

**From:** [Mora Oommen](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja's Final Environmental Impact Report (FEIR) document  
**Date:** Wednesday, August 26, 2020 10:02:30 PM

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Good Evening Commissioners:

My name is Mora Oommen, I am the parent of an 8th grade student at Castilleja. I have been a Palo Alto resident for the last 13 years and an active community member.

I strongly support the thoughtful, well researched proposal presented by Castilleja School to modernize its campus, increase high school enrollment, and reduce its impact on the neighborhood.

I'd like to comment this evening on the school's Tuition Assistance program, which I'm familiar with as a volunteer for Castilleja's parent association. Contrary to some public comments that have suggested that Castilleja is only available to the 1%, I would like to highlight the robust Tuition Assistance program for families who can not afford the cost of tuition. The school's Tuition Assistance program expands opportunity to more students, and thereby, impacts more lives. **Infact, increasing Castilleja's enrollment to 540 will provide access to more young women from diverse backgrounds.**

**Here are some helpful details on the Tuition Assistance at Castilleja**

- Castilleja was founded in 1907 to equalize educational opportunities for young women
- That tradition continues today as Castilleja works to increase enrollment and offer this educational opportunity to more young women
- 26 students currently enrolled at Castilleja will be the first in their family to go to college.
- 22% of enrolled students receive tuition assistance
- The Castilleja community has created a \$3.3 million annual tuition assistance budget, which has increased dramatically in recent years to expand opportunity
- Support includes everything from tuition to uniforms, books, field trip funds, trips to

visit colleges for seniors and more

- During COVID, the school significantly increased assistance for families who needed support with technology or other unexpected needs.
- Castilleja's new Master Plan, with increased enrollment, will also offer increased tuition assistance to continue to make this transformational educational experience accessible, no matter a family's financial circumstances

Castilleja is an important part of Palo Alto's history and community. The opportunity Castilleja is providing to support, nurture and prepare our next generation of diverse women leaders is unparalleled. Having Castilleja in our community is an asset and I urge you to support the thoughtful, thorough proposal presented by Castilleja.

Thank you for your time and consideration.

Mora Oommen

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Mora Oommen

Cell: 650-644-5354

Email: [morablossom@gmail.com](mailto:morablossom@gmail.com)

**From:** [Roger McCarthy](#)  
**To:** [Planning Commission](#)  
**Subject:** Written submission to accompany comments by Roger McCarthy at the meeting  
**Date:** Wednesday, August 26, 2020 9:04:19 PM  
**Attachments:** [Castilleja PTC comments by Roger McCarthy.pdf](#)

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Attached.

Roger

Dr. Roger L. McCarthy, P.E.  
McCarthy Engineering  
555 Bryant St., #516  
Palo Alto, CA 94301-1704  
Office (650) 449-0094  
Cell (650) 704-0464

**Re: PTC's public review of Castilleja's Final Environmental Impact Report (FEIR) - Written summary of remarks**

**To: The Palo Alto Planning & Transportation Commission**

**From: Dr. Roger L. McCarthy, P.E., 650 Waverley St., Palo Alto**

**Date: 26 August 2020**

Thank you for this opportunity to submit written remarks.

I am a retired engineering consultant at the above address for 20 years.

Two years ago, I was Chair of the Committee on Membership (CoM) of the National Academy of Engineering (NAE). The National Academies of Science (NAS), Engineering (NAE), and Medicine (NAM) were initially established as the NAS by Abraham Lincoln in 1863 to be the nation's most trusted and respected advisors to the Government and Society on issues related to Science and Technology. Today the Academies' few thousand elected members to continue to give their counsel and advice to the Government as required by our charter, in our disciplines, for free. The high honor of election to the Academies carries with it the obligation to serve and provide advice to the Nation in an uncompensated manner. As CoM Chair I was tasked, amongst other duties, with ensuring that the class of roughly 85 new members the CoM put in front of the membership for the final 2018 vote on election continued to add to the NAE's membership the range of necessary skills and expertise to advise the Nation competently. Unfortunately, because of the lack of women in the engineering "pipeline," this proved impossible to do. The 2018 class, "my class" as that year's CoM Chair, as with ALL the NAE classes before it, was mostly male. Consequently, the NAE is mostly "old, white men."

Unfortunately, fact or science-based decision making does not appear fashionable in much of government now. At a recent Academy meeting dinner, Dr. Kelvin Droegemeier, Trump's official "science advisor," remarked to us that serving in this role in Trump's Whitehouse was "like being a bartender trying to serve a group of teetotalers." I hope and believe that the PTC will ignore politics and parochialism and reach its decisions based on the facts and the science, and the real needs of society, a few of which are the following:

**Facts:** Society's failure to bring sufficient women into the science and engineering fields is NOT going to be cured by continuing to do everything we do educationally at the scale we do it now. We must INCREASE the educational scale and quality of young women to inspire them to go into the STEM fields.

**Science:** "Research on single-gender classrooms consistently shows that girls who receive opportunities to learn STEM-based principles away from boys have significantly higher grades

than those who are in a coeducational environment.”<sup>1</sup> “Girls’ school grads are **6 times more likely** to consider **majoring in math, science, and technology** compared to girls who attend coed schools.”<sup>2</sup> (emphasis in original) “Compared to coed peers, girls’ school grads are **3 times more likely** to consider **engineering careers**.”<sup>3</sup> (emphasis in original). The science has spoken, and Castilleja has got it right.

**Fact:** Castilleja has been ranked “**#1 in Best All-Girls High Schools in America**”<sup>4</sup> and this national treasure in our back yard. If we are going to trust any educational institution to make the educational payoffs worth any additional traffic inconvenience, who else would we choose?

**Final Fact:** As a society, we are not going to address our structural gender inequality without structural change by doing everything the same as always, and this WILL entail changes and “inconveniences” to the old way of doing things. The US Senate had to change the rules and Senate Chamber Architecture to accommodate a new nursing mother to the US Senate, Tammy Duckworth. Palo Alto is going to have to endure some change and inconvenience as we make the necessary changes to join the 21<sup>st</sup> century via empowering our young women.

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<sup>1</sup> <https://futureofworking.com/6-advantages-and-disadvantages-of-single-gender-classrooms/> (accessed 22 August 2020)

<sup>2</sup> [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 22 August 2020)

<sup>3</sup> [https://www.ncgs.org/wp-content/uploads/2018/12/ResearchReport\\_FINAL.pdf](https://www.ncgs.org/wp-content/uploads/2018/12/ResearchReport_FINAL.pdf) (accessed 22 August 2020)

<sup>4</sup> <https://www.niche.com/k12/castilleja-school-palo-alto-ca/> (accessed 22 August 2020)

**From:** [Michal Goldstein](#)  
**To:** [Planning Commission](#)  
**Subject:** Remarks from This Evening  
**Date:** Wednesday, August 26, 2020 8:33:30 PM  
**Attachments:** [Michal Goldstein - Remarks for City Hearing \(Castilleja FEIR\).pdf](#)

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Dear Commissioners,

I was not able to stay on for the full call and say my remarks. Here is a PDF of the comments I was going to present. Thank you for considering them.

Michal Goldstein

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**Michal Goldstein**

*she / her / hers*

Hi everyone,

I'm Michal Golstein, an Old Palo Alto resident and Castilleja 2020 alumna. Thank you to the Commissioners for the opportunity to speak about Castilleja's Final Environmental Impact Report (FEIR). Today, I would like to ask the PTC members to support Castilleja's plan to open the life-changing opportunity I received to a bigger and more diverse set of young women.

Choosing an all-girls education was the most empowering decision I have made for myself. At Castilleja, my voice was never doubted or silenced. This acceptance was especially meaningful to me as someone from a different cultural background. As an Israeli immigrant, I feel grateful for the way the Castilleja community uplifted me, through both a Jewish student affinity group and an immigrant literature class that I took in my senior year. My identity was not just celebrated among fellow students, but also in the classroom.

Beyond campus, Castilleja's commitment to reach out to the community makes an incredible impact on girls' lives and on the many initiatives that students engage with. I personally formed close connections with the founder and associates at Ada's Café by working behind the counter, boosting their online platform, and simply learning from the adults that work there while we baked together. Other than Ada's, Castilleja students also work with initiatives like Life Moves, Lucile Packard Children's Hospital, and Rosener House.

While an all-girls school isn't the right environment for everyone, Castilleja created a space that allowed me to find my voice and become confident in myself, an opportunity which every woman deserves to have should she desire it. Castilleja is more than a classroom experience-- to me, it's the engaging conversations with teachers after class, it's the everlasting sisterhood with my classmates, and it's the diversity that encourages us to be empathetic global citizens. My wish is for Castilleja to enroll more students who can find their strength in an all-girls environment. If the Final Environmental Impact report says that 540 students can be accommodated with no adverse impact (which it does), why would we not want to create that opportunity for more girls?

As an alumna, I hope that the city can reflect on my experience and support the education of the new generation of women leaders that will bring collaboration and equity into their roles in all disciplines. Thank you for your time.

**From:** [Julia Zeitlin](#)  
**To:** [Planning Commission](#)  
**Subject:** PTC Meeting Comments - 8/26/20  
**Date:** Wednesday, August 26, 2020 6:48:15 PM  
**Attachments:** [PTC Hearing Castilleja Master Plan Environmental Impact Comment - Julia Zeitlin \(1\).pdf](#)

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Hello,

My name is Julia Zeitlin and attached are my comments for the planning transportation commission about the environmental impacts of the Castilleja building plan.

Thank you.

Best,

Julia



Good evening Commissioners - My name is Julia Zeitlin. I live in Palo Alto and today started 9th grade at Castilleja. As co-founder of the Silicon Valley Sunrise Movement Chapter, I can also share the perspective of an environmentalist. With the help of Castilleja faculty and staff, I have been able to help lead my fellow classmates in initiatives that combat climate change. Last year, on September 20th, I led the school in a walkout in solidarity with the global climate strikes. Last Spring, I began working with our culinary team to start a food waste reduction initiative. Castilleja's faculty has supported this work along with countless other examples.

Castilleja's Master Plan envisions an environmentally conscious, fossil fuel-free campus with resilient vegetation, recycled water infrastructure, efficient ventilation and electric shuttles. The new campus *itself* will help educate the next generation of learners on how to be stewards of the environment. A campus with sustainability at its core will raise awareness of severe issues such as the destructive wildfires we are currently facing. Not only does the master plan mitigate climate impacts to the fullest extent, but the plan creates the opportunity to further emphasize sustainability in the school's curriculum.

Environmental experts will say the most sustainable building is no building at all. However, the current Castilleja buildings that will be replaced are close to 60 years old. This project is needed; the new buildings will be much more energy and water efficient and can serve as a model for other schools.

Castilleja's new Master Plan surpasses the standards set in the S/CAP legislation, with even more comprehensive solutions for a clean and sustainable future.

It is my pleasure to support Castilleja's Master Plan. Thank you.

**From:** [Evelyne Nicolaou](#)  
**To:** [Planning Commission](#)  
**Subject:** Castilleja redevelopment project  
**Date:** Wednesday, August 26, 2020 5:51:40 PM

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Dear Members of the Planning and Transportation Commission,

Thank you for taking the time to read my input on the Castilleja School project. I was gratified to see that the final EIR has found a path forward with no significant impacts. As a member of the Castilleja faculty, mother of a Castilleja alum and Palo Alto resident, I appreciate the time and care the City has taken to fully study the impacts and mitigation of the project. The Final Environmental Impact Report (FEIR) affirmed that relocating the campus is not a feasible option, as there are no parcels within Palo Alto that can accommodate the school, either as it currently exists or as is proposed under the Master Plan. Furthermore, the school is an integral and valuable part of the Palo alto community. I was relieved to see that the FEIR also affirms that splitting the Castilleja campus is not feasible because it would have adverse effects on the school's mission: educating girls and young women. I sincerely believe that splitting the campus is not the way forward. In my 13 years at Castilleja as a middle school teacher, I have closely observed the value of the many mentorship opportunities made possible through having multi-age groupings and relationships. Upper school students lead programs such as diversity and inclusion activities with the middle schoolers, upper school clubs interact with the younger students and help them find subjects that they really enjoy, upperclassmen are also TAs for the younger students, can help them learn in effective ways and also teach them individual study skills that helped them learn when they themselves were in middle school. This is also an important part of a formalized leadership curriculum, a key component of Castilleja's educational mission. Castilleja has addressed the key issues raised by the opponents of the project and I hope that the plan to modernize our facilities, and gradually expand our enrollment will be able to move forward.

Yours respectfully,

Evelyne Nicolaou  
Middle School French teacher

**Evelyne Nicolaou**

*She/her/hers*  
Faculty Member, French

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

**P** (650) 470 7815

**E** [enicolaou@castilleja.org](mailto:enicolaou@castilleja.org)

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

**From:** [Kley Gilbuena](#)  
**To:** [Planning Commission](#)  
**Subject:** Support for the Castilleja School Campus Renovation Project  
**Date:** Wednesday, August 26, 2020 4:44:40 PM

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To the Planning and Transportation Commission,

I am reaching out to you today to express my support for the Castilleja School campus renovation plans. During these difficult times it's encouraging to me and many of my Castilleja colleagues that our neighborhood community is gathering together, taking steps towards building a better future for our community and beyond.

I've been a member of the Castilleja community for three years now, first as a volunteer mentor for the robotics team and then as the advisor overseeing the entire program. My work takes me through the spectrum of machinery maintenance in our basement lab space, to work on project-based learning initiatives and then to regional industry outreach as we continually seek long term, strategic partnerships.

Enthusiasm and participation in our robotics program has grown steadily in the last two years. While I am seeing increased student participation trends that reflect the nationwide and global increase in the advanced, highly technical industry 4.0 landscape the draw of our program is much simpler. Castilleja has created a space that encourages girls to thrive not because it excludes boys but because it is with other girls.

I am blown away every day and every year by the initiative, drive and technical expertise that our students display constantly challenging themselves and their boundaries. Every Spring my school year culminates with at least two robotics competitions filled with hundreds, sometimes thousands, of students where our all-girls team is an anomaly among the all-male or heavily male populated robotics teams. Doing my part to help reshape this imbalance is one of my primary drivers at Castilleja. We will all benefit from a world where representation in the workplace and in every conversation more closely represents the diversity of humanity.

Increasing the student enrollment and enlarging our campus is crucial for the preparation of future women leaders in STEM. While we work towards equity, inclusion and diversity in the workplace we, students and faculty alike, strive to be active listeners for the rest of our Palo Alto community. I know that there will be a time off in the future when our learning space will be a construction site and I know it will be equally disruptive for us all. As I express my goals it is equally my goal to be a good neighbor who respects and acknowledges the perspectives of the entire neighborhood.

Working from home engaged in remote, distance learning, keeping our community safe and healthy, the knowledge that we will get off our screens one day and get back to making and building in person is energizing. Our new campus will only enable myself and my colleagues to engage our future leaders in more expansive and advanced learning experiences when we all need them to be prepared and energized for the unknown now more than ever.

Thank you for taking the time to consider my thoughts.

I look forward to hearing more updates throughout the rest of the year as we move forward together.

Sincerely,  
Kley Gilbuena

--

**Kley Gilbuena**

*He/Him/His*

Robotics Advisor + Bourn Idea Lab Faculty

**Castilleja School**

[1310 Bryant Street](#)

[Palo Alto, CA 94301](#)

E [kgilbuena@castilleja.org](mailto:kgilbuena@castilleja.org)

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

*Women Learning. Women Leading.*

**From:** [Kley Gilbuena](#)  
**To:** [Planning Commission](#)  
**Subject:** Support for the Castilleja School Campus Renovation Project  
**Date:** Wednesday, August 26, 2020 4:44:40 PM

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Thank you for taking the time to consider my thoughts.

I look forward to hearing more updates throughout the rest of the year as we move forward together.

Sincerely,  
Kley Gilbuena

--

**Kley Gilbuena**

*He/Him/His*

Robotics Advisor + Bourn Idea Lab Faculty

**Castilleja School**

[1310 Bryant Street](#)

[Palo Alto, CA 94301](#)

E [kgilbuena@castilleja.org](mailto:kgilbuena@castilleja.org)

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

*Women Learning. Women Leading.*

**From:** [Gloria Rothbaum](#)  
**To:** [Planning Commission](#)  
**Subject:** Regarding Castilleja's expansion  
**Date:** Wednesday, August 26, 2020 3:38:42 PM

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Dear Commissioners,

I first became a citizen of The City of Palo Alto in 2003 when I purchased my place 3 blocks south of University Ave. I have been loving the hustling and growth amidst peacefulness.

Most of those years I drive past Castilleja wondering where the students are and what type of activities they hold on campus. I have never encountered any traffic issues related to the school. Just a year ago, my daughter declined other acceptances and enrolled in Castilleja for its outstanding education. One of the most unusual aspects I've observed about Castilleja is its ability to educate its community (students and parents) to do the right thing.

From our first visit to the school, perspective families hear about the school's view of being traffic-friendly. By the time we sit down to apply, my daughter has already planned she would bike to school (and she didn't even own a bike then). Since enrollment, she's been riding her bike to school even on rainy days. That's a lot of school-commuting driving eliminated. All parents know that if the child is not willing to do something on their own, it doesn't happen consistently. And which parent isn't glad their child is willing and able to go to school on their own? That's Castilleja's effort.

On the parent community front, I hear about traffic management all the time. Traffic management is covered throughout the year during various parent meetings, their staff was always available to answer questions assisting parents to navigate and conform to the route pattern, and providing on-going suggestions for minimizing driving to school and options for carpooling. I admire the school's ability to take action and have observed these specific activities: letters sent home repeatedly about not driving in single-occupancy vehicles, parking attendants at all events, cones marking where you can't park, website detailed instructions for good neighbor practices.

Those measures have decreased traffic to the neighborhood by 25-30% in the past several years.

Part of Castilleja's philosophy encompasses conscience and courtesy. That's the way they educate and treat the students and parents, and it's human nature we reciprocate how we are being treated. As part of the school community, our family understands the need to minimize traffic and we consciously act on helping with the common goal (e.g. carpooling to school events even when two parents work at different locations or just simply walked to campus after having dinner at a restaurant at Town and Country). When the school proposes to have a smaller garage, I am certain they will be able to further reduce traffic to campus.

I have never seen a single organization of such size capable of influencing its community (i.e. paying customers) to conform so diligently just to be respectful of the neighborhood (think convention centers and other event venues). Growth and modernization are good and essential for longevity. Our local Mayfield didn't survive after being in business for two decades as it's



not capable of adapting to current demands. We want to be very careful to not put a damper on Castilleja's plan to upgrade its facilities as that's an effort to prepare for future demand. Their expansion plan should not be held back but should be effectively supported. Castilleja's work on traffic management is exemplary and it's a model the City of Palo Alto can leverage and use as future suggestions for other organizations and businesses.

I ask for all the commissioners' favorable support.

Sincerely,  
Gloria Rothbaum

**From:** [Eduardo F. Llach](#)  
**To:** [Planning Commission](#)  
**Subject:** I'm in support of Castilleja's Alternative 4 presented at the PTC  
**Date:** Wednesday, August 26, 2020 2:27:58 PM

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Dear PTC members, I want to thank all of you for the hard work to continue to improve our lives in Palo Alto, I know the hours and sacrifices you are making.

I'm in support of Castilleja and Alternative 4 being discussed today.

I support Castilleja because:

- My grandmother graduated from Castilleja 103 years ago. The school gave her a unique education which made her independent and successful so she could raise my father and my uncle as a single mother. As her first grand son I learned a lot from her, so thank you Castilleja!
- My wife, Teri, went to a similar all-girls school in Menlo Park and she too saw the value of being able to focus on academia and get the benefits of that all-girls education.
- We chose to send our kids to Paly, next to our home, and it was a great school for them. My son, who needed IEP help throughout, graduated from USC's Film School, so thank you Barron, Jordan and Paly! For them the benefits of Paly worked out very well.
- Castilleja provides a choice that parents and students can make between Castilleja's all-girls education and Paly's broader opportunities afforded by a school that is 5 times larger.
- With greater high school enrollment, Castilleja can offer the opportunity to more girls, including those from under resourced schools who are supported through the school's generous tuition assistance program. Many students receive tuition assistance, and some are first generation high school students from under resourced schools who benefit greatly from the added support that a small school affords.

PTC should support Alternative #4 because:

- This proposal by Castilleja was judged to be the environmentally superior option. With this alternative plan - along with required mitigations and limitations - Castilleja can achieve its goal of enrolling more students while bringing no new cars to the neighborhood.
- With Alternative #4 the school found a way to save the homes on Emerson as well as many trees - a win-win for everyone!

I urge you to support Castilleja and Alternative 4.

Thank you, Eduardo

[Eduardo F. Llach](#)

[36 Churchill Ave, Palo Alto](#)

[Cel – 650 678 1406](#)

**From:** [Kathleen Foley-Hughes](#)  
**To:** [Planning Commission](#)  
**Subject:** Letter in Support of Castilleja from a Palo Alto Resident  
**Date:** Wednesday, August 26, 2020 1:29:45 PM  
**Attachments:** [Letter in Support of Castilleja.docx](#)

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August 26, 2020

City of Palo Alto  
Planning Commission

**Re: Letter in Support of Castilleja's Revised Plan**

Dear Commissioners and Staff:

I wanted to reach out in support of Castilleja School's revised plans that have been part of their ongoing effort to educate more young women and be a part of the Palo Alto Community.

I have lived in Palo Alto, in Leland Manor, for nearly 30 years and have been an active member in the community through the public schools and am a Neighborhood Preparedness Coordinator. I believe in our public school system and I believe in the work being done at Castilleja. I have 4 children who have grown up here and benefitted from the Palo Alto Schools.

I am also the founder of Ada's Café, a non-profit that hires, trains and empowers adults with disabilities. Ada's is located at the Mitchell Park Community Center. Castilleja continues to help Ada's in various ways. The young women volunteer weekly for Ada's doing everything from working alongside our employees with disabilities in the Café, helping with social media, writing letters to donors, baking cookies, decorating for holidays, researching best practices for work with the disabled community and so much more. They are proactive, responsible and engaged in the Palo Alto Community and have been so for a long time. They have lightened my load immeasurably. I can't imagine running the program without the meaningful work they do with our most marginalized employees.

I would be happy to answer any further questions. I wholeheartedly support Castilleja and hope you approve their request.

Sincerely yours,

***Kathleen***

Kathleen Foley-Hughes  
839 Northampton Dr.  
Palo Alto, CA 94303  
650-269-5505

**From:** [Heidi Hopper](#)  
**To:** [Planning Commission](#)  
**Subject:** Support for Castilleja CUP and Master Plan  
**Date:** Wednesday, August 26, 2020 12:31:59 PM

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Dear Palo Alto Planning Commission,

I am a resident of Palo Alto and have lived here since 2003 and I have also been a parent and board of trustees member at Castilleja. I have attended most of the neighbor meetings over the last 7 years and I have heard direct feedback from neighbors requesting a garage be built to remove cars from the neighborhood streets. When we first started discussing the Master Plan, that was the major request by neighbors of the school. I still have the SJ Mercury news article quoting them saying that in 2015.

Now the garage has been designed, and the Final EIR says that having the garage is the superior alternative to having no garage. It improves the neighborhood by removing cars from being parked all along the frontage of Castilleja. Also, I have seen the beautiful renderings that WRNS has created for the school of the new campus. The garage entrance and exit are very tasteful and not at all commercial looking. I think these details blend seamlessly into the landscape and look far better than a surface parking lot and parking on the streets.

The aesthetics of the school will be much improved by the rebuilding of the classroom buildings. I love the updated modern design and the thoughtful way that it has been developed to fit better in scale and look with the surrounding neighborhood, while also preserving Castilleja traditions such as the circle. I am inspired by the design's choices to be green and sustainable and love that the roof is being so well used for photovoltaic energy generation.

So many other local schools, both public and private, have modernized their campuses. Castilleja needs to do this, too, to support the program and allow the young women beautiful places to learn and grow. I am asking the PTC and the ARB for support of the Project Alternative with the smaller garage and distributed drop-off. It is a great compromise and will work well in the community and for Castilleja.

Thank you for your time,  
Heidi Hopper

From: [Tom Shannon](#)  
To: [Nguyen, Vinhloc](#)  
Cc: [akcooper@pacbell.net](mailto:akcooper@pacbell.net); [carlab@cb-pr.com](mailto:carlab@cb-pr.com); [mcleod.bruce@gmail.com](mailto:mcleod.bruce@gmail.com); [Tom Shannon](#); [andiezreed@gmail.com](mailto:andiezreed@gmail.com); [101550@msn.com](mailto:101550@msn.com)  
Subject: Written comments memo and attachment for PTC meeting tonight - 8/26/20  
Date: Wednesday, August 26, 2020 12:22:49 PM  
Attachments: [Written comments memo sent to PTC 8.26.20.docx](#)  
[Figure 2 - Existing Traffic Volumes - Kellogg-Bryant intersection not studied.pdf](#)  
[Figure 10 - Existing Daily Traffic Volumes.pdf](#)  
[Figure 12 - Dispersed Project Alternative Traffic Volumes.pdf](#)  
[Figure 16 Dispersed Proj. Alt. Daily Net New Trips.pdf](#)  
[Comparison of EIR traffic patterns under DEIR and FEIR.pdf](#)  
[Neighbors Alternative Plan sent to PTC.pdf](#)

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**CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.**

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Hi Vinh,

I have attached a written comments memo drafted by 4 neighbors that live across the street from Castilleja along with several supporting attachments.

I hope this can be sent to the PTC before tonight's meeting. We would like to reference many of these comments in our public comments tonight.

Let me know if you need anything else from me.

Very much appreciate your help.

Thanks,

Tom Shannon  
cell: 408-230-7095

August 26, 2020

**To: Members of the Palo Alto Planning and Transportation Commission**

From:

**Tom Shannon** - 256 Kellogg Ave. - 31 years across street from Castilleja

**Alan Cooper** - 270 Kellogg Ave. - 36 years across street from Castilleja

**Carla Befera and Bruce McLeod** – 1404 Bryant St. – 52 years across street from Castilleja

**Note: For ease in reading, we have highlighted selected action items in the memo for the PTC's consideration.**

We would support a Castilleja redevelopment plan that is compatible for both the school and the neighbors. However, this is currently not the case. Castilleja faces a huge challenge, operating both **a middle school and high school** on an inadequate 6 acre parcel in one of Palo Alto's historic, residential neighborhoods. We have worked for the past seven years seeking compromise solutions with Castilleja to preserve our historic neighborhood yet we still are unable to find a plan that's acceptable to both parties.

**We ask the PTC's thoughtful help in this goal.**

Below we have outlined several selected development topics with supporting attachments that need to be more fully studied, scrutinized and fleshed out by the PTC regarding Castilleja's application.

#### **ENVIRONMENTAL IMPACT REPORT – inadequate traffic analysis**

The EIR for Castilleja's expansion has little or no study of the Kellogg/Bryant intersection. This is the most treacherous intersection among the four that interface with Castilleja. We have witnessed 2 bike/car accidents here. **Public school** children commuting by bicycle must cross this intersection on their way to/from school. Parents of young public school children will not let their children cross this intersection without adult supervision because the Castilleja traffic comes from all directions to turn onto Kellogg and access the school entrance. Even when Castilleja's traffic monitors are present, Castilleja parents are in a hurry to drop off their daughters and often drive through this intersection without watching for a child, pedestrian or bicyclist waiting to cross.

There are no stop signs on Bryant Street at this intersection because Bryant is the bicycle boulevard corridor. Castilleja parents have to drive through this intersection coming from Waverley or making left and right turns from Bryant onto Kellogg. **We don't understand why this intersection was not studied in detail like the others.**

We have described below EIR traffic "Figures" (diagrams) that show no data was provided for the Kellogg/Bryant intersection. These are copied from the EIR section called: *Traffic Impact Study for Castilleja School Expansion*. We have also attached copies of these diagrams for your easy reference.

Figure 2 – (attached) **Existing Traffic Volumes:** Kellogg / Bryant intersection not studied. Kellogg Waverley intersection not studied; Kellogg / Churchill intersection not studied. These are all feeder streets for Castilleja’s drop-off and pick- up traffic especially those that need to access the Kellogg Avenue entrance. **Why weren’t these intersections studied?**

Figure 10 – (attached) **Daily Traffic Volumes:** No data for Kellogg Ave.  
**Why was Kellogg omitted?**

Figure 12 – (attached) **Dispersed Project Alternative Traffic Volumes:** Here again: Kellogg/Bryant intersection not studied; Kellogg/Waverley intersection not studied; Bryant/Churchill intersection not studied.  
**Why were these intersections omitted?**

Figure 16 – (attached) **Daily Net New Trips:** This study shows NO traffic data for Kellogg Ave, which is one of the proposed drop-off streets for students in the Dispersed Project Alternative. **Why was Kellogg not studied?**

**The traffic study included in the EIR ignores the large number of Castilleja cars turning onto Kellogg from Waverly, Bryant, Emerson and Alma Streets.**

#### **REVISED DRAFT EIR turned into a FINAL EIR without any public comment period**

The public was given an opportunity to comment on the 2019 **Draft EIR** which had all of Castilleja’s peak hour traffic going through an underground garage. Subsequent to the Draft EIR being published, Castilleja changed the traffic pattern significantly to a “dispersed” drop off pattern in 3 – 4 locations on the surrounding streets.

**(See attached Comparison of EIR traffic patterns under DEIR and FEIR)**

Castilleja, Dudek and the school’s attorneys then simply inserted the revised traffic plan into the 2019 DEIR and called it a Final EIR, publishing it on July 29, 2020 – 28 days ago **with no comment period held for the public to speak to these revisions. How can a change this significant simply be inserted into a DRAFT EIR and have it be called a Final EIR with no opportunity for public comment?**

#### **STUDENT PARKING – not accounted for in EIR or Castilleja’s application**

The Palo Alto Muni code mandates 4 off-street parking spaces for each teaching station at a high school. This code section is woefully inadequate because it fails to consider that in this 21st century almost all of Castilleja’s driving age high school students drive to campus and park all day on the surrounding streets. The number of driving age students attending Castilleja can approach 200. There is no on-campus parking for these students. The surrounding streets become the students' parking lot. Neighbors have asked Castilleja repeatedly to prohibit students from driving to school but Castilleja refuses to enact such a policy. The head of school stated “We can’t tell a driving age teenager not to drive to school. That just won’t happen!” To that we responded, “Because there is no on-site student parking available, create a shuttle system and mandate that all students be shuttled to the campus from remote satellite locations.” Castilleja is unwilling to consider this alternative. **Neighbors request PTC’s help in assuring a program is implemented for shuttling students to campus to mitigate the extensive student-on-street parking.**



### **PEAK HOURS?**

Under the EIR mitigations, Castilleja will supposedly be held to a set number of trips during peak hours but we can't find a strict definition in the EIR as to what are the peak hours. If Castilleja were to exceed the daily peak hour limit they could simply move a portion of their student drop-off to be outside the published peak hours (before or after) and then bring themselves into compliance with trips during peak hours. We have seen 8 - 9 AM in the EIR defined as the morning peak hours but Castilleja students start pouring into school anywhere from 7:30 AM to 9 AM. We see this every day that school is in session.

