensure total campus gross floor area to be approved does not exceed the 2005 Conditional Use Permit's limit of 99,831 square feet**, including the underground garage.

Thank you,  
Andie Reed

--

Andie Reed CPA  
160 Melville Ave  
Palo Alto, CA 94301  
530-401-3809

EXHIBIT A:

Castilleja  
2006 CUP

**Attachment C**  
**Project's Conformance with Zoning Code Regulations**  
**1310 Bryant Street / File No. 05PLN-00450**

<b>Table 1: CONFORMANCE WITH CHAPTER 18.12 (R-1(10,000) DISTRICT)</b>			
<b>Feature</b>	<b>Regulation</b>	<b>Proposed/Existing</b>	<b>Conformance</b>
Minimum Site Area <i>PAMC 18.12.040(a)</i>	10,000 sq. ft.	268,783 sq. ft.	Conforms
Min. Site Width <i>PAMC 18.12.040(a)</i>	60 ft.	Approx. 500 ft.	Conforms
Min. Site Depth <i>PAMC 18.12.040(a)</i>	100	Approx. 630 ft.	Conforms
Front Setback <i>PAMC 18.12.040(a)</i>	20 ft.	Approx 25 ft. (Bryant St.)	Conforms
Street Side Setback <i>PAMC 18.12.040(a)</i>	16 ft.	Approx. 30 ft. (Kellogg Ave.) Approx. 115 ft. (Embarcadero Rd.)	Conforms
Rear Setback <i>PAMC 18.12.040(a)</i>	20 ft.	Approx. 20 ft. (Emerson Street).	Conforms
Floor Area Ratio <i>PAMC 18.12.040(a)</i>	81,385 sq. ft.	99,438 sq. ft/ 99,831 sq. ft. <i>2/16/06 ARB rpt</i>	Existing Nonconforming. Project reduces existing floor area by 393 sq. ft.
Site Coverage <i>PAMC 18.12.040(a)</i>	94,074 sq. ft.	4,474 sq. ft.	Conforms
Building Height (Gym) <i>PAMC 18.12.040(a)</i>	30 ft	30 ft.	Conforms
Daylight Plane (Gym) <i>PAMC 18.12.040(a)</i>	10' at side and 45 degrees 16' at rear setback line and 45 degrees	No Encroachment	Conforms
<b>Table 2: CONFORMANCE WITH CHAPTER 18.83 (parking/landscape)</b>			
<b>Parking Spaces</b>	<b>Required/Allowed</b>	<b>Proposed</b>	<b>Conformance</b>
Parking for Visitors and Staff	97 Spaces per CUP	97 Spaces	Conforms
Accessible Parking	Four accessible parking stalls for 97 spaces.	Four at grade	Conforms
Bicycle Parking	1 per three students for 138 bike racks	36 bike racks	Does not Conform. Required as condition of approval.
Perimeter plantings	5 ft. wide	Minimum 5 ft. wide around school	Conforms

*Prepared by Castilleja School*

1310 Bryant Street  
05PLN-00450

*pg 17, ARB submittal 12/15/2005  
05PLN-00450*

EXHIBIT B:

Castilleja School CUP Application - 2016 6/30/16

Applicant Narrative, p.g. 6

**B. Project Description** The following table summarizes the project details compared to existing conditions:

Figure 3

Project Detail	Master Plan Proposed	Current Campus
Above Grade S.F.	105,700 sf.	105,700 sf.
Basement Level S.F.	69,000 sf.	42,300 sf.
Total Square Footage	174,700 sf.	148,000 sf.
Floor Area Ratio	0.37	0.37
Maximum Building Height <sup>3</sup>	34'6"	34'6"
Minimum Setbacks		
Emerson	71'6"	15'6"
Kellogg	16'0"	25'2"
Bryant	38'5"	17'9"
Embarcadero	108'6"	108'6"
On-Site Parking Spaces	170 spaces	73 spaces
Underground Spaces	130 spaces	0 spaces
Surface Spaces	40 spaces	73 spaces
Site Coverage	21%	22%
Open Space	99,480 sf.	93,298 sf.

EXISTING above-grade sq. ftg.

**C. Neighborhood Compatibility and Design Enhancement Exception** Castilleja's Master Plan is committed to an architectural style and massing that is compatible with our neighborhood. Castilleja, located in an R-1 single-family zone district, has attempted to comply with all R-1 development standards. The R-1 building height standard, however, when applied to academic structures would create long stretches of monotonous roof forms. Castilleja's Master Plan proposes a Design Enhancement Exception which would allow for variation in roof forms typical of our neighborhood, producing a more visually interesting and compatible street view. At no point would the height of the new building exceed the maximum height of existing campus buildings.

**D. Sustainability Program** Castilleja's Master Plan attempts to set aggressive goals which will demand an on-going commitment to achieve Castilleja's sustainability mission. Charting a leadership path in the building sector does not simply entail incorporating a list of discrete design features; it requires a fundamental departure from business-as-usual.

Building Castilleja's Master Plan will necessitate engaging our design and construction team in an integrated design and delivery process that is characterized by an exceptional degree of interdisciplinary collaboration - from the very earliest stage of design, all the way through construction and start of operations.

Castilleja's sustainable campus is expected to produce benefits, over a long span of time, to numerous constituents: the students; employees, neighbors, the Palo Alto community as

<sup>3</sup> Maximum Building Height defined per City of Palo Alto's Municipal Code Definition 18.04.67

# EXHIBIT C:

## Castilleja School, #13 Project Documents, 2017

### "Compliance with R-1 Development Standards"

Project Detail	Master Plan Proposed	Current Campus
Above Grade S.F.	119,898 sf.	119,898 sf.
Basement Level S.F.	65,886 sf.	43,333 sf.
Total Square Footage	185,784 sf.	163,231 sf.
Floor Area Ratio	0.42	0.42
Maximum Building Height <sup>1</sup>	34'6"	34'6"
Minimum Setbacks		
Emerson	71'0"	15'2"
Kellogg	20'0"	25'2"
Bryant	20'0"	17'9"
Embarcadero	108'-6"	108'-6"
On-Site Parking Spaces	142 spaces	74 spaces
Underground Spaces	115 spaces	0 spaces
Surface Spaces	27 spaces	74 spaces
Allowable Site Coverage	100,374 SF (35.0%)	100,374 SF (35.0%)
Actual Site Coverage	79,962 SF (27.9%)	67,956 SF (23.7%)
Open Space	130,206 sf.	93,298 sf.

EXISTING  
above-grade  
sq. ftg.

<sup>1</sup> Maximum Building Height defined per City of Palo Alto's Municipal Code Definition 18.04.67

feet; roof mounted photovoltaic panels would increase the height to 30 feet. Most other site characteristics would comply with the remaining development standards, including setbacks, site coverage, and vehicle and bicycle parking. However, the project includes a request for further exceedance of maximum lot size via a Tentative Map with Exception process, and removal and replacement of existing non-complying gross floor area.

**Table 4-2  
Zoning Ordinance Policy Consistency Analysis**

Development Standard	R-1(10,000) Zoning	Existing Property	Proposed Project
Minimum – Maximum Lot Size	10,000 – 19,999 square feet	286,783 square feet (project site)- includes 268,78362 sq ft existing campus parcel plus lot area of two Castilleja-owned parcels (10,500 sq ft and 7,500 sq ft)	286,783 square feet (three parcels merged)
Maximum Floor Area Ratio	0.45 first 5,000 square feet of lot size; 0.30 square footage in excess of 5,000 square feet	Allowable: 1310 Bryant Street, 0.30; 1263 Emerson Street, 0.37; 1235 Emerson Street, 0.40. Total 0.31 Existing Total: 0.43	Allowable: 0.30 Proposed: 0.41
Gross Floor Area	2,250 sq ft for the first 5,000 sq ft of lot size; varies with lot size for larger lots	1310 Bryant Street: 116,297 sq ft; 1263 Emerson Street: 3,171 sq ft; 1235 Emerson: 2,850 sq ft	Total site: 115,849 sq ft
Maximum Building Height	30 feet standard; 33 feet for buildings with a roof pitch of 12:12 or greater	34 feet 6 inches	30 feet
Minimum Setbacks			
Emerson	20 feet	20 feet	20 feet
Kellogg	20 feet	27 feet 9 inches	20 feet
Bryant	20 feet	22 feet	20 feet
Embarcadero	24 feet	108 feet 6 inches	Above grade: 108 feet 6 inches (no change above grade) Below grade: 0 feet, variance requested
Maximum site coverage, multiple-story development	35% (100,374 square feet)	23% (65,263 square feet)	29% (83,043 square feet)
Vehicle Parking	2 spaces per middle grade teaching station, 4 spaces per upper grade teaching station	7482	142143
Bicycle Parking	1 space for every 5 students	95	140

EXISTING, above-grade sq ft/g

Source: City of Palo Alto 2018; Appendix B

**From:** [Gloria Rothbaum](#)  
**To:** [Planning Commission](#)  
**Subject:** Regarding Castilleja's plan  
**Date:** Saturday, November 14, 2020 4:46:57 PM

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Dear Planning Commissioners,

My name is Gloria Rothbaum. I live in Palo Alto, and I want to thank you for this opportunity to speak in support of Castilleja. In a recent PTC meeting, this Final Environmental Impact Report was praised as the most thorough the city has seen, setting a new standard for research and analysis. Now it is time to rely on the facts in this outstanding report.

1. The EIR supports a gradual increase in enrollment and does not see moving or splitting campus as a solution.
2. The EIR and the City's Comprehensive Plan both support an underground parking facility over surface lots.
3. The EIR confirms that the project will not bring new traffic to the neighborhood.
4. The EIR confirms that enrollment and traffic will be monitored and reported to the City by third parties, proving accountability.

