

Castilleja School Project

Final Environmental Impact Report

(SCH # 2017012052)



City of Palo Alto

Prepared by Dudek

July 2020

Castilleja School Project

Final Environmental Impact Report

Prepared for:

City of Palo Alto
250 Hamilton Avenue – Fifth Floor
Palo Alto, CA 94301
Contact: Amy French

Prepared by:

DUDEK
853 Lincoln Way, Suite 208
Auburn, California 95603
Contact: Katherine Waugh

JULY 2020

TABLE OF CONTENTS

<u>Section</u>	<u>Page No.</u>
1 INTRODUCTION	1-1
1.1 CEQA Requirements.....	1-1
1.2 Certification of the Final Environmental Impact Report.....	1-2
1.3 Final Environmental Impact Report Organization.....	1-2
1.4 Response to Comments.....	1-3
1.5 Summary of Draft EIR Text Revisions.....	1-8
2 MASTER RESPONSES.....	2-1
2.1 Project Description.....	2-3
2.1.1 Garage Layout and Parking.....	2-3
2.1.2 Garage Drop-Off and Pick-Up Operations	2-4
2.1.3 Use of Embarcadero Road During Operation	2-4
2.1.4 Bicycle and Pedestrian Circulation Plan	2-5
2.1.5 Tree Protection Plan.....	2-5
2.1.6 Gunn Family Administration Building/Elizabeth Hughes Chapel Theater	2-5
2.2 Conditional Use Permit.....	2-13
2.2.1 History of CUPs for Castilleja School	2-13
2.2.2 CUP Violations	2-15
2.2.3 Requested CUP Modifications.....	2-15
2.2.4 CUP Enforcement	2-16
2.3 Construction.....	2-17
2.3.1 Construction Timeline.....	2-17
2.3.2 Excavation.....	2-17
2.3.3 Transportation	2-18
2.3.4 Noise	2-21
2.3.5 Air Quality	2-22
2.4 Disbursed Circulation/Reduced Garage Alternative.....	2-23
2.4.1 Disbursed Circulation/Reduced Garage Alternative Description	2-23
2.4.2 Project Objectives and Significant Impacts of the Proposed Project.....	2-30
2.4.3 Disbursed Circulation/Reduced Garage Alternative Environmental Effects	2-31
2.5 Project Alternatives.....	2-63
2.5.1 CEQA Requirements for Alternatives Analysis	2-63
2.5.2 Castilleja School Project Objectives and Significant Effects	2-64
2.5.3 Castilleja School Project Alternatives.....	2-65
2.6 Land Use and Planning Impacts.....	2-79
2.6.1 Land Use Impacts.....	2-79
2.6.2 Floor Area Ratio.....	2-81

2.6.3	Tree Preservation and Management.....	2-82
2.6.4	Aesthetics	2-83
2.6.5	Loss of Housing	2-84
2.6.6	Special Events	2-87
2.6.7	Noise	2-88
2.6.8	Construction	2-89
2.7	Tree Impacts and Mitigation	2-90
2.7.1	City Tree Protection and Mitigation Requirements	2-90
2.7.2	Updated Tree Protection Plan	2-93
2.7.3	Project Impacts to Protected Trees.....	2-104
2.7.4	Project Impacts to Street Trees	2-105
2.7.5	Loss of Tree Canopy	2-105
2.7.6	Mitigation for Tree Impacts	2-106
2.8	Aesthetics	2-109
2.8.1	Existing Conditions.....	2-109
2.8.2	Campus-Wide Visual Character.....	2-109
2.8.3	Key Viewpoints.....	2-110
2.8.4	Tree Canopy	2-113
2.8.5	Light and Glare	2-113
2.9	Historic Resources	2-116
2.9.1	Historic Resources Evaluation	2-116
2.9.2	Lockey House.....	2-116
2.9.3	Historic District.....	2-117
2.9.4	Landscape Features	2-122
2.10	Vehicle Transportation.....	2-123
2.10.1	Transportation Impacts Analysis Report Updates.....	2-123
2.10.2	Transportation Demand Management.....	2-123
2.10.3	Existing Plus Project Conditions.....	2-125
2.10.4	Background and Background Plus Project Conditions	2-127
2.10.5	Cumulative Conditions	2-128
2.10.6	Cumulative Plus Project Conditions	2-129
2.10.7	Vehicle Miles Traveled	2-129
2.11	Bicycle and Pedestrian Safety.....	2-131
2.11.1	Existing Conditions.....	2-131
2.11.2	Construction	2-132
2.11.3	Traffic Conflicts.....	2-132
2.11.4	Suggested Mitigation Measures	2-134
2.12	Garage Circulation	2-136
2.12.1	Traffic Management.....	2-136

2.12.2	Wheel-Stop Time	2-136
2.12.3	Queueing	2-137
2.12.4	Emergency Response	2-140
2.12.5	Parking	2-140
2.13	Noise	2-141
2.13.1	Noise Measurement Terminology	2-141
2.13.2	Existing Noise Levels	2-141
2.13.3	Special Event Noise	2-143
2.13.4	Pool Noise	2-144
2.13.5	Construction Noise.....	2-146
3	RESPONSES TO COMMENTS.....	3-1
A1	State Clearinghouse.....	3-3
B1	Ambrose	3-7
B2	Canepa.....	3-21
B3	Chapman	3-29
B4	Dockter.....	3-35
B5	Eckols.....	3-67
B6	Kostura	3-77
B7	Levitsky	3-91
B8	Moncharsh.....	3-95
B9	Pang.....	3-157
B10	PNQL	3-163
B11	Romanowsky.....	3-173
B12	Sanders and Furman.....	3-187
B13	Souza.....	3-195
B14	TreanorHL.....	3-203
C1	Ballus	3-219
C2	Barton.....	3-223
C3	Befera	3-227
C4	Bishop	3-249
C5.1	Chiu	3-259
C5.2	Chiu.....	3-263
C6	Christel.....	3-267
C7	Cooper.....	3-271
C8	Costello	3-283
C9	Croce	3-289
C10.1	Darcy	3-295
C10.2	Darcy	3-299
C10.3	Darcy	3-303