**We need more factual detail on peak hours and TOTAL daily trips allowed.**

### **IS THE CITY LISTENING TO NEIGHBORS? WHO HAS PRIORITY?**

Why does Castilleja get highest priority given to their requests and needs, yet the city places lowest priority, if any, on the neighbors' concerns and quality of life?? Are not the neighbors the citizens, the voters and the taxpayers? Castilleja is the conditional user that pays no taxes, is a private-educational business and enrolls more than 75% of their students from outside Palo Alto? **Why does the city continue to give greater priority to the needs of Castilleja over the neighborhood and community's needs?**

**We, the neighbors, have suggested alternative plans to place all Castilleja traffic on their campus. (See attachment.)** Yet the city staff rejected this alternative stating it will impair the fields, the pool or the Castilleja lawn circle. The city even acknowledges in its rejection that the parcel is too small to handle Castilleja's traffic yet they are entertaining a massive enrollment increase and redevelopment expansion with all the Castilleja traffic placed on the neighborhood streets. How does that sync with the goal of preserving Palo Alto's historic, residential neighborhoods?

All of us acknowledge that a 6 acre site for *a middle school and a high school* is truly inadequate. We suspect even Castilleja would acknowledge that! Yet the neighborhood streets have to bear the brunt of all the traffic and parking while Castilleja is permitted to preserve its open space field, circle and pool. **Should there not be compromises made on any one or more of these amenities (the field, pool or circle) in order to accommodate the traffic generated by the school? Again, please reconsider the attached draft Alternative Plan proposed by neighbors.**

### **CASTILLEJA IS IN VIOLATION OF ITS CURRENT CUP**

Why is an expansion application even being considered while the school knowingly continues to be in violation of its current CUP? Why does Castilleja get a pass on continuing to be in violation of its current CUP? We know the school states they had a deal with the former City manager but we, as neighbors, never saw that deal approved in a CUP amendment, never saw that deal come before a publicly noticed meeting, never saw that deal come before the Planning and Transportation Commission and never saw that deal come before the City Council. **How can the city in good conscience move forward on an expansion application while the applicant is in violation of the current CUP?**

### **CASTILLEJA'S WAY OF ENGAGING THE NEIGHBORHOOD**

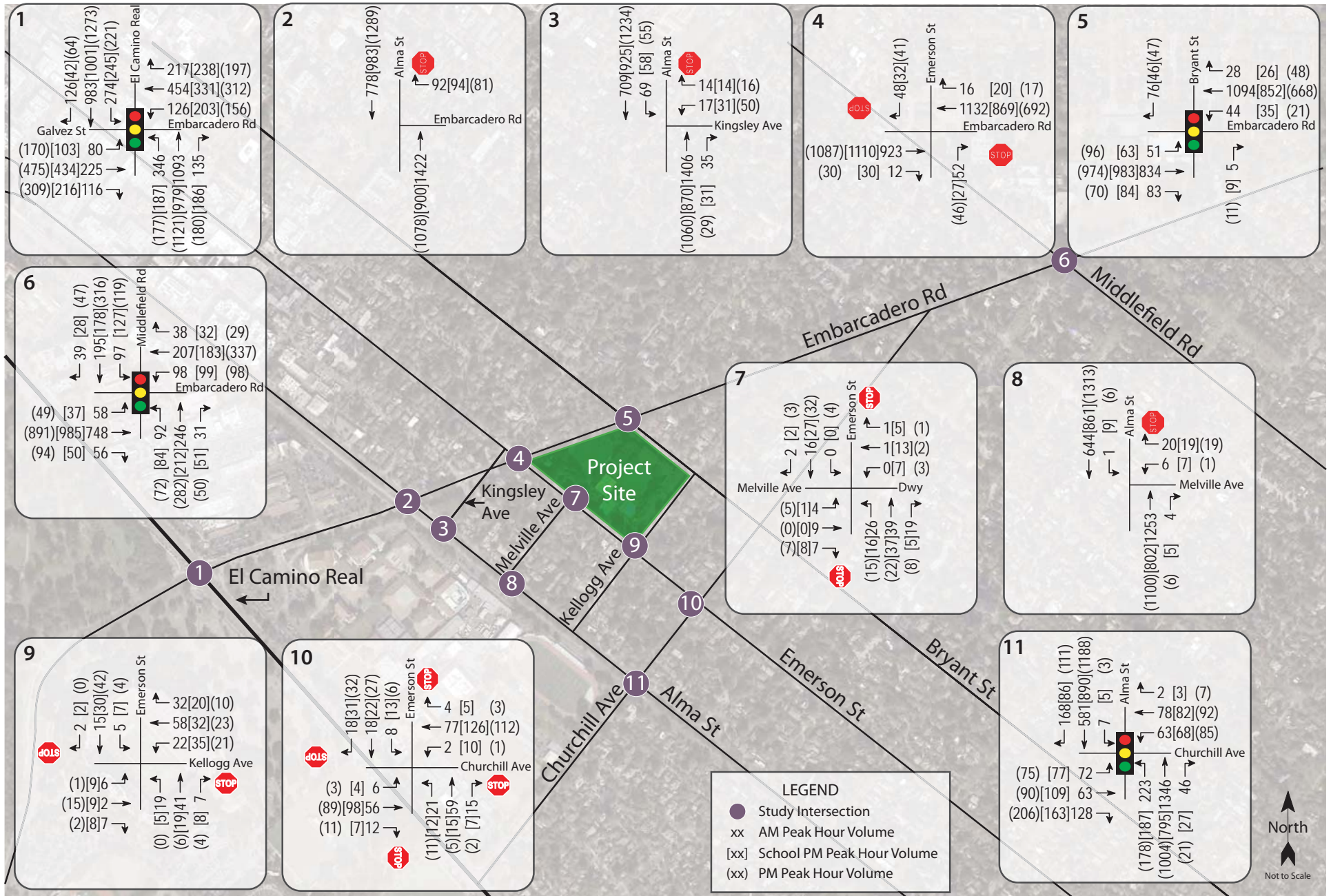
We participated on the neighborhood Small Working Group (SWG) from 2013 – 2016 that tried to come to an agreement with Castilleja on their redevelopment plans. We never made any progress mainly because our comments and ideas were not taken seriously by Castilleja. They held meetings with us but rarely entertained any of our suggestions and habitually held back disclosing information to the group. It took over a year to get Castilleja to even share a desired enrollment number. After about a year of meetings, Castilleja came forth with an enrollment of 490 students which has now mushroomed to a request for 540 students – a 30% increase in enrollment from their allowed 415 students on a parcel that's too small even for the current enrollment.

After three years of SWG meetings, Castilleja chose to submit its redevelopment application to the City on June 30, 2016 - just 2 weeks after first presenting it to the Small Working Group. (SWG first learned of Castilleja's development plan on June 15, 2016 – 15 days prior a formal application being submitted to the city.) There was no opportunity for SWG to give Castilleja any feedback. There were no neighborhood meetings held to introduce the plan. No feedback was welcomed. They showed us the plans and then immediately submitted them to the city. **How can Castilleja's actions be considered an open process engaging the neighborhood?**

### **QUIET ENJOYMENT?**

What about our neighborhood's right to "quiet enjoyment?" That's impossible when Castilleja operates a full time middle school and high school (Grades 6 -12) on a 6 acre parcel from August to June, then opens its summer school for the months of July and August and meanwhile holds over 90+ events/year on the campus some, at times, with over 500 participants. **Should we not be allowed to exist as a "residential neighborhood" and not be overrun by a conditional user private school?**

Thanks for reading.

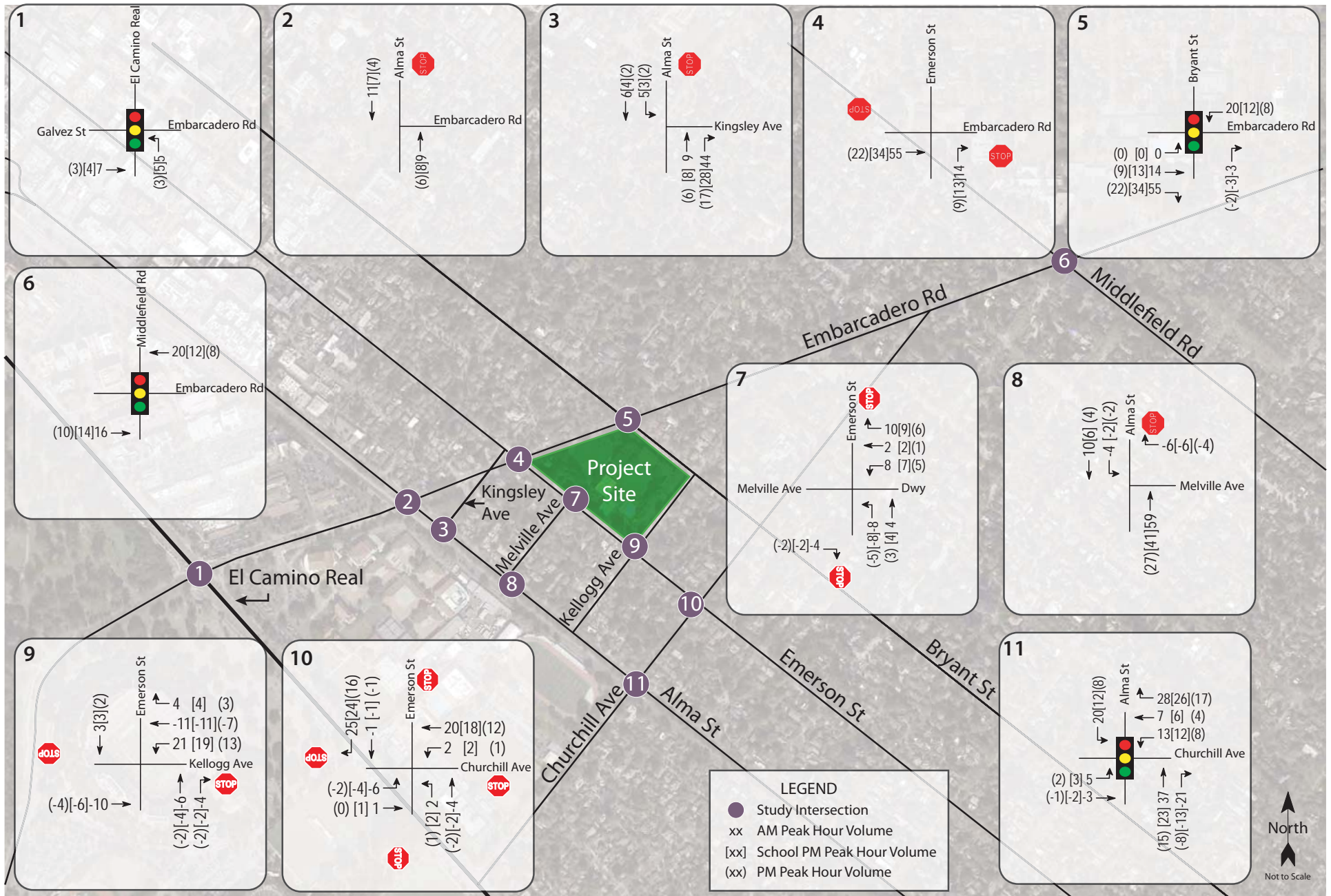


Traffic Impact Study for the Castilleja School Expansion  
**Figure 2 – Existing Traffic Volumes**



Traffic Impact Study for the Castilleja School Expansion  
**Figure 10 – Existing Daily Traffic Volumes**





Traffic Impact Study for the Castilleja School Expansion  
**Figure 12 – Dispersed Project Alternative Traffic Volumes**

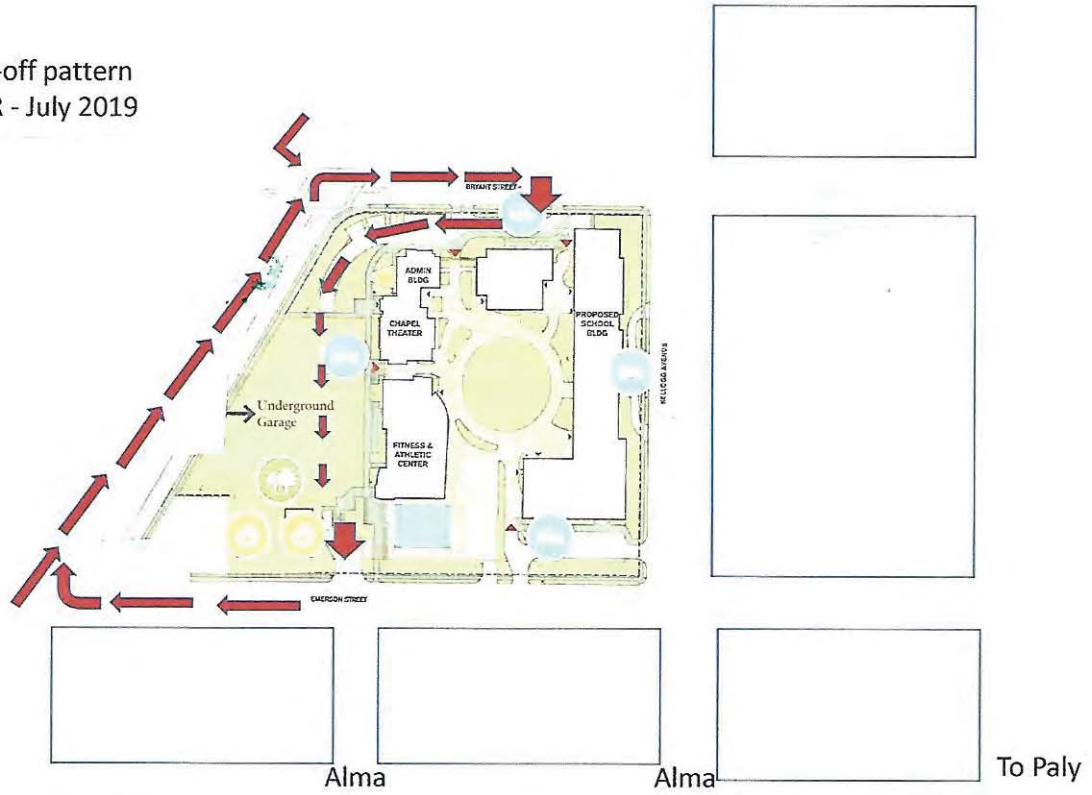


Traffic Impact Study for the Castilleja School Expansion  
**Figure 16 – Dispersed Project Alternative Daily Net New Trips**

# Castilleja School

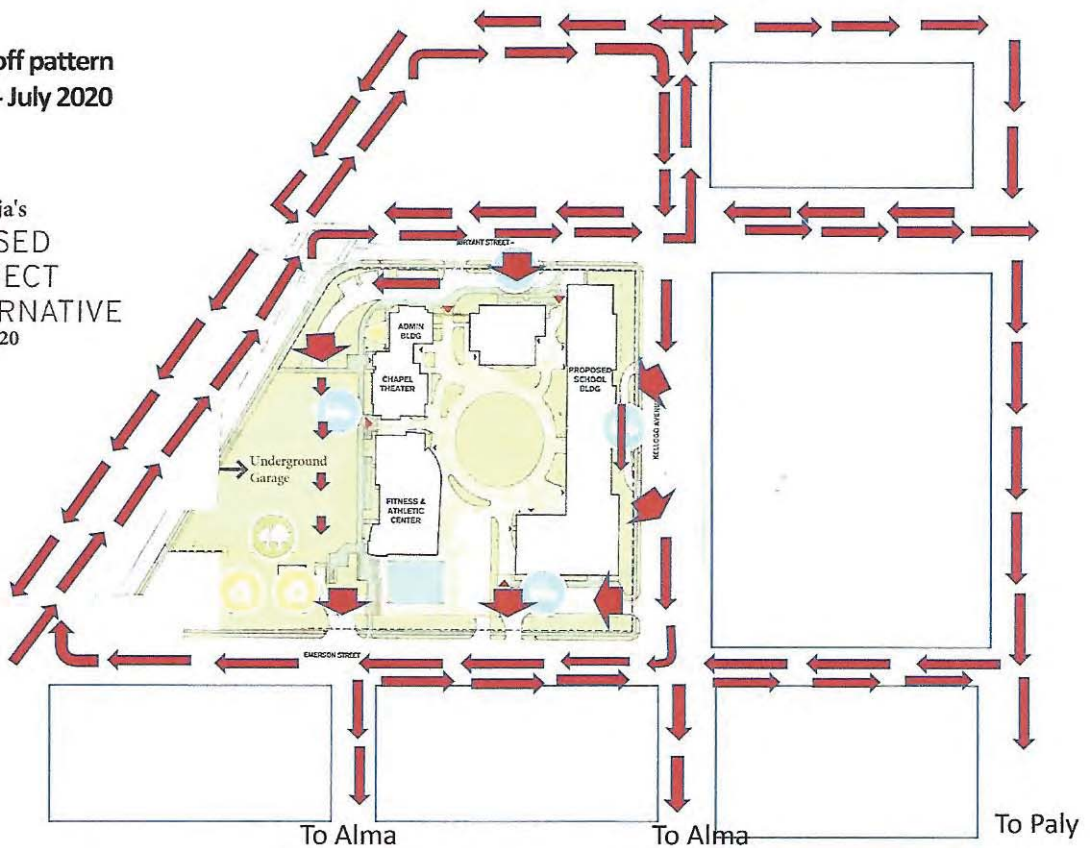
Comparison between the Draft EIR "Drop-off" traffic pattern published in July 2019 to the Final EIR "Drop-off" traffic pattern just recently published on July 30, 2020

Traffic drop-off pattern per the DEIR - July 2019



Traffic drop-off pattern per the FEIR - July 2020

Castilleja's  
REVISED  
PROJECT  
ALTERNATIVE  
April 2020



## NEIGHBORS' ALTERNATIVE PLAN FOR CASTILLEJA SCHOOL

### **Alternative plan to Castilleja's proposed plan:**

The following alternative plan we propose has the ultimate goal of mitigating the extreme traffic environmental impacts stated in the FEIR and thereby benefiting the City, Castilleja, the neighborhood and bicycle riders. The plan is to create a "Castilleja Educational Village" with traffic flow into and out of the Village from Embarcadero.

### **Plan Benefits - Immediate:**

The plan would dramatically improve bike safety along the Bryant Street Bike Boulevard adjacent to Castilleja by eliminating the interaction of cars with bicycles and pedestrians.

The plan enhances Castilleja's concept of preserving their historic presence and permits them to grow in a unified and self-contained 6 acre educational village, while being a congenial neighbor without adding massive traffic and parking issues.

The plan leads to better traffic management, not more traffic, on Embarcadero Road, and would enhance safety for bicyclists and pedestrians crossing Embarcadero Road along Bryant Street.

### **Implementation Plan:**

All of these benefits can readily and realistically be achieved with minimal adjustment to existing development plans by Castilleja and the City (e.g. future high speed rail).

### ***Castilleja:***

1. Castilleja would adjust their design to incorporate a historic "Castilleja Gate" (i.e. similar to UC Berkeley's Sather Gate) along Embarcadero Road thru which all Castilleja traffic would ingress and egress its Educational Village.
2. Traffic entering the Village could be routed along an internal, extensive queue access route to accommodate cars and student drop-off/pick-up and give access to Village parking. This can be done without any back-up of cars on Embarcadero.
3. Parking in the Village could be accommodated in the current underground garage and potentially a larger underground garage under the Circle (new).
4. Castilleja would revamp their design to eliminate entry to the Village from surrounding streets, thereby providing added space for buildings and campus activities.

### ***City:***

1. The City would close both sides of the Bryant Street intersection at Embarcadero to all cars, and would install a limited traffic signal at the current intersection. Only bikes, pedestrians and emergency vehicles could cross Embarcadero along Bryant Street by using this on-demand triggered signal.
2. A controlled signal would be installed at the "Castilleja Gate" entrance. This would become the dominant signal on Embarcadero between Waverley and Emerson Streets.
3. Additional speed control signage/monitoring would be put along Embarcadero to enhance safety at the Castilleja Gate intersection.



## Plan Benefits – Long term:

1. **Improved quality of life:** The plan would dramatically reduce traffic through the neighborhoods surrounding Castilleja thereby greatly enhancing quality of life in these neighborhoods (compared to traffic in pre-Covid times and FEIR predictions). Neighbors would not endure the projected 1000+ car trips/day along with shuttles and busses for Castilleja's student pick-ups, drop-offs, faculty, staff, visitors and student trips, and daily garbage-truck pickups and 16-18 wheel truck deliveries.
2. **Enhanced bicycle safety:** The plan provides greater bike safety near Castilleja by eliminating the interaction of cars and bicycles at Bryant and Embarcadero. This is consistent with the City's stated goal of limiting traffic on the Bryant Bicycle Boulevard. And, because residential streets would not be needed to access the Castilleja Village, this would dramatically improve bike safety on Emerson, Bryant and Kellogg streets
3. **Greater Castilleja autonomy:** The plan would provide Castilleja greater flexibility in their design, scheduling and handling of Village buildings, activities and events, with all Castilleja traffic flow and parking within the Village.
4. **Greater Embarcadero Traffic Safety:** The plan would provide greater control of traffic and safety for students and bicycles in the area around Castilleja with two on demand signals. Traffic would flow more uniformly because signals would only be activated when needed. The Castilleja internal access road would be long enough to queue all student drop-offs and pick-ups to prevent back-up onto Embarcadero.

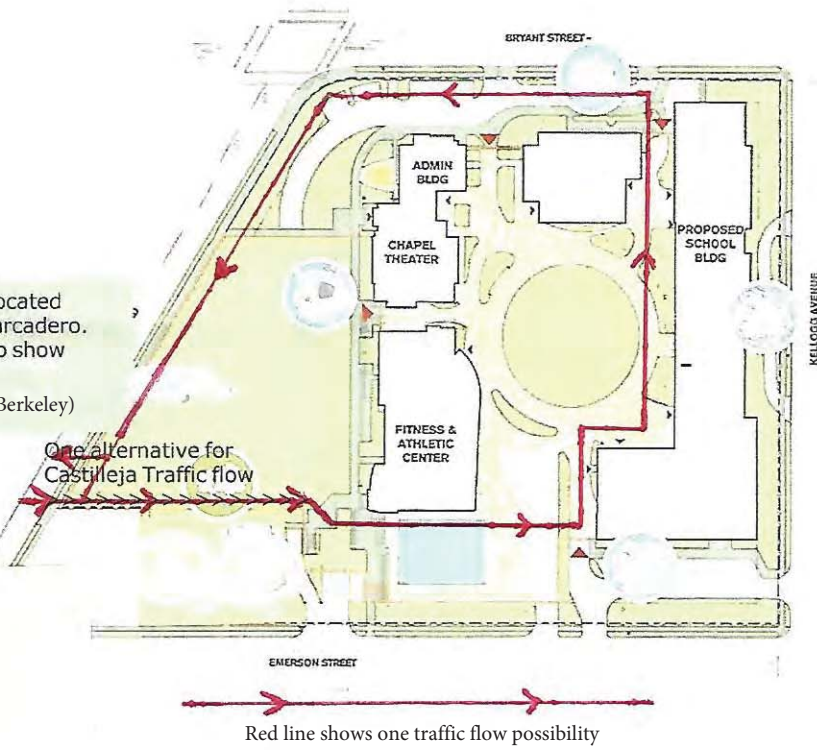
## Added Bonuses:

1. **Bike safety improved for Palo Alto HS students:** If the Alma bicycle crossing is moved from Churchill Ave. to Kellogg Avenue with high speed rail, then this Kellogg underpass/interchange would dramatically improve bicycle safety, if there is no Castilleja traffic on Kellogg Ave.
2. **Future Castilleja traffic impediments removed:**  
The Churchill/Embarcadero/Caltrain High Speed Rail dilemma is currently under study. By containing all of Castilleja's traffic to its Village entrance on Embarcadero and keeping car traffic within the boundaries of its campus, this plan would remove any future impediment that Castilleja's traffic might have on the final outcome of resolving the Churchill/Embarcadero/Caltrain/High Speed Rail conflicts.

The attached diagram illustrates one possible surface traffic flow diagram for the Castilleja Educational Village, based on the current Castilleja plan drawings. Other flow patterns are possible. Thank you for your time and attention in considering this alternative.

Castilleja Alternative Proposal  
"Castilleja Gate" July 2020

"Castilleja Gate" to be located somewhere along Embarcadero. Diagram not intended to show specific location.  
(i.e. like Sather Gate at US Berkeley)

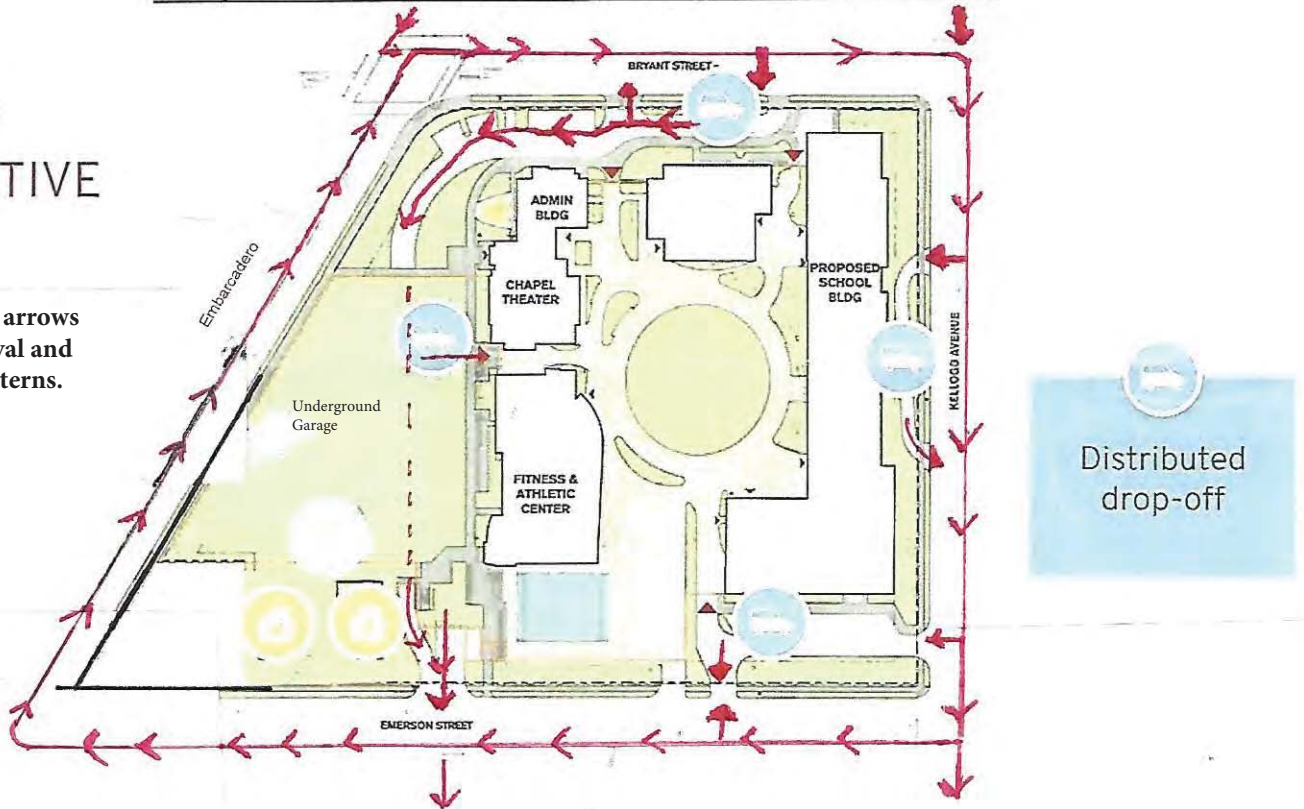


Sather Gate at UC Berkeley

**Comparison of Castilleja Plan with Neighbors' Proposed Plan**

Castilleja's  
**REVISED  
 PROJECT  
 ALTERNATIVE**  
 April 2020

Red lines and arrows show car arrival and departure patterns.

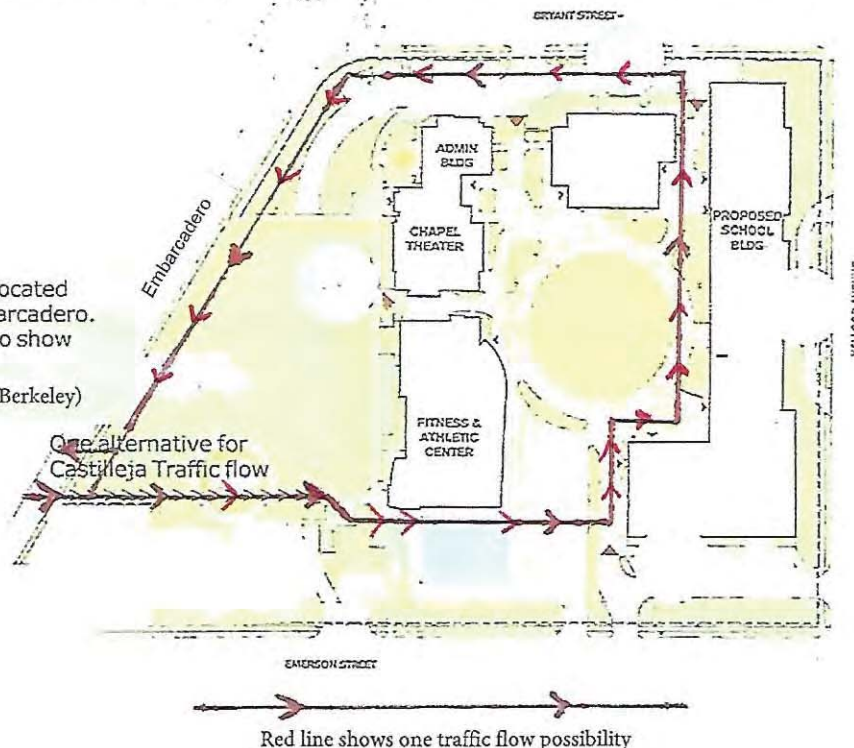


Note - Castilleja's proposed plan (above) has just about ALL of Castilleja's traffic - staff, students, visitors, guests, buses, truck deliveries - using the Bryant Street Bike Boulevard to access the campus, the underground garage, and the student drop-offs/pick-ups. Bryant, Kellogg and Emerson streets are all impacted with "significant and unavoidable traffic per the FEIR.

**PROPOSED PLAN BY NEIGHBORS (below)** calls for a gated entrance off of Embarcadero in order for all Castilleja traffic and parking to be on site. With this plan, the first block of Bryant St. south of Embarcadero would be closed to car traffic thereby dramatically improving the safety of the Bike Boulevard. Bikes, pedestrians and emergency vehicles could use Bryant St. to cross Embarcadero with a triggered signal.