In 2013, the City asked Castilleja to reduce traffic. By adding buses, shuttles, Traffic Demand Management participation for employees, and off-site parking, the school has reduced daily car trips by 25–31%. These outstanding results prove the school's capacity to follow the City's limits and abide by those changes.

Between the facts that are clearly outlined in the thorough Final Environmental Impact Report, and the school's proven track record of minimizing impacts on the neighborhood, I think it is time to listen to the facts and approve this project with the conditions of approval.

There are NO significant impacts in the FEIR, and that means there are NO reasons to delay any longer. Approve this thoughtful project and continue to open educational opportunities in Palo Alto.

I ask for your positive support of Castilleja's plan.

Sincerely,



Gloria Rothbaum

**From:** [Ms Dawn Billman](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja  
**Date:** Friday, November 13, 2020 8:25:09 PM

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Dear Planning and Transportation Commission,

Thank you for providing me with the opportunity to voice my support for Castilleja's campus modernization project. I am a Palo Alto resident and the mother of daughters who attended PAUSD schools. I am happy that this project would expand students' access to educational opportunity within Palo Alto.

During the most recent hearing, I heard Commissioners Lauing and Suma speak in favor of a gradual enrollment increase with check-ins after two years. I don't actually see how that idea differs from what is proposed here—except that the check-ins in the current proposal would happen every year. Castilleja's increase is gradual, 25-27 students. Then it stops. If traffic remains under the cap, the process can continue for another 25-27 students, then it stops. Again, if traffic remains under the cap, the gradual growth can continue. This is a vigilant process, and could not be more careful or gradual than it is.

I also want to voice my complete opposition to the idea that Castilleja should just grow by a few students now and then re-apply for another CUP to grow again every two years. That is a truly terrible idea. This first CUP has taken almost ten years and has taken a great deal of precious time from the community, the City Staff and the school. We should not simply rinse and repeat this terrible process over and over again. I urge you all to reject that suggestion and instead support this CUP with reasonable and fair conditions of approval. Asking to redo this every two year would be unreasonable and unfair.

I truly hope that expanding access to education within Palo Alto is something we can all get behind. Let's reward thoughtful and community-driven planning and provide Castilleja with the opportunity to continue serving our students and future leaders. I hope you will support their project.

Thank you,  
Dawn Billman  
Lincoln Avenue

**From:** [Irene Au](#)  
**To:** [Planning Commission](#); [Council, City](#)  
**Subject:** In support of Castilleja"s plans  
**Date:** Friday, November 13, 2020 2:53:41 PM

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Dear Planning and Transportation Commission,

My name is Irene Au, and I am a longtime resident of Palo Alto. I am writing to express my strong support for Castilleja's plans to build a modern campus that better serves their students. I sincerely hope that through writing this letter, I inspire you to address the imbalance of attention that has been given to a small number of critics in this process.

Castilleja is such an important part of our community, and the work they have put into crafting a plan that considers all interests is really remarkable. I personally know that on the issue of noise control, the school has taken many steps to mitigate the effects on the surrounding neighborhood. Castilleja held more than 50 individual and community meetings with neighbors for feedback, and the compromises they reached show real respect for the surrounding neighborhood.

I hope that you will continue working to create a clear path toward approval. I understand there is concern over rampant growth in Palo Alto, but this project does not fall in that category. The school has put forward a design with a lower FAR and no significant impacts. I know both of these facts are a disappointment to opponents, but they are true. This is not a development project that sets a bad precedent. It is a school that has listened to community feedback and compromised. It would set a terrible precedent to ignore the facts and limit educational opportunity.

After so many years of careful deliberation by the City, Castilleja, and community members, I encourage you to approve the school's plan.

Thank you,  
Irene Au  
Oxford Avenue, Palo Alto

**From:** [Lila Fitzgerald](#)  
**To:** [Planning Commission](#)  
**Subject:** Allow Castilleja to continue serving our community!  
**Date:** Friday, November 13, 2020 10:50:02 AM

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Dear Planning and Transportation Commission,

I am compelled to write to you after watching last week's PTC hearing. While this project has been met with outsized controversy, I believe that any effort to expand educational opportunity in our community is a worthwhile endeavor. The school's request is simple: to complete a much needed renovation to aging facilities, and to allow more girls to study on their campus. **The findings of the extensive FEIR support this request.**

Somehow along the way, I feel like the conversation about trust became out of hand. Opponents of the project have led decision makers like you to focus on their violation of ten years ago rather than all of the efforts they've made in recent years to do right by their neighbors. PNQL has led you to focus on their proposal with an unduly negative lens, and I ask you to please check the facts. It is **grossly** inaccurate to characterize Castilleja as an entity that can't be trusted. As Commissioner Roohparvar stated, Castilleja came forward about their violation, and **they "should not be punished for doing the right thing."** This is a school for girls—the only school of its kind in Northern California. This is a valuable asset that fills a void in our community, and they have focused for TEN YEARS on re-earning the community's trust.

As much as I wish this weren't the case, not every kid can thrive at Paly. It's a huge school, with a lot of opportunity to learn resilience and confidence, but for some kids, it's just plain overwhelming. Castilleja is a local option for those girls, and it supports mental health for students who aren't suited to the dynamics of a larger school.

It is easy to lose sight of this subject's inherent simplicity when there is so much noise surrounding the project. I hope you will allow Castilleja to continue serving our community by approving their master plan and enrollment, a project that is a great win for Palo Alto and the many girls, present and past, who have benefited from this all-girls education.

Thank you,  
Lila Fitzgerald  
Walter Hays Drive

**From:** [Sajjad Jaffer](#)  
**To:** [Planning Commission](#)  
**Cc:** [Suky Jaffer](#)  
**Subject:** Castilleja School Proposal  
**Date:** Thursday, November 12, 2020 9:25:49 PM

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Dear Planning and Transportation Commission,

I am writing in support of Castilleja school's proposal, but I want to draw attention to my concern about your recent vote to require daily electronic traffic monitoring. I am concerned for two reasons, first of all because it seems that the commission believes they are in common use in Palo Alto and second because the commission seems to feel they are justified in this project.

First of all, Stanford does NOT employ daily electronic traffic monitoring, as was stated in the hearing last week. Instead, Stanford only counts eight times a year for a week with temporary equipment. If Castilleja is going to be held to the same standard as Stanford, which is questionable in itself given the difference in scale, but anyway, if they are going to be held to the same standard, that does not involve daily electronic counts and the expense of permanent equipment. And, Stanford's measures are only of the peak inbound and peak outbound traffic. Their model does not monitor all trips. Asking Castilleja to do MORE than Stanford is beyond unreasonable.

Looking for a local nearby site that uses real-time electronic monitoring, Facebook has real-time equipment that reports to Menlo Park, but Facebook has 15,000 employees on site and is one of the most valuable companies in the world with \$71 billion in annual revenue. Castilleja has just over 100 employees and is a not-for-profit. I know that you CAN ask Castilleja to employ real-time monitors, but that doesn't mean that you SHOULD. I hope that you will reconsider this condition of approval because:

Stanford does not use them, so this is not a parallel application.

It is a stretch to put Stanford and Castilleja in the same category, but if you must, that would call for periodic third-party counts, not every day.

Castilleja's volume does not warrant this kind of monitoring.

It seems onerous to place this cost on the school; this is NOT Facebook.

Please look closely at the plans outlined in the FEIR. There is a way to do this by third party counts, at much less cost to the school and in a way that is not an undue burden on the school. The condition as it stands now does not feel fair or justified to me.

Thank you for your service and for your consideration of our request.

-Sajjad & Suky Jaffer, Bryant Street

Sajjad  
he/ him/ his

Sajjad Jaffer  
[sajjad@twosixcapital.com](mailto:sajjad@twosixcapital.com)  
(415) 937 1740

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**From:** cbhechtman <[cbhechtman@att.net](mailto:cbhechtman@att.net)>  
**Sent:** Saturday, November 07, 2020 6:33 PM  
**To:** French, Amy <[Amy.French@CityofPaloAlto.org](mailto:Amy.French@CityofPaloAlto.org)>  
**Subject:** Castilleja Conditions and Findings

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Ms. French,

Attached please find a document listing the specific changes to the draft conditions of approval which I proposed at the November 4th hearing. Also in the document are specific changes to the draft findings that I intend to propose and explain at the November 18th hearing.

I have not offered specific language for these changes, but rather I have tried to give clear enough direction so that, as to those changes which the Commission decides to recommend to the City Council, staff would be able to craft appropriate language after our hearing, and the Castilleja application could then move forward to City Council without needing to return to the PTC for a review of revised conditions and findings.

I ask that these be made available to the Commissioners and the public in advance of the 11/18 hearing (along with any public comments that come in).

Stay well,  
Bart Hechtman

## **Hechtman Castilleja Draft Conditions Revisions Proposed at 11/4/20 PTC Hearing**

### Generally

Set of minor clean-up changes to the draft conditions submitted before the meeting.

### Specific Conditions

6. Change the maximum number of special events per year to 74.
7. Require Castilleja to manage traffic at the PAUSD events.
9. State that the maximum summer enrollment is the same as the maximum academic year enrollment for the school year ending that summer.
29. Make clear that 29 does not apply to any violation addressed in MM 7a, which should be the exclusive method of addressing ADT and AM Peak overages.

## **Hechtman Castilleja Draft Findings Revisions to be Proposed at 11/18/20 PTC Hearing**

### Generally

Set of minor clean-up changes to the draft findings submitted before the meeting.

### Specific Findings

CUP Finding 2: in the first sentence after “zoning designation” add a parenthetical referencing Section 18.12.030, Table 1, where Private Educational Facilities are listed as a use allowed with a CUP.