C11 Drumright.....	3-307
C12 Edmonds.....	3-311
C13 Farenthold	3-315
C14 Flack.....	3-319
C15 Glanckopf.....	3-323
C16.1 Graves.....	3-329
C16.2 Graves.....	3-333
C16.3 Graves.....	3-337
C17 Grinberg	3-341
C18.1 Heinrich	3-345
C18.2 Heinrich	3-363
C19 Hickey	3-367
C20 Hitchings	3-375
C21.1 Jordan	3-379
C21.2 Jordan	3-383
C22 Keehn	3-387
C23 Kenrick.....	3-391
C24.1 Kishimoto	3-395
C24.2 Kishimoto	3-403
C25 Larson and Schmutz.....	3-407
C26 Levinsky.....	3-411
C27.1 Levitsky	3-419
C27.2 Levitsky	3-423
C27.3 Levitsky	3-427
C27.4 Levitsky	3-431
C27.5 Levitsky	3-435
C28 Low	3-439
C29 MacDaniels	3-443
C30 Machado.....	3-447
C31 Macy.....	3-451
C32 Mandinach.....	3-455
C33 Margevicius and Fearnside	3-459
C34 Martin.....	3-463
C35 McCroskey.....	3-467
C36 McGee, A.....	3-471
C37 McGee, J	3-475
C38.1 McLeod.....	3-479
C38.2 McLeod.....	3-483
C39.1 Ng.....	3-489

C39.2 Ng	3-507
C39.3 Ng	3-511
C40 Nordman.....	3-515
C41 Owes.....	3-519
C42.1 Poppy.....	3-525
C42.2 Poppy.....	3-529
C42.3 Poppy.....	3-533
C42.4 Poppy.....	3-537
C42.5 Poppy.....	3-541
C42.6 Poppy.....	3-547
C42.7 Poppy.....	3-551
C42.8 Poppy.....	3-557
C42.9 Poppy.....	3-561
C43 Powar	3-565
C44 Quigley.....	3-575
C45.1 Reed.....	3-579
C45.2 Reed.....	3-583
C45.3 Reed.....	3-593
C45.4 Reed.....	3-597
C45.5 Reed.....	3-601
C46 Rolfe.....	3-605
C47 Roth.....	3-609
C48 Rubinstein	3-613
C49.1 Schmarzo	3-617
C49.2 Schmarzo	3-621
C50 Sidhu Suckow	3-625
C51 Slaney.....	3-633
C52.1 Sousa.....	3-637
C52.2 Sousa.....	3-641
C52.3 Sousa.....	3-645
C52.4 Sousa.....	3-649
C52.5 Sousa.....	3-655
C53 Sperling	3-659
C54 Stone.....	3-663
C55 Strom.....	3-667
C56.1 Sylvester	3-671
C56.2 Sylvester	3-675
C57.1 Vrhel.....	3-699
C57.2 Vrhel.....	3-703

C57.3 Vrhel.....	3-735
C58 Whittier.....	3-739
C59 Willer.....	3-747
C60 Wong, C.....	3-755
C61.1 Wong, K.....	3-759
C61.2 Wong, K.....	3-763
C61.3 Wong, K.....	3-767
C62.1 Yarkin.....	3-771
C62.2 Yarkin.....	3-775
D1 Au.....	3-779
D2 Avis.....	3-783
D3 Bean.....	3-787
D4 Bender.....	3-791
D5 Bi.....	3-795
D6 Bordeaux.....	3-799
D7 Chang.....	3-803
D8 Chen.....	3-807
D9 Darling.....	3-811
D10 Debs.....	3-815
D11 Fearon.....	3-819
D12 Garber.....	3-823
D13 Glidden.....	3-827
D14 Goldeen.....	3-831
D15 Graglia.....	3-835
D16 Gross.....	3-839
D17 Guinta.....	3-843
D18 Gwin.....	3-847
D19.1 Hazlett.....	3-851
D19.2 Hazlett.....	3-855
D20 Hopper.....	3-859
D21 Kepner, M.....	3-863
D22 Kepner, S.....	3-867
D23 Kocher.....	3-871
D24 Larson, S.....	3-875
D25 Llach.....	3-879
D26 Maydan.....	3-883
D27 Millan.....	3-887
D28 Ofori-Nyako.....	3-891
D29 Oku-Ampofo.....	3-895

D30 Oommen.....	3-899
D31 Pandey.....	3-903
D32 Pasmooij, D.....	3-907
D33 Pasmooij, L.....	3-911
D34 Pruitt.....	3-915
D35 Rose.....	3-919
D36 Shrout.....	3-923
D37.1 Tuck.....	3-927
D37.2 Tuck.....	3-931
D38 Turner.....	3-935
D39 Upton.....	3-939
D40 Van Dusen.....	3-943
D41 Verwillow.....	3-949
D42 Zeitlin.....	3-953
E1 Planning and Transportation Commission Public Hearing.....	3-957
E2 Historic Resources Board Public Meeting.....	3-972

Please refer to the Draft EIR, revised July 2020, for the Draft EIR and Appendices Table of Contents.