August 2020

"Castilleja Gate" to be located somewhere along Embarcadero. Diagram not intended to show specific location. (i.e. like Sather Gate at US Berkeley)



From: [Kimberley Wong](#)  
To: [Planning Commission](#)  
Cc: [Council, City](#); [Shikada, Ed](#); [French, Amy](#); [Lait, Jonathan](#); [Architectural Review Board](#); [Castilleja Expansion](#)  
Subject: Comments for the PTC meeting on August 26 2020 re Castilleja School FEIR  
Date: Wednesday, August 26, 2020 12:08:01 PM

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My name is Kimberley Wong and I have lived right across from the Lockey house on Emerson Street for 24 years. I am extremely concerned with the Castilleja project and the impacts it will have on our R-1 Zoned Single Family Neighborhood in which the school sits. I am concerned for impacts of the construction of the site as well as the final project and the long lasting impacts it will have to our neighborhood.

The school violated the 415 enrollment limit for years before being found out by neighbors during a community meeting, hosted an 100+ events way exceeding the 5 large events and "several" smaller ones that are allowed in the CUP rules, and continually downplay the impacts to DUDEK who drafted FEIR by omitting important data, facts and details in their plans. Until they present a fully transparent plan with depths of Garage, detailed plans of how they will manage construction site and vehicles, how they will manage any enrollment increase in the current COVID-19 pandemic, as well as providing proper, quantifiable studies to study the true impact to the neighborhood 24/7 (because residents don't shut their doors between 5pm and 7am) the school should not be allowed to go forth with their revised plans and present during a second round to the ARB or PTC until all those details are ironed out.

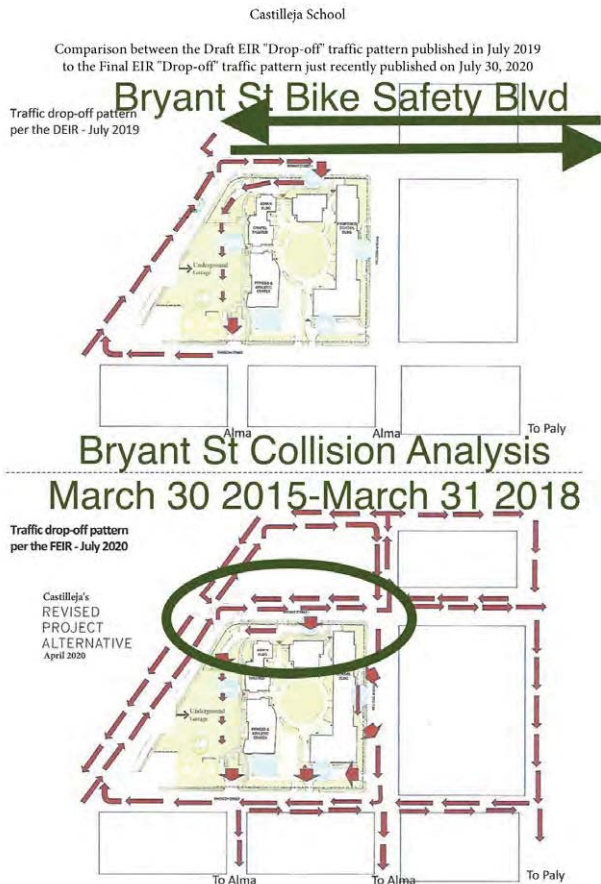
#### [Palo Alto Municipal Code sec 18.76.010 Conditional Use Permit \(CUP\)\(c\)](#)

Findings Neither the director, nor the city council on appeal, shall grant a conditional use permit, unless it is found that the granting of the application will: (1) Not be detrimental or injurious to property or improvements in the vicinity, and will not be detrimental to the **public health, safety, general welfare, or convenience**;

I feel that Castilleja's project violates ALL of these conditions:

- Dangers to **Public Health**, walking in underground garage filled with exhaust and under a sewer line. The extra traffic will add pollution to the neighborhood as cars cue up for drop offs and pickups.
- **Re: Safety and General Welfare**: Danger to bicyclists as cars drive onto the Bryant street bike boulevard in and out of the garage and pull into the drop off areas around the campus
- **Convenience**: Traffic congestion will inconvenience those driving to school and the residents trying to avoid the traffic.

**SLIDE 1** As you can see in the illustrations... the original plans called for all cars to enter into a garage off the Bike Boulevard which would cause **significant and unavoidable impacts**. The second alternative allows for better flow off of Embarcadero but still with garage and 3 drop offs, the traffic flow will be messy and can endanger bicyclists. How can it be decided from extrapolation that this is not significant anymore? This flimsy data should not be accepted by the PTC or anyone deciding on this project!



The safety of bicyclists on the **Bryant Bike Safety Boulevard** is of most concern to me as I am an avid bicyclist and also love to walk. Being only one block from Embarcadero I frequently pass on Embarcadero and Bryant to travel to North and South Palo Alto. There have been more times than I can count where cars have sped the corner around Castillelleja's Administration building side and almost hit me or others as they rush to pick up their child at the school. Or they speed up going west on that short left turn lane from Embarcadero onto Bryant Street to turn towards the school.

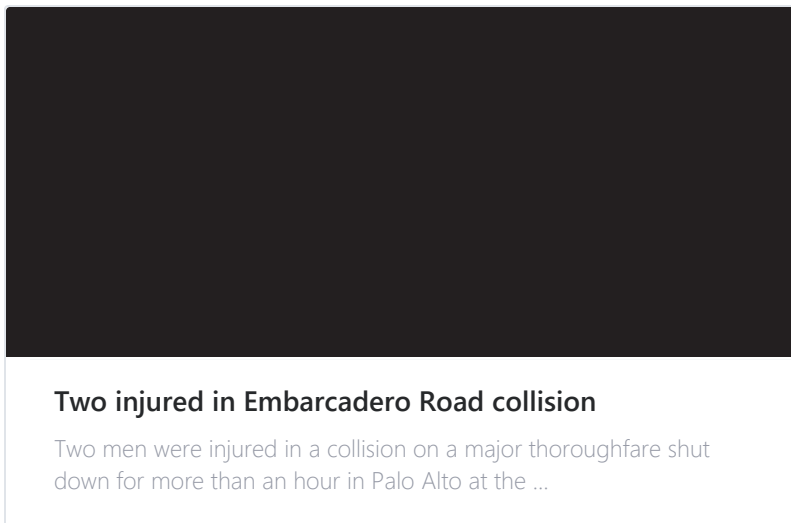
I and many of my friends have seen countless incidents of near misses of bicyclist and cars at the corner of Embarcadero and Bryant. I am shocked to see that in the FEIR this was reported:

- The following is from page 44 of Castilleja EIR Appendix E Traffic Impact Study for Castilleja School Expansion\_July 2020.pdf Bryant Street Collision Analysis. The collision history for the segment of Bryant Street between Embarcadero Road and Kellogg Avenue was reviewed to determine the number of collisions during a recent three-year period and to potentially identify trends based on the collision history. This information is based on records available from the California

HighwayPatrol as published in their Statewide Integrated Traffic Records System (SWITRS) reports from March 30, 2015 to March 31, 2018. A single non-injury collision occurred along the study segment during this period. This collision occurred between a vehicle and a fixed object and did not involve a bicycle.

**DUDEK Finding** –Given the relatively small number of documented crashes and the lack of any crashes involving bicycles along the segment of Bryant Street between Embarcadero Road and Kellogg Avenue, a safety concern involving bicycles along the study segment has not been demonstrated.

However there **WAS** an accident in that time frame involving a bicyclist at the intersection of Bryant and Embarcadero on 2/13/2018 at around 5pm that shutdown both directions of Embarcadero for over an hour. Following is extracted from the [Palo Alto Weekly article](#), “**Two injured in Embarcadero Road collision**”.



Two men were injured in a collision on a major thoroughfare shut down for more than an hour in Palo Alto at the height of the evening commute on Tuesday, police said. Officers responded to the collision at Embarcadero Road and Bryant Street around 5 p.m. An adult driving a sedan was heading west on Embarcadero and struck the pedestrian with a scooter and bicyclist at the intersection, police said.

As stated here, two men were injured and sent to the hospital. One was a teacher who was hospitalized for several days. His injuries were severe enough that he was not able to return to teach for quite a while. It is surprising that this major incident was completely overlooked. This begs the question **how many other incidents from 2015-2018 were not included in the FEIR?**

**Suggestion: The PTC should request that these studies need to be re-evaluated and a larger study from Kingsley to Kellogg, Emerson to Waverley should be studied to prevent any of the other reports of collisions with bicycles from falling through the cracks.**

As I remember, the traffic was redirected through Emerson past my house and around to Kellogg to avoid the area. Just one incident can impact the neighborhood's living condition due to the fact that Castilleja is embedded deeply into a residential neighborhood and its narrow streets cannot handle this type of emergency traffic. Think of what could happen if there was a emergency on campus. Is this campus with a proposed garage equipped to bring in emergency vehicles onto the property in a timely manner especially if the roads are backed up? This is only one example of how our living conditions can be severely impacted by safety issues around the school. This will be exacerbated by the construction and traffic flow into and out of an underground garage on a major Bike Safety Boulevard.

With administrators, teachers, parents and children coming to the campus via 3 drop offs including a proposed underground garage entering onto the Bicycle Safety Boulevard the extra traffic will also introduce congestion, pollution as well as safety hazards on all sides of the campus. These issues are severe impacts to ensuring livable conditions which are not in accordance with the Comprehensive plan.

Underground garages are not allowed to be in R1 zoned neighborhoods and for good reason. They cause disruption in traffic, are not aesthetically pleasing even if you lace it up with greenery, and are not consistent with a Single Family zoned neighborhood.

**Suggestion to the PTC: Ask that a no garage option be returned to the table, prevent any drop offs to the school as Nueva does and studied to provide a more sensible, less impactful alternative more consistent with a Single Family Neighborhood.**

Until we have clarity of other projects affecting other roadways in City of Palo Alto during this new phase of navigating the aftermath of the pandemic we ask that Castilleja put their project on hold and first work with the City to design protective and traffic calming measures as seen in cities such as Berkeley, Portland and other bicycle friendly cities. Castilleja should really seek other ways to minimize and reduce their impacts to the neighborhood to prove their commitment to the preserving the safety and livability of the surrounding community which has embraced the school for over 100 years. Let's work together to avoid this scenario! This is a photo taken on Churchill and Alma in 2016 at the height of the traffic congestion, only two blocks away, but could easily occur at Bryant and Emerson if a garage entrance is build on the Bike Street Boulevard near Embarcadero!





From: [Rebecca Sanders](#)  
To: [Planning Commission](#); [Council, City](#)  
Subject: Castilleja's RDEIR  
Date: Wednesday, August 26, 2020 11:12:34 AM

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Dear Planning and Transportation Commissioners:

There are significant changes in Castilleja's Revised DEIR. Don't such changes require an opportunity for distribution and public comments, rather than a rush job? It's the law, right? We the community members don't have enough time to look these changes over. At first glance, the revised DEIR appears to sidestep not only the city's concerns but the neighborhood's concerns from the first DEIR. I request that you reschedule this item to allow the city an opportunity to circulate the RDEIR and the public an opportunity to review and to respond.

At the very least I can comment on my immediate concern about popping a corporate-sized parking garage in a residential neighborhood, with entrance and exits on three different streets and the accompanying signal lights and warning sounds that will inevitably be needed to alert pedestrians, bicyclists and other cars between the hours of operation, which could be anywhere from 6:30 am to 11 pm, correct? I mean one of these streets is Bryant, one of our bike boulevards. Plus, Melville and Emerson, as well as Bryant Street are home to hundreds of residents that will be impacted by living near a corporate parking garage.

For Castilleja, an established institution with a large endowment and wealthy patrons, it would seem reasonable to achieve their lofty expansion goals ONLY by opening a second campus and splitting the school or by developing a new campus somewhere else altogether. Their reasons for insisting on growing within their existing inadequate-to-support-the-growth-they-want-footprint can't possibly justify the ruination through corporatization of a neighborhood with impacts percolating throughout the city.

Furthermore, I for one advise FULL STOP on any development where the applicant has not been in compliance for years, has flouted our municipal code and not paid the fines for having more students enrolled than their CUP permits. I frankly don't understand why that is okay. Why in the world will they abide by a new CUP when they showed no compunction in violating its current one.

Thank you for your consideration of my concerns.

Becky Sanders  
Ventura

From: [stewraph@aol.com](mailto:stewraph@aol.com)  
To: [Planning Commission](#)  
Subject: Castilleja's project  
Date: Wednesday, August 26, 2020 10:27:19 AM

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August 26, 2020

Dear Planning and Transportation Commission,

I am very pleased and appreciative of the meticulous work of the Planning and Transportation Commission and City Staff in reviewing Castilleja's project. Your team has undertaken a thoughtful analysis during this process. I am a Palo Alto resident and I have followed the details of this project and I am delighted with the careful and detailed work presented in the Final Environmental Impact Report (FEIR). That report informs a comprehensive assessment and response to the concerns raised in the draft report a year earlier.

I wholeheartedly support the FEIR consultant's recommendation that Castilleja's alternative project with the smaller garage footprint and distributed drop-off are very viable options. The reason why I feel this way is because:

**Smaller Garage:** The smaller garage serves the benefit of taking parked cars off the neighborhood streets, yet the garage has a reduced size in order to save two homes on Emerson Street and numerous trees. Housing is in short supply in Palo Alto, and because two homes were not demolished/removed in the alternative plans is outstanding.

**Distributed Drop-off:** The distributed drop-off in this alternative plan fixes the traffic impact seen in Castilleja's original project. I am glad for an improved solution that prevents any neighbors from being negatively impacted while still allowing for the school's enrollment increase. I believe those are all significant improvements.

I am ready for this project to move forward and my sentiments are shared by many of my neighbors and friends in Palo Alto. This community wants this project to commence. I sincerely believe as a commission you acknowledge the work Castilleja has done to consistently improved its plans to respond to the neighbor's concerns. Thanks for your thoughtfulness, attention, and consideration.

Respectfully yours,

Stewart Raphael  
571 Military Way, Palo Alto

**From:** [Suman Gupta](#)  
**To:** [Planning Commission](#)  
**Subject:** Support for Castilleja's Campus Redevelopment Project  
**Date:** Tuesday, August 25, 2020 11:39:36 PM

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Dear Members of the Palo Alto PTC,

My name is Suman Gupta and I have been a resident of Palo Alto for over 20 years. I have three children, all of whom have attended Ohlone Elementary. My son went on to attend JLS Middle School and Palo Alto High School. My daughters went on to attend Castilleja School – one graduated in 2017 and the other is currently in Middle School. As a resident of not only Palo Alto, but also of the Palo Alto Unified School District, my family feels incredibly fortunate to have had access to excellent public and private education so close to home.

I am writing today to express my wholehearted support for Castilleja's desire to modernize the campus and increase its enrollment. I have been following Castilleja's multi-year effort to engage the Palo Alto community in developing the proposed design to support the school's educational and co-curricular goals while also being thoughtful of the needs and concerns of surrounding neighbors and the City as a whole, especially with regard to traffic.

The Final Environmental Impact Report (FEIR) that was released at the end July illustrates how diligent Castilleja has been in adjusting its design to retain natural elements such as trees, structural elements such as school-owned homes on Emerson Avenue and the neighborhood feel of the block on which the school sits. I particularly like Castilleja's plans to build an underground garage as it will divert a significant percentage of parked cars from the surface streets to below ground, thereby making the surrounding streets not only more aesthetically pleasing, but also safer for pedestrians and cyclists who travel them during the day. The FEIR indicates that, of all the project alternatives considered, Alternative #4 with the smaller underground garage is the superior proposal for aesthetic reasons. The Report further states that zoning rules do in fact allow for underground garages in a residential (R1) neighborhood. And given how traffic will flow into and out of the garage, the overall impact will be that no additional traffic will be introduced to the neighborhood.

I hope that you will support Castilleja's project, including construction of the underground garage.

Sincerely,  
Suman Gupta

From: [Lian Bi](#)  
To: [Planning Commission](#)  
Subject: Support of Castilleja's FEIR  
Date: Tuesday, August 25, 2020 10:31:40 PM

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Hi, Dear Planning & Transportation Commission:

I am writing this email to show my STRONG support for the positive elements of the Final Environmental Impact Report.

Castilleja's Project Alternative has a smaller garage and distributed drop-off (i.e., students are dropped-off at various points around campus to minimize a traffic impact on any one street). This project alternative results in the school having no significant and unavoidable impacts in the neighborhood

I am heartened that the Final Environmental Impact Report's (FEIR) positive findings reflect Castilleja's years of community engagement and Project refinements, which resulted in a Project Alternative that addresses many of the issues raised throughout the planning process. It maintains additional benefits laid out in the Draft Environmental Impact Report, such as a design that seamlessly blends with the surrounding neighborhood; limits to on-campus events to reduce noise impacts; and sustainability elements that significantly surpass local and state environmental goals. The resulting Project Alternative presented in the FEIR is environmentally superior to the Original Project, and is one that the community can truly be proud of.

I am a local neighbor of the school, living in old Palo Alto and I feel so lucky to have such a nice school like Castilleja as part of our community!

Best  
Lian Bi  
380 Coleridge Ave  
Palo Alto CA 94301

To: Planning & Transportation Commission  
City of Palo Alto  
From: Barbara Gross  
Date: August 22, 2020

RE: Castilleja School Expansion

Dear Commissioners,

Although my granddaughter (a current Casti student) will not benefit from the proposed campus modernization plan, other future leaders will. I have lived in Palo Alto for thirty-five years and worked in the downtown for thirty years. As a community member and business leader, I have been engaged in traffic issues for many years.

Improving institutions and retaining our neighborhoods are not mutually exclusive. Mitigations are negotiated, so that both can meet the demands of our evolving needs. Extensive communication and outreach have thoroughly vetted the familiar issues.

Castilleja initiated a TDM program, which has already reduced the number of car trips to campus. Pre-pandemic, I witnessed changes to include multiple available parking spaces when visiting the school during the day, and staff oversight of the drop-off and pick-up times. The tight grip the administration has on faculty, parents and students is a cooperative effort to be good neighbors, conscientious stewards of the environment and maintain an essential community asset.

Supporting a nationally ranked school – which has been a community asset for over 100 years, must be an essential goal. Castilleja will be under the watchful eye of the city and its neighbors to meet the no new car trips cap. With the phased development plan, adjustments will come with time. Just as our public school modernizations and expansions have been successful, so must this.

Thank you for your attention.

Barbara Gross

From: [neva yarkin](#)  
To: [Planning Commission](#)  
Subject: from neva yarkin  
Date: Tuesday, August 25, 2020 4:37:20 PM

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August 25, 2020

Dear Planning Commission,

I live at 133 Churchill and my family has owned this property for over 60 years. My house is 5 houses from the Churchill/Alma train crossing and 2 blocks from Castilleja School. 2 major projects (Train Crossing at Churchill and Castilleja expansion) are being planned for my neighborhood. 2 major developments could be happening at the same time. How will that work?

My concerns for Castilleja expansion are **traffic impacts** and **safety** in this neighborhood. If you allow the expansion of another 125 students, that will be 1,477 daily car trips into the neighborhood. Traffic Study, Table 15, (June 2020). How many cars are in the area already? This doesn't take into consideration that with COVID you will have more parents driving cars because they will not feel safe letting their daughters take the train, or shuttle buses with COVID in the air. The impacts with COVID needs to be studied (on Traffic) because 75% of students live outside of Palo Alto.

In the New TDM Program it **says** it will **encourage** students to ride bikes, or walk to school. (Final EIR July 2020). The students who live outside of Palo Alto travel between home and Castilleja campus 7.69 miles. How many students (75% come from outside Palo Alto) will be riding or walking 7.69 miles each day? (traffic impact study June 10, 2020).

In the traffic study it says that "the School and City should develop a traffic monitoring program". (Traffic Impact Study, June 10, 2020). The city has a \$40 million deficit, and only 25% of students come from Palo Alto. Is this benefiting most Palo Alto residents?

Morning drop-off during peak hours will be staggered to alleviate traffic. (Traffic Impact Study, June 10, 2020). You still have other public schools in the area that might keep to a regular start time. There would continue to be traffic in this area.

Construction will happen for 5 years.

Hundreds of Big cement trucks will have to follow the construction **route** in Palo Alto, which is

taking Alma, **to any side-streets close to the construction site.** (Palo Alto Municipal Code). Lane closures will also happen on Embarcadero during construction. Will the citizens of Palo Alto be excited about any of this?

Trucks --Arriving 1,625 trips for trucks and 1,625 trips departing the site. That would be 1 truck arriving or departing every 5 minutes during an 8-hour period. (Excavation Phase, phases 1 and 4) (Chapter 2, Master responses, FEIR, July 2020).

Castilleja will continue to teach classes in portable buildings on top of Spieker Field while construction is going on. You will have construction trucks, cars, students, bikers, and pedestrians all crowded together in **Phase 2** of this expansion. **Safety Risks** could be challenging during this period (Chapter 2, Final EIR July 2020).

Several of the following paragraphs above will have significant impacts to the neighborhood and the city.

**Please look at the merits of this project and how will it benefit Palo Alto** since Castilleja pays no taxes. Would any of you want this expansion occurring in your neighborhood?

Thank you for your time on this issue.

Sincerely,

Neva Yarkin  
133 Churchill Ave.  
[nevayarkin@gmail.com](mailto:nevayarkin@gmail.com)

From: [Hank Sousa](#)  
To: [Planning Commission](#)  
Subject: Castilleja Expansion  
Date: Tuesday, August 25, 2020 4:27:07 PM  
Attachments: [Hank Sousa PTC 8-26-2020.docx](#)

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Dear Commissioners:

Here are my comments for tomorrow's PTC meeting, one page written and one page photo collage.

Thanks,

Hank Sousa



PTC meeting 8/26/2020

"Kiss-n-ride" drop offs

Hank Sousa, PNQL  
Melville Avenue

Good Evening Commissioners:

The neighborhood group, PNQL, has been suggesting an authentic program of shuttling to replace the school's single car drop offs. The school says there are no available parking lots in PA (FEIR ch.3 B10-8 page 169) but "kiss n ride" drop off spots don't require the purchase of parking lots. Drop off spots could be utilized in areas the school has reached agreements with. The photo collage shows several examples of possible spots (starting top left and going clockwise):

- 1 Shoreline Athletic Fields Rengstorff/Charleston/Garcia features a loop driveway and is a little east of 101
- 2 Sand Hill/Lawler Ranch Rd just west of 280
- 3 Baylands Athletic field Embarcadero/Geng just east of 101 (lots of room)
- 4 Lasuen where it dead ends at El Camino Real just south of University/Palm Dr. (close in but avoids Town & Country mess)
- 5 Lord's Grace Christian Church @San Antonio/Bayshore & 101 ( big parking lot)

The school has electric vans which pick up kids at the train station and East PA. That is fine but we would like to see contracts between the school and the parents of students who either drive themselves or are dropped off. Many other schools do this successfully. Once public transportation makes a safe comeback and the school is teaching students in person it should be part of the TDM. The 1400 daily car trips (FEIR MR 2-76) are simply too many into our small neighborhood streets.

Part of a successful reimagining of the school should include the question: What is the benefit to the neighborhood?

If the school embraces the kiss n ride drop off spots the benefit will be clear. A large reduction in the 1400 daily car trips will please the neighbors and the environment benefits from greenhouse gas emission reductions. Plus, the school's emphasis on STEM teaching fits right into the model many of the girls will be entering upon graduation from college and that is the use of alternate modes of transportation to get to work.

Please recommend this 21<sup>st</sup> century way of commuting as a complement to the green buildings the school is proposing to construct.

Thank you for your consideration.



From: [Tench Coxe](#)  
To: [Planning Commission](#)  
Subject: Castilleja Campus Redevelopment  
Date: Tuesday, August 25, 2020 4:21:10 PM  
Attachments: [PTC.pdf](#)

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Dear Palo Alto Planning and Transportation Commission,

I am writing to you along with my wife, Simone, to pledge our full support of the Castilleja campus redevelopment and urge the Planning and Transportation Commission to approve this important project. Simone and I, who reside across the street from the Castilleja campus, feel this redevelopment project is a necessary step in modernizing and sustaining Castilleja so they may carry on their unique educational experience and shape future generations of girls and young women into strong, independent leaders.

Sincerely,

Tench Coxe

TENCH COXE  
1401 Emerson Street  
Palo Alto, CA 94301

August 25, 2020

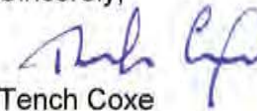
Palo Alto Planning and Transportation Commission  
City of Palo Alto City Hall  
250 Hamilton Avenue  
Palo Alto, CA 94301

Re: **Castilleja School Project – Campus Redevelopment**  
**1310 Bryant Street and 1235 and 1263 Emerson Street**

Dear Palo Alto Planning and Transportation Commission,

I am writing to you along with my wife, Simone, to pledge our full support of the Castilleja campus redevelopment and urge the Planning and Transportation Commission to approve this important project. Simone and I, who reside across the street from the Castilleja campus, feel this redevelopment project is a necessary step in modernizing and sustaining Castilleja so they may carry on their unique educational experience and shape future generations of girls and young women into strong, independent leaders.

Sincerely,

  
Tench Coxe

From: [Cath Garber](#)  
To: [Planning Commission](#)  
Subject: Castilleja comments  
Date: Tuesday, August 25, 2020 2:59:37 PM

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To the members of the Planning and Transportation Commission,

I would like to share my thoughts regarding the final EIR for Castilleja.

I am a principal at Fergus Garber Architects and have been practicing architecture in Palo Alto since the mid 90's. I have designed a number of new homes in the neighborhood - one each on Kellogg, Emerson and Waverley and two on Cowper. I am currently working on two historic remodels across the street on Embarcadero.

I live next to Green Middle school and my children, both boys attended Palo Alto schools. My strongest relationship with Castilleja is that I ride my bike by it on my way to my office near Town and Country. In all my years I have never witnessed anything other than calm and courteous parents, staff and students getting dropped off. I feel very safe as I ride by on my bike.

As with other interested community members and as a curious architect, I have looked at the proposal. I like its overall design and its attention to its surrounding neighborhood. I was pleased to see that the historic Gunn building will remain and I think the new buildings are appropriate in mass and scale and their materials quietly complement the historic building. The new buildings are appropriately lower height than what is there. By having recesses and balconies and by incorporating variations in materials, the new buildings also have interest without being loud. I agree with the FEIR which states --the project improves the neighborhood aesthetics.

I also want to comment on the landscaping. I think the gates and fencing proposed are handsome and better detailed than you see on most institutional projects, I am also impressed with the plant and tree selection. The landscaping looks dense and as attractive as found on most of the residential projects in the neighborhood.

In summary I want to commend the school for proposing this alternative . It saves homes, preserves trees, reduces the scale of the garage, and eliminates traffic impacts associated with the original project. This is evidence of Castilleja's responsiveness to input from the DEIR and from neighbors.

--

**Catharine Fergus Garber, Partner**

**Fergus Garber Architects**

[www.fg-arch.com](http://www.fg-arch.com)

81 Encina Avenue

Palo Alto CA 94301

o 650.459.3700

m 650.245.9680

From: [Gerry Marshall](#)  
To: [Planning Commission](#)  
Subject: Castilleja school plans  
Date: Tuesday, August 25, 2020 2:38:56 PM

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Dear Palo Alto Planning and Transportation Commission,

As a Bryant Street neighbor, living directly across the street from Castilleja's main entrance and parking lot since 1979, I wanted to express my thoughts on the school's plans to update their campus.

>

> First, as presented in the Final Environmental Impact Report (FEIR), the school has changed its plans in order to save their two Emerson buildings and many trees by reducing the size of the much needed under ground garage. At first, I was concerned that the smaller garage would not accommodate enough cars to adequately reduce the number of cars parking on the streets. Taking cars off the street is important to us as we are experiencing an uptick of cars parking in front of our home of persons working downtown and persons living in homes on Embarcadero. In the past, Castilleja has effectively managed their staff's and students street parking to accommodate its neighbors but it was still difficult to assure parking in front of our own home for our health caregivers. However, it has made us very happy that by downsizing the garage, they are able to save their trees and two homes. That's a great decision. We are confident that the school will continue to maintain its parking and traffic controls that have been so effective in our neighborhood.

>

> Also, the school actively implements safety rules to protect our pedestrians, bicyclists and neighborhood vehicles. They have crossing guards during school and all events. I so appreciate the guards helping me safely back out of my driveway or to park. What a perk. Living on a bike boulevard is not easy. Most bicyclists do not seem to realize how very difficult it is to see them whizzing by driveways. Thank goodness for Castilleja's due diligence in helping it's neighbors stay safe. Thank you! We know we would not have such safety conscience neighbors without Castilleja's efforts in greatly reducing the street traffic around the school campus. These last few years we hardly notice the school's traffic in the morning or after school. It's about 20 minutes in the morning and after school. The rest of the day is super quiet.

> We always get notifications of events coming up and honestly we don't really notice that an event is happening or happened. So different from a public school's noise. We always know that something is happening at PALY or Stanford. Noise and traffic is high with blocked streets and parking issues. Not to mention their trash left behind.

>

> I'd also like to mention how glad we are about the esthetic low profile and appearance of Castilleja's new buildings. Very neighborly. We live in an historical home and so much appreciate Castilleja keeping a non Industrial appearance out of our neighborhood.

>

> All in all we are very happy to have Castilleja as our neighbor. We look forward to seeing their plans come into the 21st century. We also feel that helping their students attain a learning environment for an ever growing future is important.

> We're old citizens of Palo Alto and love it dearly. One thing for sure, Castilleja has been a big part of our past and we support the school's growth into the ever changing future. Their history and growth is vital for so many reasons in our neighborhood in developing a bright future for so many.

>

> Gerry Marshall/Bernie Newcomb  
> 1301 Bryant Street, Palo Alto  
> SE Corner of Bryant/Embarcadero

From: [Maggie Pringle](#)  
To: [Planning Commission](#)  
Subject: Castilleja's Project Alternative Plan  
Date: Tuesday, August 25, 2020 2:33:47 PM

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Dear Members of the Planning and Transportation Commission,,

I am writing in strong support of Castilleja's Project Alternative Plan that has been so thoughtfully prepared with a sincere goal of providing outstanding education to as many girls as possible in our community while also being a good neighbor.

I was the Director of Alumnae Engagement at Castilleja for ten years and have followed so many of the remarkable Castilleja alumnae who are well prepared for college and making a difference in our world – whether it be as physicians, engineers, teachers, community organizers, business owners, veterinarians, etc.. They all attribute much of their impact in their communities and around the world to the broad education and diverse community/world engagement that they learned at Castilleja.

It is time to allow more middle and high school girls throughout our community to have the opportunity to choose an excellent all-girls education. Part of offering a cutting-edge education includes upgrading facilities just as most other schools, public and private, have done in our area. Castilleja started with a plan that would make a significant difference to their programs and has made many concessions to assure that the school is an asset to the neighborhood and the City. The Alternative Plan allows for providing excellent learning facilities as well as a most attractive campus that continues to fit into the beautiful Old Palo Alto neighborhood.

I urge you to support diverse education opportunities in Palo Alto and the unique program that Castilleja offers.