Also, add a reference to the project’s consistency with the applicable development and parking standards. To do that, Table 4-2 of the Final EIR should be adapted to apply to Alternative #4 and included in this finding.

Finally, expand the last sentence to tie it to the Comp Plan and/or the zoning ordinance.

Variance Finding 1: Add to the list of facts supporting the finding that there current exist on the parcel 116,000 square feet of legal, countable, building square footage.

Variance Finding 3: Copy the entirety of CUP Finding 2 into Variance Finding 3, including the changes I proposed to that CUP finding. Also add analysis explaining why below-grade facilities are not included in GFA.



**From:** [Teri Llach](#)  
**To:** [Planning Commission](#)  
**Subject:** Regarding Castilleja  
**Date:** Thursday, November 12, 2020 4:01:02 PM

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Dear Planning and Transportation Commissioners,

I live on Churchill, and I am a nearby neighbor of Castilleja. Like so many other neighbors, I support the school. And like so many other Palo Altans, I support many of the residentialist ideas that have carried new City Council members into office in the most recent election. I care about protecting the quality of our neighborhoods.

Based on how the city voted just a few days ago, I see that leaders who support slower growth were successful in their bids. I can see why because I also support slow and thoughtful growth.

As someone who supports slow growth and supports Castilleja, I realize that PNQL has very strategically defined Castilleja's project as an "expansion" and growth accelerator - and placed the debate about the school within the larger debate about whether City leadership is selling the soul of Palo Alto to developers.

PNQL's campaign of untruths has had a surprisingly long run, but I am hoping that you are beginning to see through the false parallels. Yes, Palo Alto has grown and changed at lightning speed, and voters have begun to gravitate toward leaders who are mindful of and cautious about the future of our city. I appreciate that vigilance and support their goals. But Castilleja is completely separate from that entire conversation.

- First of all, Castilleja is not a greedy developer who wants to transform the fabric of our hometown for quick profit. Castilleja has been with us all along, and it is a not-for-profit school that offers over \$3.5M in financial aid.
- Second, Castilleja is not growing. The variance in the application is for reduced FAR; the square footage is going down; the rooflines will be lower; and the setbacks will be improved. They are increasing enrollment, and the FEIR shows that it can be done with NO IMPACT on the neighborhood.

Placing Castilleja into the middle of the city-wide debate about growth was a strategic tactic on the part of PNQL, but it falls apart when we look honestly at the mission of the school and the facts of the project. If we are really trying to save the soul of Palo Alto, let's support the schools. That is where all leaders who care about the future of the city should begin. Yes, carefully steward our city to face the challenges ahead, and begin with supporting this and all other schools.

Sincerely,  
Teri Llach, Churchill Avenue  
650-575-6913

**From:** [hwai](#)  
**To:** [Planning Commission](#)  
**Subject:** support of CUP and Master Plan  
**Date:** Thursday, November 12, 2020 3:07:41 PM

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Dear Commissioners,

I feel incredibly fortunate to be writing to you today as a Palo Alto resident. There are many things I love about our community, including a dedication to education, demonstrated leadership in sustainable development, and the residential feel that makes my neighborhood truly feel like home.

Something that concerns me, however, is how many City resources have been dedicated to Castilleja's campus modernization project. I do not understand how such a modest school project, one that should not be in the least controversial, has taken so much time and attention from our local leaders. I have to believe that this attention could be better spent on other, more substantial projects that are also needed by our community.

For that reason, I would like to request that you approve this project, and redirect resources to other development priorities.

Thank you for your time reading this email and thank you for making our community an amazing place.

Warm regards,  
Hwai

**From:** [Wileta Burch](#)  
**To:** [Planning Commission](#)  
**Subject:** Support for Castilleja Project  
**Date:** Thursday, November 12, 2020 1:59:31 PM

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Dear Planning and Transportation Commission,

Thank you for the opportunity to write today. My name is Wileta Burch, and I have lived in Palo Alto for 40+ years. And I have to say, I have watched the community embroiled in a fight over Castilleja's modernization project for nearly a decade, something I truly do not understand.

I have looked at the project myself, and to my eye, it appears to be very modest. A school is simply asking to modernize its campus and gradually add more students. And yet, the attention this project has gotten from City leadership and our community does not seem to match the project itself. It is my hope that the Planning and Transportation Commission and City Council can provide this project with the last approvals it needs so that we can spend our time and energy on other, more pressing matters for our community.

Please guide this project through by keeping perspective about what is really being asked here. The FEIR finds no impacts, so this is not a drastic change. And the variance is for LESS above-ground square footage. Are we really thinking that can't be supported? We aren't going to allow the school to build smaller buildings with lower rooflines and bigger setbacks?

I hope that you hear the voices of the many supporters of this project and create conditions that allow the school to thrive.

Thank you for your time,  
Wileta Burch  
Hemlock Court, Palo Alto

**From:** [Liza Hausman](#)  
**To:** [Planning Commission](#)  
**Subject:** Palo Alto resident supporting Castilleja's enrollment plan  
**Date:** Thursday, November 12, 2020 11:34:35 AM

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Dear Planning and Transportation Commission,

Thank you for providing me with the opportunity to submit my support for Castilleja's campus modernization plan. I felt compelled to write this note after overhearing some comments regarding a prior issue with the school's enrollment.

It is true: eight years ago Castilleja disclosed it was in violation of its enrollment cap. It is also true that as soon as the new Head of School Nanci Kauffman took over, this violation was remedied, enrollment was reduced, and the school has been in compliance with City requirements ever since. The school has been very transparent and worked hard to rebuild trust with the community - and will continue to be subject to enrollment audits by a third party.

I am a resident of Palo Alto and I hope you are gaining a sense of the extent of support Castilleja has within the community. There are a few critics who want to drive the school away by asking you to create unreasonable conditions of approval. I hope that the line of thinking that began last week during PTC's deliberations, addressing impacts, is one that can continue. With an eye toward impacts, the data in the FEIR can guide your choices about conditions of approval that are fair and reasonable.

"Cancel Culture" is alive and well, but I hope you will not forever write off the school for a mistake it made years ago (and came forward to report). And I do not believe that future students should be prevented from attending the school because of this error. I hope Castilleja can count on your support.

Sincerely,  
Liza Hausman  
Edgewood Drive, Palo Alto

**From:** [Patty Boas](#)  
**To:** [Planning Commission](#)  
**Subject:** Support Castilleja's Modernization Project  
**Date:** Thursday, November 12, 2020 8:57:30 AM

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Dear Planning and Transportation Commissioners,

I'm writing today in support of Castilleja's modernization project. I have followed this project closely for years, and after watching the recent hearings feel that it is my obligation to write to you. I know there are some in the community who believe this project should not move forward because Castilleja exceeded its enrollment cap eight years ago. I am deeply concerned that this rhetoric continues to be amplified, for a variety of reasons.

At recent meetings, some members of your commission noted that the fact that the Head of School alerted the city to the over-enrollment was a true sign of her integrity. I agree, and I admire Nanci Kauffman for coming forward herself to report the issue and face the consequences. This is *exactly* the type of leader you can trust. Since then, Castilleja has worked with the City to develop an amended CUP, reduced its enrollment, and has been in compliance with the City's enrollment reduction plan for years. To grant the school permission to enroll more girls would not be rewarding bad behavior, it would be moving forward with appreciation for the school's honesty and transparency in this process.

With regard to enrollment overall, I want to support the commissioners who have correctly identified that the issue is impact not enrollment. I completely agree that the students do not impact the neighborhood once they are at school, so there could be 415, 540, or 1,000, if the impacts do not change, the number doesn't matter. Since the school has a stellar record with TDM and outstanding results, if a gradual increase to 540 fills out their programs with no significant impacts for the neighbors, and the FEIR does confirm that fact, then the school should be granted that permission.

In my opinion, the school has worked for the better part of a decade to rebuild trust with the community. Ongoing complaints about trust can begin to feel like distraction created by some who do not have meaningful critiques of the project before you. For that reason, I hope you will remain focused on the merits of Castilleja's campus modernization plan, and that I can count on your support.

Thank you,  
Patty Boas, 1533 Dana Avenue

**From:** [Gerry Marshall](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja's project  
**Date:** Thursday, November 12, 2020 8:40:43 AM

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Dear Planning and Transportation Commissioners,

Thank you for the time and attention you have given to Castilleja School's proposal. My husband and I live across the street from the main entry to school on Bryant Street, and as a direct neighbor of the school's main entry point, I want to express my support of the school. I hope that it has become clear to you that I am not an outlier. There are many of us who live right next to the school who support this project.

Yes, I support the mission. Yes, I like seeing the students and faculty come and go each day. And, yes, I believe it helps all of Palo Alto to have an excellent girls school right here in our city. But those are not the only reasons I support the school's plans to modernize and increase enrollment. I support the school's proposal because there is no reason for me not to.

1.

The school handles traffic flow beautifully without back ups or queues. I have no reason to doubt that they will continue to do so. The school's plans for the future are thorough, and the traffic experts have studied this and found no impacts.

2.

The new building will improve our view considerably. It allows light through, the roof lines are lower, and basically the old building was never a beauty. I can't wait for the new one to take shape.

3.

The events the school hosts do not negatively impact our lives. We find it hard to believe there were 90 last year because they came and went without our noticing.

I realize that there are neighbors who oppose the project. I know you have been hearing their concerns loud and clear for some time. I don't mean to discount their voices, but I do want to add mine to the list of many supporters to achieve some balance in this conversation.