FIGURES

MR1-1	Proposed Project Garage Modification.....	2-7
MR1-2	Garage Circulation.....	2-9
MR1-3	Campus Circulation Plan.....	2-11
MR4-1	Dispersed Circulation Alternative Site Plan.....	2-55
MR4-2	Dispersed Circulation Alternative Garage Layout.....	2-57
MR4-3	Dispersed Circulation Alternative Tree Impacts.....	2-59
MR4-4	Dispersed Circulation Alternative Site Views.....	2-61
MR7-1	Proposed Tree Impacts.....	2-108
MR8-1	Proposed Views.....	2-115

TABLES

1-1	Index of Commenters on the Draft Environmental Impact Report.....	1-3
1-2	Summary of Draft EIR Revisions.....	1-9
2-1	Master Response Topics.....	2-1
MR2-1	Prior Conditional Use Permits.....	2-13
MR3-1	Project Phases and Construction Timeline.....	2-17
MR3-2	Temporary Lane Closures.....	2-20
MR4-1	Comparison of Existing Conditions, Proposed Project, and Disbursed Circulation/Reduced Garage Alternative.....	2-26
MR4-2	Disbursed Circulation AM Peak Hour Allocations.....	2-33
MR4-3	Background and Background Plus Disbursed Circulation/Reduced Garage Alternative Peak Hour Intersection Levels of Service.....	2-39
MR4-4	Cumulative and Cumulative Plus Disbursed Circulation/Reduced Garage Alternative Peak Hour Intersection Levels of Service.....	2-43
MR4-5	Disbursed Circulation/Reduced Garage Alternative Impact Summary.....	2-52
MR5-1	No Garage Alternative Impacts Summary.....	2-74
MR5-2	Enrollment Levels and Daily Vehicle Trips.....	2-76
MR7-1	Updated Tree Impacts.....	2-95
MR7-2	Updated Tree Impact Summary.....	2-104
MR10-1	Comparison of Peak Hour Corridor Performance Measures.....	2-127
3-1	Potential Tree Impact Avoidance Measures.....	3-57
3-2	Tree Impacts and Retention y Size Class.....	3-126
3-3	Peak Hour Traffic Volumes on Emerson Street.....	3-255

CHAPTER 1

INTRODUCTION

The City of Palo Alto (City) circulated the Draft Environmental Impact Report (EIR) for the Castilleja School Project (proposed project) for public review from July 16, 2019 through September 17, 2019. This Final EIR contains comments received during the circulation period in response to the Draft EIR and responses to each of those comments.

The City held two public hearings on the Draft EIR during the circulation period. The City’s Planning and Transportation Commission held a public hearing on August 14, 2019 and the Historic Resources Board held a hearing on September 12, 2019. Responses to oral comments provided at these hearings regarding the environmental analysis are included in this Final EIR.

The City will consider all comments received during the circulation period when making any discretionary decisions with respect to the proposed project. As discussed further below, this Final EIR is organized in three chapters. Chapter 1 provides an introduction to the Final EIR, summarizing the organization of this document and the list of comments received, Chapter 2, Master Responses, presents a set of comprehensive responses covering specific topics and impact analyses on which the City received similar or repeated Draft EIR comments. In addition, direct responses to each individual Draft EIR comment are provided in Chapter 3, Responses to Comments. The Final EIR also includes the Draft EIR and Technical Appendices as revised in response to the comments. Revisions to the Draft EIR include text changes and new or updated figures; revisions to the Technical Appendices include incorporation of updated site plans and clarifying project information and an updated Traffic Impact Study.

1.1 CEQA Requirements

Under the California Environmental Quality Act (CEQA), the lead agency (the City) must certify the Final EIR prior to approving the proposed project. CEQA Guidelines Section 15132 specifies the content of a Final EIR, which shall include:

- The Draft EIR or a revision of the Draft EIR;
- Comments and recommendations received on the Draft EIR, either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The lead agency’s responses to significant environmental points raised in the review and consultation process; and
- Any other information added by the lead agency.

The Final EIR allows commenting agencies and the public an opportunity to review revisions to the Draft EIR and the responses to comments. Overall, considering both the Draft and Final documents, this EIR serves to inform the City’s consideration of the proposed project by disclosing the environmental consequences that would result if the proposed project or one of the alternatives is approved and

implemented. As noted in Section 1.5, a new project alternative has been added to the EIR, as discussed in detail in Master Response 4.

1.2 Certification of the Final Environmental Impact Report

The Final EIR, which includes all comments received, responses to those comments, and revisions to the Draft EIR will be considered by the City of Palo Alto City Council prior to issuing a decision on the proposed project. As required by Section 15090(a)(1)–(3) of the CEQA Guidelines, in certifying a Final EIR, a lead agency must make the following three determinations:

- The Final EIR has been completed in compliance with CEQA;
- The Final EIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project; and
- The Final EIR reflects the lead agency’s independent judgment and analysis (14 California Code of Regulations (CCR) 15090(a)(1–3)).

As required by CEQA Guidelines Section 15091, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding, supported by substantial evidence in the record. The possible findings include:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR (14 CCR 15091).

Additionally, pursuant to the CEQA Guidelines Section 15093(b), when a lead agency approves a project that would result in significant unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing the reasons for supporting the action. The Statement of Overriding Considerations must be supported by substantial evidence in the lead agency’s administrative record.

The Findings of Fact and Statement of Overriding Considerations are included in a separate document that will be considered for adoption by the City’s decision makers concurrent with deliberations on the proposed project.

1.3 Final Environmental Impact Report Organization

This Final EIR is organized as follows:

- **Introduction (Chapter 1)** – Includes a brief procedural history and summary of CEQA requirements, a summary of how the document is organized, a list of the agency and public

comments received on the Draft EIR (Table 1-1), and a summary of text revisions made to the Draft EIR (Table 1-2).