Thank you,

Maggie Ely Pringle

--

**Maggie Pringle Grauer**  
**home-650.323.6601**  
**cell-650.722.1649**  
**[maggiepringle@gmail.com](mailto:maggiepringle@gmail.com)**



From: [Nelson Ng](#)  
To: [Planning Commission](#)  
Cc: [French, Amy](#); [Lait, Jonathan](#); [Shikada, Ed](#); [Council, City](#); [Castilleja Expansion](#)  
Subject: Comments of Aug 26 2020 PTC review of Castilleja Expansion  
Date: Tuesday, August 25, 2020 2:18:00 PM  
Attachments: [CastillejaPTC\\_Aug26\\_2020.pdf](#)

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Dear PTC Commissioners,

Please see the PDF attachment for my comments of the PTC review of Castilleja Expansion project.

Thanks

Nelson

Date August 24<sup>th</sup> 2020

Dear PTC Commissioners,

My name is Nelson Ng. I have lived for 24 years at 1260 Emerson Street that is across from Castilleja's proposed garage exit. Being one of the closest residents to the garage exit, I strongly oppose Alternative 2 to 5 as stated in the Final EIR because none of the alternatives reduce traffic to address the true impact of the Castilleja Expansion project to the neighborhood.

Building an underground garage or surface parking lot in an R-1 Single Family Neighborhood will allow Castilleja to bring additional traffic to the neighborhood that will result in degrading the living conditions of the adjacent residents.

### **Palo Alto Municipal Code sec 18.76.010 Conditional Use Permit (CUP)**

(c) Findings

Neither the director, nor the city council on appeal, shall grant a conditional use permit, unless it is found that the granting of the application will:

(1) Not be detrimental or injurious to property or improvements in the vicinity, and will not be detrimental to the public health, safety, general welfare, or convenience;

The alternative that would truly reduce the impact to the neighborhood is to provide satellite parking and shuttle students and staffs to campus without building underground garage or additional surface parking lot.

This Final EIR Traffic Impact Study is incomplete and with inaccurate findings. By citing CEQA's limited requirements for studying only peak commute hours, the FEIR fails to provide a complete picture of the proposed project traffic impact to the neighborhood. Unlike commuters, the residents live in the neighborhood 24/7. Nor were any studies conducted to study traffic with 3 drops offs and the garage as proposed in the Alternative 4 introduced in 2020. In addition, assumptions were made based on inaccurate information or without justification. Therefore, I am requesting the commission to reject the current version of the Final EIR until necessary studies and accurate information are presented.

Following are some of the examples

- In year 2000, the City issued Castilleja a CUP with **condition #5**
  - **point # 27:** Castilleja has 5 major functions each year ...
  - **point #28:** Additionally, there are several other events during the year...

Over the years, Castilleja has violated the CUP by holding over 100 events per academic year. That is an average of over 3 events per week. Therefore, it is

important to study the event impact during weekdays, evenings and weekends. However, in **Responses to Comments C39-1-10** rejected to study events with

Special event traffic is not reflected in the traffic impacts analysis because this traffic typically occurs outside of peak hours and does not contribute to average daily traffic volumes and conditions.

The Final EIR accepted the Castilleja's current **100+ events** as the baseline without any study and recommending **90 events** as stated in Castilleja's Expansion application. Most private schools in the area only allow for 0 to 10 after hours events per academic year. Therefore, I am urging the commission to recommend that Castilleja will only be allowed to have **no more than 10–20 events per years** and with strict monitoring and reporting process to the City and the neighbors. Any violation will result in severe fines or revoke the CUP from more than 3 violations. They as any other business must adhere to strict regulations for operating under a **Conditional Use Permit in a Single Family Neighborhood!**

- In the DEIR, both Alternative 2 and 3 were found to result in **Significant and Unavoidable Impact even with Mitigation** due to over 80% increase of net new trips for northbound Emerson to eastbound Embarcadero from 842 to 1521 daily trip. Alternative 4 was proposed in April 2020 and added to the Final EIR without any study to validate the assumption. In **page 44 of TIS,**

This alternative **assumes** 60 percent off all project related private auto travel would use the Bryant Street loop, 30 percent would use the Kellogg Avenue loop and the remaining 10 percent would use the underground garage with an entrance on Bryant Street and exit onto Emerson Street.

By arbitrarily assigning only 10% of the traffic will go into the underground garage and further splitting up the garage exiting traffic by allowing to either turn left or right on to Emerson, it supposedly reduces the net new traffic for northbound Emerson to eastbound Embarcadero by 92% from 679 to 51. However, this assumption was not justified with any reason or study to ensure that the assumption will actually happen.

- Kellogg Ave that is at the south border of Castilleja was never studied in the EIR. So we do not know what is the impact to Kellogg from Alternative 4 due to the garage exist traffic left turn onto Emerson toward Kellogg and the additional dropoff points on Bryant and Kellogg side of Castilleja campus proposed in Alternative 4.

- In **Figure 16 page 53 of TIS**, it shows 292 and 220 net new daily trips are added to Bryant Street between Embarcadero and Kellogg and between Kellogg and Churchill due to Alternative 4 by adding the addition dropoff on Bryant Street. Bryant Street is a Bike Blvd that is a major artery for students and commuter cyclists. Adding any additional traffic will increase the risk to the cyclists. I can't find in the FEIR concrete steps to mitigate the risk.
- For over 24 years, I have lived within 300 ft from the south side of Embarcadero and Emerson. On a daily basis, I have to make a right turn from northbound Emerson onto eastbound Embarcadero. I frequently see Paly students riding their bikes on the south side of Embarcadero Road sidewalk that borders Castilleja traveling eastbound crossing Emerson to PALY. Although this is against the traffic direction of the road, they avoid the long signal light at Town and Country by traveling on the south sidewalks of Embarcadero instead of the north side. This is very dangerous intersection because drivers making right turn from Emerson onto eastbound Embarcadero will be focusing to look to their left for the high speed eastbound Embarcadero traffic traveling 30 to 40+ MPH. I have seen near misses when bicyclists crossing Emerson on south side of Embarcadero toward PALY. I requested that to be study as part of Comment Letter C39.2 for DEIR. However, in the **Response C39.2-1 in Final EIR**, it only stated the following assumption with boilerplate answer by citing CEQA without addressing the risk of the real situation that many Paly students on a daily basis are using the sidewalk on south side of Embarcadero Road traveling westbound to PALY. *(Please see picture below for better visual understanding of the Emerson and Embarcadero intersection)*

Since CEQA states that the analysis in an EIR should not be speculative, it is reasonable to assume that individuals will adhere to traffic laws, including speed limits and bicyclists using the right-hand side of the road. Any bicyclists using the Emerson Street crosswalk on the south side of Embarcadero Road should also be traveling eastbound and would be visible to a driver watching the eastbound vehicle traffic.

- As part of Comment C39.1-9 for the DEIR, I requested that car traffic be measured one to two blocks away since many times I have seen parents drop off students or drive to events on campus. Encroachments further out into outlying neighborhoods were not studied but should have been. For example, Castilleja students are routinely dropped off at the cul-de-sac on Melville between Bryant and Waverley. Those traffic counts are not included in Castilleja's count of cars entering their parking lot. However, in the Response C39.1-9 in Final EIR, it only stated the following boilerplate answer by citing CEQA without studying the true impact

The comment is correct that driveway vehicle counts do not capture students that may be dropped-off on neighborhood streets. The student travel survey was used to account for those students. The results of the TDM plan monitoring reports were also used to further inform the assessment of trip generation and distribution associated with existing and proposed conditions. This represents a reasonable attempt at determining an accurate baseline and projected conditions, consistent with industry standard methods, and consistent with CEQA Guidelines Section 15003(i) which states that "CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure."

- The following is from page 44 of [Castilleja EIR Appendix E Traffic Impact Study for Castilleja School Expansion July 2020.pdf](#)

#### **Bryant Street Collision Analysis**

The collision history for the segment of Bryant Street between Embarcadero Road and Kellogg Avenue was reviewed to determine the number of collisions during a recent three-year period and to potentially identify trends based on the collision history. This information is based on records available from the California Highway Patrol as published in their Statewide Integrated Traffic Records System (SWITRS) reports from March 30, 2015 to March 31, 2018. A single non-injury collision occurred along the study segment during this period. This collision occurred between a vehicle and a fixed object and did not involve a bicycle.

Finding - Given the relatively small number of documented crashes and the lack of any crashes involving bicycles along the segment of Bryant Street between Embarcadero Road and Kellogg Avenue, a safety concern involving bicycles along the study segment has not been demonstrated.

However, there was an accident involving a bicyclist at the intersection of Bryant and Embarcadero on 2/13/2018 at around 5pm that shutdown both direction of Embarcadero for over an hour. Following is extracted from the Palo Alto Weekly article [Two injured in Embarcadero Road collision](#)

Two men were injured in a collision on a major thoroughfare shut down for more than an hour in Palo Alto at the height of the evening commute on Tuesday, police said.

Officers responded to the collision at Embarcadero Road and Bryant Street around 5 p.m. An adult driving a sedan was heading west on Embarcadero and struck the pedestrian with a scooter and bicyclist at the intersection, police said.

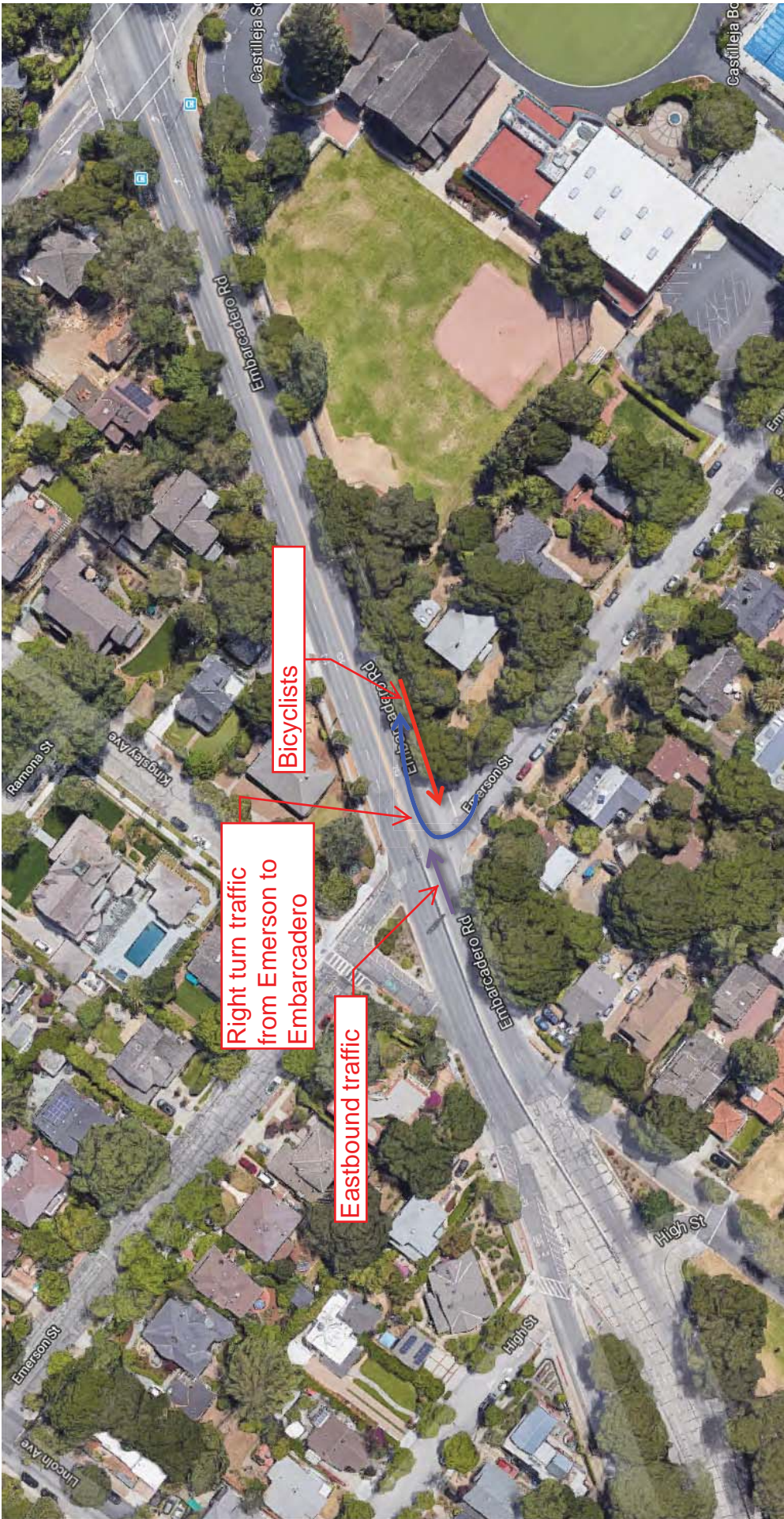
The above are just some of the examples of the incompleteness and inaccuracy of this Final EIR. It doesn't fully study the impact and the safety issues of this project to the neighborhood.

Due the COVID-19 pandemic, all the schools in the US and across the world are trying to find ways to cope with the current situation and plan for the post COVID-19 world to provide education to the students. The City of Palo Alto has temporary closed segments of streets around University Avenue for outdoor dining. We do not know if these changes will still be in place post COVID-19. Those closures could reroute some of the University Ave traffic to Embarcadero Road. The Castilleja Expansion proposal and the FEIR were completed without any consideration of the COVID-19 world and extra vigilance that must be taken for social distancing, student density and acceptable activities. With so much uncertainty in the future, how can we be sure any of the proposal of this expansion will not have additional significant impact to the community of Palo Alto?

Therefore, I ask the commission to reject this Final EIR and request additional studies to fully address the impacts and safety concerns as well analyzing the potential impacts of COVID-19 in the future and also postpone the discussion of the CUP until the studies are complete to ensure it will not be detrimental to the public health, safety, general welfare, or convenience.

Sincerely,

Nelson Ng



Bicyclists

Right turn traffic from Emerson to Embarcadero

Eastbound traffic

From: [Laura Stark](#)  
To: [Planning Commission](#)  
Subject: Supporting Castilleja School  
Date: Tuesday, August 25, 2020 1:29:46 PM

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Dear Planning and Transportation Committee members,

My daughter is a senior at Castilleja and my son is a sophomore at Palo Alto High School. I am writing to provide my support for Castilleja's new campus plan.

Palo Alto has always stood for world class education - it is part of our City's brand and value proposition. It is the reason why many families move to Palo Alto. And, whether it be the Palo Alto Unified School District, Stanford University, or a nationally recognized private school like Castilleja, all of the students in our community deserve modern educational facilities. I worked tirelessly on the 2018 Measure Z Bond campaign to ensure that our public schools have the funds they need to modernize their campuses. I believe that Castilleja deserves the opportunity to refresh and modernize theirs as well.

Castilleja is the only all-girls, non-sectarian school in the Bay Area, and it is recognized and ranked nationally - it should be considered a crown-jewel for our City and we should treat it as such. The school has worked tirelessly to preserve the neighborhood feel of the campus and to incorporate feedback from neighbors in their current plan. Their efforts were reflected in the recently released final Environmental Impact Report.

I ask that you support Castilleja with their campus modernization plans.

Regards,  
Laura

--

Laura Stark 645 Hale St. Palo Alto, CA 94301



From: [Carla Befera](#)  
To: [Planning Commission](#)  
Subject: Comments on Castilleja proposed growth project  
Date: Tuesday, August 25, 2020 1:02:35 PM  
Attachments: [Carla Befera Comparison of Castilleja traffic for ARB 8.20.20.pdf](#)

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Dear members of the PTC:

I would like to address some specific issues related to Castilleja's proposed plans for growth.

First, Castilleja submitted a plan in 2019 which was subject to an Environmental Impact Report, and underwent a comment period as required by SEQA. The public carefully reviewed the impacts of that plan, and submitted comments during the proscribed period last summer.

During the EIR Review process, the school submitted a revised plan, which was NOT opened to a review period for public comment. The revised plan completely altered the suggested traffic pattern, with no additional traffic studies.

Instead of cars arriving and exiting adjacent to Embarcadero as originally proposed, the new plan has cars dropping off and picking up on all three neighborhood-facing sides of the school. According to table MR5-2 in the FEIR, the school anticipates 1,477 car trips per day, now driving through all adjacent intersections of this residential neighborhood.

The revised plan maintains that this extensive traffic influx, now spread throughout an R-1 neighborhood, will be mitigated by its TDM. The neighbors who spent two years negotiating Castilleja's previous CUP in the year 2000 can tell you that TDMs - and for that matter enrollment caps - are in reality not monitored and not enforced.

We are concerned the City's approach seems to be one of acquiescence and trust: this traffic impact will be mitigated "because the school says it will." The neighbors' experience tells us it is unlikely to be mitigated in reality, and that as future concerns arise, they will once again fall on deaf ears at City staff, who simply do not have the wherewithal to monitor or enforce.

Among other issues, we can point to the hard fact that after the City mandated an enrollment cap of 415 in the year 2000, the school immediately enrolled 416 students the following year, and continued to grow its enrollment until it came to light that the school had some 458 students, well over its approved cap. Similarly traffic issues were constant problems, but neighbors were rebuffed by both the City and by the school - until the school mounted an effort to request additional growth, and suddenly implemented the

TDMs it had been neglecting since the year 2000.

You can see by the attached illustration the differential in the original plan and the school's revised plan - under this revised plan cars will travel through all the neighboring streets, including the Bryant Street Bike Boulevard, as well as Kellogg, (which is being proposed as a new bike access to Paly). All this traffic cuts through bike, car, and pedestrian traffic trying to commute to neighboring public schools including Green Middle School, Addison and Walter Hayes Elementary schools, and Paly High. Neighbors are acutely aware of screeching brakes and near misses at the corner of Kellogg and Bryant, as parents rush to drop off their kids at Castilleja during key commute hours.

I submit that the revised plan should have required its own public comment period, and request that this error is corrected, so that the public may comment on this revised plan.

Finally, under code the school is permitted .30 FAR, but is asking for current pre-existing FAR of .42. However, with the garage added, the actual proposed FAR is closer to .58, almost twice the permitted FAR.

There is argument that unlike for a residence, a garage (if allowed under a CUP) should not be included in the FAR. We dispute this interpretation. CUPS are not granted to single family homes and the code clearly states that should a CUP be granted, then **“the area of the underground garage shall be counted in determining the floor area ratio for the site.”**

**Somehow the school is being permitted an underground garage via a new CUP which has not been submitted or approved at this time, and is also not being required to include the garage in its total FAR.**

Two other issues to consider:

1. Building code says: “if the evaluation of improvements exceed more than 50% of the existing structure, you are required to conform to existing code.” The school is proposing to improve some 70% of its existing structures, but is also looking at either .42 FAR (if the garage is not counted) or .58 if it is. In either scenario, a significant exception is being made - why?
2. The requested increased FAR is predicated on a significant growth in enrollment, - form 415 to 540 - which would only be allowed under a new CUP, one which has not been approved at this point, and which the public has not seen. How can the City review and approve plans that are based on CUP allowances that have not been approved?

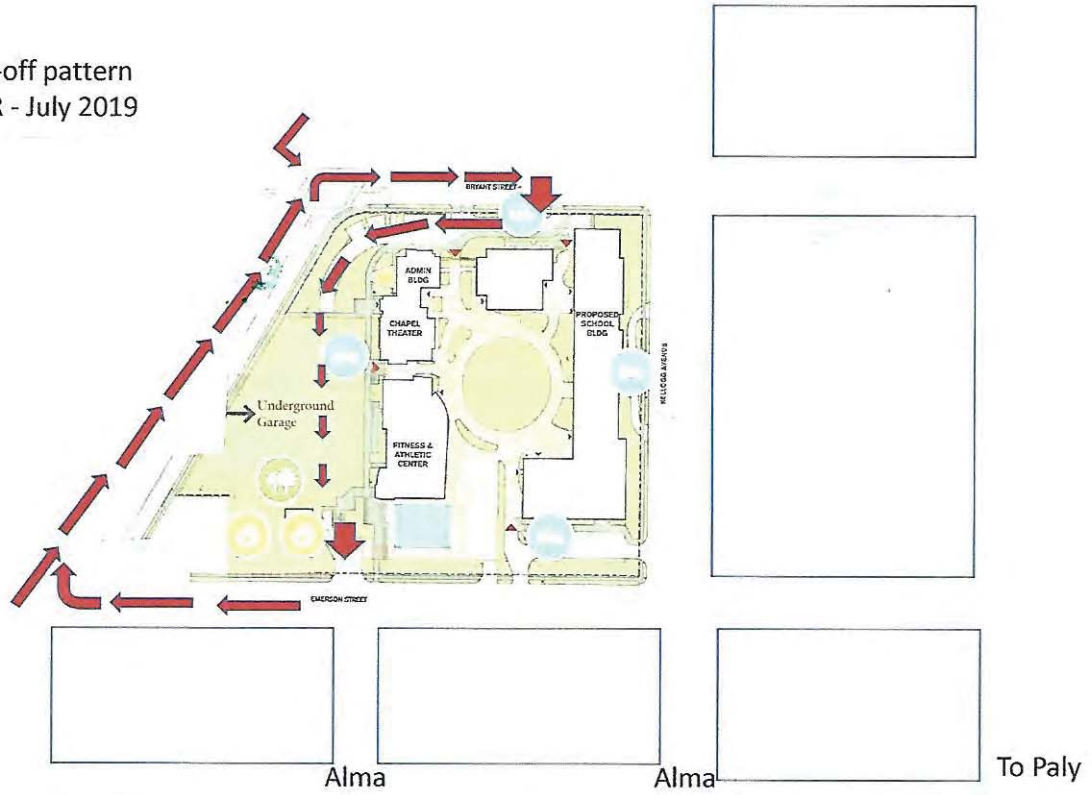
**We request that you deny this approval of Castilleja's current plan.**

Carla Befera  
1404 Bryant Street  
Palo Alto

# Castilleja School

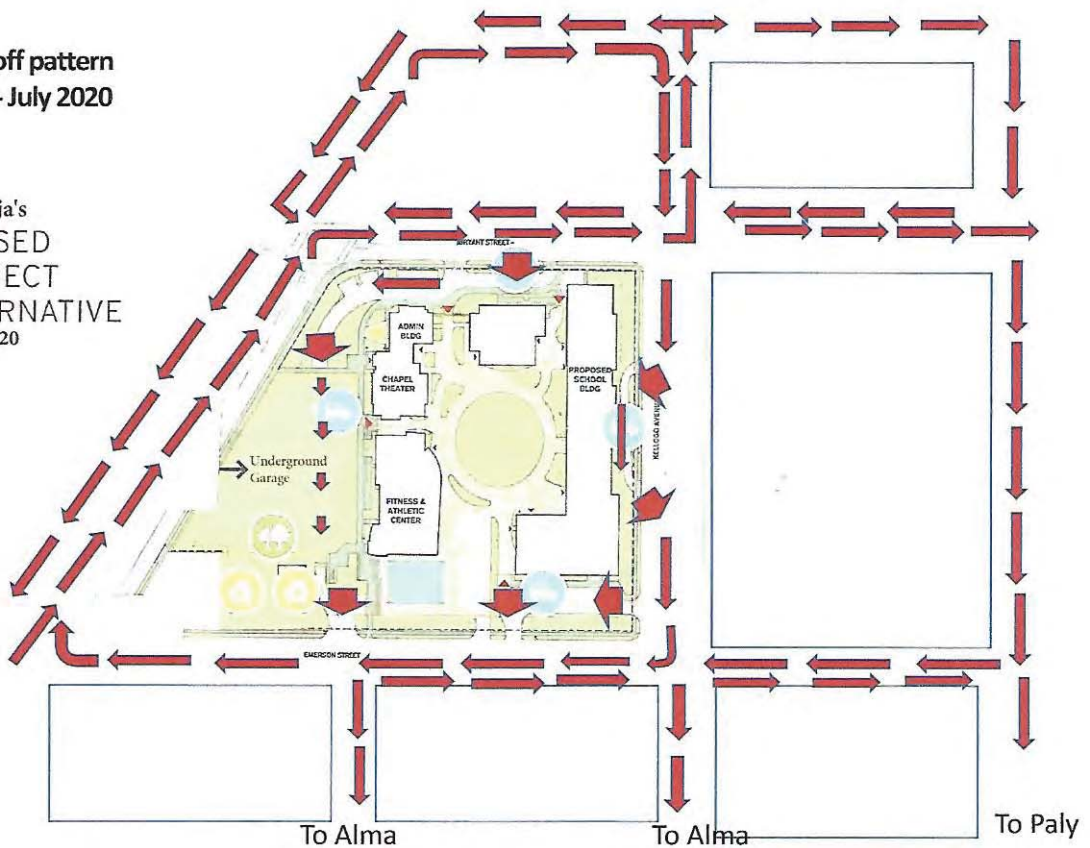
Comparison between the Draft EIR "Drop-off" traffic pattern published in July 2019 to the Final EIR "Drop-off" traffic pattern just recently published on July 30, 2020

Traffic drop-off pattern per the DEIR - July 2019



Traffic drop-off pattern per the FEIR - July 2020

Castilleja's  
REVISED  
PROJECT  
ALTERNATIVE  
April 2020



From: [Parag Patel](#)  
To: [Planning Commission](#)  
Subject: In support of the Castilleja Project  
Date: Tuesday, August 25, 2020 10:57:58 AM

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Dear Planning & Transportation Commission,

As a Castilleja Parent, I want to attest to the commitment Castilleja has made to Traffic Demand Management. We live not far from the school, and it is remarkable how the administration reaches out to offer clear directions about how to visit without impacting neighbors - *for every single event*. They always emphasize the desire to be sensitive to the needs of their neighbors. Furthermore, this remarkable community of students does everything they can to minimize the number of cars by coming to school in carpools, by train, by bus and on foot and on bicycles.

Castilleja's existing TDM measures have reduced traffic by 25-30% since 2013, and the extension of these measures in the environmentally superior disbursed circulation Project Alternative #4 will lead to continued success. Since increased enrollment is contingent upon NO INCREASE IN DAILY CAR TRIPS, compliance with TDM is built into Castilleja's application. I ask you to support this proposal because Castilleja has proven that it can reduce traffic and take action to mitigate impacts and improve quality of life in the neighborhood.

I would also note that the public high schools create far more traffic and congestion on a per capita basis, and it bewilders me why a highly successful all-girls school is being placed under more stringent standards than the other schools. This is your opportunity to help improve the campus and expand access to a first-class education to more girls. I hope you can join me and many local residents in supporting this application.

thank you,  
Parag Patel (midtown)

From: [Roy Maydan](#)  
To: [Planning Commission](#); [Council, City](#); [Architectural Review Board](#)  
Subject: I Support Castilleja"s Plans  
Date: Tuesday, August 25, 2020 8:52:26 AM

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To Members of the City Council, Planning Commission, and Architectural Review Board,

I am writing to express my support for Castilleja's plans. From the final EIR, it is clear that Castilleja has done a lot of work to maintain the integrity of the neighborhood including the preservation of houses and trees. My daughter is a Castilleja student who bikes to school, so I was glad to see that biking to campus will continue to be safe, and she will be able to avoid any cars lining up to enter the garage. Castilleja's submission combined with their long standing traffic mitigation policies will help alleviate any surface traffic issues. All in all, this plan is a win-win for the school, the neighborhood, and the city.

Regards,  
Roy Maydan  
131 Byron Street

From: [Janelle London](#)  
To: [Planning Commission](#)  
Subject: Support for Castilleja Master Plan -- a role model for sustainability  
Date: Monday, August 24, 2020 9:53:03 PM

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Dear Commissioners,

I am the co-executive director of Coltura, a nonprofit working toward a gasoline-free America by 2040.

This is to express my support for Castilleja School's Project Alternative. Our state is targeting carbon neutrality by 2045, and Castilleja's Project Alternative is a role model of how to get there.

Sustainable aspects of the design and construction process include:

- Upgrades to transportation infrastructure with bike parking, EV charging stations and additional electric shuttle routes
- Fossil fuel-free spaces (except for science labs)
- Onsite-generated energy through solar and heat recovery
- High-efficiency and recycled water infrastructure
- Drought-resistant landscaping and the preservation of trees
- Construction using non-hazardous, responsibly sourced green building materials
- The old campus buildings will be disassembled to maximize reuse and recycling, utilizing building materials from the old campus in the new campus design

Castilleja is committed to shrinking its environmental footprint on campus. With the climate crisis growing worse almost by the minute, I hope you will support Castilleja's master plan with its sustainability plan.

Thank you for your leadership.

Sincerely,

Janelle London

From: [Sulev Suvari](#)  
To: [Council, City](#); [Planning Commission](#); [Architectural Review Board](#)  
Subject: PTC Hearing for Castilleja School  
Date: Monday, August 24, 2020 9:20:35 PM

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City Council  
Planning and Transportation Commission  
Architectural Review Board

I am in full support of the current plan before the City of Palo Alto to modernize the Castilleja School campus. I moved to California and Palo Alto from the East Coast 2 years ago. In that short time I have come to love the Bay Area and in particular living in the City of Palo Alto - I finally found my forever home. In full transparency, my daughter attends Castilleja, and though I am not a direct neighbor of the school, we are fortunate to live close enough for her to ride her bike to school. Additionally, I live extremely close to Duveneck Elementary School and can fully sympathize with concerns regarding Castilleja School and school-related traffic.

Having served 23 years in government, I recognize the complexity of managing a city and applaud the honest and rigorous debate that goes into building the future of Palo Alto. The discussions sponsored by the City are in line with my personal beliefs that when setting the future all should be encouraged to compete in a fierce competition of ideas, especially younger voices. Arriving in Palo Alto and learning of the ongoing Castilleja School debate, I feel I have an important perspective as a new resident because I am not emotionally tied to the topic. It is from this perspective that I am writing to you to vote yes in support of the Castilleja School plan.

I consider the topic of Castilleja School and all questions before the City Council with a clear perspective and assess proposals with a simple question, "Where does Palo Alto want to invest in its future?" I was not here when Castilleja enrollment numbers did not meet city guidance, or when traffic volume was less on Embarcadero Rd, or housing was cheaper, or when Hwy 101 was 2 lanes. That for me was the past, important to consider but it is unchangeable and I am here now, looking at what kind of City Palo Alto can be in the future. As I consider that future, one thing clear to me is that education with its exchange and challenging of ideas is fundamental to a successful future. To secure that future, investment must be made, and at a certain point action must be taken. The debates have been held, competing ideas delivered, and compromises made - from traffic considerations with a robust TDM to design changes for noise reduction. It is now time to act. I encourage the members of the Council to consider Palo Alto's future and the role Castilleja School has in securing that future, and vote in support of the current plan before the City. Yes to Castilleja School.

Kind Regards,  
Sulev Suvari



306 Iris Way, Palo Alto

From: [cathy williams](#)  
To: [Planning Commission](#)  
Subject: Castilleja  
Date: Monday, August 24, 2020 8:55:58 PM

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Dear planning commission:

We live on Bryant Street in old Palo Alto, not far from Castilleja School. I would like to express my support to Castilleja's revised plan because I think it reflects a genuine effort by the school to compromise and find an outcome that's acceptable for itself and the neighbors. It's unfair to object to every plan the school is proposing, as some of the neighbors seem to be doing. Just like we can't oppose a neighbor's remodeling proposals no matter what they do. The school has a place in the neighborhood just as each neighbor does, and we should strive to find a path forward that works for everyone, just as we would with a neighbor who is remodeling their home.