Finally, I want to point out that the driveway to enter the underground parking will be directly in front of my house, and I support this aspect of the project wholeheartedly. The entry will be hidden behind gentle landscaping, and I agree with the

Comprehensive Plan that it is better to move cars and parking below ground whenever possible.

Thank you,  
Gerry Marshall (1301 Bryant Street)

Sent from my iPhone

**From:** [linda lovely](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja campus Modernization  
**Date:** Thursday, November 12, 2020 8:12:32 AM

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Dear Planning and Transportation Commission,

I am a Palo Alto resident, the mother of three daughters who attended Palo Alto public schools, not Castilleja. I'm writing to encourage your approval of Castilleja's campus modernization project. I care deeply about sustainability and am happy to live in a community that also values the environment and green development. Castilleja's project sets a new bar for enduring environmentally-sound design and construction, exceeding both Palo Alto and California's sustainability benchmarks.

At your recent meeting I heard a mention of concern about possible inconsistencies in the code, and yet there are so many reliable experts who support the underground facility. **The FEIR supports underground parking. The Comprehensive Plan supports underground parking. Recent precedent at Temple Kol Emeth supports underground parking. The City attorney states that the code supports underground parking. The land use attorneys on the Commission support the underground parking. This is a very consistent set of findings from a broad set of sources.**

I realize there are community members who assert that the underground parking facility is not a green choice, and those assertions are counterfactual. The data in the FEIR prefers the underground structure over surface lots. Experts studied the impacts on the environment for YEARS. The facility does not negatively impact the water table, the air, the natural history, anything on the site. Years of thought and study back up the fact that the parking garage is superior. There is no need to revisit that work.

Please approve Castilleja's master plan, with the underground parking structure, and help Palo Alto maintain its position as a leader in sustainable development.

Best,  
Linda Lovely  
Lincoln Avenue

Sent from my iPhone



**From:** [John Rollins](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja Project  
**Date:** Thursday, November 12, 2020 7:18:14 AM

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Dear Planning and Transportation Commission,

I'd like to voice my support for the Castilleja campus modernization project. I am a close neighbor of the school, just a couple of blocks away on Waverley Street. I am pleased that Castilleja has spent the past eight years working with the community to develop the best project possible for Palo Alto, which has been validated by the FEIR.

The FEIR studied traffic impacts in great detail, arriving on a daily trip count that caused no significant impacts. Therefore, I'm concerned about the commission's decisions to reduce below that level. It seems a questionable choice to me to begin to exert limits that are not justified by the experts' data. As a body making decisions about the capacity of the school to enjoy its property rights without impinging on neighbors, you have a trip limit in the FEIR that allows just that. Why would you impose more drastic reductions when the FEIR does not deem them necessary—or justified? This choice is concerning and causes me to wonder whether this project is being viewed fairly and justly in this process.

An environmentally-friendly project that enhances the appearance of the neighborhood, expands educational opportunities for young women, and brings no negative impacts to the neighborhood is one that all Palo Altans can feel proud of. Although there are opponents who want more strict rules applied, these are also people who want the school to vacate completely. As you apply these more strict rules, you may want to ask yourself whether you are taking this too far. There is more than one way to drive the school away, and it would be a shame to create those circumstances unintentionally. The vast, vast, vast, majority of Palo Altans want to see Castilleja remain and thrive in our City. Please think more carefully about the consequences of limits that are not supported by data.

Thank you,  
John Rollins  
1801 Waverley Street

**John W. Rollins**  
[jwrollins3@icloud.com](mailto:jwrollins3@icloud.com)  
302.530.3210 (mobile)

**From:** [Lisa Van Dusen](#)  
**To:** [Planning Commission](#)  
**Subject:** My remarks at the 11/4/20 PTC meeting (for the record)  
**Date:** Wednesday, November 11, 2020 11:20:53 PM

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Dear Planning and Transportation Commissioners:

Thank you for the opportunity to address you at last week's PTC meeting (Wed. 11/4/20) on the topic of the Castilleja agenda item.

I am sharing my remarks in writing here below so that they can be reflected in the record. Again, my comments are entirely from my perspective as an individual and bear no connection to any organizational affiliation I may have.

With appreciation and encouragement for full approval of this project at your meeting next week on 11/18,

Lisa

Lisa Van Dusen  
+1 650-799-3883 | [lvandusen@mac.com](mailto:lvandusen@mac.com)  
[www.lisavandusen.com](http://www.lisavandusen.com)  
[twitter](#) + [Instagram](#) @lisavandusen  
[My TEDx talk on the Joys of Otherhood](#)

Good evening, Commissioners. Thank you for your time this evening. Please note that these remarks are strictly from me as an individual and in no way reflect any organizational affiliation I may have.

We often hear from opponents of Castilleja about this process feeling rushed. It is hard for me to sympathize with that assertion given that Castilleja has patiently worked with its neighbors and the City for over eight years. The first phase, the 3 ½ years of conversations with neighbors before the application was even submitted, comprised over 50 neighbor meetings, an extensive study of accessing campus directly from Embarcadero, and significant modifications to the school's plan.

The 2nd phase, the 4+ years of working with City staff from the time the CUP application was submitted in 2016 to the release of the F.E.I.R. in July of this year, involved additional significant plan modifications, reductions in the number of events and car trips allowed, and more stringent standards and

heightened consequences for any CUP violations.

We are now in phase 3, the public hearing phase, where you and the other public officials are tasked with reviewing the record and making decisions on the application. The proposal before you is the result of all of these conversations and adaptations in response to neighbor, City, PTC, and ARB feedback and for that reason, it is ripe for a decision.

As I review the materials, what rises to the surface is that everyone is getting something and no one party, including Castilleja, is getting everything. This is the nature of compromise.

- Those who want fewer cars parked on neighborhood streets are getting an underground parking facility.
- Those who are concerned about the alleged institutional feel and size of the original garage design are getting a smaller underground parking facility that preserves houses and trees, creates more green space, and is characterized by an unobtrusive and beautifully landscaped garage entrance and exit.
- Those concerned with the massing of the buildings along Kellogg get a façade compatible with the neighborhood aesthetic, with reduced building heights and increased setbacks, and a design that breaks up the linearity of the eave and roofline.
- Those concerned about noise get a significant reduction in school-related noise. Eighty-five percent of adjacent residential residences are estimated to have a decrease or no change in noise levels. Of that 85%, half are estimated to see a decrease in noise levels. Most impressive, 28.5% of adjacent residences are estimated to see a decrease of at least

12 decibel points, which is more than double the amount that is considered to be a significant improvement.

- Those tired of hearing and seeing delivery vehicles, waste management trucks, and school buses are relieved of this burden through moving these activities to the center of campus and, in most cases, below grade. This is an enormous investment that Castilleja is making on behalf of neighbors.
  - Those concerned about events get a 22% reduction from current numbers, a more clearly defined set of rules than under the current CUP, fixed hours of operation, and elimination of events on Sundays.
  - Those concerned about traffic get the most stringent, detailed, and closely monitored TDM requirements and penalties ever imposed by the City of Palo Alto.
  - Those concerned about the cost to Palo Alto and Castilleja not paying taxes should note that 1) thousands of Palo Altans who have sent their daughters to Castilleja over the years pay property taxes that benefit the PAUSD while not using its services 2) Castilleja will contribute funds to resolve the citywide impact at Kingsley and Alma, and 3) the school will pay for a robust TDM program that will serve as a model for other Palo Alto institutions.
- 
- Those concerned about the value of their homes retain a school that attracts homebuyers to the neighborhood and, according to realtors, enhances home prices.

- Those who prioritize the education and advancement of women over their own self interests retain a nationally recognized school in their neighborhood and preserve the joy of seeing motivated and inspired girls and young women from a diversity of backgrounds in the neighborhood.
- Palo Altans interested in providing their daughters with an all-girls education will have greater opportunity to do so with more spaces in the high school.
- The City of Palo Alto retains an educational institution that for over 100 years, along with PAUSD and Stanford, has supported Palo Alto's reputation as a center of educational excellence.
- Silicon Valley secures an enhanced resource that provides female graduates eager to join the world of technology at a time that the valley is suffering from a dearth of female engineers, scientists, and leaders.
- While giving up a lot and putting itself under a microscope, Castilleja ultimately gets to fulfill and enhance its mission of educating girls and young women for leadership.

As you have heard, this proposal is better for everybody and perfect for no one. Thank you for your attention and for approving Castilleja's significantly modified proposal this evening so that after all of this time it can finally move forward to City Council.

###

**From:** [Shaila Sadrozinski](#)  
**To:** [Planning Commission](#); [Council, City](#)  
**Cc:** [Baird, Nathan](#); [Hur, Mark](#)  
**Subject:** residential parking permit program changes  
**Date:** Wednesday, November 11, 2020 1:55:07 PM

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Dear Members of the City Council and the Planning & Transportation Commission,

As a resident of the Southgate neighborhood, where we have the parking permit program, I am very upset to learn that the Office of Transportation is converting to an all-digital permitting program and considering eliminating the physical hang-tag permits that residents are able to use for guests.

Having only daily online access to acquiring guest permits not only makes this an unnecessary burden to residents, but also represents a significant increase in cost. Until now, the hang-tags cost the same and were valid for the same period as the sticker permits; if a resident had two different guests at different times on the same day, no additional permit was needed.

When we had out-of-town guests visiting for a few days, we could have them use the same hang-tag; under the new proposal, we would have to remember to go online every day to get another daily permit.

I am a senior citizen, not very comfortable with doing things online, and having to remember to go online every time I need a permit for an unexpected guest will be an unacceptably stressful situation. Some elderly residents have caregivers coming to the home every day and they may not have easy access to the internet; some older residents may not even have a computer.

I have already written to Nathan Baird and Mark Hur, but am bringing these points to your attention, so that you are aware of these concerns before new rules are set in stone.