- **Master Responses (Chapter 2)** – Provides Master Responses to address topics and comments that were common to many of the Draft EIR comments. The responses clarify, correct, and/or amplify text in the Draft EIR, as appropriate.
- **Responses to Comments (Chapter 3)** – Provides responses to each individual Draft EIR comment. The responses clarify, correct, and/or amplify text in the Draft EIR, as appropriate.
- **Revised Draft EIR** – The full Draft EIR as revised is provided to present the text and figure changes made to the Draft EIR either in response to comments or at the initiative of the City to correct, clarify, and amplify the EIR descriptions, analysis, and conclusions. These changes are shown in strikeout/underline format. The revisions to the Draft EIR do not alter the conclusions of the Draft EIR and no significant new information has been added.
- **Updated Technical Appendices**– The Technical Appendices to the Draft EIR are also provided. Several of the appendices include revised and/or supplemental information to clarify the proposed project and the technical analysis of potential project impacts.

1.4 Response to Comments

The City received a total of 160 comment letters. Table 1-1 presents the list of entities and individuals that provided oral and written comments on the project. Each of these comment letters is assigned a binomial (A, B, C, or D) designating the category of the comment and a number (e.g. A1). When one commenter submitted more than one comment, each is given the same binomial and an additional serial designation (e.g. C5.1 and A5.2). Comment Letters E1 and E2 summarize the oral comments from a number of individuals on the environmental effects of the proposed project or the content of the Draft EIR received at these hearings.

Table 1-1
Index of Commenters on the Draft Environmental Impact Report

Comment Letter	Date of Letter	Commenter and Affiliation (if applicable)
Public Agencies		
A1	September 17, 2019	California Governor’s Office of Planning and research, State Clearinghouse
Organizations		
B1	September 12, 2019	Ambrose, Stephen E., on behalf of PNQL
B2	September 16, 2019	Canepa, Brian, Nelson Nygard, on behalf of Castilleja School Foundation
B3	September 16, 2019	Chapman, Dan, Castilleja School, on behalf of Castilleja School Foundation
B4	September 14, 2019	Dockter, David, on behalf of PNQL
B5	September 16, 2019	Eckols, Robert H., Fehr & Peers, on behalf of Castilleja School Foundation
B6	undated	Kostura, William, on behalf of PNQL

**Table 1-1
Index of Commenters on the Draft Environmental Impact Report**

Comment Letter	Date of Letter	Commenter and Affiliation (if applicable)
B7	August 6, 2019	Levitsky, Rob, on behalf of PNQL
B8	September 16, 2019	Moncharsh, Leila, Veneruso & Moncharsh, on behalf of PNQL
B9	September 16, 2019	Pang, Heather and Peggy McKee, Castilleja School, on behalf of Castilleja School Foundation
B10	August 5, 2019	Reed, Andie, on behalf of PNQL
B11	September 16, 2019	Romanowsky, Mindie S., Jorgenson, Siegel, McClure & Flegel, on behalf of Castilleja School Foundation
B12	August 13, 2019	Sanders, Rebecca and Sheri Furman, on behalf of PAN
B13	September 16, 2019	Souza, Pauline, WRNS Studio, on behalf of Castilleja School Foundation
B14	September 16, 2019	TreanorHL, on behalf of Castilleja School Foundation
Individuals		
C1	August 2, 2019	Ballus, Pamela
C2	August 8, 2019	Barton, Megan
C3	September 15, 2019	Befera, Carla
C4	August 11, 2019	Bishop, Chris
C5.1	August 13, 2019	Chiu, Elana
C5.2	September 17, 2019	Chiu, Elana
C6	August 6, 2019	Christel, Amy
C7	September 14, 2019	Cooper, Alan
C8	July 30, 2019	Costello, Peter
C9	September 14, 2019	Croce, Kathy
C10.1	August 5, 2019	Darcy, Diana
C10.2	August 17, 2019	Darcy, Diana
C10.3	August 17, 2019	Darcy, Diana
C11	August 14, 2019	Drumright, Donald
C12	August 2, 2019	Edmonds, Tim
C13	August 2, 2019	Fahrenthold, Nathan
C14	August 2, 2019	Flack, Charlene
C15	August 12, 2019	Glanckopf, Annette
C16.1	July 29, 2019	Graves, Pria
C16.2	August 13, 2019	Graves, Pria
C16.3	September 13, 2019	Graves, Pria
C17	August 3, 2019	Grinberg, Judy
C18.1	September 5, 2019	Heinrich, Gogo

**Table 1-1
Index of Commenters on the Draft Environmental Impact Report**

Comment Letter	Date of Letter	Commenter and Affiliation (if applicable)
C18.2	September 12, 2019	Heinrich, Gogo
C19	September 2, 2019	Hickey, Karen Ambrose
C20	August 8, 2019	Hitchings, Hamilton
C21.1	August 15, 2019	Jordan, Kathy
C21.2	August 17, 2019	Jordan, Kathy
C22	August 14, 2019	Keehn, Suzanne
C23	September 12, 2019	Kenrick, Al
C24.1	August 10, 2019	Kishimoto, Yoriko
C24.2	September 16, 2019	Kishimoto, Yoriko
C25	August 19, 2019	Larson, Amy and Tom Schmutz
C26	September 12, 2019	Levinsky, Jeff
C27.1	September 14, 2019	Levitsky, Rob
C27.2	September 14, 2019	Levitsky, Rob
C27.3	September 14, 2019	Levitsky, Rob
C27.4	September 14, 2019	Levitsky, Rob
C27.5	September 16, 2019	Levitsky, Rob
C28	July 13, 2019	Low, Kenneth and Judy
C29	August 16, 2019	MacDaniels, Joan
C30	July 25, 2019	Machado, Paul
C31	September 14, 2019	Macy, Marie
C32	August 7, 2019	Mandinach, Jo Ann
C33	August 20, 2019	Margevicius, Joe and Tracey Fearnside
C34	August 14, 2019	Martin, Kim
C35	September 8, 2019	McCroskey, Pam
C36	August 8, 2019	McGee, Anne
C37	August 8, 2019	McGee, Joseph
C38.1	September 16, 2019	McLeod, Bruce
C38.2	September 16, 2019	McLeod, Bruce
C39.1	September 10, 2019	Ng, Nelson
C39.2	September 10, 2019	Ng, Nelson
C39.3	September 16, 2019	Ng, Nelson
C40	September 9, 2019	Nordman, Eric
C41	August 14, 2019	Owes, Ronald
C42.1	July 29, 2019	Poppy, Jim
C42.2	August 5, 2019	Poppy, Jim