I learned that Castilleja is now making their garage smaller and is able to conserve 16 more trees. In revising their plan, Castilleja is going to plant 103 new trees, leaving or relocating 139 trees, removing 18 trees due to drought or illness. I think that is a reasonable plan and it will leave the school with a bigger and healthier canopy.

As a neighbor who often walks by the school, I particularly appreciate the beautiful canopy that defines Palo Alto.

Thank you to Castilleja for recommending a plan that takes care of our trees and does its best to find a balance between the school's needs and the desires of the neighbors.

Cathy Williams  
Resident of old Palo Alto

From: [Bob Kocher](#)  
To: [Planning Commission](#)  
Subject: Support letter for Castilleja  
Date: Monday, August 24, 2020 8:23:15 PM

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August 24, 2020

Dear City of Palo Alto Planning Commission,

I am writing in support of Castilleja's proposal for their new campus. As a longtime neighbor on Emerson Street, I think Castilleja has gone to great lengths to listen to our neighbors and bent-over-backwards to be a good neighbor. We appreciate the efforts and willingness of Castilleja to respond to feedback from our neighborhood and believe that the new plan does a very good job at addressing the concerns and feedback of people in our neighborhood.

Specifically, these commitments by Castilleja make a meaningful difference:

- Very few evening events: Ending all athletic by 8pm on weekdays and no events on Sundays
- Limiting parking: Ensuring that on-campus or satellite parking is provided for events
- Quieter pool: Lowering the pool will make it quieter. Aquatic events are the ones that we can really hear so this should make a big difference.
- Less delivery noise: Moving deliveries to a below grade and inside-campus location should be quieter.

Moreover, I feel fortunate to have an exceptional school in our neighborhood that educates highly engaged students who are invested in making our community more vibrant and better. It is a good policy in my opinion to support the investment of millions of dollars by Castilleja to build a state-of-the-art school that will help Castilleja continue to succeed. Castilleja adds a great deal to our community by attracting talented students, teachers, administrators, and families to Palo Alto.

I hope that the Planning Commission supports Castilleja's new campus.

Sincerely,

Bob Kocher  
1870 Emerson Street  
Palo Alto, CA 94301

From: [Andie Reed](#)  
To: [Planning Commission](#)  
Cc: [French, Amy](#)  
Subject: Castilleja Expansion - Moncharsh letter  
Date: Monday, August 24, 2020 7:01:27 PM  
Attachments: [Moncharsh PTC ltr with Attmt.pdf](#)

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Dear Planning and Transportation Commissioners:  
CC: Amy French, Chief Planning Official

Attached is Leila Moncharsh's attorney letter in response to the Final EIR for the Castilleja Expansion project.

Leila asked that I send it along to the Commissioners and appropriate staff for this week's PTC meeting.

Thank you for your consideration.

Andie Reed  
PNQL

--

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

DONNA M. VENERUSO (d.'09)  
LEILA H. MONCHARSH

LAW OFFICES  
VENERUSO & MONCHARSH  
5707 REDWOOD ROAD, SUITE 10  
OAKLAND, CALIFORNIA 94619  
TELEPHONE (510) 482-0390  
FACSIMILE (510) 482-0391  
Email: 101550@msn.com

August 24, 2020

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

Re: Castilleja School Hearing, 19PLN-00116 EIR, Use Permits

Dear Commissioners:

I am a land use attorney representing PNQL and am grateful for the ARB and the planner slowing down the schedule for hearings. This letter addresses several issues, but certainly not all of them. The release of so many documents over these last three weeks, including the substantially revised draft EIR (RDEIR), the final EIR (FEIR), many comment letters, and two staff reports present an overwhelming amount of text to digest.

In summary, the Comp Plan does not require or encourage the proposed underground garage in the R-1 zone. Under the California Environmental Quality Act (CEQA), the extensive RDEIR must be recirculated for public comment because it presents new negative impacts, not addressed there or in the FEIR. There is no evidence supporting at least several claims in the FEIR and RDEIR. For CEQA purposes, the baseline for events is five and "several others" as represented in the 2000 CUP because events are not physical or operational conditions as those terms are used in the relevant case law. The City cannot legally make the findings required for a variance to allow greater floor area ratio (FAR) than permitted under the municipal code for the proposed large building. (See my attached letter on this topic, attachment 1.) The city council should not approve a permit allowing ten, two-story portable classrooms because they are unsightly and difficult to get removed from the property longterm.

**A. The Palo Alto Comprehensive Plan Policy T.5.6 Does Not Support Underground Garages in R-1 Low Density Zones as Opposed to Downtown Commercial, Employment, and Multi-Family Zones**

The Comprehensive Plan (Comp Plan) policies do not require or even encourage underground garages for new school construction at all and certainly not in R-1 residential zones. The Comp Plan has to be read *with* the headers for each section and the paragraphs lending context above and below the cited policy. Here, the headers and

Planning & Transportation Commission  
City of Palo Alto  
250 Hamilton, 5<sup>th</sup> Floor  
Palo Alto, CA 94301  
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paragraphs above and below Policy T-5.6 show that this particular policy applies to underground garages for commercial, large residential structures, and public spaces, not schools located in the R-1 residential zone.

As shown below, the parking and other transportation policies relevant to the Castilleja project require reducing single occupancy vehicle (SOVs) trips into the City and reducing parking spaces over time as a way to prevent SOV trips. The proposed project does not comply with these policies and undergrounding a garage will not correct the inconsistency between the project and the Comp Plan because it provides parking spaces and space for drop-offs and pick-ups to accommodate SOVs.

On packet page 18 of Planner Ms. French's staff report, she notes that an ARB commissioner thought that Plan Policy T-5.6 was relevant to the discussion about whether Castilleja should be permitted to construct an underground garage:

The table includes a citation for Policy T-5.6, which an ARB member called out as relevant to the discussion of a subterranean garage. Policy T-5.6 states: "Strongly encourage the use of below-grade or structured parking and explore mechanized parking instead of surface parking for new developments of all types while minimizing negative impacts including on groundwater and landscaping where feasible."

Palo Alto's Comp Plan starts its discussion under its heading "PARKING" with its overarching goal: "Effectively managing parking supply and demand can reduce traffic congestion, protect the livability of residential neighborhoods and support local businesses." It reduces the number of SOVs coming into the city by *reducing* the number of available parking spaces over time, the exact opposite of what the school is seeking here where it wishes to *increase* the number of available parking sites through use of an underground garage, combined with already available street parking, and possibly add special lanes for parents in SOVs to drop off and pick up their children. The goal relies on "incentivizing use of alternatives," which is also the opposite of the school's plan which relies heavily on parents driving their children to school in SOVs and even students driving themselves in SOVs to school. (Comp Plan, pp. 74-75.)

In the next relevant section, Goal T-1 under "SUSTAINABLE TRANSPORTATION" states: "Create a sustainable transportation system, complemented by a mix of land uses, that emphasizes walking, bicycling, use of public transportation and other methods to reduce GHG emissions and the use of [SOVs]." It

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then lists the policies which are binding on the City (as opposed to goals). Policy T-1.1 requires the City to take “a comprehensive approach to reducing SOV trips by involving those who live, work, and shop in Palo Alto in developing strategies that make it easier and more convenient not to drive.” (Comp Plan, p. 78; see also Policy T-1.2 [requires collaboration with business to institute plans to reduce SOVs].) Under this policy it lists “programs,” one of which mentions PAUSD and others to change travel habits, presumably towards discontinuing use of SOVs. (Comp Plan, p. 78.)

Program T1.2.3 strictly requires transportation demand management plans (TDM) that utilize “regular monitoring/reporting and provide for enforcement with meaningful penalties for non-compliance.” These TDMs would, among other accomplishments, establish “a mechanism to monitor the success of TDM measures and track the cumulative reduction of peak hour motor vehicle trips. TDM measures should at a minimum achieve. . . reduction in peak hour motor vehicle trips, with a focus on [SOV] trips.” (Comp Plan, pp. 78-79.) The focus is again on reducing SOVs but the Castilleja project increases their use through expanding parking accessibility underground, combined with the parking spaces on the street, and possibly providing special lanes above ground to accommodate SOVs.

Under the heading “INCREASING TRANSIT USE,” legally binding Policy T-1.6 states: “Encourage innovation and expanded transit access to regional destinations, multi-modal transit stations, employment centers and commercial centers, including those within Palo Alto through the use of efficient public and/or private transit options such as rideshare services, on-demand local shuttles and other first/last mile connections.” *PNQL* has consistently been advocating for the City to require the school to provide shuttle and bus services given that its students are coming from all around the region. This policy requires compliance with that method of transportation, instead of permitting SOV trips.

Under “NEIGHBORHOOD IMPACTS,” Goal T-4 emphasizes protecting streets and “adopted school commute corridors that contribute to neighborhood character and provide a range of local transportation options.” This is in keeping with the earlier policies emphasizing the decrease of SOVs and increasing use of shared ride systems such as private buses and shuttles. Policy T-4.1 states: Keep all neighborhood streets open as a general rule. (Comp Plan, p. 89.)

In the next section “MOTOR VEHICLE AND BICYCLE PARKING,” Policy T-5.1 again emphasizes the need to reduce parking spaces over time for new construction: “MANAGING PARKING SUPPLY” and now focuses on commercial and employment

zones, not single-family residential zones. Accordingly, we see that the sections leading up to T-5.6, mentioned by the ARB commissioner, are not related to single-family residential neighborhoods. Similarly, the next section “PARKING INFRASTRUCTURE AND DESIGN,” where we find the Policy T-5.6 that the ARB commissioner mentioned, is still about the commercial and employment zones, not single family residential zones. (See, Comp Plan, p. 92 - Program T5.8.1 about city streets.)

We can also see that Policy T-5.6 relates to the commercial and employment zones because the next section after the above discussion is entitled, “RESIDENTIAL PARKING and contains one policy dealing with the interface between residential and businesses: Policy T-5.11 says: Work to protect residential areas from parking impacts of nearby businesses and uses, recognizing that fully addressing some existing intrusions may take time.”

Furthermore, the Housing Element of the Comp Plan states: “The basic requirement for a single-family house is two [parking] spaces, at least one covered, *with underground parking generally prohibited.*” (Comp Plan, p. 111 – emphasis added.) The Land Use Element specifically refers to undergrounding parking for public streets and public spaces: Policy L-9.2 states, “Encourage development that creatively integrates parking into the project, including by locating it behind buildings or underground wherever possible . . . .” Moreover, if Policy T-5.6 intended by the words “new developments of all types” to include undergrounding school parking in the R-1 single-family zone, it would have recommended a different table for the City’s parking requirements. The opportunity to develop an underground garage only seems to arise where there is a requirement for a substantial number of parking spaces and in an applicable zone. See below:

**Table 4-7 Parking Requirements for Residential Zones**



Zoning District	Vehicle Parking Requirement	Bicycle Parking Requirement
R-1	2 spaces; 1 covered	None required
Second Dwelling Unit based on sqft	1 to 2 additional space	None required
R-2	1.5 spaces per unit; 1 covered	1 space per unit
RMD	1.5 spaces per unit; 1 covered	2 space per unit
RM-15	1.25-2.00 spaces per unit; 1 covered	3 space per unit
RM-30	1.25-2.00 spaces per unit; 1 covered	4 space per unit
RM-40	1.25-2.00 spaces per unit; 1 covered	5 space per unit
Guest Parking	For projects exceeding 3 units: 1 space plus 10% of total number of units provided that if more than one space per unit is as signed or secured parking, then guest spaces equal to 33% of all units is required.	1 space for each 10 units

Source: City of Palo Alto Zoning Code Section 18.52.040

(Comp Plan, p. 112.)

**B. Under CEQA, the Revised Draft EIR Must Be Recirculated for Another Round of Comments Due to the Numerous Changes in the Original DEIR**

The FEIR includes a massive amount of changes in its RDEIR that require recirculation of the RDEIR for comment. Many of the changes are responses to comment letters. Other changes are understandably made to show where potential impacts of the project have been lessened in one way or another, and there is also a new and necessary discussion about alternatives to the original proposed project. However, some of the changes reflect new negative environmental impacts or changes to mitigations that are not adequate. These changes require recirculation of the RDEIR.

Planning & Transportation Commission  
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Re: Castilleja Project  
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The California Supreme Court has held that when a city acting as lead agency adds significant new information to a DEIR after the comment period has closed and before the FEIR is certified, as has occurred here, it must pursue “another round of consultation.” (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 447-448, Resources Code, § 21092.1, Guideline § 15088.5.) To require recirculation, the changes must be significant and:

only if as a result of the additional information “the EIR is changed in a way that deprives the public 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. (*Ibid.*)

Here, there are numerous changes to the RDEIR that fall within that definition, above. For example, the RDEIR now proposes a new alternative, the Disbursed Circulation/Reduced Garage Alternative, to reduce the size of the garage and disperse cars onto the street. However, it fails to evaluate the traffic impacts related to going into the garage and that present safety problems for the neighbors and the school. Neighbor Andie Reed writes in her submission to the PTC, dated August 24, 2020:

However, [the Alternative] includes an underground garage with entrances and exits in the same busy corners of very commuter-active arterials (Embarcadero and Bryant, Embarcadero and Emerson, and aiming down the short-block of Melville to wait for a traffic break at Alma. This plan also includes, in addition to garage access driveways, 2 drop-off “loop driveways” at Bryant and Kellogg, and doesn’t mention (although they appear in the plans) how these would interact with the school driveways at Kellogg and Emerson and delivery and bus traffic into the driveway on Emerson. It does not solve 1,477 car trips per day (FEIR MRpg2-76), but tells us that the school will disburse them around as mitigation.

Mr. Tom Shannon also points out in his submission to the PTC that the new Alternative does not study the Kellogg/Bryant intersection or Waverley or Churchill. As to the Kellogg/Bryant intersection, he states, “This is the most treacherous intersection among the four that interface with Castilleja. This is where I have witnessed 2 bike/car accidents. This is where **public school** children commuting have to cross to get to the public schools. Note - parents of young public school children will not let their children cross this intersection without adult supervision given the Castilleja parent traffic trying

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to get to the Kellogg entrance pretty much ignores pedestrian and bike traffic and speeds through this intersection.”

This alternative in the RDEIR should have been recirculated so that the public could have a meaningful opportunity to comment on the adverse environmental impacts of it.

Another example deals with the historic Gunn building. After informing us that there would be no changes to the Gunn Administration building in the DEIR, the RDEIR crosses out those words and now states that the project will necessitate removing a wall and installing an outdoor set of metal fire escape stairs on the eastern façade of the building. (FEIR, p. 6-6, 6-21.) On page 3-7 – 3-8, the FEIR states that the project now includes separating the Gunn Administration Building from a classroom building which will be demolished. The project will make a new wall and outdoor metal, fire-escape stairs on the new wall of the Gunn building:

To refinish the exterior wall on the eastern façade of the Administration Center, the project proposes to cover the exposed sections of the wall with stucco on the first floor and wood shingles on the second floor, consistent with the existing building materials and finishes. New doors would be installed on the first and second floors and new exterior stairs would be constructed to provide access to the second floor.

Then, without any analysis of whether these changes represent an environmental negative impact to this cultural resource, the FEIR just makes the conclusionary statement that these newly disclosed plans are okay since they “demonstrate compliance with the Secretary of the Interior Standards for rehabilitation” because they would preserve the building’s finishes and character-defining characteristics. (FEIR, p. 6-21.) The public is left with no right to review and comment on this new information.

The FEIR goes on to describe in flourishing details how the removal of a wall on the Gunn building, as part of demolition of another building, will be acceptable because the work will use stucco and shingle cladding to “match the existing exterior finishes in material, color and dimension and the refinishing plans would not alter the building dimensions. Upon project implementation, the [Gunn] building would continue to convey its distinctive features, finishes, construction techniques, and examples of fine craftsmanship.” It then again makes the conclusionary statement without any expert support that the project would “have no adverse effects on the historic significance and integrity of the Administration Center.” (FEIR, p. 6-22.)

If the public had the opportunity to comment on this project, it could show the falsity of these self-congratulating claims. Here is a picture (Figure 4-1) of the building with the proposed changes<sup>1</sup>:



As shown above, the right side remodel is not consistent with the left side. The remodel shows a different roof line that does not match any of the building's other roof lines, there is a door inserted that is not centered as is the clock on the other side, and the stucco does not match the other side. The stairs are on the outside of the wall instead of inside the wall. Therefore, the work is decidedly not consistent to convey the architect's original intent.

To comply with its informational purpose for the public and the decision-makers, this newly proposed part of the project requires research regarding what the original plans looked like, and the specific materials used. It also should have been reviewed by an architectural historian for consistency. If the proposed project is not consistent, a mitigation measure should be included in the FEIR to address that issue.

### **C. There Is No Evidence Supporting Many of the FEIR's Conclusions**

A FEIR cannot make conclusionary statements without any evidentiary bases. Throughout the FEIR and responses to comments, the City ignores this rule. Substantial evidence "shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." (Pub. Resources Code, § 21082.2, subd. (c); Guidelines, § 15384; *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.) As shown in section B, the conclusionary statements attesting that the proposed project to reconstruct a wall will not reduce the value of the historical Gunn building is totally unsupported and written as if "selling" the project. The sudden new addition of the Disbursed Circulation/Reduced Garage Alternative provides nothing but conclusionary statements about the traffic safety.

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<sup>1</sup> This picture was copied a section at a time from Figure 4-2 in the FEIR as that was the only way it could be accomplished.

Other examples include a FEIR conclusion that 14 seconds is enough time for students to get in and out of cars fast enough without causing a backup on the street. First in the DEIR, W-Trans claimed it had performed a “sensitivity test,” with no details as to what that was. After we challenged the 14 second conclusion, the FEIR presented data where it timed students in three schools: K-8 Bentley in Oakland, Greene Middle School and Castilleja in Palo Alto. It provided no information as to whether these schools have waiting times to get in and out of garages (they don’t!) and the chart conclusions in the three-page memo from W-Trans do not support their own conclusion that 14 seconds is enough. (See, B-17, 18; memo from W-Trans, dated March 25, 2020.) Then, they offer the conclusionary statement that the way to get the wait time solved is with 7 traffic monitors, based on Bentley’s use permit traffic plan, which has many components and uses a very long street and circle off the street for drop-off and pick-up.

There also is no study or evidence that putting seven “monitors” on the drop-off and pick-up route will assure that students get in and out of cars within 14 seconds. For example, in looking at the chart for this process, we see that three of the seven monitors are teenagers. (<https://www.cityofpaloalto.org/civicax/filebank/documents/75349>) It is not reasonable to think that teens are going to control their peers or parents. Nor does it make sense that parents are going to take directions from students even if the monitors are in high school. The more likely result is that the teen monitors are going to just stand there looking at cell phones rather than giving orders to adult drivers.

Similarly, there is no evidence supporting the FEIR response that Castilleja cannot reduce the number of vehicle trips using bus and shuttle service as reflected in the Archer use permit where 80% of the students arrive and leave by shuttle, private bus, city bus, walking or biking. It frees up parking for employees and visitors, which would reduce the traffic congestion in this dense residential neighborhood and around it. The FEIR admitted, as it had to, that this use permit restriction “can be effective,” but then made the ridiculous claim that Castilleja would have to obtain a satellite parking lot and could not because there are no vacant parking lots in Palo Alto. There is no evidence supporting this disregard for a use permit restriction similar to the one imposed on Archer School. As a mitigation, it does not require purchase of a satellite parking lot, anymore than businesses with shuttle services for employees have to buy one.

For decades, private schools have used everything from station wagons to full-sized buses for transporting students from pick-up locations, including everywhere from shopping mall parking lots to residential street corners. The FEIR presents not one iota of evidence supporting that this method that effectively stops use of SOVs transporting students, requires the school to obtain an empty parking lot. Furthermore, it was the EIR preparer’s responsibility to obtain the necessary student addresses to determine where pick-up and drop-off locations could be located such that they do not create negative impacts anywhere. (FEIR responses, B10-8.)

Moreover, the FEIR claims that schools which prohibit student drivers necessitate parents driving SOVs to school, instead. There is no evidence to support that absurd claim. The prohibition necessitates teenagers riding a school bus or shuttle, a much safer practice than having teens driving and one that reduces traffic impacts. An administrator of a private school once justified his school's prohibition by stating, "If you let them, a teenager will drive the car to the mailbox!" It is not a necessity and many schools commonly do not allow it. (FEIR responses, B-18.)

Cumulatively, by resorting to claims with no evidentiary support, the FEIR succeeds in arriving at meaningless voluntary mitigations that depend on the willingness of the parents to comply. "Encouraging" public transportation use and "using lotteries and rewards" in case students actually do reduce traffic is not a substitute for effectively reducing unnecessary traffic load on freeways, Palo Alto streets, and in the residential neighborhood.

#### **D. The FEIR Is Legally Incorrect – It Should Have Used the Five-Event and Several Others Restriction in the 2000 Use Permit as a Baseline**

The FEIR refuses to evaluate the environmental impacts of Castilleja hosting 90 events per year. It contends that the instead of looking at the difference between the 2000 use permit's five major events per year "and several others" and the more than 90 events the school now requests, the FEIR should use 90 events as the "baseline" for evaluating the difference between that number of events and what the school is requesting:

However, the history of CUP violations is not directly relevant to the analysis of environmental impacts under CEQA because CEQA case law has found that when existing on-site physical conditions and existing operations are the result of illegal activity, such as activity that is inconsistent with existing permits, the correct environmental baseline condition against which impacts are evaluated is the actual conditions existing at the time of CEQA review (*Fat v. County of Sacramento* (2002), 97 Cal.App.4th 1270 (*Fat*) and *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428 (*Riverwatch*)). Further, the courts have found that Lead Agencies are not required to evaluate impacts compared to a baseline condition that predates such illegal activity and it is not necessary to determine the nature and consequences of the prior conduct of a project applicant within the context of a CEQA document. (FEIR, p. 213.)

PNQL is not asking to have the FEIR use the baseline of five large events and several others because Castilleja violated its use permit but because events cause negative impacts on the neighborhood due to noise and traffic. The school choosing to host 95 events instead of five major ones and several others is not in itself a "physical condition" but these events do cause physical environmental impacts on neighbors. (See, *Woodward Park Homeowners Assn., Inc. v.*

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*City of Fresno* (2007) 150 Cal.App.4th 683, 707-710 [court emphasized that the test applies to “physical conditions” and also, required that the EIR examine both potential baselines, earlier and the current one].) Events are nothing more than occasions when the school hosts them if it wishes to do so, and generally do not occur during normal teaching school hours. Unlike here, *Fat* and *Riverwatch*, cited above, and the cases that followed them involved either physical environmental conditions or operations that formed part of the physical environmental conditions. *Fat* involved an illegal development at a mine and there was no way for the EIR preparer to turn back the clock and evaluate a future project as if the illegal development did not exist. *Riverwatch* involved an airport that had been developed over 30 years. The appellate court held that the baseline regarding the airport’s current operations constituted the baseline, not its illegal operations over the years. (See also, *Citizens for East Shore Parks v. California State Lands Com.* (2011) 202 Cal.App.4th 549, 553-554 [Court found that the baseline for a marine terminal that had been in operation for 50 years was its current operation, not when it first entered into its lease].)

Events are not a school’s physical operation, as with an airport or marine terminal. The school holds events when it wishes to do so, and not as part of its business educating students. A very recent appellate case rejected the very same argument when the University of California took an almost identical position. (*Save Berkeley’s Neighborhoods v. Regents of the University of California* (2020) 51 Cal.App.5th 226.) In 2005, when the UC Regents published their 2020 Long Range Development Plan (LRDP), the plan projected approximately 30,000 students by the 2020 academic year. However, it then increased the number of students without environmental review by about 3,000 students. Neighbors sued, seeking an order that the court require UC to obtain a supplemental EIR for the additional students. UC, in turn, argued that its baseline for another EIR would be 33,000 students, not the 30,000 in the LRDP with any further enrollment it would seek in its 2036-2037 LRDP. The appellate court disagreed. While it was interpreting a statute relevant to the university, it also stated that its conclusions were consistent with CEQA:

In 2005, respondents analyzed the impacts of increasing enrollment at the U.C. Berkeley campus by a modest amount (1,650 students) in an EIR developed in a public process. Starting just two years later, respondents allegedly made a series of decisions to increase enrollment fivefold with no public notice, no CEQA analysis, and no mitigation of environmental impacts. This undercuts the fundamental premise of CEQA to ensure informed decisionmaking and meaningful public participation by disclosing the environmental impacts of decisions *before* the decisions are made (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 395, as well as CEQA’s requirement for agencies to mitigate significant environmental effects when feasible.

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Here, Castilleja increased its events, beyond the five large ones and several others in its use permit for three years, according to the FEIR. (FEIR, p. 2-88.) Not only were these increases in events far from “physical conditions” as that term is used in the above cases, they are not long-standing operational conditions. Accordingly, the FEIR should have evaluated the traffic and noise impacts from the events by comparing the current 90+ events with the five major events plus several other ones, as listed in the 2000 use permit.

### **E. The PTC Should Disallow Portables On the Campus**

An ARB commissioner brought up the problem with allowing Castilleja to use ten modules (portables) during construction. He pointed out that these unattractive two story structures will likely become at least long term fixtures on the campus. My experience is similar – once portables end up on a school campus, they never leave. The students don’t like them because they are not part of the real school buildings and the neighbors don’t like looking at them. These ten portables fill up a majority of the campus and are unattractive. (see the drawing with them spread out on the campus: <https://www.cityofpaloalto.org/civicax/filebank/documents/57679> and the literature showing what they look like: <https://www.cityofpaloalto.org/civicax/filebank/documents/64422>).

Thank you for considering our comments.

Very truly yours,

*Leila H. Moncharsh*

Leila H. Moncharsh, J.D., M.U.P.  
Veneruso & Moncharsh

LHM:lm

cc: Clients



DONNA M. VENERUSO (d.'09)  
LEILA H. MONCHARSH

LAW OFFICES  
VENERUSO & MONCHARSH  
5707 REDWOOD ROAD, SUITE 10  
OAKLAND, CALIFORNIA 94619  
TELEPHONE (510) 482-0390  
FACSIMILE (510) 482-0391  
Email: 101550@msn.com

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Amy French, Chief Planning Official  
City of Palo Alto  
250 Hamilton, 5<sup>th</sup> Floor  
Palo Alto, CA 94301

Re: Castilleja School Application for Variance for One 84,572 Square Foot Building in Violation of Zoning Code Floor Area Ratio Restriction

Dear Ms. French:

My client, PNQL, opposes Castilleja School's application for a zoning variance allowing construction of an 84,572 square foot institutional above-ground structure, which exceeds the allowable floor area ratio (FAR) under the zoning code. Castilleja is also not entitled to the variance because the proposed structure violates the Comprehensive Plan. The proposed building is incompatible with the surrounding residential neighborhood. Granting the variance would illegally bestow a special privilege on Castilleja since the city has not allowed other properties in the same zone and vicinity to exceed the FAR restriction in the zoning code.

Furthermore, if Castilleja eventually moves in the future, the city could find itself burdened with an 84,572 square foot structure on the property that will be hard to repurpose due to its size. Developers generally are hesitant to pay the repurpose or demolition costs for such a large building. Today's decisions about the configuration of the property may well dictate the city's options for future uses of the property. The city council should deny the request for a variance.

**A. Requested Variance for A Combined Building of 84,572 Square Feet**

On March 22, 2018, Castilleja applied for a variance that would facilitate demolishing five existing buildings and then combining the square footage of those five demolished buildings into one new large building. The school believes that the city planner's decision to require a variance is due to "unintended consequences because the floor area ratio" will exceed the current FAR for residential properties in the R-1 zone. It argues that the construction of the 84,572 square foot building is necessary because the older buildings it wishes to demolish cannot be brought up to today's green and seismic building standards. Further, the community will receive benefits because the single structure will allow for a half-acre community park and a public bike pavilion. Castilleja also argues that historically, the city has granted permits for Castilleja's requests to develop its property as it wishes. Therefore, reasons Castilleja, the city should issue a variance now and continue allowing Castilleja to develop its property as it pleases. We disagree with the school's analysis.

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The city planning department is requiring a variance because the square footage of the proposed new large building violates the zoning code. The five buildings Castilleja wishes to demolish were constructed on the school property before Palo Alto adopted a particular type of density restriction into its zoning code. The use of the FAR calculation was incorporated into city zoning codes during the 20th century as a way for cities to control rapid growth. Today, city planners use it for restricting planning permissions, setting a limit on the "load factor" generated by new developments, beyond which the proposed project may place undue stress on a city and its public infrastructure. The calculation also allows cities to control the density of use in given zones. By containing the size of a building on a given lot, the FAR restriction allows the city to limit the number of persons who will be using that building.

It appears that the five buildings Castilleja wishes to demolish would not be permitted today without a variance because their square footage would violate the current zoning code FAR for the zone where the school is located. Combining the square footage of all the five buildings Castilleja wishes to demolish and placing the square footage all in one huge building does not prevent the need for a variance from the FAR restriction. It would just convert five small buildings into one huge, very institutional appearing building, in the middle of a single-family residential neighborhood.

As of this writing, Castilleja has not yet submitted plans showing the details of the proposed 84,572 square foot building. Therefore, the planner cannot determine by how much the proposed new building exceeds the FAR for the zone. However, there is no dispute from Castilleja that its proposed project requires a variance for the proposed 84,572 square foot building.

Castilleja did not include the 84,572 square foot building in its plans to help the neighborhood by providing a park and bicycle way station. It is driven exclusively by the school's desire to increase the number of students and employees. That desire and the rest of the reasons Castilleja offers to support its request for a variance do not justify granting one, which will open the door for other institutions in the same zone and vicinity to claim they are also entitled to the equal privilege. Eventually, the FAR would become meaningless. As shown below, Castilleja has not met its burden to demonstrate with facts and law that it is eligible for a variance under the city's zoning code.

## **B. Castilleja Has Failed to Demonstrate that It Is Entitled to A Variance**

The city code provides that variance permits are intended to address unique constraints that would make it a hardship for the developer to comply with the zoning code restrictions:

The purpose of a variance is to:

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- (1) Provide a way for a site with special physical constraints, resulting from natural or built features, to be used in ways similar to other sites in the same vicinity and zoning district; and
- (2) Provide a way to grant relief when strict application of the zoning regulations would subject development of a site to substantial hardships, constraints, or practical difficulties that do not normally arise on other sites in the same vicinity and zoning district.

(Section 18.76.030)

No particular physical constraints or hardships are preventing the campus from being used in ways similar to other sites such that it would qualify for a variance from the zoning FAR restriction. Therefore, Castilleja is not entitled to the grant of one.