Thank you,

Shaila Sadrozinski, 62 Churchill Ave

**From:** [Lesley King](#)  
**To:** [Planning Commission](#)  
**Subject:** In support of Castilleja Project  
**Date:** Tuesday, November 10, 2020 3:40:47 PM  
**Attachments:** [CastiPTC.pdf](#)

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Dear PTC Commissioners-

I am attaching my letter in support of the Castilleja Project. Thank you for your service to our beautiful town.

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Lesley King  
203.536.5851

"My work with the poor and the incarcerated has persuaded me that the opposite of poverty is not wealth; the opposite of poverty is justice. " - Bryan Stevenson, Just Mercy

November 10, 2020

Dear Palo Alto PTC Commissioners –

My name is Lesley King, and I am a resident of Old Palo Alto right around the corner from Castilleja School. I want to speak in support of Castilleja School, as I have heard some of the discussion around events on campus and I don't think the level of scrutiny is warranted. These are the comments I made during the meeting last week on Zoom.

Thank you for your service to the town. I have heard a small number of opponents of Castilleja point to a few schools like Hillbrook, Stratford, and Pinewood (although erroneously as it turns out). In contrast, I have looked at Menlo, Sacred Heart, and Crystal Springs - schools that are much more comparable to Castilleja in type and location - and I found that none of them have any restrictions on events under their CUP's. NONE.

The CUP for Serra High School, a boys' school on ten acres in a residential neighborhood in San Mateo, only places a limit on events that fall after 10pm Monday through Saturday and 6pm on Sunday. Castilleja NEVER has events that run past 10pm on Monday through Saturday, and Castilleja has no events at all on Sundays. This means that 100% of Castilleja's current events would be permitted under that residential CUP.

But let's get back to this site on Bryant, Castilleja's home for 110 years. Careful reading of the current CUP shows that Castilleja is well within its rights to hold the number of events it has been:

The current CUP clearly allows:

- 5 Major Events that bring almost all parents and students to the Campus
- Then for events with 50-100 visitors, the CUP includes a long and open-ended list of event types, including student seminar evenings, science exhibitions, dances, and school performances. The school is allowed to have several of each type listed, plus others that are not specifically defined.
- There are no specific restrictions on the number of events between 100 and "almost all Parents and Students."

The 22% reduction in events in Castilleja's conditions of approval is a big concession and one that Castilleja has made in the spirit of compromise.

I would like to see us stop debating this item as Castilleja has already made a dramatic reduction. Instead I would like to see the town move this project forward in support of providing young women with a range of experiences – and yes that includes dances, plays, music recitals, dance performances – the kinds of events enjoyed by students at both co-ed and all-boys schools.

I don't believe that Palo Alto wants to inappropriately restrict an all-girls school while its co-ed and all-boys rivals thrive in other towns such as San Mateo, Hillsborough, Mountain View, and Atherton. As a Palo Alto resident I desperately hope that you agree with me. Please approve the current plan so that we can all move on.

Thank you,

Lesley King  
249 Lowell Palo Alto



**From:** [cathy williams](#)  
**To:** [Planning Commission](#)  
**Subject:** Support Castilleja  
**Date:** Tuesday, November 10, 2020 2:44:58 PM

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Dear planning commission:

My name is Cathy Williams. I am another neighbor who wants to support of Castilleja. Castilleja is a thoughtful and considerate neighbor. I appreciate their success in reducing traffic by up to 31% so far. As other people have noticed, no one else in Palo Alto has been able to achieve these results.

I also appreciate how much Castilleja has worked to gather and listen to neighbor and community input. With over 50 meetings and eight years of revising the proposal, they now have a project that is better than the one they started with. The underground parking, which was added to the project in response to neighbor feedback, is now as small as it can be and still meet city parking requirements. This change has saved trees and homes. It also moves cars below ground, which I appreciate.

I am impressed with the significant compromises Castilleja has made in response to neighbors, including:

- Changes to the building on Kellogg to reduce the massing
- Preserving trees and increasing the number of trees overall
- Protecting two homes
- Reducing the number of events
- Reducing the number of deliveries and moving them below grade
- Building a sound wall around the pool
- Making sure drops off mirror current patterns
- Ensuring and increasing safety along the Bike Boulevard

- Reducing the above-ground square footage
- Adding gentle landscaping and increased setbacks

Honestly, the list goes on and on. Castilleja has improved this project in all areas, and the new campus will be more beautiful, more suited to the neighborhood and more environmentally sound. I realize there are a few very vocal neighbors who oppose this project, even after these significant improvements. It is beginning to seem that no matter what, they will never be satisfied unless Castilleja vacates Palo Alto. How sad and disappointing that would be for our city to allow these few voices to drive away an excellent school and a thoughtful neighbor.

I am so glad you are hearing from so many of us who are near neighbors in support of this project. In recent hearings, and in the letters you are receiving, you can finally see how many of us there are who want to see this school thrive—without making any significant impacts. In fact, their updates will bring positive changes to my neighborhood. Please approve them.

Warm regards,  
Cathy Williams

**From:** [Tom Kemp](#)  
**To:** [Council, City: Planning Commission](#)  
**Subject:** Letter in support of Castilleja project  
**Date:** Tuesday, November 10, 2020 12:37:43 PM

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Hi Councilmembers of the City and the PTC --

I am a 20+ year resident of / voter in Palo Alto who supports preserving neighborhoods. I also support healthy schools as an essential element in healthy neighborhoods.

I first and foremost want to express my support for the Castilleja project. They have jumped through every hoop over the last 8 years and have provided a world-class plan that met the requirements of the city's ARB. As you know other Palo Alto schools, businesses, churches, etc. have been able to enhance their facilities, and I am not sure why Castilleja should not be afforded the same opportunity in light of the massive amount of effort to address community concerns.

I also want to discuss exaggeration and misrepresentation I hear about events at Castilleja. Under its Conditional Use Permit Castilleja may hold five large events each year, far fewer than many neighborhood schools host. Since neighbors have voiced concerns, Castilleja has been scaling back. Many residents of Palo Alto ask why Castilleja does not open its facilities to the public. As a former board member of the Palo Alto Girls Softball (PAGS) and softball coach of Palo Alto girls fastpitch teams for 8 years, I would have loved to be able to use the Castilleja softball field, but it is not available. This is because the terms of the Conditional Use Permit do not allow it. I'm sure the school would want to find a way to invite neighbors to hear speakers or attend open forums if their CUP allowed it.

Meanwhile, the word "event" is a misnomer for most of the activity that takes place on campus. These aren't events, they are just meetings with counselors or teachers or class deans. These are named and counted as events—and they are cited by some neighbors as excessive—but really they are just the *regular programming* of a school.

Truthfully many of these meetings include fewer than 10 people, the equivalent of PTA sub committees. Not something that could accurately be called an "event" at all. In the end, these PTA meetings have been quietly taking place on this campus for generations and should be allowed to continue to do so. This activity does not harm a residential neighborhood. It strengthens it.

I urge you to vote in support of the Castilleja project.

Yours truly  
Tom Kemp  
Resident of Midtown Palo Alto

**From:** [Andie Reed](#)  
**To:** [Planning Commission](#)  
**Subject:** Moncharsh letters  
**Date:** Tuesday, November 10, 2020 9:34:49 AM

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Dear Commissioners:

Thank you for studying these important issues for the next PTC meeting, including the latest 4 letters from Ms. Moncharsh that address the Variance and the Conditions. Because they are hard to find, we are making it as easy as possible to access them.

Provided below are the links to the Public Comment section of the PTC page of the City of Palo Alto website. Click the link and scroll down to the pages indicated to get to each Moncharsh letter listed.

**Moncharsh FAR and Variance Letter w/attmts 10-8-2020**, pages 14-50 of the link below:

<https://www.cityofpaloalto.org/civicax/filebank/documents/78759>

**Moncharsh Variance Letter w/attmts Oct 26, 2020**, pages 80-140 of the link below:

<https://www.cityofpaloalto.org/civicax/filebank/documents/78977>

**Moncharsh 1st Letter re CUP w/attmts Oct 28, 2020**, pages 20-47 of the link below:

<https://www.cityofpaloalto.org/civicax/filebank/documents/78977>

**Moncharsh 2nd Letter re CUP w/attmts Nov 1, 2020**, pages 36-73 of the link below:

<https://www.cityofpaloalto.org/civicax/filebank/documents/79062>

Thanks for your attention to this matter,  
Andie Reed  
PNQL

--

Andie Reed CPA  
160 Melville Ave  
Palo Alto, CA 94301  
530-401-3809

**From:** [Teresa Zepeda Kelleher](#)  
**To:** [Planning Commission](#)  
**Subject:** Support for Castilleja's expansion project  
**Date:** Monday, November 9, 2020 3:45:36 PM

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Dear members of the City of Palo Alto Planning Commission,

I am a Castilleja parent and a close neighbor to the school. Castilleja is vital to Palo Alto. I know that opponents focus on the fact that only 25-30% of students reside in Palo Alto, but they do not add that among the different communities Castilleja draws from, Palo Alto students far outnumber those coming from any other place. The school directory has page after page of names of students who live in the 94303, 94301, and 94306 zip codes.

Still, I'm sure many of you know girls from Palo Alto who were disappointed because they were not admitted. With the high school at about 60 students per grade, it's incredibly hard to get in; maybe 10 or 12 students are admitted each year. Deserving and talented girls are turned away because there isn't enough space. Meanwhile, the Environmental Impact Report proves that we can make space for these students without negatively impacting the neighborhood. It completely mystifies me that anyone is struggling over this choice. Allow more girls to benefit from this education without impacting the neighborhood. This should not be a politicized issue, and one very small school is not to blame for the traffic on Embarcadero and the growth in Palo Alto.