**Table 1-1
Index of Commenters on the Draft Environmental Impact Report**

Comment Letter	Date of Letter	Commenter and Affiliation (if applicable)
C42.3	August 5, 2019	Poppy, Jim
C42.4	August 6, 2019	Poppy, Jim
C42.5	August 8, 2019	Poppy, Jim
C42.6	August 11, 2019	Poppy, Jim
C42.7	August 12, 2019	Poppy, Jim
C42.8	August 14, 2019	Poppy, Jim
C42.9	September 16, 2019	Poppy, Jim
C43	July 30, 2019	Powar, Bill
C44	September 9, 2019	Quigley, David
C45.1	August 13, 2019	Reed, Andie
C45.2	August 15, 2019	Reed, Andie
C45.3	September 6, 2019	Reed, Andie
C45.4	September 15, 2019	Reed, Andie
C45.5	September 16, 2019	Reed, Andie
C45.6	September 16, 2019	Reed, Andie
C46	August 13, 2019	Rolfe, Joe and Diane
C47	August 19, 2019	Roth, Elizabeth and Ronald Katz
C48	August 19, 2019	Rubinstein, Holly and Paul
C49.1	August 6, 2019	Schmarzo, Bill
C49.2	August 10, 2019	Schmarzo, Bill
C50	September 15, 2019	Sidhu, Minty and Suckow, Brian
C51	August 5, 2019	Slaney, Malcolm
C52.1	August 1, 2019	Sousa, Hank
C52.2	August 15, 2019	Sousa, Hank
C52.3	August 15, 2019	Sousa, Hank
C52.4	August 26, 2019	Sousa, Hank
C52.5	September 10, 2019	Sousa, Hank
C53	August 21, 2019	Sperling, Nadia
C54	September 5, 2019	Stone, Chris
C55	August 23, 2019	Strom, Nancy
C56.1	August 2, 2019	Sylvester, Mary
C56.2	September 16, 2019	Sylvester, Mary
C57.1	August 13, 2019	Vrhel, Rita
C57.2	September 13, 2019	Vrhel, Rita
C57.3	September 15, 2019	Vrhel, Rita

**Table 1-1
Index of Commenters on the Draft Environmental Impact Report**

Comment Letter	Date of Letter	Commenter and Affiliation (if applicable)
C58	September 16, 2019	Whittier, Wally
C59	August 17, 2019	Willer, Cecilia
C60	September 16, 2019	Wong, Chi
C61.1	August 14, 2019	Wong, Kimberley
C61.2	September 11, 2019	Wong, Kimberley
C61.3	September 16, 2019	Wong, Kimberley
C62.1	August 24, 2019	Yarkin, Neva
C62.2	September 15, 2019	Yarkin, Neva
Letters of Support		
D1	August 15, 2019	Au, Irene
D2	August 12, 2019	Avis, Anne
D3	August 16, 2019	Bean, Jim
D4	August 12, 2019	Bender, John
D5	September 14, 2019	Bi, Lian
D6	September 16, 2019	Bordeau, Kyle
D7	September 11, 2019	Chang, David and Glowe
D8	September 15, 2019	Chen, Cindy
D9	August 16, 2019	Darling, Amy
D10	August 8, 2019	Debs, John
D11	August 8, 2019	Fearon, William F.
D12	September 16, 2019	Garber, Catharine
D13	August 12, 2019	Glidden, Jacquelyn
D14	September 14, 2019	Goldeen, Deborah
D15	August 12, 2019	Graglia, Mike
D16	September 9, 2019	Gross, Barbara
D17	August 16, 2019	Guinta, Diane
D18	August 17, 2019	Gwin, Christina
D19.1	September 13, 2019	Hazlett, Barbara Ann
D19.2	September 14, 2019	Hazlett, Barbara Ann
D20	August 16, 2019	Hopper, Heidi
D21	August 8, 2019	Kepner, Melissa Beville
D22	August 9, 2019	Kepner, Scott
D23	August 9, 2019	Kocher, Bob
D24	August 11, 2019	Larson, Sydney
D25	September 17, 2019	Llach, Eduardo

**Table 1-1
Index of Commenters on the Draft Environmental Impact Report**

Comment Letter	Date of Letter	Commenter and Affiliation (if applicable)
D26	August 2, 2019	Maydan, Roy
D27	August 16, 2019	Millan, Marcela
D28	September 13, 2019	Ofori-Nyako, Abena
D29	September 13, 2019	Oku-Ampofo, Ruth
D30	September 14, 2019	Oommen, Mora
D31	July 29, 2019	Pandey, Kusum
D32	August 14, 2019	Pasmooij, Duco
D33	August 14, 2019	Pasmooij, Laurie
D34	August 14, 2019	Pruitt, Mary Jo
D35	August 14, 2019	Rose, Mary
D36	August 12, 2019	Shrout, Kate
D37.1	August 2, 2019	Tuck, Nancy
D37.2	August 26, 2019	Tuck, Nancy
D38	August 22, 2019	Turner, Annie
D39	August 8, 2019	Upton, Elizabeth
D40	September 12, 2019	Van Dusen, Lisa
D41	August 14, 2019	Verwillow, Anna
D42	September 15, 2019	Zeitlin, Julia
Public Hearing Comments		
E1	August 14, 2019	Summary of verbal comments received at the Planning and Transportation Commission hearing
E2	September 19, 2019	Summary of verbal comments received at the Historic Resources Board hearing