**a. There are no unique physical constraints on the Castilleja campus**

Castilleja argues that it meets the criteria because it has a unique history. It built its structures before the city's adoption of the zoning code with FAR density restrictions. After the passage of the zoning code, the city allowed the school to build and remodel structures in compliance with a conditional use permit but did not enforce the FAR restriction. Further, the FAR applies to residential properties, not institutions. (3/22/18 Letter, page 2<sup>1</sup>.) However, the burden was on Castilleja to show that its physical constraints due to natural or built features prevented it from being used in ways similar to other sites in the same vicinity or zoning district. (*Walnut Acres Neighborhood Assn. v. City of Los Angeles* (2015) 235 Cal.App.4th 1303, 1313-1315 (*Walnut Acres*)). The city historically allowing Castilleja to construct larger buildings than would be permitted today does not meet that test.

**b. There is no showing that Castilleja would suffer a substantial hardship without a variance**

Castilleja contends that if the city denied a variance from the FAR restriction, it would disproportionately constrain Castilleja's property compared to other parcels in the vicinity. (Letter, page 3.) However, zoning regulations are designed to restrict the use of properties. Whether they do so disproportionately is not relevant to the legal requirement that the applicant demonstrates "substantial hardship" to qualify for a variance. For example, hardship is something that would prevent profitability. *Walnut Acres, supra*, is instructive. In that case, the developer applied for permits to build a 50,289 square foot eldercare facility in a low-density

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<sup>1</sup> All citations to a "Letter" are referring to the one written by Castilleja's attorney, Mindie Romanowsky, to city planner Amy French and dated March 22, 2018.

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residential neighborhood, similar to the one surrounding Castilleja. The Los Angeles zoning code restricted the FAR to 12,600 square feet. The developer argued that the growing demand for senior care was so great that if it reduced the square footage to comply with the zoning code, it could only provide 16 rooms instead of 60 rooms and thus, would deprive Los Angeles of needed senior services. The city council granted the variance requested by the developer and the neighborhood association filed a lawsuit. The superior court ruled in favor of the neighbors and set aside the permit. The court of appeal rejected the property owner's reasons for its appeal because there was no substantial evidence of a hardship:

There was no evidence that a facility with 16 rooms could not be profitable. Eldercare homes apparently include small homes with four to 10 beds, according to the zoning administrator's report. There was no evidence that necessary support services demanded additional rooms in order to generate a profit. Just as in *Stolman v. City of Los Angeles*, supra, 114 Cal.App.4th at page 926, there was no "information from which it [could] be determined whether the profit [was] so low as to amount to 'unnecessary hardship' "

(*Walnut Acres*, supra, at page 1315.)

Like the developer in *Walnut Acres* Castilleja submits no evidence that if it is required to construct buildings on its property that comply with the FAR restriction it will become unprofitable or that running a private school, of necessity requires larger structures than the FAR limitation would allow. Accordingly, it has not demonstrated that it will suffer "substantial hardships, constraints, or practical difficulties that do not normally arise on other sites in the same vicinity and zoning district." (Zoning Code Section 18.76.030.<sup>2</sup>) Accordingly, the city council should deny Castilleja's request for a variance to construct an 84,572 square foot structure.

There also is no showing by the school that the FAR would only apply to residences and not to institutions. Typically, the city would apply the FAR limitation to the institution's location. We expect that the FAR applicable to institutions in downtown Palo Alto or its industrial area would be more flexible for an institution wishing to build there than a FAR that applies to single-family zones. There is nothing in Castilleja's argument that shows complying with the current FAR would prevent the school from using its property due to physical or natural constraints, which do not exist for other similar properties. Nor does it show that compliance with the FAR restriction would create a hardship that would not apply to other institutions in the same zone and vicinity. The school's problem is that it wants to re-arrange its structures so that it can accommodate a much higher enrollment than what it has now, but that is the very reason for

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<sup>2</sup> All section references are to the Palo Alto Zoning Code.

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the FAR restriction – to prevent a high level of density incompatible with the institution’s surrounding neighborhood.

Without the variance requirement, and just relying on the existing conditional use permit for density, as the school would prefer, the school would be able to keep seeking modifications of its conditional use permit for more enrollment. The variance requirement prevents the school from building its property to accommodate unfettered growth that depends on the “politics of the day.” Instead, the variance restriction relates to the city’s interest in not having the project site use excessive city resources, to the detriment of the overall, surrounding infrastructure maintained by the city. For example, the larger the allowable density, the more people who can be on the campus. That means more cars parking on the streets, more traffic for students and employees on city streets, and more city services to maintain those streets, provide protection, arrange for garbage disposal, and the like.

It is not in the city’s interest to grant a variance. Furthermore, the city council does not have the factual or legal basis for making the findings for granting a variance.

**C. The City Council Does Not Have a Basis for the Findings  
Necessary to Grant a Variance**

The zoning code only allows the city council to grant an application for a variance by making specific findings. It would have to find, in relevant part, *all* of the following:

1. That there are special physical circumstances that exist on the property which would cause the strict application of the FAR to deprive Castilleja of privileges enjoyed by other property in the vicinity and the same zoning district as Castilleja's property;
2. That the special personal circumstances peculiar to Castilleja does not form any consideration for granting a variance;
3. That the granting of the application would not affect substantial compliance with the zoning regulations;
4. That the grant of a variance will not 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;
5. That the granting of the variance is consistent with the General Plan; and

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6. That the granting of the application will not be detrimental or injurious to property or improvements in the vicinity, will not be detrimental to the public health, safety, general welfare, or convenience.

(Section 18.12.030, subd. (c).)

**1. There are no unique physical circumstances that exist on Castilleja's property which would cause the strict application of the FAR to deprive Castilleja of privileges enjoyed by other property in the vicinity and the same zoning district as Castilleja's property**

On page 3 of the Letter, it correctly states that the school's parcel is different from the parcels with housing because it is much larger in square feet, but that is irrelevant when determining whether a variance would grant a privilege to Castilleja that is not enjoyed by other property in the same zone and vicinity. Castilleja had the burden to list properties in the same zone and vicinity where the city has granted the privilege of exceeding the FAR. It has failed to do so. For that reason alone, the city council should deny the application for a variance.

Castilleja relies on several cases to support its position that in considering whether to grant a variance, it should look at the "disparities between properties, not the treatment of any individual property's characteristics in the abstract." (Letter, page 4.) That is true but is out of context. A city can properly grant a variance when strict enforcement of the FAR restriction would prevent safety problems or a property owner from enjoying the same amenities enjoyed by owners of properties in the same zone and vicinity.

For example, in *Eskeland v. City of Del Mar* (2014) 224 Cal.App.4th 936, cited by Castilleja, the appellate court upheld the grant of a variance, keeping in mind that other houses in the same area were able to build with amenities that the property owner wanted to include in his rebuilt home. The variance application requested a variance from the setback zoning restriction so that the owner of a house could rebuild it on a very steep hillside. The city based its decision to grant a variance because the steepness of the hill restricted its development potential. Unlike Castilleja, the property owner demonstrated that without a variance, he could not construct a house with the same amenities as other houses within the same area. The lack of a variance would restrict him to build a house that would adversely impact the steep slope and landform. Also, if the city denied the variance, the driveway to the house would be "very steep and dangerous." (*Id.* at 952.)

In *Save Hollywood Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, another case cited by Castilleja, the appellate court upheld the grant of a variance from the three-foot setback requirement and the height restriction because there was an adequate showing of substantial hardship if the city had denied it. The property owner had constructed a wooden fence

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on top of a 1920s historic masonry wall, instead of three feet back from the wall. (*Id.*, at page 1172.) The court concluded that there was evidence of hardship if the city had required a three-foot setback. The subject property was a three-parcel site without a backyard, and all of the property faced a winding street. Much of the yard was below grade, which made enforcing the three-foot setback problematic. (*Id.*, at page 1184.) Also, the three-foot setback, if applied, would cause a gap between the wall and yard, which would cause a safety hazard:

Further, the property sits below grade on a winding street, and enforcing the requirement would create a more significant risk by providing a gap between the wall and yard into which persons and debris could fall. The fact that other properties in the area may have a similar below-grade configuration and do not have such fences does not detract from the necessity of ameliorating the substantial safety hazard which would remain if the City strictly enforced the setback requirement.

(*Id.*, at page 1184.)

Castilleja's third cited case also does not support its position that the city should compare the size of residential lots and the size of Castilleja's property, and on that basis alone, grant a variance from the FAR restriction. In *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506 (*Topanga*), the California Supreme Court determined that the city did not make sufficient findings to support the grant of a variance, allowing a 93-space mobile home park within an acreage zoned for light agriculture and single-family houses with a one-acre minimum lot size. (*Id.*, at page 510.) The court recounted the support for granting the variance, including the desirability of satisfying a growing demand for new low-cost housing, presumably through use of mobile homes, that the project could provide a fire break, and that other uses such as for single-family houses would necessitate costly grading. (*Id.*, at page 520.) Then, the court explained that these considerations were legally irrelevant:

These data, we conclude, do not constitute a sufficient showing to satisfy the (cite) variance requirements. [Variances are permitted] "only when, because of special circumstances applicable to the property, . . . the strict application of the zoning ordinance deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification." This language emphasized disparities between properties, not the treatment of the subject property's characteristics in the abstract. It also contemplates that at best, only a small fraction of any one zone can qualify for a variance.

(*Id.*, at page 520.)

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Here, Castilleja has not shown in what way it cannot construct its improvements by staying within the FAR restriction. It also has not demonstrated that other properties near it have been allowed to build in contravention to those restrictions. Thus, there is no substantial hardship preventing Castilleja from constructing new buildings due to safety problems, land configuration limitations, or otherwise as occurred in two of its cited cases. Nor has it shown that the city has waived the same restrictions for surrounding property owners.

Like the developer in *Topanga*, Castilleja has only come up with irrelevant arguments to support its variance application. For example, it argues that the following supports its position: the difference in the square footage of surrounding properties compared with its square footage, the history of the city granting permits for buildings on the site, that the new building will be seismically up-to-date, that the new plan will be beneficial to the neighborhood, and that the building will be architecturally attractive. (Letter, page 5.) None of these arguments suffice to show that the school cannot build on its campus without a variance.

Castilleja argues that it needs the variance to meet current code and seismic standards, but it does not show why the lack of a variance prevents it from upgrading its existing buildings or constructing one or more new buildings less than 84,572 square feet and complying with the FAR limitation. Increasing square footage with a new plan that incorporates this large, institutional building may be an advantage, but it does not satisfy any legal requirement for obtaining a variance from the FAR restriction. Similarly, even if Castilleja believes that the new, sizeable institutional building will be attractive and compatible with the neighborhood, that also does not qualify as showing “substantial hardship” or that the neighbors are receiving some advantage that Castilleja does not enjoy.

The city council should deny the variance application.

**2. Granting the variance will affect substantial compliance with the regulations and will constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity or same zone**

Castilleja contends that its master plan substantially complies with the zoning code (Letter, page 5.) Its contention evidences a lack of reality. A project that substantially meets the zoning code is one that requires a building permit, not a slew of discretionary permits including variances that are exceptions to the rules for the zone. Here, Castilleja is requesting a conditional use permit, encroachments into public easements, a variance to construct a building that violates the FAR, and for another variance to get around the setback requirements by encroaching into the sidewalk for a proposed underground garage. The city does not have to grant any of these permits – each is discretionary. These requested permits represent privileges that the city could grant, not rights that the city must grant to Castilleja. They are also privileges that Castilleja has



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City of Palo Alto  
250 Hamilton, 5<sup>th</sup> Floor  
Palo Alto, CA 94301  
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failed to show nearby neighbors are enjoying. PNQL is aware of nobody else in the neighborhood, who has exceeded the FAR or obtained a variance to do so.

The fact that historically, the city has granted permission to build out the site in a way that exceeds the current FAR restriction is not a legally cognizable reason to grant a variance, as discussed above. Castilleja has cited no cases that would support such an interpretation of the city's requirement to make specific findings. For this reason, also, the city should deny the application for a variance.

### **3. Granting the Requested Variance is Inconsistent with the Comprehensive Plan**

Castilleja references goals and land use policies in its Letter (page 7) to support the construction of the proposed 84,572 square foot building. However, policies, not goals, are binding upon the city. (See definitions of "policies" and "goals" on page 6 of the Comprehensive Plan (CP). Also, the CP contains several "elements," and the planner has to consult each in determining whether the application for a variance violates the CP. Below are the relevant sections from each, the housing and land use elements:

Policy H1.4 Ensure that new developments provide appropriate transitions from higher density development to single-family and low-density residential districts to preserve neighborhood character. (Housing Element.)

An 84,572 square foot building next to a residential neighborhood does not conform with the above policy. The policy requires avoiding placing large buildings in close proximity with single-family homes in a neighborhood such as the one surrounding Castilleja, which is low-density, residential.

Policy L-1.1 Maintain and prioritize Palo Alto's varied residential neighborhoods while sustaining the vitality of its commercial areas and public facilities. (Land Use element.)

Policy L-1.5 Regulate land uses in Palo Alto according to the land use definitions in this Element and Map L-6.

Policy L-1.6 Encourage land uses that address the needs of the community and manage change and development to benefit the community.

Policy L-1.7 Use coordinated area plans to guide development, such as to create or enhance cohesive neighborhoods in areas of Palo Alto where significant change is foreseeable. Address both land use and transportation, define the desired character and urban design traits of the areas, identify opportunities for public open space, parks and recreational opportunities,

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address connectivity to and compatibility with adjacent residential areas; and include broad community involvement in the planning process.

Policy L-1.11 Hold new development to the highest development standards in order to maintain Palo Alto's livability and achieve the highest quality development with the least impacts.

These policies, above, demonstrate that the city has prioritized its residential neighborhoods. Given the city's problems with providing sufficient housing, these policies require preservation of existing housing and avoidance of disturbing the characteristics of residential areas. Part of maintaining these neighborhoods is assuring that substantial buildings, with questionable future uses, are not placed near single-family houses. The institutional structure that Castilleja seeks to build will not contribute to maintaining the residences around it. When Castilleja is done with the site and moves on to another one, the proposed campus will present problems for repurposing it into much-needed housing. The demolition cost of a substantial institutional building is sufficient to discourage developers from building on the site.

Policy L-2.3 As a key component of a diverse, inclusive community, allow and encourage a mix of housing types and sizes, integrated into neighborhoods and designed for greater affordability, particularly smaller housing types, such as studios, co-housing, cottages, clustered housing, accessory dwelling units and senior housing.

Policy L-2.7 Support efforts to retain housing that is more affordable in existing neighborhoods, including a range of smaller housing types.

Policy L-2.8 When considering infill redevelopment, work to minimize displacement of existing residents.

Policy L-2.9 Facilitate reuse of existing buildings.

Policy L-3.1 Ensure that new or remodeled structures are compatible with the neighborhood and adjacent structures.

The subject neighborhood includes a mixture of cottages, small single-family houses, small to medium sized apartment buildings, rentals, and secondary units. If the city continues to allow Castilleja to "institutionalize" the neighborhood by tearing down housing for its institutional uses, building large institutional buildings, and disturbing the neighborhood with its activities, eventually the city will lose this diverse residential neighborhood. It is evident from a site visit that over time, the school has already encroached deeply into the neighborhood. The

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city should follow the above policies and stop the encroachments, including allowing construction of a huge institutional building and garage in the middle of the neighborhood.

Castilleja's argument that it wishes to tear down old buildings for seismic and code reasons violates policy L2.9, which requires the city to facilitate reuse of existing buildings. The proposed huge building also directly violates L-3.1 because its proposed new building is not compatible with the surrounding single-family housing, which is why it is seeking a variance from the FAR restriction.

Ordinance No. 5446: In May 2018, Palo Alto citizens gathered sufficient signatures to place an initiative on the ballot to cap the amount of office and R/D (research and development) development at 850,000 square feet. On July 30, 2018, the Palo Alto City Council passed Ordinance 5446, amending portions of the 2030 Comprehensive Plan to include this cap. The Ordinance contains the following finding:

2. Palo Alto Cannot Tolerate More Traffic: According to the City's own study, there are already about three jobs in the City for every employed resident. As a result, the City has one of the highest commuter ratios in the nation for cities with populations of more than fifty thousand. Excessive new office/R&D development in Palo Alto-as the recently adopted 2030 Comprehensive Plan allows-will lead to even more jobs and thus exacerbate traffic congestion and parking shortages in the City. Two-thirds of City residents cite these issues as major concerns. (Ordinance 5446, page 2.)

While the Ordinance caps new office and R&D development, it includes the finding above, indicating an intention to reduce traffic from commuters in the city. The only reason Castilleja is seeking to construct an 84,572 square foot building is because of its concomitant plan to add over 100 more students and eventually become a school of 540 students, along with employees to serve them. A substantial institutional building accommodating increased enrollment on the campus will further add to traffic congestion from commuter students and employees, in contradiction to the citizens' amendment to the Comprehensive Plan.

Castilleja cites two other CP policies, but they are relevant to different parts of Palo Alto than residential neighborhoods. (Letter, page 7.) Policy 6.1 applies to Employment Districts -- the design of buildings and public space (CP, pages 45-46) and Policy 9.6 applies to Parks and Gathering places - public streets and public spaces (CP, pages 50-51). Furthermore, Castilleja's arguments under these two policies are illogical and irrelevant to the legal test for whether the city should grant a variance.

For example, Castilleja contends that demolishing older buildings and building one new colossal structure will allow "for more site improvements and foster[] an enhanced sense of

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City of Palo Alto  
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community” including a bike pavilion at the corner of Bryant and Kellogg and a half-acre community park at Emerson Street and Melville Avenue. Castilleja does not explain how any of these items will build a sense of community. The neighbors never requested a bike waystation or a park open to the public. A park in the midst of housing can become a nuisance very quickly due to noise, lack of supervision and maintenance, and inappropriate behavior by patrons, especially after dark. To PNQL’s knowledge, no neighbor has asked for inclusion of either a public park or bike waystation in the school’s master plan. The residents are not looking for a “sense of community” that would mean expanding their involvement with people who do not live in the neighborhood or opening up their neighborhood for public uses for “a more welcoming environment with enhanced views and gathering spaces.” (Letter, page 7.) As would be true with any neighborhood, the residents desire a peaceful place to live, not a way to open up their neighborhood to the public.

Castilleja describes all of the design features it intends to include in the new building as positive improvements. (Letter, pages 6-8.) The CP stresses the importance of maintaining and reusing existing buildings. Castilleja presents no evidence that it cannot remodel its existing structures with the improvements Castilleja describes. Moreover, as shown above, a robust transportation demand management plan, an excellent education for young girls, an underground garage, increased open space, and the like are not relevant to the legal question of whether the city should grant a variance from the FAR restriction.

Contrary to its claim that it complies with the R-1 zone restrictions, Castilleja’s proposed master plan violates its zoning prohibition against the encroachment of schools into this primarily residential zone. Its proposed master plan proposes demolition of two houses with no replacement housing:

The R-1 single-family residential district is intended to create, preserve, and enhance areas suitable for detached dwellings with a strong presence of nature and with open area affording maximum privacy and opportunities for outdoor living and children's play. Minimum site area requirements are established to create and preserve variety among neighborhoods, to provide adequate open area, and to encourage quality design. Accessory dwelling units, junior accessory dwelling units and accessory structures or buildings are appropriate. *Community uses and facilities, such as churches and schools, should be limited unless no net loss of housing would result.* (3/22/18 letter, page 8; Zoning Code, section 18.12.010, subd. (a) – emphasis added.)

Castilleja attempts to get around the zoning restriction by arguing that it is contributing to the neighborhood a park and a bike waystation, which does not address the R-1 intent that the neighborhood consists of primarily single-family housing. It also does not address the loss of housing at a time when the need is at an all-time high in Palo Alto.

Amy French, Chief Planning Official  
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250 Hamilton, 5<sup>th</sup> Floor  
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#### **4. Granting the variance would be detrimental and injurious to property in the vicinity and to the general welfare**

As discussed above, placing large, institutional buildings near residential neighborhoods presents two problems: 1) they are incompatible in size and design, and 2) they are challenging to repurpose given their surroundings. While Castilleja emphasizes that one colossal building will allow for a community park, the neighbors do not want a park, and it should not be up to Castilleja to force one upon them. The CP requires reuse of existing buildings to prevent waste and excessive filling of land dumps. The growth of the school population is the underlying cause for a substantial institutional structure, and with increased enrollment comes exacerbation of noise, deliveries, traffic, and the like.

For all for the above reasons, the city council should refuse to grant a variance.

#### **D. The City Must Include in the DEIR A Discussion About the Impacts of the Master Plan Due to it Not Conforming with the Zoning and Comprehensive Plan**

As I understand the timeline, the variance issue arose after the scoping session. Dudek completed the initial study in January 2017, and the Notice of Scoping Session was dated February 8, 2017. However, the application for a variance as to the new building was not sent to the city until a year later on March 22, 2018. PNQL did not realize that Castilleja planned to seek a variance to the FAR restriction at the time of the scoping comment period and public hearings. This is primarily due to Castilleja dribbling its plans and documents to the city, instead of having all of its documents ready for submission when the planner requested them. Even at this very late date, the plan showing the 84,572 square foot proposed structure has not been submitted to the city and therefore, it has not been made available to the public.

Under “Land Use and Planning,” Dudek, the author of the Initial Study (3.10) states: “The proposed project has the potential to have significant impacts related to compatibility with neighboring land uses and thus land use impacts will be analyzed in the project EIR.” (Page 31.) It concludes that no mitigations are necessary. However, it does not identify the conflict between the proposed project with the CP and the zoning code. The Initial Study requires study if the project would:

Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including . . . general plan . . . zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

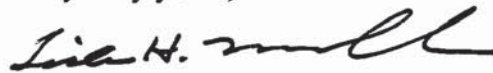
CP policy L-2.9 (facilitating reuse of buildings) and L-3.1 (compatibility with adjacent structures) are related to environmental effects. L-2.9 removes the need for unnecessary disposal

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of building materials, and L-3.1 applies equally to the preservation of historic districts and structures, which are evident in the neighborhood surrounding Castilleja. Ordinance 5446, by its terms, was designed to make changes to the CP as a way to reduce traffic impacts, an environmental effect.

We look forward to the city council requiring Castilleja to submit a revised master plan that does not include requests for variances. Thank you for considering our comments.

Very truly yours,



Leila H. Moncharsh, J.D., M.U.P.  
Veneruso & Moncharsh

LHM: lm

cc: Clients

Amy French (amy.french@cityofpaloalto.org)  
Jonathan Lait (jonathan.lait@cityofpaloalto.org)  
James Keene (james.keene@cityofpaloalto.org)  
Ed Shikada (ed.shikada@cityofpaloalto.org)  
Molly Stump (molly.stump@cityofpaloalto.org)

From: [nancytuck@aol.com](mailto:nancytuck@aol.com)  
To: [Planning Commission](#)  
Subject: Copy of comments made on the Zoom call for Castilleja's Renovation Plan  
Date: Monday, August 24, 2020 6:17:27 PM  
Attachments: [ARB Comments 082020.pdf](#)

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Please see attached the transcript of my comments made on the call last Wednesday, 8/20/20.

Thank you,

Nancy Tuck  
113 Melville Avenue  
650-922-0599

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Good morning. My name is Nancy Tuck, and I've lived in my home on Melville Avenue - a couple hundred yards from the school - for the past 9 years. I am also a parent of a 2017 Castilleja graduate. I haven't had any contact with members of the ARB, so you can add me to your list of strong supporter of this project. I have attended countless outreach meetings graciously hosted by Castilleja over the years. As someone who has been directly involved in the conversation and collaboration over these many years, I can attest to Castilleja's commitment to transparency and meaningful dialogue with its neighbors.

Even more important, the plan itself speaks to the steps Castilleja has taken to listen and respond with solutions that address neighbor concerns. Castilleja's proposal to significantly decrease their garage size, and maintain multiple - or distributive - drop-off and pick-up locations are key examples of this. So was the meeting they held with neighbors when we could provide direct feedback to the architects on design elements. Now, Castilleja has a plan with no significant impacts and a beautiful design, which is a win for everyone—the neighborhood, the school, and the City. As a neighboring property owner, I find the proposed upgrades to be far more aesthetically pleasing than the current structures. I appreciate that there is no increase in building height, the modern architecture, the proposed landscaping, as well as the environmental benefits of the reduced carbon emissions. I also am pleased with the amended traffic plan, with additional drop off and pick up spots, as well as options for disbursement direction for autos leaving the proposed garage.

At various times over the years, my support of this project has made relations hard for me in the neighborhood, but I stand by my conviction because I see how hard Castilleja has worked to make design changes to respond to input. Castilleja is an excellent and considerate neighbor, and I feel lucky to own a home nearby. The administration and the Castilleja community always work to be mindful of neighbor needs and requests.

In recent months, I've especially appreciated how Castilleja delivered to neighbors' doors detailed information about their new project alternative. We have been informed of progress and updates to the plans every step of the way. This smaller, less impactful project is the result of a successful collaboration toward shared goals to improve the neighborhood and the campus. The renderings on the Castilleja website are significantly more attractive than the dated buildings that we look at today, and would greatly enhance our community.



From: [Andie Reed](#)  
To: [Planning Commission](#)  
Subject: Castilleja Expansion Plans  
Date: Monday, August 24, 2020 3:55:35 PM  
Attachments: [Castilleja No Gar Alt B - PNQL Aug 2020.pdf](#)

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Dear Planning and Transportation Commissioners:  
cc: Amy French, Chief Planning Official

Attached is our [Response From Neighbors](#) to the Final EIR.

Thank you for reading and considering the **No Garage Alternative B**; retaining houses and trees and including mandatory shuttling and a modest enrollment increase.

Andie Reed  
PNQL

--

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

### **The Disbursed Circulation/Reduced Garage Alternative Is Ineffective at Reducing Key Negative Impacts.**

We appreciate that in the Disbursed Circulation/Reduced Garage Alternative (DCRGA), the school is taking into consideration neighbor and DEIR concerns about vastly changing the face of the neighborhood and provides, instead, to retain houses and hopefully many more trees and residential character. However, it includes an underground garage with entrances and exits in the same busy corners of very commuter-active arterials (Embarcadero and Bryant, Embarcadero and Emerson, and aiming down the short-block of Melville to wait for a traffic break at Alma. This plan also includes, in addition to garage access driveways, 2 drop-off “loop driveways” at Bryant and Kellogg, and doesn’t mention (although they appear in the plans) how these would interact with the school driveways at Kellogg and Emerson and delivery and bus traffic into the driveway on Emerson. It does not solve 1,477 car trips per day (FEIR MRpg2-76), but tells us that the school will disburse them around as mitigation.

### **The No Garage Alternative (NGA) in the FEIR Could be Improved to Reduce Impacts without Demolishing Houses and Trees**

The FEIR also produces a No Garage Alternative A (NGA) which allows for surface parking and reduced classroom buildings and enrollment. However, we don’t agree with the FEIR that the only way to avoid an underground garage is to tear down houses and trees and pave most of the Emerson Street side of the property. The goal of any No Garage alternative mentioned at the DEIR hearings was to be less destructive, not more. This alternative NGA increases adverse aesthetics and loss of community character by replacing houses with paved parking lots, increased removal of trees, and increased potential for adverse noise (Revised DEIR 13.8). We don’t think this report takes this alternative seriously.

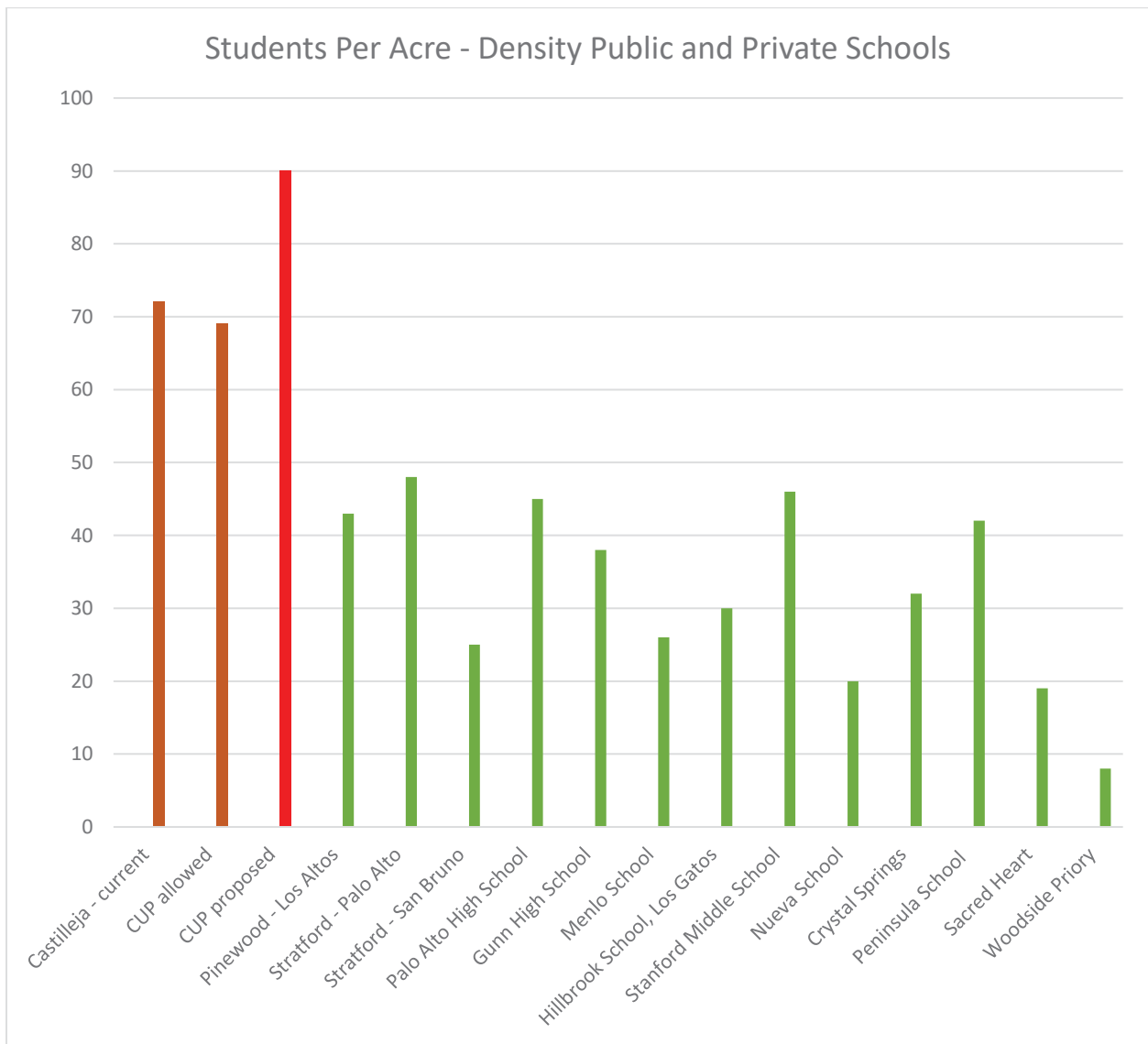
The entire project, and all its potential environmental impacts, depends on the enrollment number that the City Council grants to the school. If we set aside Castilleja’s insistence on the City permitting 540 students and focus on how a lower enrollment number would work, it appears a very good solution, contingent on retaining houses and trees. We call it No Garage Alternative B.