Castilleja places Palo Alto on the map of cutting-edge learning for girls because Castilleja is frequently ranked as the #1 girls' school in the country. This force within our community only serves to elevate the women's issues and drive for educational equity and professional parity that our entire city cares deeply about. Castilleja is a mission-driven not-for-profit that furthers the ideals of our City and works to amplify women's voices in all corners of our community.

Thanks,  
Teresa Kelleher  
512 Coleridge Ave.  
Palo Alto

**From:** [Bill Burch](#)  
**To:** [Planning Commission](#)  
**Subject:** My comments from the Nov 4th PTC virtual meeting  
**Date:** Monday, November 9, 2020 10:57:31 AM

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Dear Commissioners,

I wanted to thank you for allowing me to speak at last week's meeting. Pasted below are my comments that I would like included in the public record.

Sincerely,

Bill Burch  
777 Marion Avenue  
Palo Alto, CA 94303

*My name is Bill Burch and I have been a Midtown resident of Palo Alto since we bought our home in 1983.*

*Tonight I want to call the Commission's attention to the issue of Floor Area Ratio and Castilleja's request for a variance. As you are aware, the school has been located at 1310 Bryant Street since 1910. This was long before any of the surrounding homes were built and prior to the introduction of residential zoning codes. The Chapel Theater and the Gunn Administration Building were built in the early 1900's and to this day they are included in the "above-ground floor area" on the Campus. In the 1960's, Castilleja applied for and received zoning permission to build additional academic buildings. The permission to add those buildings predates the current codes for "Floor Area Ratios"*

*Now, fast forward to 2020 and Castilleja's need to rebuild those buildings. In order to do so, they have to apply for a zoning variance simply to replace existing buildings. But here's the kicker...Castilleja's variance request is to actually reduce the above-ground square footage from current conditions.*

*Yes, that's right. The variance will grant Castilleja the ability to make the above-ground square footage of their campus buildings SMALLER than it is right now.*

*To me it would seem that this is a WIN-WIN and should be easy to approve. And the cries by PNQL's "Stop Castilleja Expansion Campaign" seem alarmist and dishonest when held up against the realities of the project and this Floor Area Ratio variance request.*

*The Floor Area Ratio is reducing, and the above ground square footage will be smaller. That is not an "expansion" at all.*

*I hope that you will use this example of how the facts undo the rhetoric to explore other ways that opponents have distorted the facts.*

*There will be 50% more trees on the new campus than there are now. There will be no more additional cartrips. And the list goes on. I ask that you please carefully attend to the facts and approve this project.*

*Thank you for your time and consideration.*



**From:** [Parag Patel](#)  
**To:** [Planning Commission](#)  
**Subject:** In support of Castilleja's CUP  
**Date:** Monday, November 9, 2020 8:05:58 AM

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Dear PTC:

I live in Palo Alto and writing in support of Castilleja's application for a variance to maintain their current Floor Area Ratio (F.A.R). This variance will not increase the F.A.R., instead it allows the school to retain its current F.A.R. In addition, the plans the school had submitted actually reduce the above-ground square footage of the structures on campus.

This variance request is consistent with the Palo Alto Comprehensive Plan and would not allow an increase in Castilleja's square footage compared to what exists today, thus not causing a significant environmental impact. Due to the large size of Castilleja's lot compared to other residential lots in the surrounding zone, the F.A.R. for the school is in proportion to the size and scale of the surrounding residences. Not allowing Castilleja to maintain its F.A.R. would be a hardship to the school as it would treat them differently than the other lots on a relative basis.

Castilleja had been on this site since 1907, since long before this neighborhood could be classified as residential because there was no zoning code then. This establishes precedent - the City has historically issued Castilleja its CUPs to operate as a school and build to support school use.

Castilleja can make these improvements and maintain the integrity of this historic neighborhood. This will not add density to the City because the F.A.R. is being maintained. With a Final Environmental Impact Report with no significant impacts and established precedent, this decision to approve the variance for the current F.A.R. seems straightforward.

On a different but related note, I want to highlight that over the past two PTC public meetings, something like 60 members of the public spoke about Castilleja's plans, with >40 speaking in favor. I also counted approximately 18-20 people who live within 1-2 blocks of Castilleja's campus speaking in favor of the school's plans. This reinforces comments I have made earlier to the PTC that there is a very significant majority of Palo Altans for Castilleja, who have traditionally been silent, but very supportive.

thank you,  
Parag Patel

**From:** [Suzanne Keehn](#)  
**To:** [Council, City](#); [Planning Commission](#); [Shikada, Ed](#)  
**Subject:** Castilleja  
**Date:** Sunday, November 8, 2020 8:25:37 PM

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Dear Planning Commissioners and City Council Members:

I am reading about Castilleja's project being shoved through the City boards and commissions at a very fast pace, and without time for any of the deliberating bodies to understand and digest the very complicated issues. Particularly when you consider the Conditions that will make up the Conditional Use Permit that the neighbors will have to live with for 20 years. I hope with this continuance to 11/18 that the Commissioners have time to read all the information supplied by the neighbors and make sure and answer their questions, particularly about the garage.

The fact that the school gets all their parents and others who work there to speak and say what a wonderful neighbor the school is; how do they know? They don't live there. They are all reading the same points provided by the school. You can easily tell the difference between school supporters claiming to be neighbors and the real neighbors. Citizens should get heard, not parents. Don't let this be another President Hotel mess; stop it now. Reduce the enrollment increase and then the school won't need the underground garage. What school in Palo Alto has an underground garage in an R-1 neighborhood? None. Why this exception?

Thank you,  
Suzanne Keehn  
94306

**From:** [Vania Fang](#)  
**To:** [Planning Commission](#)  
**Subject:** my comments at the 11/5 ARB meeting regarding Castilleja's modernization project  
**Date:** Friday, November 6, 2020 4:26:21 PM

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I am joining the hearing again today because I live directly across from Castilleja School on Kellogg, and therefore, I am very invested in this process. The last time I spoke, I shared my gratitude to Castilleja for the thoughtful design plans for the new campus. I look forward to the new building, and as I mentioned before, I especially appreciate the gentle entry on Kellogg, because it is subtle and beautifully landscaped. The current drop-off patterns do not negatively impact us as direct neighbors, and I want to reiterate that I am happy those will be the same on the new campus.

Castilleja has been a good neighbor to us in so many ways—with excellent traffic monitoring, no school parking outside my home, and quiet students who we are happy to see again now that campus has reopened to small groups. During the past ARB and PTC meetings I attended, traffic and noise were often raised as concerns about Castilleja's modernization project.

As a direct neighbor, I honestly have never experienced any traffic or noise issues from Castilleja. We used to live near a neighborhood school prior to relocating to our current house, every morning going to work we would be stuck behind a long queue of cars doing drop-offs as well as yielding to heavy pedestrian traffic. None of that happened at Castilleja. Traffic was always well managed, and never overflowed onto the neighborhood streets. In fact, we experience much more traffic problems as we approach the nearby Palo Alto High School, but we accept the fact because we bought our home knowing it is close to schools. While I understand that public schools go through a different traffic regulation process, to me as a neighbor, Palo Alto High and Castilleja are both schools. Castilleja is not the source of traffic issues in this neighborhood now and I believe this fact will remain unchanged with the new campus.

Regarding noise, we rarely hear any sound from Castilleja, and remember we are almost directly across from Castilleja's pool. On the rare occasion that we do hear something, it hardly qualifies as noise. It is a school after all and schools should not be silenced.

I know at the last hearing, as a board you had suggested further adjustment to reduce the massing on Kellogg, and now that I see the changes the architects have made, I understand why that was important. I appreciate the new setbacks along the second story roofline, and I think these incremental changes from the past two hearings now add up to a very different and much-improved result.

I think this modernized building will be a new way that Castilleja will improve as a neighbor to me, creating a space that is beautiful and warm and scaled to match the textures and variety of our neighborhood. I am excited for this project to move forward, and I thank you for your guidance and expertise in this process. I urge you to support this with a final vote today, because I want to see this process start, and I also want our neighborhood to be able to move forward.

**From:** [Roger Mccarthy](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja's Expansion Approval  
**Date:** Friday, November 6, 2020 3:54:23 PM

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My name is Roger McCarthy and I live a few blocks from Castilleja School at 650 Waverley Street. I have had no connection to Castilleja, past or present. I have never set foot in the place. I strongly feel that it is time to approve this project. In fact, it is well beyond time. If these poor Castilleja folks weren't so dedicated, they would have given up a long time ago.

The fact is Silicon Valley is dominated by men—from the entry level positions to the highest leadership roles. I have worked my entire career in the tech industry and have recently been the Membership Committee Chair of the National Academy of Engineering. At the national level, in technology, we suffer the same huge gender imbalance.

So what are you going to do? Wait for someone else to solve this problem? Again???? Palo Alto has an incredible opportunity to address this problem. We desperately need women in Engineering and Technology to make our products, our culture, and our world better. And we need to STOP talking about the problem and START doing something about it. A key part of our national solution to this problem is the all-girls school.

Study after study proves that graduates from all-girls schools are more SIX times more likely to pursue careers in STEM[1], and THREE TIMES more likely to pursue a career in engineering[2]. We have the SECOND BEST all-girls school in the entire NATION[3], and the only nonsectarian one in California, right down my street.