1.5 Summary of Draft EIR Text Revisions

Table 1-2 summarizes all revisions made to the Draft EIR and its appendices. These text revisions include introducing a new project alternative that was developed by Castilleja School to address some of the public concerns about the project. Master Response 4 provides a detailed description of this alternative and analysis of the environmental effects of this alternative. The information presented in Master Response 4 has also been added to Draft EIR Chapter 13, Alternatives. Another important change is that changes in the CEQA Guidelines have been made in accordance with the requirements of Senate Bill 743 to stipulate that traffic congestion as measured by intersection levels of service (LOS) cannot be considered an environmental impact. Specifically, pursuant to California Public Resources Code section 21099(b)(2) and CEQA Guidelines Section 15064.3, “a project’s effect on automobile delay shall not constitute a significant environmental impact.” Thus the Traffic Impact Study (EIR Appendix E) and Draft EIR Chapter 7, Transportation, have been updated to avoid identifying impacts based on LOS. However, the analysis of the project’s effects related to LOS within the study area is retained in the Traffic Impacts Study and Draft EIR

for informational purposes and to address community concerns. Both the Traffic Impacts Study and Draft EIR Chapter 7 have been updated as part of preparation of this Final EIR and are included herein.

The Draft EIR revisions presented in this Final EIR do not include any increases in the severity of environmental effects or any new adverse environmental effects. Further, the Draft EIR revisions do not introduce any new information that results in the public having been deprived of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect.

**Table 1-2
Summary of Draft EIR Revisions**

Original Draft EIR Page, Table, or Figure Number(s)	Revised Draft EIR Page or Figure Number(s)	Text Revision Made
Chapter 1 Executive Summary		
Pages 1-3 and 1-4	No change	Correct number of parking spaces
Page 1-5	No change	Update amount of open space
1-6	No change	Correct the title of the City's Tree Preservation and Management Regulations
1-7	No change	Add summary descriptions of Alternative 4 and Alternative 5
1-9 and 1-10	1-10 through 1-14	Revise Mitigation Measures 4a and 4b
1-11	1-15 and 1-16	Revise Mitigation Measure 5a
1-14 through 1-16	1-19 through 1-22	Revise Mitigation Measure 7a
1-17	1-24	Omit Mitigation Measure 7c
1-19	1-25	Add dust control measure to Mitigation Measure 9a
1-21	1-28 and 1-29	Add geotechnical recommendations to Mitigation Measure 12a
Chapter 2 Introduction		
2-6	2-6 and 2-7	Add summary description of Alternative 4 and Alternative 5
2-11	2-12	Update list of Appendix B items
Chapter 3 Project Description		
3-1	3-1	Update the list of Appendix B items
3-2	No change	Update number of parking spaces
Page 3-3	No change	Correct the title of the City's Tree Preservation and Management Regulations
Page 3-3	No change	Update status of tree removal
Page 3-7	Pages 3-7 and 3-8	Update construction schedule phasing summary
Page 3-8	No change	Eliminate project construction schedule discussion
Page 3-9, Table 3-1	Pages 3-8 through 3-10, Table 3-1	Update Table 3-1 to reflect revisions in project design
n/a	Pages 3-10 and 3-11	Add discussion regarding project construction schedule
n/a	Page 3-11, Table 3-2	Add Table 3-2 Temporary Lane Closures

**Table 1-2
Summary of Draft EIR Revisions**

Original Draft EIR Page, Table, or Figure Number(s)	Revised Draft EIR Page or Figure Number(s)	Text Revision Made
Pages 3-10 and 3-11	Page 3-13	Revise number of parking spaces and size of parking structure and delete information regarding public utility easement (PUE)
Page 3-11	Pages 3-13 and 3-14	Update information regarding bicycle parking and rack spaces
Page 3-11	Page 3-14	Relocate and expand discussion of 25-foot wide PUE
Page 3-11	Page 3-14	Include CUP requirement daily trip rate be reduced to 2.4 trips per student
Page 3-13	Page 3-16	Add text to describe the refinishing of the eastern façade of the Gunn Administration Center
Page 3-16	Page 3-19	Correct information regarding tree removal and relocation
Page 3-16	Pages 3-20	Revise text describing student drop off and pick up procedures and include reference to Figure 3-12 Campus Circulation Plan
Page 3-17	Page 3-21	Add discussion of bicycle and pedestrian circulation
Figure 3-7 Garage Plan	No change	Update with revised Garage Plan
Figure 3-9 New Classroom Building Floor Area Diagrams	No change	Correct graphic to correctly place and label Level 1 and Level 2 (the figure in the Draft EIR reversed these levels)
Figure 3-11 Landscape Plan	No change	Update with revised Landscape Plan
n/a	Figure 3-12	Add Figure 3-12 Campus Circulation Plan
n/a	Figure 3-13	Add Figure 3-13 Garage Circulation
Chapter 4 Land Use		
Page 4-1	No change	Correct the title of the City's Tree Preservation and Management Regulations
Page 4-1	No change	Revise text reference to project site
Pages 4-1 and 4-2	Page 4-2	Update text regarding 2019 tree removal
Page 4-2	No change	Clarify allowable lot sizes in the R-1 (10,000) zone
Page 4-3	No change	Add reference to 2006 CUP
Page 4-3	No change	Revise size of below-grade parking garage
Page 4-8	No change	Correct the title of the City's Tree Preservation and Management Regulations.
Page 4-8	No change	Add references to PAMC sections regulating street trees and those regulating protected trees
n/a	Pages 4-8 and 4-9	Add description of Deconstruction and Construction Materials Management ordinance
Page 4-9	No change	Change "criteria" to "criterion"
Page 4-10	No change	Delete reference to Mitigation Measure 7c