### **PNQL Urges the PTC to adopt changes to NGA and Recommend Our “No Garage B” Alternative (NGB)**

We request that the PTC consider **NGB**, which equitably solves almost all of the neighbors’ problems and satisfies almost all of the school’s goals. We recommend an enrollment of 450 students versus the requested enrollment of 540 students. See attached chart comparing students per acre in local schools; 540 is extreme.

#### **(1) Enrollment of 450 students represents an 8% increase**

Castilleja’s demand for 540 students is a 30% increase over the 2000 use permit enrollment cap of 415 students. **NGB’s** 450 enrollment cap would allow the school an 8% increase, which is the same percentage increase granted in 2000. This works especially well for a school that advertises itself on its website as small and intimate with classes limited to only 14 students and a 7:1 ratio of students to faculty.<sup>1</sup> This still allows for a sizeable enrollment in comparison to any other private or public school in the City of Palo Alto (see Density chart below; Private school information was culled from their website or CUP, and Public school information came from PAUSD documents).



<sup>1</sup> <https://www.castilleja.org/meet-castilleja/at-a-glance>

The FEIR states that a lower enrollment level does not achieve one of Castilleja's goals. However, the FEIR does not, and cannot, properly contend that Castilleja has a legal right to 100% of whatever enrollment it requests. Nor does it claim that the school has a right to 100% of each and every goal that it is seeking. Otherwise, cities would of necessity be legally required to grant permits for 100% of what all developers request for square footage. The EIR should have honestly and factually considered the alternatives, looked at enrollment levels approaching what neighbors could find palatable, and assumed that the City would use its fair and just discretion.

## **(2) Transportation – TDM – Mandatory Shuttling Program**

The FEIR should have considered other methods of controlling traffic, more consistent with today's standards. Just relying on voluntary steps taken by parents, as advanced in the EIR, is not adequate. **NGB** would depend upon a much more robust traffic plan. Mandatory shuttling would ease almost all traffic issues.

An example of an up-to-date solution is the TDM and use permit for a very similar girls' school in Los Angeles, Archer School for Girls, whose conditions of approval were submitted to the City of Palo Alto during the Draft EIR comment period.

Archer exists on 6.2 acres and like Castilleja, it has 430 students. It operates with 8 buses, and 80% of students bus to school (meet up with bus or shuttle at kiss-and-ride lots to ride together to school). This places the onus on the parents and the school to make the transportation plan work, instead of forcing neighbors and commuters to "live with" the problems.

Certainly Castilleja would prefer to let parents do whatever they feel like and not be bothered complying with use permit conditions. However, there has to be recognition that Castilleja decided to enlarge in this one neighborhood without expanding to another campus. The cost of that decision should not be borne by the neighbors. Already, Castilleja expects the neighbors to live adjacent to and near a very industrial appearing campus, inconsistent with their neighborhood<sup>2</sup>:

## **(3) Parking**

Surface parking as exists will support 450 students, as extrapolated from the NGA teaching stations discussion in the FEIR and according to Municipal Code (FEIR page MR2-28). The mandatory shuttling program will not only dramatically reduce traffic, but it will reduce parking needs by all students who would otherwise drive, so all surface parking is prioritized for Staff and Faculty, using off-site parking as needed, as is the case now. Staff and Faculty would also be able to use shuttles of course.

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<sup>2</sup> Castilleja website: <https://www.castilleja.org/community/castilleja-reimagined>



#### (4) NGB Advantages to the School

- a. NGB would reduce the cost and construction time for the project because its size would be smaller
- b. The current parking spaces would remain. There would be some re-design of the proposed new buildings, as in NGA.
- c. The school would solve the transportation problem through a system that is **mandatory** and required by the City via the Conditional Use Permit, rather than one where parents can blame the school if they don't like the system
- d. The school would stay at a size that would allow for easily pivoting between hybrid and online education now and in the future
- e. The NGB proposed size would allow more preservation of trees and the houses that would soften the look of the school and its surroundings
- f. Students would start their day at meet-up lots to join friends on the bus and arrive at school on the ground level, enjoying the visual benefits of the trees, the historic Gunn building, the circle, the new buildings and the landscaping, rather than being underground

#### (5) NGB Advantages to the Neighbors

- a. The amount of traffic and the duration of peak periods would lessen dramatically with mandatory use of shuttles/buses for the majority of students who do not live near the school
- b. Palo Alto commuters would not have a traffic backup to deal with when going to work
- c. The overall appearance of the school would be softened by removing the industrial-like garage, including the problematic entry and exit on a residential street
- d. There would be less need for so much new construction square footage, reducing the appearance of an office-park type setting

- e. The neighbors would have some assurance what their neighborhood would look like and that the school would remain at a predictable level
- f. Disruptions from construction would last a shorter period of time
- g. There would be no need for 10 large 2-story portables currently proposed to sit on the field for a year or two (or more)
- h. The neighbors could develop better and more effective communication with the school

**(6) NGB Advantages to Palo Alto**

- a. The city could maintain choices in education for its residents without “going all in” on a development that may not last very long due to changes over time
- b. The citizens of Palo Alto would have a much easier time on Embarcadero and Alma without the SOVs that the current plans would bring into those streets
- c. Palo Alto would avoid investing in this project by granting a permit for a very large private school on a small piece of land that then succumbs to a multitude of looming challenges (political, financial, demographic changes, public health risks)
- d. Imagine the savings in city staff time from continuing disputes between neighbors and the school

We encourage the school to rebuild, upgrade and enjoy new buildings, with mandatory shuttling and an enrollment level and events limits that are compatible with the site and the neighbors’ level of tolerance.

Thank you for your consideration.

Andie Reed

PNQL

From: [James Colton](#)  
To: [Architectural Review Board](#); [Planning Commission](#)  
Cc: [Council, City](#); [Castilleja Expansion](#)  
Subject: Castilleja's Plan  
Date: Monday, August 24, 2020 3:47:28 PM

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I strongly oppose Castilleja's plan for several reasons:

- The number of car trips will increase dramatically which will exacerbate an already crowded corridor.
- The large building is not compatible with a neighborhood of single family homes.
- A majority of students are not from Palo Alto giving little benefit to Palo Alto.
- This would set a bad precedent for other developers to invade residential neighborhoods.
- Castilleja has not been forthright in dealing with the problems of exceeding their student limit. We simply can't trust what they say about their future behavior.

Jim Colton  
Green Acres II

From: [Kerry Yarkin](#)  
To: [Planning Commission](#)  
Subject: CUP for Castilleja  
Date: Monday, August 24, 2020 12:57:15 PM

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Dear Commissioners:

I am writing this short memo to ask you to NOT grant a CUP for Castilleja. I attended 3 neighborhood meetings around the year 2000, where Mr. Lusardi(Chief Planner) for the City said that granting the increase of enrollment at that time(from 385-415) would prevent any future increases of enrollment for Castilleja. My understanding is that the variance was granted in 2000 with that clear understanding to the community, Castilleja, Planning and Transportation Commission and City Council. For that reason, the majority of the neighborhood/community did NOT obstruct or prevent the very large expansion that took place at that time. I know many other neighbors were satisfied and acted in good faith to support and work to make this CUP work.

Now, around 20 years later the City is being asked to negate their commitment and go back on their word. I ask each of you to uphold the terms agreed to at that time so that we can count on you and the decisions that you make for us your constituents. I feel this is a fundamental issue about enforcing and holding true to your public oath as Commissioners for the City of Palo Alto. I also hold the City Staff and Council to the same standard.

“Promise is a big word. It either makes something or it breaks something.”-Anonymous

Stay well,  
Kerry Yarkin



From: [Trisha Suvari](#)  
To: [Planning Commission](#)  
Subject: Castilleja and Environmental Impact Report  
Date: Monday, August 24, 2020 10:41:36 AM

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Dear Commissioners,

I am writing in response to the positive news about the Final Environmental Impact Report for Castilleja's modernization. It is very exciting that there is now a new alternative that is both environmentally superior and has no significant impacts. I attended the Planning and Transportation Commission hearing last summer, and I am so gratified that Castilleja has addressed the core concerns I heard voiced there. With the much smaller garage design and dispersed drop off Castilleja has retained homes to keep the neighborhood feel, preserved beloved trees, and eliminated the traffic impacts.

Bravo to Castilleja for developing this excellent solution and thoughtful compromise. I appreciate the time and care that went into studying the findings in the Draft Environmental Impact Report, listening to neighbors, and responding creatively. I look forward to seeing our community come together around the good work Castilleja has done as the project is now able to move forward into another phase.

Even more, I am thrilled that Castilleja's enrollment increase is supported in this report. Now more than ever, offering this unique educational opportunity for a more diverse set of young women is a mandate for a city like Palo Alto. While there are so many things we can disagree about as we watch our state, nation, and planet struggle through the pressures of current events, education is always part of every solution for a better future for all.

Thank you for considering my comments, and I urge you to support alternative #4 for Castilleja, the plan with a smaller garage and distributed drop-off.

Trisha Suvari  
306 Iris Way, Palo Alto

From: [Hank Sousa](#)  
To: [Architectural Review Board](#)  
Subject: Castilleja expansion  
Date: Friday, August 21, 2020 11:11:53 AM  
Attachments: [ARB Hank Sousa comments.PDF](#)

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Dear Board Members,

A copy of my comments at yesterday's Castilleja hearing is attached.

Thank you for giving members of the public an opportunity to present their concerns about the size and scope of the project.

Regards,

Hank Sousa  
Melville Ave

August 20, 2020 ARB meeting with Castilleja project on agenda

Hello Board Chair Baltay and fellow board members:

PNQL's stance from the beginning was no garage, no demo of the school's two Emerson St. homes and preservation of protected trees. The school's "no garage alternative" calls for the demo of the two homes substantially altering the community character leaving one private residence on the corner of Emerson & Embarcadero.

What we would like to see happen is the preservation of the 86 parking spaces on the current campus. That would require some redesign of the proposed new buildings but the "no garage alternative" already calls for a reduction in classroom space and lower student enrollment. This idea is in the revised DEIR section 13.8 Alternative 5 (pages 13-30 and 13-31). This reconfiguring of the buildings utilizes "tucked under" parking. To go a bit further with that logic use the existing footprints of the current buildings. An enrollment of 450 would most likely be more palatable to nearby residents.

Let's assume the 86 spaces on campus are assigned to workers and staff. The school would continue to use off-site parking for some of the staff.

Next- let's address the single car drop offs. If the school were to establish east and west side "kiss and ride" drop off spots where buses picked up the students there would be virtually no traffic issues associated with the school except when large events occur. The school could continue to park vehicles on the playing field for large events ( which we would like to see reduced to 20 per year). The school has yet to show a willingness to embrace an authentic shuttling program. The newly planned buildings have state of the art environmental features. Building an underground garage is incongruous.

There is no need to reinvent the wheel. Use the current parking on the campus, reconfigure the buildings, save the two Emerson St. residences, shuttle in the students, and continue to provide a high quality education to a student population that fits comfortably within the site.

We'd like to see you recommend new buildings that are less massive than the one planned for Kellogg, no underground garage, and the embrace of authentic shuttling from drop off spots.

Thank you,

*Hank Sousa*

Hank Sousa 160 Melville Ave.

# EXISTING PARKING LAYOUT

BRYANT STREET

2 (2) PARKING SPACES FOR DROP-OFF

2 parking spaces

24 parking spaces

2) DRINK WATER BUILDING TO REMAIN

2) ANALYSIS HALL

2) BUSHING TRAINING CENTER TO REMAIN

2) APPELLATE COURT CHAMBER CENTER

2) OFFICE & STUDENT CENTER TO REMAIN

2) HALL

25 parking spaces

2) DRINKING WATER BUILDING

35 parking spaces

2) ADMINISTRATION BUILDING

PELLING AVE

MARKET STALLS

EMERSON STREET

2) FIRE ALARMS

2) DRIVEWAY  
2) TRUCK  
PROPERTY LINE

2) FIELD  
2) BICYCLE PARKING 21 SPACES TO REMAIN

2) HOUSE

EMERSON STREET

From: [Andie Reed](#)  
To: [Architectural Review Board](#)  
Subject: Castilleja expansion  
Date: Friday, August 21, 2020 10:59:19 AM  
Attachments: [Castilleja Expansion CUP&FloorArea.pdf](#)

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Dear Chair Baltay and Board Members,

I attach below my comments at yesterday's first ARB meeting. The school's attorney and city staff dismissed our numbers, so I also attach documentation as to where you can find the numbers I used in my speech. The Permitted Square Footage of 86,700 comes from page 4 of the Ms. Romanowsky Request for Variance, dated March 2018, which I sent around to everyone last week. The 116,000 requested square footage comes from Page G..001 of the current site plans.

We neighbors have been asking the school and the City to reduce the scope of the expansion for many years, without any success. The DEIR forced the school to step back and retain houses and a few more trees; they did not do it out of respect for the neighbors. However, we are happy to see some recognition of the issues. The one point I added to my speech yesterday and will again press is that, despite the LEED buildings and sustainable landscaping and bioswales, there has never been a discussion about the underground garage, and what that does to the water table, how is it environmentally sustainable, even how does the gate open, does it clang, how does the tunnel work? For 4 years we have asked the school to have the garage architects appear at a meeting, and the school demurs, and did again for your meeting. WRNS is a fine architectural firm, but where is Archirender, who designed the garage? It gets completely ignored.

Thank you for your hard work on this tough job.

Andie Reed

--

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

To: ARB, Aug 20, 8:30 am  
From: Andie Reed, Melville Ave, Palo Alto  
Re: Castilleja expansion

CUP and floor area:

Castilleja operates in an R-1 zone under a Conditional Use Permit. These conditions include number of students to be enrolled and number of events that can be held on campus. The school has exceeded their Conditions on both of these over the last many years, and yet this project that you are currently reviewing asks for MORE students and MORE events. You have the difficult job of deciding whether the City should bend new Conditions around the school's latest "business model" or instead require that the private tax-exempt school adjust its goals to fit into the needs and interests of the residents of Palo Alto.

There is a variance being requested for an increase of 33% in Floor Area Ratio. Current Muni Code allows 86,800 square feet above-grade floor area, and the school is asking for 116,000 square feet, **although if you include the underground garage, which Muni Code appears to require, the increase is more like 70%**. The proposed modern-style building will loom large and is not compatible architecturally with the surrounding small, older homes.

What is also important to note is another square footage increase not otherwise apparent. Page G..001 of the current plans specifies that the total floor area, above and below grade combined, currently existing is 160,200 square feet, and the proposed is 192,200 square feet. The school is asking for an increase of 32,000 square feet of useable space, or 20% on this same 6 acre site where they have successfully educated girls for many decades. That percentage increase doubles when you include the underground garage as useable, active space.

No matter how you look at it, all of this increase in square footage is to accommodate 30% more students, parents, staff, faculty, supporters and volunteers so Castilleja can achieve its new operational model. Unless it can be shown how this benefits Palo Alto, the Boards and Commissions reviewing this project should request the school dramatically reduce its demands.

Thank you.

The case law on the subject of variances prescribes that granting a variance is grounded in conditions peculiar to the specific property, as distinguished from other properties within the zone or vicinity. The cases emphasize the **disparities** between properties, not the treatment of any individual property's characteristics in the abstract (See *Eskeland*, 224 Cal.App.4th at 951; see also *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 520; see also *Committee to Save Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1182, 1183).

Exhibit A clearly illustrates the Property's unique characteristics as distinguished from other properties within Zone and surrounding vicinity. By way of specifics, the second largest lot within the Zone (after Castilleja's Property) is located at 1140 Cowpe Street (currently occupied by a church) with a lot size of 100,188 SF (2.3 acres), less than half the size of the Property. The largest residential lot size in the Zone appears to be located at 537 Coleridge Ave., with a lot size of 50,965.2 (1.17 acres), about 1/6<sup>th</sup> the size of the Property. The extreme disparity in lot sizes is particularly detrimental to the Castilleja Property because of the formula prescribed by the Zone to calculate permitted FAR. The formula calculates permitted FAR at .45 for the first 5,000 square feet, and then it drops to .30 for additional square feet. As properties increase in size, the maximum permitted FAR decreases. The calculations on the chart below show how this formula creates a disparate hardship unique to the Castilleja Property.

Lot Size	Maximum Permitted SF (5000 * .45) + (Lot Size - 5000) * .30	Maximum Permitted FAR (Maximum Permitted SF / Total Lot SF)
10,000 SF	3750 SF	.375
15,000 SF	5250 SF	.35
20,000 SF	6750	.3375
25,000 SF	8250	.33
50,000 SF	15750	.315
100,000 SF	30750	.3075
200,000 SF	60750	.303
268,783 SF	66,784.9	.3026

As evidenced in the above table, if the average lot size within the Zone is approximately 10,000 SF, the maximum permitted FAR for the majority of lots in the Zone yields a FAR of at least 7.2% more than permitted for the Property. Thus, Castilleja's uniquely large Property yields disparate treatment related to its development, by its very nature.

# PROJECT ALTERNATIVE DATA

ASSESSOR'S PARCEL NO	SQ. FT.		ACRES	
	124-12-034	268,783	6.17	
124-12-033	EXCLUDED FROM PROJECT ALTERNATIVE			
124-12-031	EXCLUDED FROM PROJECT ALTERNATIVE			
<b>TOTAL AREA</b>	<b>268,765</b>	<b>6.17</b>		
NET LOT AREA	268,765 SF			
LOT COVERAGE	ALLOWED	EXISTING	PROPOSED	PAMC*** 18.12.030 TABLE 1
	100,374 SF (35.0%)	65,273 SF (24.3%)	72,240 SF (27%)	
EXISTING FLOOR AREA RATIO	0.43			
PROPOSED FLOOR AREA RATIO	**0.43			
EXISTING GROSS FLOOR AREA	ABOVE GRADE SF	*116,297 SF		
	BELOW GRADE SF	43,913 SF		
	<b>TOTAL SQUARE FOOTAGE (INCL. LOWER LEVEL)</b>	<b>160,210 SF</b>		
PROPOSED GROSS FLOOR AREA (INCLUDES EXISTING CAMPUS BUILDINGS)	ABOVE GRADE SF	115,895 SF (SEE G.005)		
	BELOW GRADE SF	76,543 SF (SEE G.004)		
	<b>TOTAL SQUARE FOOTAGE (INCL. LOWER LEVEL)</b>	<b>192,438 SF</b>		
NO. OF STORIES	2 (1 LEVEL OF BASEMENT)			
TYPE OF CONSTRUCTION	TYPE II-B			
OCCUPANCY GROUPS	E (MAIN OCCUPANCY), A2, A3, B, S			
FIRE PROTECTION SYSTEM	FULL FIRE ALARM AND SPRINKLERS			
ZONE DISTRICT	R-1 (10000)			
SETBACKS	ALLOWED	EXISTING	PROPOSED	
FRONT EMBARCADERO	24'-0"	108'-6"	108'-6"	



From: [Andie Reed](#)  
To: [Planning Commission](#)  
Cc: [Hank Sousa](#)  
Subject: Castilleja Neighbors Summary Statement  
Date: Friday, August 21, 2020 10:32:50 AM  
Attachments: [Castilleja Neighbors Summary Statement 2020.pdf](#)

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Aug 21, 2020

Dear Planning and Transportation Commissioners,

We are a loosely-organized group of neighbors of Castilleja who have been meeting and working together over the past 4-5 years to limit the expansion plans.

Attached is an introduction to who we are and what many of our neighbors are in agreement about, written by 10 of us who live on the surrounding streets. We have gathered 50 signatures from the surrounding neighbors who agree with this statement, as we see the project working its way through the system.

The attached [Castilleja Neighbors Summary Statement](#) will give you our perspective and how we have tried to reasonably influence the process and have our concerns addressed.

Thank you,

Andie Reed  
Hank Sousa  
PNQL steering committee members

--

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

Proposed Castilleja School Expansion  
Summary Statement Prepared by Neighbors

**Situation:** Castilleja, a private middle and high school located in an R-1 neighborhood, has submitted to the City of Palo Alto a proposal to significantly remodel its campus and increase enrollment by 30% (plus unspecified increases in faculty/staff).

Neighbors, who have already borne the brunt of the private school's significant growth over many years, challenge Castilleja's plan to increase the size and scope of its operation on this very small parcel. We urge the City to deny approval of an enrollment increase, and not permit the outsized redevelopment proposals, for the following reasons:

1. **Traffic congestion, crowded street parking, bike safety concerns on Bryant St. Bike Blvd.** Palo Alto seeks fewer traffics issues, not more. 75% of Castilleja's students and staff commute from outside Palo Alto, with 4 car trips/day/student (drop-off and pick-up) adding congestion to all our main arteries. The neighborhood absorbs unrelenting impact from traffic, busses, parking, deliveries, events, sport meets, and more, on days, nights, weekends, and throughout the summer.
2. **Outsized nature of the project:** The school is proposing 200,000 sf of buildings on a one-block (268,000 sf) lot. For comparison, imagine a Costco ... or two City Halls or Home Depots ... located on one small block in a residential neighborhood.
3. **Castilleja's Conditional Use Permit (CUP) is far more lenient than neighboring private schools' permits.** Other private schools in Palo Alto and nearby towns are held to much stricter standards, such as specified hours of operation, less density, few or no night events, and none allow an underground garage in a residential neighborhood. Why is Castilleja exempt from similar conditions? No local private schools are permitted more than 20 events per year, Castilleja hosts 100+ events per year.
4. **The City should enforce its own Muni Code/Comprehensive Plan statutes.** Castilleja's use does not satisfy the City's definition of an R-1 conditional use which per PAMC 18.76.10 will "not be detrimental to the public health, safety, general welfare, or convenience (in the vicinity)" and shall "be located and conducted in a manner in accord with the Palo Alto Comprehensive Plan." The Comp Plan states that the city "seeks to promote community /commercial uses but not at the expense and quality of the residential neighborhoods." When the school was founded, it was a small boarding school. Its growth and future plans far exceed what is appropriate for this site.
5. **City's prior directive assuring the neighborhood of no future expansion.** In 2000, Palo Alto Planning Director John Lusardi was forceful in his CUP approval letter to Castilleja: "*The approved Conditional Use Permit does not provide for any increase in students over 415, and any subsequent request for additional students will not be favorably looked upon by the City. ... the City is not willing to continue to approach increasing school enrollment for Castilleja School in an incremental manner.*" The neighbors did not realize this cap would be ignored by Castilleja starting in 2001, and violations would go unenforced by the City. Why would the City ignore its own 2000 directive, favoring the school's desire to grow over the needs of Palo Alto residents?
6. **Continuous Violation** - Castilleja has exceeded its existing enrollment cap for the last 19 years, collecting millions of dollars from over-enrollment. The City is unable to enforce CUP violations, and neighbors have no viable enforcement or compliance leverage. Neighbors have no confidence that future CUP conditions will be met, nor that conditions will be improved with a significant increase in students, plus accompanying parents, teachers, staff, and visitors, coming daily to this small section of Palo Alto.

For years neighbors have asked the school to work together in good faith, asking the school to reduce enrollment to the allowed level, and institute a robust shuttle by which ALL students/staff would be delivered to campus. Instead the school has moved ahead with outsized plans, far more expansive than other schools are allowed (see chart attached.)

NO neighborhood would welcome this type of unbridled growth from a private entity in its midst. The City Council has an obligation to protect and preserve the rights of its citizens, and to enforce its own codes.

We urge the City to oppose this application. If the school wishes to expand, the City should require it to follow the example of other private schools and divide into two appropriately-sized campuses, or move to a larger location which will support as

many students as it desires, or require ALL arrivals/departures by shuttle from a satellite parking area, significantly reducing the impact not only on this neighborhood, and the Bike Boulevard, but on all Palo Altans.

Thanks for your time and attention.

– *Neighbors of Castilleja (surrounding blocks)*

*July 2020*

Al Kenrick	Melville Ave
Amber La	Kellogg St
Andie Reed	Melville Ave
Bill Schmarzo	Emerson St
Bill Powar	Emerson St
Bruce McLeod	Bryant St (SW corner Bryant and Kellogg)
Carla Befera	Bryant St (SW corner Bryant and Kellogg)
Carolyn Schmarzo	Emerson St
Chi Wong	Emerson St.
Daniel Mitz	Melville Ave
David Quigley	Emerson St.
Debby Fife	Emerson St
Diane Rolfe	Emerson St (NW corner Emerson and Kellogg)
Ed Williams	Kellogg St
Elizabeth Olsen	Melville Ave
Geegee Williams	Kellogg St
Han Macy	Melville Ave
Hank Sousa	Melville Ave
Jim Poppy	Melville Ave
Joan MacDaniels	Emerson St
Joseph Rolfe	Emerson St (NW corner Emerson and Kellogg)
Kathleen Judge	Churchill St
Kathy Croce	Emerson St (SW corner Melville and Emerson)
Kimberley Wong	Emerson St (NW corner Melville & Emerson)
Lee Collins	Embarcadero St
Marie Macy	Melville Ave
Mary Joy Macy	Melville Ave
Mary Sylvester	Melville Ave
Matt Croce	Emerson St (SW corner Melville and Emerson)
Midori Aogaichi	Churchill St
Nancy Strom	Melville Ave
Nelson Ng	Emerson St
Neva Yarkin	Churchill St
Pam McCroskey	Emerson St
Patricia Wong	Emerson St
Richard Mamelok, MD	Churchill St
Rob Levitsky	Emerson Street
Robert Yamashita	Bryant St (NE corner Bryant and Kellogg)
Val Steil	Kellogg St
Vic Befera	Bryant St
Wally Whittier	Bryant St
William Macy	Melville Ave

Ying Cui  
Yoriko Kishimoto  
Yuri Yamashita

Waverley St (SW corner Embarc & Waverley)  
Embarcadero St  
Bryant St (NE corner Bryant and Kellogg)

From: [Gary Paladin](#)  
To: [Architectural Review Board](#)  
Subject: Comments Re Castilleja Master Plan Delivered 8/20 to ARB  
Date: Friday, August 21, 2020 10:01:20 AM  
Attachments: [Casti Master Plan Comments - 08-21-20.pdf](#)

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Architecture Review Board:

This forwards my comments made at yesterday's meeting discussing the Castilleja campus Master Plan. The attached is for the record.

Regards,

**Gary Paladin**

Strategic Business Consulting  
Palo Alto, CA || [gary.e.paladin@gmail.com](mailto:gary.e.paladin@gmail.com) || (650) 302-8902

# Gary Paladin

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## Comments Delivered 8/21/20 to PA ARB re: Castilleja Campus Master Plan

Good morning.

I believe Castilleja deserves recognition for the effort it has put into developing a Master Plan for its campus. This Plan aims to reduce the school's environmental footprint in our community, and establishes a benchmark of sustainability that other institutions will want to model.

Castilleja's Plan aims to meet or surpass both California's and Palo Alto's aggressive sustainability goals, with innovative solutions for a clean and sustainable future.

For starters, outdated campus structures will be disassembled rather than razed, to maximize recycling and utilization of existing building materials. And new construction will incorporate only non-hazardous, responsibly-sourced green building materials.

The future campus is designed to be completely self-sustainable, reliant upon onsite-generated energy from solar panels on building rooftops, and heat recovery systems. With the exception of its science labs, the campus will be entirely fossil fuel-free.

Planned installations of a high-efficiency recycled water infrastructure and drought-resistant landscaping, and efforts to preserve existing trees on campus, will also contribute to the school's self-sustainability.

Castilleja's Plan demonstrates commitment to the environment and community. And plans to build environmental education into the curriculum, demonstrate commitment to educating young women to become environmental stewards and leaders.

Thank you for considering my comments.

From: [Hyunkyu Lee](#)  
To: [Council, City](#); [Architectural Review Board](#); [Planning Commission](#); [Castilleja Expansion](#)  
Subject: Objection to Castilleja expansion  
Date: Friday, August 21, 2020 9:32:53 AM

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Hello,

I would like to thank you for all your hard work.

I have reviewed the Castilleja expansion plan and would like to object to its plan from Kellogg resident's perspective. I found that there is no community benefit to Castilleja's expansion plan for Palo Alto, especially for the residents living around the Castilleja school.

### **1. Only 25% of Castilleja's students come from Palo Alto.**

Castilleja sits on just over 6 acres in a R-1 residential neighborhood, upon which they pay no taxes. They have been over-enrolled (from which they've banked over \$10 million) for 19 years. The school is requesting a 30% increase in enrollment and 90 events per school year, which needs to be significantly reduced to levels comparable to other schools in R-1 neighborhoods.

### **2. Construction of a Costco-Sized Facility**

Castilleja's plans call for the construction of an oversized, boxy structure, which does not fit in with the character of the neighborhood and causes dramatic densification of one residential block.

### **3. Destruction of the Natural Environment**

A bucolic residential neighborhood will now lose many protected oaks and redwoods, some chopped down and some "re-located", in what will be a futile attempt, to a new location on the campus. The health of Palo Alto's carbon-reducing tree canopy is further destroyed.

### **4. Underground Garage, Threat to Pedestrians and Cyclists**

Proposed 440 car trips during 2 peak hours alone (total in excess of 1400 daily car trips) will overwhelm the neighborhood. Cars entering and exiting the garage would clog neighborhood streets and jeopardize cyclists on the Bryant Street bike boulevard.

### **5. Precedent-Setting Project for Palo Alto Neighborhoods**

If this project is approved, what does this mean for Palo Alto's neighborhoods? Would YOU want a commercial underground garage exit across from your home, constant weekday traffic and off-hour events, and 5 years of commercial construction?

Given all these concerns, I strongly object to Castellija expansion plan. There is NO community benefit from the plan.

Best regard,

Kyu Lee (151 Kellogg)



From: [Cath Garber](#)  
To: [Architectural Review Board](#)  
Subject: Castilleja's EIR - comments from today  
Date: Thursday, August 20, 2020 4:02:28 PM

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To the ARB Board,

I thought it might be helpful to have a copy of my comments that I presented this morning to the board. See below.

I would like to share my thoughts regarding the final EIR for Castilleja

I am a principal at Fergus Garber Architects and have been practicing architecture in Palo Alto since the mid 90's. I have designed a number of new homes in the neighborhood - 1 each on Kellogg, Emerson and Waverley and 2 on Cowper. I am currently working on two historic remodels across the street on Embarcadero

I live next to Green Middle school and my children, both boys attended Palo Alto schools. My strongest relationship with Castilleja is that I ride my bike by it on my way to my office near Town and Country. In all my years I have never witnessed anything other than calm and courteous parents, staff and students getting dropped off. I feel very safe as I ride by on my bike.

As with other interested community members and as a curious architect, I have looked at the proposal. I like its overall design and its attention to its surrounding neighborhood.

I was pleased to see that the historic Gunn building will remain and think the new construction is complementary. The new buildings are quiet and their materials nicely complement the historic building. Being lower height, having recesses and balconies, and incorporating variations in materials, the scale and massing feels right on the new construction. I agree with the FEIR which states --the project improves the neighborhood aesthetics.