Co-ed schools will not solve our huge STEM gender imbalance, which stands in mute testimony to their long term ineffectiveness. Our huge gender imbalance is NOT going to improve without change, and what are doing now in our nation, including in Palo Alto, is not enough. We need to do MORE. We need to do MORE NOW. This problem is NOT going to solve itself. We need to allow Castilleja to admit more girls now because we can't sit back and wait for change. We have to make choices to actively promote change. We certainly can't wait for the red states to do it. And we simply can't allow NIMBY to obstruct the futures of our daughters.

You have a chance to make a difference here. The world needs girls and young women to see themselves as computer programmers, scientists, and engineers. You know we are facing steep challenges. We need all the nation's talents! We need all of the brightest, most creative, most resilient, and most insightful people in the room. Many of those people are women. You are the people who can open this door to more girls in STEM. It is well beyond time.

Solving the gender imbalance in tech is far more important to all of us than tree roots and traffic.

Dr. Roger L. McCarthy

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[1] <https://www.theglobeandmail.com/news/national/education/how-a-single-gender-environment-can-leads-girls-to-choose-a-stem-career/article26498295/> (accessed 6 November 2020)

[2] [https://www.heri.ucla.edu/PDFs/Sax\\_FINAL%20REPORT\\_Sing\\_1F02B4.pdf](https://www.heri.ucla.edu/PDFs/Sax_FINAL%20REPORT_Sing_1F02B4.pdf) (accessed 6 November 2020)

[3] <https://www.niche.com/k12/castilleja-school-palo-alto-ca/> (accessed 6 November 2020)

**From:** [Jeannine Marston](#)  
**To:** [Planning Commission](#)  
**Subject:** Letter in support of Castilleja Project 11/4  
**Date:** Friday, November 6, 2020 11:01:46 AM  
**Attachments:** [Letter to Planning Commission.pdf](#)

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Please see attached letter. Thank you.

To: Planning Commission, City of Palo Alto  
From: Jeannine Marston, 1921 Waverley Street  
Re: Castilleja School Project

11/4/20

I have lived for forty-four years in the neighborhood of Castilleja. My family members have attended both public and private schools here. I am a former teacher, and currently volunteer for an organization that supports under resourced students in East Palo Alto. When I talk to my neighbors and friends, they state their clear support for the Castilleja--a school featured in the city's own Centennial history book--- a school that represents a legacy, a pillar value of Palo Alto: education.

I listened carefully last week to the council's intelligent questions about enrollment. Increasing the high school enrollment aligns perfectly with other Palo Alto goals to democratize housing opportunities, our parks and other areas of city life. Allowing more upper school students grants spaces for girls from different backgrounds, including more first generation college students, a category Castilleja has tripled the past four years. Students of color represent over 50% of the enrollment. Diversification efforts can help address old city-wide disparities. Recently, two African American Castilleja alums, one a local physician and one an engineer, spoke about their education as empowering. Palo Alto has an opportunity to increase equity and inclusion by supporting Castilleja's plan. Increasing the size also makes for a much stronger program - and having a better program is better for Palo Alto. Castilleja is the only high school in the region - public or private - that doesn't increase its size between middle and high school. Especially at upper level classes, you need a critical mass of students to support collaboration and inspire dialogue. More students will allow a greater breadth of class offerings. And outside the classroom, Castilleja needs more students to support its athletics, music, and theater programs.

The Final Environmental Impact Report assures us there are no significant negative impacts AND a great benefit: to maximize the utilization of a key

resource--an excellent education for women. Let's believe the science and the data in a report you have judged complete.

I pass Bryant and Kellogg every day, and I personally look forward to a new, beautiful, green campus that enhances the neighborhood, and yes, enhances the values of local homes.

The school is committed to doing this project carefully. For eight years they committed precious resources to meeting the neighbor's and city's requirements. Other schools in Palo Alto have grown and modernized. Castilleja is asking to do both responsibly. And when the question arises what Castilleja graduates do for the community? My answer includes that they make Palo Alto proud---just the way Paly and Gunn graduates do--- and carry the Palo Alto name and its hundred year plus core commitment to education excellence where they go, work and live.

Thank you for your service to our community. -----Jeannine Marston

**From:** [James Smith](#)  
**To:** [Planning Commission](#); [Council, City](#); [Castilleja Expansion](#)  
**Subject:** Please Support Castilleja  
**Date:** Friday, November 6, 2020 10:22:57 AM

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Dear Mayor Filseth and members of City Council,

My name is James Smith and I live in Los Angeles, CA. I am writing to express my support for Castilleja School's new Master Plan and Conditional Use Permit application.

I am very happy that the DEIR found Castilleja's proposal to be 100% compliant with Palo Alto's Comprehensive Plan. The school and the City predate all of us and have a rich history together. Through this proposal, we hope to create the best possible future for the school, the neighborhood, and the City.

The DEIR supports Castilleja's project in many important and exciting ways, including a new campus design that is more compatible with the surrounding residential neighborhood; LEED Platinum Environmental measures that surpass Palo Alto's sustainability goals; a Traffic Demand Management Program that could allow for increased enrollment without increasing daily trips to campus; and an underground garage that is preferred over surface parking.

Castilleja was founded 112 years ago to equalize educational opportunities for women. I support Castilleja because Muchas gracias. ¿Como puedo iniciar sesion?.

I hope you will support Castilleja as it seeks to modernize its campus and gradually increase high school enrollment while minimizing its impact on the neighborhood.

Sincerely,

James



**From:** [Cindy Chen](#)  
**To:** [Planning Commission](#)  
**Subject:** Supporting Castilleja's Master Plan  
**Date:** Thursday, November 5, 2020 7:15:27 PM

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I have lived in Old Palo Alto for over 10 years, just 5 blocks away from Castilleja, and I appreciate the incredible work that the school has done listening to neighbor concerns and modifying their plans accordingly. I have followed this project closely for years, including the fact that neighbors asked for an underground garage to accompany any campus modernization.

As I look at the plans now—with a smaller underground parking, improved aesthetics, preserved redwoods, fewer events, outstanding traffic management—I firmly believe it's time for this process to draw to a close and for Castilleja's Master Plan to be approved. The FEIR finds no impacts. The proposal is in compliance with the Comprehensive Plan. I truly don't understand this resentment and hostility around a school.

The school has modified and modified, and now it's time to recognize the plan for what it is: one that gives more opportunity to students with no negative impacts. I am a strong proponent of increasing the size of the upper school as long as car trips do not increase. This will increase access for young women, something Palo Alto should be proud of.

In terms of noises from Castijella events, I don't hear anything and have any concerns. Periodically, in fall months, from PALY football games, I would hear enthusiastic cheers from fans and music from the marching band. To be honest, during these months of Covid-19 sheltering-in-place, I miss these sounds. To me, the cheers and music represent a vibrant community.

The immediate neighbors knew they'd be living in a home adjacent to a school with drop-off and pick-up, events, and the joyful sounds of students in the neighborhood. I urge you to recognize the responsiveness of the school; approve plans to modernize campus and increase enrollment, and put forth the mitigations necessary so that the community can move forward.

**From:** [Jeff Levinsky](#)  
**To:** [Nguyen, Vinhloc](#)  
**Subject:** Fw: Powerpoint for tonight's PTC Meeting  
**Date:** Thursday, November 5, 2020 1:53:33 PM  
**Attachments:** [CastillejaPTC2020-November-4.pptx](#)

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Hi Vinh:

Please include my slides from last night (also attached to this email) in the next batch of PTC letters from the public, if you haven't already.

And thank you so much for your professional and efficient handling of city Zoom meetings. I, along with many others, are impressed with how smoothly you make the meetings flow and how evenhanded and fair you are to every speaker.

Jeff

----- Original Message -----

**From:** [Jeff Levinsky](#)  
**To:** [Vinhloc Nguyen](#)  
**Sent:** Wednesday, November 4, 2020 2:38 PM  
**Subject:** Powerpoint for tonight's PTC Meeting

Hi Vinh:

Please find attached my slides for tonight's meeting. I think you have from Andie the names of the four people who will yield me time.

Thanks very much,

Jeff Levinsky

# Castilleja

# FAR and Variance

November 4, 2020

Jeff Levinsky

# Underground Parking

Clearly doesn't meet the code definition of basement

18.04.030(a)(15) says:

“Basement” means that portion of a building between the lowest floor and the ceiling above [...].

The underground parking is not a portion of some larger building

# Footprint Rule

18.12.090(a) says:

Basements may not extend beyond the building footprint and basements are not allowed below any portion of a structure that extends into required setbacks, except to the extent that the main residence is permitted to extend into the rear yard setback by other provisions of this code.



How does this invalidate the footprint rule?

# Kol Emeth “Precedent”

- Not equivalent to Castilleja, as Kol Emeth underground garage was a portion of a building and thus was a basement
- Was in a staff report for only a preliminary review, not a regular ARB hearing
- Staff report didn't explain the reason for the exemption

# Kol Emeth Staff Report

According to PAMC Section 18.12.090(a), Permitted Basement Area, basements may not extend beyond the building footprint and basements are not allowed below any portion of a structure that extends into required setbacks, “except to the extent that the main *residence* is permitted to extend into the rear yard setback.” The proposed structure is not a residence, so the underground parking facility may be allowed beyond the building footprint, as long as the Performance Criteria (18.23) for non-residential uses adjacent to residential uses are met.

# Kol Emeth Would be a Terrible Precedent

- Every R-1 lot structure that is not a residence (e.g., detached garages, pool houses, backyard offices, ...), can have a basement that:
  - Extends beyond the building footprint
  - Extends into setbacks
- Were such fence-to-fence basements truly the intent of the rule?



# So Castilleja's Garage Should Count as GFA

- It's not a basement
- Even if it were, it's not under a footprint
- Rather, it is an "accessory structure"
- Accessory structures greater than 120 sq. ft. are gross floor area

# Variance Eligibility

- Staff report doesn't explain the full variance rules
- The Castilleja FAR variance would violate many rules

# The Floor Area Rule for R-1

Your allowed Floor Area is:

- 45% of first 5,000 sq. ft., plus
- 30% of every additional sq. ft.