**Table 1-2
Summary of Draft EIR Revisions**

Original Draft EIR Page, Table, or Figure Number(s)	Revised Draft EIR Page or Figure Number(s)	Text Revision Made
Page 4-10	No change	Update square footage of new above-grade building space
Page 4-13, Table 4-1	No change	Correct reference to Appendix B1
Page 4-14, Table 4-1	No change	Remove “below grade” from description of bus drop off and pick up area
Pages 4-14 and 4-15, Table 4-1	No change	Update the number of parking spaces
Page 4-16, Table 4-1	No change	Add reference to Mitigation Measure 7a and Appendix B
Page 4-16 Table 4-1	No change	Correct title of Chapter 7
Page 4-16, Table 4-1	No change	Delete Policy T-2.4 and consistency analysis
Page 4-17, Table 4-1	No change	Correct title of Chapter 7
Page 4-18, Table 4-1	No change	Update tree removal, retention, and relocation numbers. Correct title of the City’s Tree Preservation and Management Regulations
Pages 4-18 and 4-19, Table 4-1	Page 4-19	Update tree removal, retention, and relocation numbers. Correct title of the City’s Tree Preservation and Management Regulations
Page 4-22, Table 4-2	No change	Correct existing square footage, add column for gross floor area, and update number of parking spaces
Page 4-24	No change	Delete reference to Mitigation Measure 7c
Page 4-25	No change	Correct the proposed bus drop-off and pick-up area
Pages 4-25 and 4-25	Page 4-26	Update discussion regarding special events
Page 4-27	No change	Correct title of Traffic Impact Study
Page 4-27	Page 4-28	Add reference to Mitigation Measure 4a and TDM measures
Page 4-28	Page 4-29	Revise the discussion related to regulated trees and applicable PAMC sections
N/A	Page 4-29	Add reference to Figure 4-3 Proposed Tree Impacts
Pages 4-29 to 4-38, Table 4-4	Pages 4-30 to 4-39, Table 4-4	Revise table to reflected current Tree Protection Plan and tree regulatory status
Page 4-38	Page 4-39	Add reference to Figure 4-3 and correct title of the City’s Tree Preservation and Management Regulations
Pages 4-38 and 4-39	Pages 4-39 and 4-40	Update discussion of trees to be removed, relocated, and retained in place.
Page 4-39	Page 4-40	Add reference to Figure 4-3, add reference to Tree Technical Manual, and correct title of the Tree Preservation and Management Regulations

**Table 1-2
Summary of Draft EIR Revisions**

Original Draft EIR Page, Table, or Figure Number(s)	Revised Draft EIR Page or Figure Number(s)	Text Revision Made
Pages 4-40	Pages 4-41 and 4-42	Revise Mitigation Measure 4a to define limitations and requirements for special events held on campus
Pages 4-40 and 4-41	Pages 4-42 and 4-43	Revise Mitigation Measure 4b to clarify the procedures to be followed to reduce/compensate for impacts to trees
Page 4-41	Page 4-44	Update date associated with PAMC reference
Figure 4-1 Building Elevations	Figure 4-1	Update Figure 4-1 to correct building elevations
n/a	Figure 4-3	Add Figure 4-3 Proposed Tree Impacts
Chapter 5 Aesthetics		
Page 5-5	No change	Correct the title of the City's Tree Preservation and Management Regulations
Page 5-8	No change	Correct the number of existing surface lot parking spaces
Page 5-9	No change	Revise the size of the proposed parking garage and number of parking spaces
Page 5-10	No change	Add reference to Figure 5-6
Page 5-12	No change	Add reference to Figure 5-6
Page 5-13	No change	Add reference to Figure 5-6
Page 5-15	No change	Add reference to Figure 5-6
Page 5-13	No change	Correct the proposed bus drop-off and pick-up area
Page 5-15	Page 5-16	Revise text regarding visibility of the parking garage fence from Emerson Street.
Page 5-15	Page 5-16	Correct the proposed bus drop-off and pick-up area
Page 5-16	No change	Add reference to Figure 5-6
Page 5-16	No change	Add reference to Figure 3-11
Page 5-19	5-20	Add clarification to Mitigation Measure 5a, regarding the PAMC
Chapter 6 Cultural Resources		
6-11	6-11 through 6-12	Add discussion of Lockey Alumnae House
6-20	6-20	Add reference citation
n/a	6-21	Add discussion of modifications proposed to Gunn Family Administration Building
Chapter 7 Transportation		
Page 7-1	No change	Change the word "impacts" to "effects" and add "Background" and "Background Plus Project" to the list of scenarios in the first paragraph
Page 7-8	No change	Add date that traffic counts were collected
n/a	Page 7-10 and 7-11	Add background conditions information
Page 7-13	Page 7-15	Correct table reference

**Table 1-2
Summary of Draft EIR Revisions**

Original Draft EIR Page, Table, or Figure Number(s)	Revised Draft EIR Page or Figure Number(s)	Text Revision Made
Page 7-14	Page 7-16	Correct table references
Page 7-15	Page 7-17 and 7-18	Add introductory information regarding assessment of intersection impacts
Page 7-16	Page 7-18	Add reference to City's Local Transportation Impact Analysis Policy and reworded parts of the subsequent for clarification
Page 7-16	Page 7-18	Correct table reference
Page 7-17	Page 7-19	Correct table numbering
Page 7-18	Page 7-20	Revise wording of impact conclusion for accuracy
Page 7-18	Page 7-20	Add increases to v/c ratios attributed to the project
n/a	Page 7-21 through 7-23	Add Background Plus Project Conditions
Page 7-19	Page 7-23	Correct table references
Page 7-19	Page 7-24	Correct table numbering
Page 7-21	Page 7-25	Correct table reference
Page 7-22	Page 7-26	Correct table references
Page 7-22	Page 7-26	Revise wording for impact conclusions
Page 7-23	Page 7-27	Correct table reference
Page 7-24	Page 7-28	Correct table numbering
Page 7-26	Page 7-30	Correct table numbering
n/a	Page 7-32 through 7-35	Add discussion of traffic impacts from during construction
Page 7-29	Page 7-36	Correct table reference
Page 7-30	Page 7-37	Correct table reference and numbering
Page 7-31	Page 7-38	Correct table reference
Page 7-31	Page 7-38	Revise wording of impact conclusion.
Page 7-31	Page 7-39	Add reference to Mitigation Measure 7a
Page 7-33	Page 7-40	Add details regarding vehicle discharge rates queue length
Page 7-34	Page 7-41	Add text regarding required use of garage for student drop off and pick up
Page 7-34	Page 7-41	Correct table reference and numbering
Page 7-34	Page 7-42	Correct table reference
Page 7-35	Pages 7-42 and 7-43	Change subtitle heading from "Driveway Sight Distance" to "Sight Distance," clarify sight distance requirements, include Emerson Street in discussion
Page 7-36	Page 7-43 through 7-44	Add information regarding construction traffic
Page 7-36	Page 7-44	Add details regarding emergency response in the garage

**Table 1-2
Summary of Draft EIR Revisions**

Original Draft EIR Page, Table, or Figure Number(s)	Revised Draft EIR Page or Figure Number(s)	Text Revision Made
Page 7-37	Page 7-45	Delete reference to Mitigation Measure 7e
Page 7-37	Page 7-45	Add discussion regarding TIRE Index impacts
Page 7-37	Page 7-45	Revise impact conclusion statement
Page 7-37	Page 7-46	Correct table references, add info on VMP intersections, add info regarding v/c ratios
Page 7-38	Page 7-46 through 7-47	Add information regarding v/c ratios and additional info regarding intersection LOS
Page 7-38 through 7-39	Page 7-47	Revise conclusion
Page 7-42 through 7-43	Page 7-50 through 7-52	Revise text of Mitigation Measure 7a
Page 7-43	Page 7-53	Delete Mitigation Measure 7c
Chapter 8 Noise		
Pages 8-13 and 8-14	No change	Add reference to Figure 8-1
Page 8-16	No change	Correct the proposed bus drop-off and pick-up area
n/a	Pages 8-27 and 8-28	Add Figure 8-1, Noise Impacts
Chapter 9 Air Quality		
Pages 9-27 through 9-28	Pages 9-27 through 9-28	Add additional dust control requirement to Mitigation Measure 9a
Chapter 10 Greenhouse Gas Emissions		
Page 10-23	Page 10-23	Add discussion regarding carbon sequestration
Chapter 12 Geology, Soils, Seismicity of Paleontology		
Page 12-1	Page 12-1	Correct and update the contents in Appendix H
Page 12-16 through 12-17	Page 12-16 through 12-17	Add additional geotechnical recommendations to Mitigation Measure 12a
Chapter 13 Alternatives		
Page 13-2	Pages 13-2 and 13-3	Modify text discussing Impact 7-7 to address TIRE Index rather than intersection LOS
Page 13-4	No change	Delete text regarding intersection congestion impacts
Page 13-5	No change	Compare parking under Alternative 2 with the proposed parking
Page 13-5, Table 13-1	Pages 13-5 and 13-6, Table 13-1	Correct number of existing and proposed parking spaces
n/a	Page 13-7	Add introduction to new Disbursed Circulation/Reduced Garage alternative; add introduction to new No Garage alternative

**Table 1-2
Summary of Draft EIR Revisions**

Original Draft EIR Page, Table, or Figure Number(s)	Revised Draft EIR Page or Figure Number(s)	Text Revision Made
Page 13-9	No change	Correct number of parking spaces in proposed project, remove reference to significant impact at Kingsley Avenue/Alma Street intersection
Page 13-11	Page 13-12	Correct location of proposed bus drop-off and pick-up area
Page 13-12	Page 13-13	Remove reference to cumulative traffic volumes
Page 13-15	Page 13-16	Correct location of proposed bus drop-off and pick-up area
Page 13-17	No change	Remove reference to cumulative traffic volumes
Page 13-20	No change	Correct location of proposed bus drop-off and pick-up area and change in parking spaces compared to proposed project
Page 13-21	Page 13-22	Remove reference to cumulative traffic volumes
n/a	Page 13-23 through 13-30	Add analysis of Alternative 4
n/a	Page 13-30 through 13-39	Add analysis of Alternative 5
Page 13-23	Page 13-40	Add Alternatives 4 and 5 to Table 13-3
Pages 13-23 and 13-24	Pages 13-40 and 13-41	Add summary discussion of Alternatives 4 and 5 to Section 13.10
n/a	Figure 13-1	Add figure showing site plan for Alternative 4
n/a	Figure 13-2	Add figure showing garage layout for Alternative 4
n/a	Figure 13-3	Add figure showing tree impacts/protection for Alternative 4
Chapter 14 Additional CEQA Analysis		
14-4	No change	Modify text discussing Impact 7-7 to address TIRE Index rather than intersection LOS