Castilleja gets more GFA than smaller R-1 lots.

But ... it would like FAR of 0.42 – the same as tiny 6,250 sq. ft. lots

# Claim of Special Circumstances

## 18.76.030 (c) Findings - General

Neither the director, nor the city council on appeal, shall grant a variance, unless it is found that:

(1) Because of special circumstances applicable to the subject property, including (but not limited to) size, shape, topography, location, or surroundings, the strict application of the requirements and regulations prescribed in this title substantially deprives such property of privileges enjoyed by other property in the vicinity and in the same zoning district as the subject property.

# “Properties in Vicinity and Same Zoning District”

Staff report doesn't list these!!

There are 33 other properties on Castilleja's block and across a street – all in the R-1 zoning district

91% have FARs lower than 0.42 – so they too don't have what Castilleja wants

Only 9% of the nearby properties are enjoying what the staff report says Castilleja is unfairly deprived of

# Staff Report Needs Correcting

From Draft Variance Findings:

“The size of the campus (at 268,765 sf) is substantially greater than any other lot in the R-1(10,000) zone”

Actually, 3233 Cowper (Our Lady of the Rosary Church and Silicon Valley International School) is in the same R-1 zoning district and larger yet at 323,997 sq. ft.

# Private School is Irrelevant

From 18.76.030 (c)(1)

Special circumstances that are expressly excluded from consideration are:

(A) The personal circumstances of the property owner,

This rule is missing from the staff report.

Being a private school , wanting to expand, and being there a long time thus cannot be reasons to grant a variance. Those must instead be excluded.

# 1992 Additions Being Ignored

From 18.76.030 (c)(1)(B) Any changes in the size or shape of the subject property made by the property owner or his predecessors in interest while the property was subject to the same zoning designation.

The site expanded significantly in 1992 through land purchase and parcel mergers. It was already R-1. The current parcel size therefore cannot be used to justify the variance.

The staff report is silent on this too.



# Again, No Special Privileges

From 18.76.030 (c)(2) The granting of the application shall not affect substantial compliance with the regulations or constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and in the same zoning district as the subject property

Giving Castilleja a higher FAR than 91% of its neighbors is clearly a special privilege

# Why Grant 0.42 FAR?

If you must give a variance, use the lowest nearby FAR of 0.34 (1250 Bryant)

That way Castilleja gets no special privileges other nearby lots don't have

# Horrible Precedent

By granting 0.42 FAR to Castilleja, you're being unfair to other R-1 owner in Palo Alto with a lower FAR!

There are 10,102 other R-1 parcels below 0.42 FAR

Every one of those could use Castilleja as a precedent and ask for a variance raising their FAR to 0.42

# Summary

## Underground Parking

- Is not a “basement”
- Does not meet the footprint rule
- Kol Emeth precedent incorrect – and allows all R1 lots to have 100% basements
- Castilleja’s garage should count as FAR

## Variance for FAR

- Private school use is irrelevant
- Site changes aren’t discussed
- Most other R-1 parcels have FAR below 0.42
- Granting 0.42 FAR is a special privilege and thus not allowed
- 10,102 other parcels could request 0.42 FAR if you grant it to Castilleja

End

**From:** [Trisha Suvari](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja-ARB comments Nov. 5 meeting  
**Date:** Thursday, November 5, 2020 11:06:37 AM

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Dear PTC,

Below, please find my letter to the ARB dated November 5, 2020, concerning Castilleja's modernization plan.

I attended your hearing for Castilleja's project in August, in October, and I am here again today. As an observer, I appreciate the quality of the deliberation you have fostered in this process. As a board, you have made thoughtful observations and asked excellent questions, and your guidance has improved the project.

Today, we are reviewing the culmination of years of work from the school taking in feedback from neighbors, consultants, and other city leaders. This process has continued with input from all of you. I am impressed with how specific and reflective all of you have been in these recent hearings. And as a result, I am also impressed with how responsive Castilleja has been, making small and large adjustments to create an updated campus that will make the neighborhood more beautiful. The changes and feedback I have noted include:

- Clarity around the smaller circle to increase setbacks, which offers up more space along the surrounding streets.
- Two rounds of changes to the Kellogg facade to break up the massing, vary the roof lines, and modify the external materials
- Adjustments to the Bryant entry to include historical elements
- Thoughtful assessment of sustainability elements, such as solar panels
- Review of the best ways to enter campus and allow the school to relate to and interact with the surrounding streets

This has been a fruitful process, and I sincerely hope that you will vote to approve these plans as they are today. I remember that at a recent hearing, as a board, you discussed the fact that you wanted to do more than just improve upon the current buildings, which I think we can all agree are dated and need to be replaced. But you talked about wanting to do the best you can to reach beyond that low-hanging fruit to a bigger goal of creating a new campus that is beautiful on its own merits. I think you have done that here. The work that you have put into the process has made a difference. Now I hope we can now shift into concrete steps the school can take to begin making these plans a reality.

Sincerely,  
Trisha Suvari

**From:** [YANTING ZHANG](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja school extension project  
**Date:** Thursday, November 5, 2020 11:05:50 AM

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Hello, My Name is Yanting Zhang, and I am one of the many neighbors of Castilleja who supports this project. I live nearby on Bryant Street. I have watched the school make changes to improve the plans in response to city and neighbor feedback, and this new project alternative number 4 is a positive plan that brings together the very best of the school's hopes and their neighbors' input.

The project alternative reduces the size of the underground parking significantly. Since underground parking is preferred by the Final Environmental Impact Report and the City Plan, I am happy that Castilleja could meet city parking requirements in that way. The smaller structure preserves homes, conserves trees and still moves cars away from neighborhood streets. I am particularly happy that the redwoods on Spieker Field have been preserved and that the plan carefully outlines steps to keep them safe during the construction process.

I can also attest that Castilleja will be able to manage traffic beautifully, as they have done already for the past seven years. Please take their proven track record to heart. They have also proven that they can comply with enrollment guidelines because they have followed every single scheduled enrollment reduction that the city has outlined. They should be granted an enrollment of 540 to support their programming and continue to thrive.

Most of all, I am excited for the new building. I have looked at the external renderings and I love the way the facades and setbacks are varied to blend in with the residential scale of my neighborhood. The old buildings are outdated and not very appealing visually, so the new ones will be a welcome improvement and beautiful update.

Yanting zhang



**From:** [Cath Garber](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja  
**Date:** Thursday, November 5, 2020 11:01:44 AM

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To the Planning Commission,  
I would like to submit what I shared with the ARB this morning, Nov. 5th. 2020.

My name is Catharine Garber and I often present projects to the city as an architect representing clients in Palo Alto. Today, I am speaking as a Palo Alto resident who also cares deeply about how our city continues to evolve architecturally and become stronger as a community. With that perspective in mind, I want to voice my support for Castilleja's designs and modifications.

I am pleased to see refinements that have been made along the Kellogg side of campus. The new breaks in the Kellogg facade parallel the look and scale of that new porch on Bryant. These changes addressed the goal to reduce the massing and to break up the eave.

I feel it does so in a way that creates coherence along the different street views. The sections of the building along Kellogg feel more distinct from each other, while also connecting visually with the facade on Bryant in new ways.

The last time I reviewed these plans, I was pleased to see that the porch that had been added on Bryant integrated elements from the historic Gunn Building. Specifically it was nice to see the option to bring the green carved doors on the current Bryant entry over to the new porch.

And new for this presentation green tiles have been added to the outside of the building at the breaks on Kellogg. I think this is a lovely new addition to the project, as are the touches of having the belly band to break the two floors and the added vertical battens on the second floor.

With the input from your commission I feel the Castilleja team has brought an attention to detail that serves to tie together the historic structures to the handsome new sustainable spaces.

This has been a long process for the city and for the school, but I truly believe we have arrived at the end of this productive road. The evolution of this project has brought important changes, Now, it is time to approve these plans. Modernization is desperately needed for Castilleja. The current structures are aging and do not enhance the neighborhood in the least. The new buildings and the thoughtful landscaping around them will settle in gently and create

a beautiful backdrop for residential life in this corner of Palo Alto.

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**From:** [Trisha Suvari](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja's Modernization Plans  
**Date:** Thursday, November 5, 2020 11:00:40 AM

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To the Planning and Transportation Committee Members,

I am a resident of Palo Alto, and I am impressed by Castilleja's proposal. I would like to focus on how much the school has modified their plans in response to community feedback. Significantly, Castilleja significantly reduced the size of the parking structure. These changes preserve two houses, protect mature redwoods, and mitigate all significant traffic impacts.

In the most recent ARB hearing, Castilleja presented plans that also significantly reduced the massing of the building on Kellogg and changed the facade to respond to specific neighbor concerns. The plans also included thoughtful changes to the entry on Bryant. I applaud that Castilleja is addressing both the large and the smaller comments from neighbors. Now, the final proposal they have is better for the neighborhood, the school, and the City of Palo Alto.

In the spirit of cooperation that the school has established with positive and meaningful responses to feedback - including many, many meetings with neighbors over the past eight years, it is time to approve the project you have before you. As Members of the PTC, I urge you to recognize all that Castilleja has done to make big and small changes to address neighbors' concerns. After 8 long years, it's time for this project to be approved. The goalposts keep moving, and it begins to feel that this vocal group of opponents cannot be satisfied. At some point, the never-ending "do this, no do that" nature of the process is also unreasonable. Please support this project and allow positive progress.

Sincerely,  
Trisha Suvari