I also want to comment on the landscaping. I think the gates and fencing proposed are handsome and better detailed than you see on most commercial projects, I am also impressed with the plant and tree selection. The landscaping looks dense and as attractive as found on most of the residential projects in the neighborhood.

In summary I want to commend the school for proposing this alternative . It saves homes, preserves trees, reduces the scale of the garage, and eliminates traffic impacts associated with the original project. This is evidence of Castilleja's responsiveness to input from the DEIR and from neighbors.

Thank you, Catharine Garber

--

**Catharine Fergus Garber, Partner**

**Fergus Garber Architects**

[www.fg-arch.com](http://www.fg-arch.com)

81 Encina Avenue  
Palo Alto CA 94301

o 650.459.3700

m 650.245.9680

From: [Lorraine Brown](#)  
To: [Architectural Review Board](#)  
Subject: Comments about Castilleja project  
Date: Thursday, August 20, 2020 3:32:32 PM

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Thank you ARB members for this opportunity. I grew up in Palo Alto and raised my family here since the 1990s. I also work at Castilleja. I know traffic has been a concern for our neighbors so I want to comment on how Traffic Demand Management, or TDM, has become embedded in the culture at Castilleja. As a longtime Palo Altan, I appreciate concerns about traffic in our city, so I'd like to share my perspective on the school's commitment to managing traffic and parking, and being the best neighbor we can be.

When Castilleja embarked on the master planning and CUP process years ago, we kept an eye toward reducing impacts in everything from noise to traffic. Alternative #4 shown in the Final EIR specifically features a smaller garage and distributed drop off for this reason.

In the seven years since we developed our robust TDM plan, our traffic levels have been consistently 25-30% below where we started, accomplished at a time when traffic was relentlessly increasing in the Bay Area.

Over this period, TDM has become part of our culture. It is not just what we do, but who we are. Through parent, student, and employee education, frequent reminders, and strict rules for parking and traffic, everyone in our community has come to appreciate their role in making a difference—and they DO.

To support their efforts, we have added bus routes, shuttle service between Caltrain and the school, and employee reimbursements for non-car commuting. All employees are required to come to campus at least three days a week by some means other than single occupancy vehicles or participate in traffic duty to help manage flow during drop off and pick up. The results have been astonishing with fewer than 50% of our students arriving on campus by SOV.

With this successful track record and a depth of experience, we are poised to continue to reduce our car trips per student as we grow enrollment, resulting in no net new trips while making this unique education available to more girls from a diversity of backgrounds. We will be held accountable through carefully documented mitigations and conditions of approval with penalties to ensure our compliance.

To ensure compliance within our own community, we have at least 7 monitors who help with daily and special event traffic and parking. They also patrol neighborhood

streets to ensure that Castilleja community members are only parking in designated areas. We have shifted event-related parking to our athletic field, and our attendants promote compliance and efficiency. We intend to further reduce our parking impacts with the underground garage, designed to relocate parking on the perimeter of campus below ground. I also want to note that a proposal from the community to enter and exit campus on Embarcadero was studied at the City's request before we filed our CUP application, and after study by traffic consultants, the City determined that it would cause an adverse impact.

I am telling you this to demonstrate our commitment and capacity to limit traffic and parking in our neighborhood. I hope that you can now understand why we are so proud of our traffic reduction achievements and why we believe that we are offering a model for schools and employers to curtail traffic and parking in Palo Alto.

Thank you,

Lorraine Brown

--

**Lorraine Brown**

Director of Communications & Community Relations

**Castilleja School**

[1310 Bryant Street](#)

[Palo Alto, CA 94301](#)

**P** (650) 470-7735

**E** [lbrown@castilleja.org](mailto:lbrown@castilleja.org)

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

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*Women Learning. Women Leading.*

From: [Bruce McLeod](#)  
To: [Architectural Review Board](#)  
Subject: FAR for 1310 Bryant  
Date: Thursday, August 20, 2020 11:14:20 AM

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Allowable Floor Area for that lot is 81,3815 s.f.  
See parcel map.

Bruce McLeod  
650-465-2908

“Everything I know about morality and the obligations of men, I owe it to football.”

Albert Camus

From: [Barbara Ann Hazlett](#)  
To: [Architectural Review Board](#)  
Subject: ARB Hearing - Castilleja Neighbor Input  
Date: Thursday, August 20, 2020 10:33:06 AM

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August 20, 2020

Dear ARB Commissioners:

I spoke at this morning's ARB hearing regarding Castilleja School and I also wanted to submit my comments in writing. Thank you.

My Comments:

My name is Barbara Hazlett. I have lived very near Castilleja School, just across Embarcadero for 40 years. I feel lucky to live near this important institution. We all need to be reminded that, much like Stanford, Castilleja is a nationally ranked school. How lucky are we to have these kinds of educational institutions in our back yard.

Specific to this hearing, I wanted to speak today about the building design and how pleased I am with the proposed plans. The school's architects have carefully studied the surrounding homes to select materials that mirror them. The new rooflines are at the same height or lower than the current structures, reducing the overall size and allowing for more sunlight. I've looked at the renderings Castilleja has shared on their website, and the landscaping, including all of the trees, blends the buildings beautifully into the surrounding neighborhood. Without increasing any Floor Area Ratio, Castilleja's modernization greatly improves on the current aging structures we see on campus now. All of us, as immediate neighbors, will benefit greatly from this design.

In conclusion, the school is an excellent neighbor. The school pre-dates all of the neighbors, having been at this location since 1910. Castilleja should have the opportunity to modernize as have Ohlone, Paly, Addison and Stanford. I look forward to seeing this plan come to fruition because I know it will quickly become part of the architectural fabric of

our residential streets. Castilleja has always been a gem in Palo Alto, and I hope they can finally modernize their aging campus. Please support the school's plans and ensure that inspired architecture and exceptional education continue as foundational and timeless values in Palo Alto. Thank you.

Barbara Hazlett  
bthazlett@aol.com

**From:** [Bruce McLeod](#)  
**To:** [Architectural Review Board](#)  
**Subject:** Castilleja School  
**Date:** Thursday, August 20, 2020 8:45:29 AM  
**Attachments:** [ARB letter response 081820.docx](#)

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Members of the ARB;

1) Building Aesthetics:

The ARB's charge includes "Promoting visual environments which are of high aesthetic quality and variety and which, at the same time, are considerate of each other."

I have worked with WRNS Studio and the aesthetics of the proposed buildings for Castilleja do not rise to the quality and creativity of their many acclaimed projects. The Kellogg facade is devoid of any variation along the nearly 400' roof line and includes a minimal sprinkling of alcoves or recesses. When asked about this at a public meeting, the school's representative stated that the neighbors would not notice once the landscaping was in place. Good design does not need to be concealed by landscaping.

As for neighborhood considerations, I admire many of the modern homes that have been built around the City. When designers and homeowners honor the scale and spacing of the surrounding residences they have been welcome additions to the diverse fabric of our neighborhoods. This project does not do that. The continuous mass along Kellogg ignores and overpowers the smaller scale and diverse details of the homes across the street and permanently casts an industrial pall on that block. The Bryant frontage, is only marginally better and is only considerate of the existing Craftsman administration building by trying to ignore it. Perhaps the ARB can persuade the school to consider a design framework that is more in keeping with the Palo Alto Single-Family Individual Review Guidelines against which it should be measured.

2) Floor Area:

The Palo Alto Municipal code allows replacement of buildings for grandfathered CUP uses with no increase in floor area. Castilleja circumvent the spirit, and possibly the letter, of the Code by adding over 30,000 s.f. of new school floor area below grade plus another 30,000 s.f. of garage space.

I ask that the ARB make a clear statement to protect Palo Alto neighborhoods from overreaching development, however well-intentioned, by rejecting plans that in any way increase the floor area on this already over-developed site.

3) Process:

In April of this year, 8 months after the DEIR public comment period, Castilleja submitted revised plans. This should have triggered additional studies, especially traffic flow, and a public comment period. It did not. Even if the City staff believes this hasty process is legally defensible, avoiding additional public comment for the revised plans is a betrayal of the public trust and an abdication of their responsibility to the community at large.

The ARB should correct this lack of oversight and refuse to consider any development plans for this site until revised plans are subjected to public comments and review.

Respectfully  
Bruce McLeod



1404 Bryant Street  
Palo Alto

Bruce McLeod  
650-465-2908

**“Everything I know about morality and the obligations of men, I owe it to football.”**

Albert Camus

Date August 20<sup>th</sup> 2020

Dear ARB Commissioners,

My name is Nelson Ng. I have lived for 24 years at 1260 Emerson Street that is across from Castilleja's proposed garage exit. Being one of the closest resident to the garage exit, I strongly oppose Alternative 2 to 5 as stated in the Final EIR because none of the alternatives addresses the true impact of Castilleja Expansion by reducing traffic to the neighborhood.

Palo Alto Municipal Code sec 18.76.020 Architectural Review under (d) Findings

subsection (2)(E)

Enhances living conditions on the site (if it includes residential uses) and in adjacent residential areas.

subsection(4)

The design is functional, allowing for ease and safety of pedestrian and bicycle traffic and providing for elements that support the building's necessary operations (e.g. convenient vehicle access to property and utilities, appropriate arrangement and amount of open space and integrated signage, if applicable, etc.).

Building an underground garage or surface parking lot in a Single Family Neighborhood will allow Castilleja to bring additional traffic to the neighborhood that will result in degrading the living condition of the adjacent residents. The alternative that would truly reduce the impact to the neighborhood is to provide satellite parking and shuttle students and staffs to campus without building underground garage or additional surface parking lot.

This Final EIR Traffic Impact Study is incomplete and with inaccurate findings. By citing out of scope for CEQA, many studies that are needed to provide a more complete picture of the proposed project traffic impact to the neighborhood were not conducted. Assumptions were made base on inaccurate information or without justification. Therefore, I am requesting the commission to reject the current version of the Final EIR until necessary studies and accurate information are presented

Followings are some of the examples

- Castilleja has over 100 events per academic year. Therefore, it is important to study the event impact during weekday, evening and weekend. However in Responses to Comments C39-1-10 rejected to study events with

Special event traffic is not reflected in the traffic impacts analysis because this traffic typically occurs

outside of peak hours and does not contribute to average daily traffic volumes and conditions.

- In the DEIR, both Alternative 2 and 3 were found to result in **Significant and Unavoidable Impact even with Mitigation** due to over 80% increase of net new trips for northbound Emerson to eastbound Embarcadero from 842 to 1521 daily trip. Alternative 4 was proposed in April 2020 and added to the Final EIR without any study to validate the assumption. In page 44 of TIS,

This alternative **assumes** 60 percent of all project related private auto travel would use the Bryant Street loop, 30 percent would use the Kellogg Avenue loop and the remaining 10 percent would use the underground garage with an entrance on Bryant Street and exit onto Emerson Street.

By arbitrarily assigning only 10% of the traffic will go into the underground garage and further split up the garage exiting traffic by allowing to either turn left or right on to Emerson, it reduced the net new traffic for northbound Emerson to eastbound Embarcadero by 92% from 679 to 51. However, this assumption was not justified with any reason or study to ensure that it will be feasible.

- Kellogg Ave that is at the south border of Castilleja was never studied in the EIR. So we will not know what is the impact to Kellogg from Alternative 4 due to the garage exist traffic left turn onto Emerson toward Kellogg and the additional dropoff points on Bryant and Kellogg side of Castilleja campus proposed in Alternative 4.

- In Figure 16 page 53 of TIS, it shows 292 and 220 net new daily trips are added to Bryant Street between Embarcadero and Kellogg and between Kellogg and Churchill due to Alternative 4 by adding the addition dropoff on Bryant Street. Bryant Street is a Bike Blvd that is a major artery for students and commuter cyclists. Adding any additional traffic will increase the risk to the cyclists. I can't find in the FEIR concrete steps to mitigate the risk.

- For over 24 years, I have lived within 300 ft from the south side of Embarcadero and Emerson. On a daily basis, I have to make a right turn from northbound Emerson onto eastbound Embarcadero. I frequent see Paly students riding their bikes on the south side of Embarcadero Road sidewalk that borders Castilleja traveling eastbound crossing Emerson to PALY. Although this is against the traffic direction of the road, this will allow them not wait for the long signal light at Town and Country to cross Embarcadero as for north side of Embarcadero bicyclists. This is very dangerous intersection because drivers making right turn from Emerson onto eastbound Embarcadero will be focusing to look to their left for the high speed eastbound Embarcadero traffic traveling 30 to 40+ MPH. I have seen near misses when bicyclists crossing Emerson on

south side of Embarcadero toward PALY. I requested that to be study as part of Comment Letter C39.2 for DEIR. However, in the Response C39.2-1 in Final EIR, it only stated the following assumption with boilerplate answer by citing CEQA without addressing the risk of the real situation that many Paly students on a daily basis are using the sidewalk on south side of Embarcadero Road traveling westbound to PALY. *(Please see picture below for better visual understanding of the Emerson and Embarcadero intersection)*

Since CEQA states that the analysis in an EIR should not be speculative, it is reasonable to assume that individuals will adhere to traffic laws, including speed limits and bicyclists using the right-hand side of the road. Any bicyclists using the Emerson Street crosswalk on the south side of Embarcadero Road should also be traveling eastbound and would be visible to a driver watching the eastbound vehicle traffic.

- As part of Comment C39.1-9 for the DEIR, I requested that car traffic be measured one to two blocks away since many times I have seen parents drop off students or drive to events on campus. Encroachments further out into outlying neighborhoods were not studied but should have been. For example, Castilleja students are routinely dropped off at the cul-de-sac on Melville between Bryant and Waverley. Those traffic counts are not included in Castilleja's count of cards entering their parking lot. However, in the Response C39.1-9 in Final EIR, it only stated the following boilerplate answer by citing CEQA without studying the true impact

The comment is correct that driveway vehicle counts do not capture students that may be dropped-off on neighborhood streets. The student travel survey was used to account for those students. The results of the TDM plan monitoring reports were also used to further inform the assessment of trip generation and distribution associated with existing and proposed conditions This represents a reasonable attempt at determining an accurate baseline and projected conditions, consistent with industry standard methods, and consistent with CEQA Guidelines Section 15003(i) which states that "CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure."

- The following is from page 44 of [Castilleja EIR Appendix E Traffic Impact Study for Castilleja School Expansion July 2020.pdf](#)

#### **Bryant Street Collision Analysis**

The collision history for the segment of Bryant Street between Embarcadero Road and Kellogg Avenue was reviewed to determine the number of collisions during a recent three-year period and to potentially identify trends based on the

collision history. This information is based on records available from the California Highway Patrol as published in their Statewide Integrated Traffic Records System (SWITRS) reports from March 30, 2015 to March 31, 2018. A single non-injury collision occurred along the study segment during this period. This collision occurred between a vehicle and a fixed object and did not involve a bicycle.

Finding - Given the relatively small number of documented crashes and the lack of any crashes involving bicycles along the segment of Bryant Street between Embarcadero Road and Kellogg Avenue, a safety concern involving bicycles along the study segment has not been demonstrated.

However, there was an accident involving a bicyclist at the intersection of Bryant and Embarcadero on 2/13/2018 at around 5pm that shutdown both direction of Embarcadero for over an hour. Following is extracted from the Palo Alto Weekly article [Two injured in Embarcadero Road collision](#)

Two men were injured in a collision on a major thoroughfare shut down for more than an hour in Palo Alto at the height of the evening commute on Tuesday, police said.

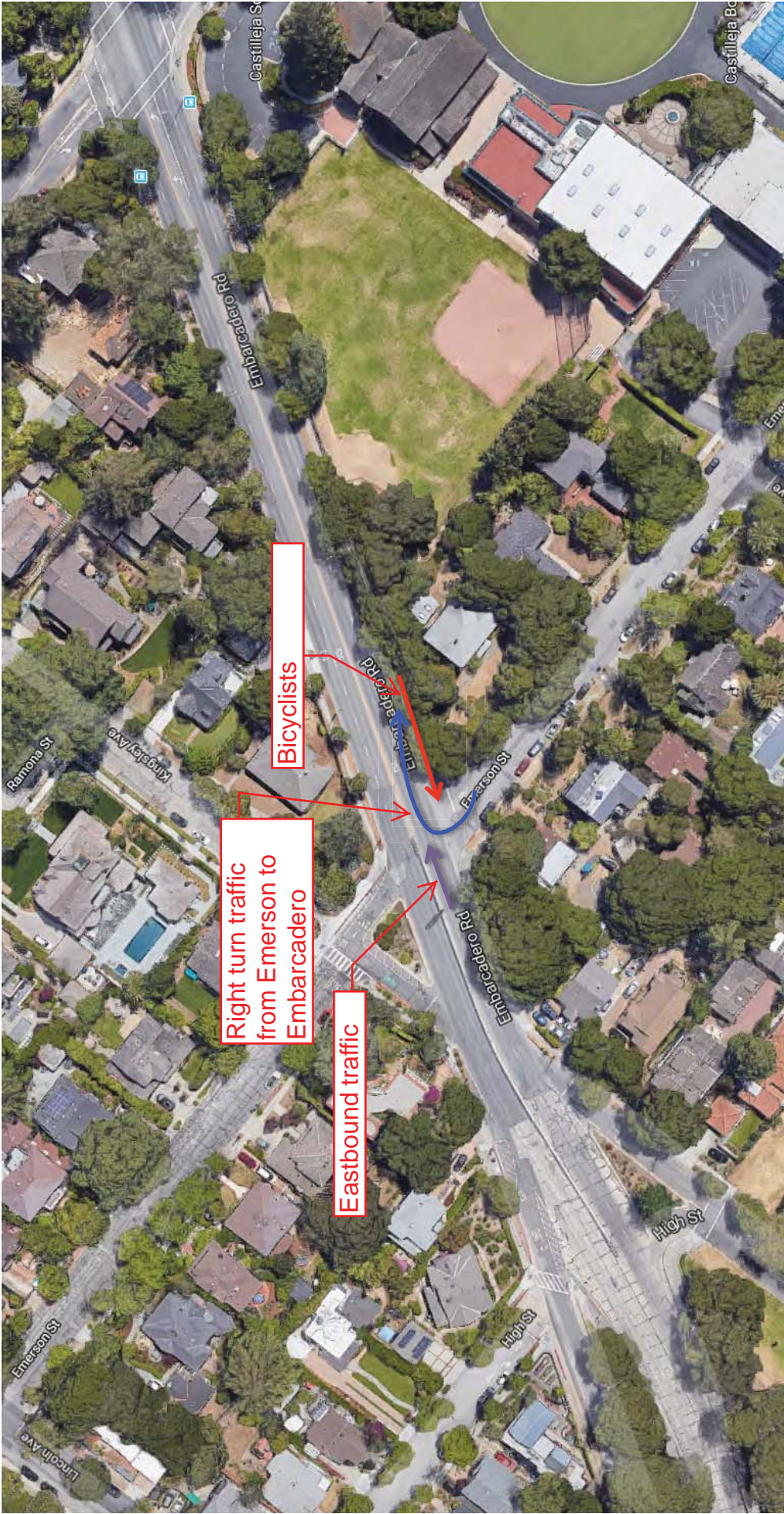
Officers responded to the collision at Embarcadero Road and Bryant Street around 5 p.m. An adult driving a sedan was heading west on Embarcadero and struck the pedestrian with a scooter and bicyclist at the intersection, police said.

The above are just some of the examples of the incompleteness and inaccuracy of this Final EIR. It doesn't fully study the impact and the safety issues of this project to the neighborhood.

In addition, Due the COVID-19 pandemic, all the schools in the US and the world are trying to find ways to cope with the current situation and plan for the post COVID-19 world. The Castilleja Expansion proposal and the FEIR were completed without any consideration of the COVID-19 world and extra vigilance that must be taken for social distancing, student density and acceptable activities. How can we be sure any of the proposal of this expansion will not have additional significant impact to the community of Palo Alto?

Therefore, I ask the commission to reject this Final EIR and request additional studies to fully address the impacts and safety concerns as well analyzing the potential impacts of COVID-19 in the future.

Nelson



Bicyclists

Right turn traffic from Emerson to Emarcadero

Eastbound traffic

From: [Marie Macy](#)  
To: [Planning Commission](#)  
Subject: Fwd: regarding continued discussion of Castilleja expansion  
Date: Wednesday, August 19, 2020 12:54:37 PM

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**Subject: regarding continued discussion of Castilleja expansion**

To the Architectural Review Board  
and  
Members of the Planning Commission

I am writing to express in the strongest possible terms our objection to Castilleja's persistent push to expand their private facility at the expense of our neighborhood. In writing, I think about you, members of this board and this commission: acceptance of this move would set a precedent. How would each of you feel if this project were realized 1/2 block from each of your homes? Looks different, doesn't it, but you are setting the stage for similar moves.

And may I remind you that this is not a neighbor family requesting a one-time variance to build a 100 square foot tree house in their front yard or add a 4th story to their house. Such requests would not even be considered. No, this is a tax exempt commercial operation. Tax exempt: this means that we, the affected neighbors, are underwriting the city's infrastructure and services. This is completely outrageous. What are we talking about? WHY are we STILL talking about it? How did this get this far?

The garage is going to exit onto my one block of Melville? All those cars? We already had a car totaled by a Castilleja driver and a cat run over (I mean, they're kids). And exactly what does the City of Palo Alto get out of this? (I mean, the vast majority - 75% - of the students are from other towns.) What is the motivation for your counsel and commission even considering this? What is missing here?

Another outraged neighbor family,  
Skip and Marie Macy, Han and Mary Joy Macy and two very small children

From: [Vic Befera](#)  
To: [Planning Commission](#)  
Subject: Castilleja FEIR - meeting topic August 25  
Date: Wednesday, August 19, 2020 12:22:04 PM

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To the Planning and Transportation Committee:

At 94 I am perhaps the oldest resident and one of the longest neighbors of Castilleja School, and can offer a historical perspective spanning over 50 years of dealing with the school.

In 1968, when it was still a small boarding school with limited enrollment of students, many living in resident dormitories, the school blended easily with the character and charm of old Palo Alto. However, when the school converted to a day school it began an explosion of new enrollment that continues to the present. Traffic and parking problems erupted, with illegal parking, blocked driveways, noisy delivery trucks, and weekend social and athletic events lasting long into the night. Parents bringing and picking up students both mornings and afternoons double-park, clogging streets. Our appeals for relief to the school went unheeded. Elsewhere you can read details of the city-imposed student enrollment cap and traffic demands management requirements – which we neighbors negotiated over 18 months in 1998-1999 - and the school’s flagrant, years-long code violations.

Now Castilleja, bursting at the seams, is embarked upon a proposed multi-million dollar expansion and campus redevelopment while requesting yet another increase in enrollment, despite the City’s unequivocal statement in 2000 that *“any subsequent request for additional students will not be favorably looked upon by the City. ... the City is not willing to continue to approach increasing school enrollment for Castilleja School in an incremental manner.”* What neighbors accepted as a final directive has been blithely ignored by the school and gone unenforced by the city.

Demolition and construction in several phases will become a multi-year ordeal of dust, noise, and traffic dislocation. A proposed underground parking garage entered on Bryant Street will endanger bikers traveling via the Bryant Street Bike Boulevard. The Environmental Impact report is unblinking: it will cause “significant and unavoidable increase in traffic.” The growth will impact cross-town traffic on Alma Street, Embarcadero Road, Bryant Street, and other school access thoroughfares. Congestion delays and accidents are inevitable, especially when heavier traffic resumes after the coronavirus pandemic abates. This neighborhood dispute becomes a serious city-wide problem.

The pricey, elite private school with tuition rivaling Stanford’s is in fact a “non-profit” commercial business operating in one of the city’s earliest residential zones. It pays income or property taxes, yet enjoys full city services of police and fire protection. Lacking adequate



campus parking, it forces many students, teachers, staff, and visitors to park on city streets.

Architecturally the outsized expansion design will bring a sterile, industrial look and big box wholesaler exterior with a jarring contrast to the patina of age in surrounding homes.

I applaud the school's impeccable scholastic ranking. Quality education of our children is of supreme importance in a democratic society. Unfortunately Castilleja's management has lost our trust with its broken promises and lack of transparency in flouting city codes. A school that professes to teach high standards of integrity and morality and good citizenship to young minds has flunked Ethics 101.

Long after we have all passed from the scene, the deeds of your commissions for planning, architecture, and traffic will endure permanently. Ask yourselves what course is best for the face and future of Palo Alto.

Vic Befera  
1404 Bryant Street  
Palo Alto CA 94301

From: [Kimberley Wong](#)  
To: [Architectural Review Board](#)  
Cc: [Castilleja Expansion](#); [Council, City](#); [French, Amy](#); [Lait, Jonathan](#); [Shikada, Ed](#)  
Subject: Comments of FEIR review for ARB Aug 20,2020 meeting  
Date: Wednesday, August 19, 2020 9:36:26 PM  
Attachments: [Screen Shot 2020-08-19 at 10.54.43 AM.PNG](#)  
[IMG\\_4911.PNG](#)

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Dear ARB board members,

My name is Kimberley Wong and my husband Nelson and I have lived directly across from the Lockey house for 24 years. With the construction of the gym in 2007 our roads and livability were affected by noise, dust, and the constant dewatering for months. The project Castilleja is proposing is monstrous in comparison. Even the newest alternative fails aesthetically and negatively on living conditions due to its size and scale.

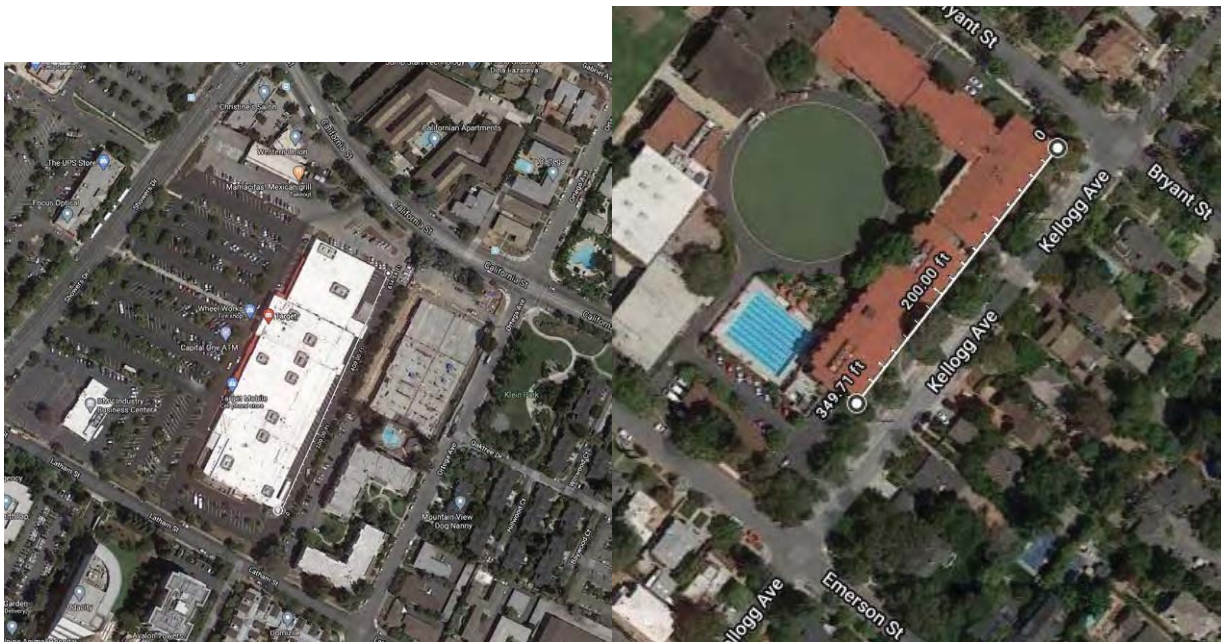
The Palo Alto Municipal Code sec 18.76.020 ARB requirement is that a project "enhances the living conditions on the site... and in adjacent residential areas". These refer to the **34 homes** surrounding the school. It also says that projects should "promote visual environments which are of high aesthetic quality and variety and which, at the same time, are considerate of each other."

The newly proposed Castileja buildings are also not keeping with the scale and character of buildings on the campus or surrounding neighborhood of homes in Professorville and Old Palo Alto. And the proposed project does NOT take into consideration that the surrounding neighborhood needs to bear the brunt of traffic brought on by this massive project. The beeps, whistles and car traffic will carry into the neighborhood. And cars traveling in and out of the proposed underground garage and multiple drop off sites will compete with bicyclists on the Bike Safety Boulevard and around the campus.

In terms of a4, of "promoting visual environments of high aesthetic quality" The proposed 3/4 of a block long building fails to blend in with the classic homes such as tudors, craftsman, colonial revival on Kellogg. It is also incompatible with the Craftsman style Administration building and Chapel on campus as well as the Lockey house, a charming home which retains much of it's old character. Neither does this building blend in with the other classic homes on the other 3 sides of the campus. Gustave Laumeister, son-in-law of Henry Seale, who sold Miss Lockey the property to build her campus, was well known for developing the Administration building as well as many homes in Professorville, just north of the campus. Photos of the the surrounding homes are attached.

As for size and massing: Please look at these two aerial photos. To the left is Target which is 600 ft long and Castilleja which currently is 200 feet long. Though the scale is different, the relative mass in relation to the street length is the same. At least the

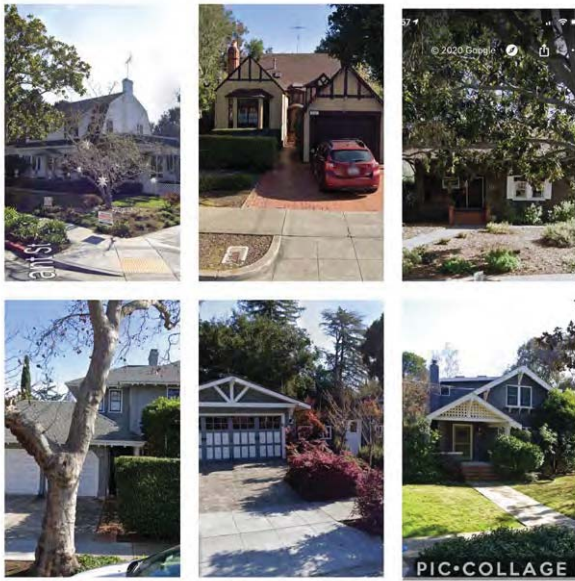
view towards Target on Ortega Drive is shielded by three separate buildings whereas the residents on Kellogg are looking at one huge mass. Making this building any longer will be even more overbearing than it is now.



And the style as we see below is not compatible with any of the classic homes across the street.



Here are the samplings of Kellogg Homes. The homes on the other 3 surrounding streets are attached below to give you a full view of the styles of homes which Castilleja should strive to be compatible with to maintain consistency within their city block.



The size and scale of this new proposed building is out of line with no pass-throughs as the present building . Take a look at the original plans as Laumeister arranged the buildings to reduce the scale and size of any one building to aesthetically blend into the single family neighborhood on the 6 acre land that the campus was zoned for.

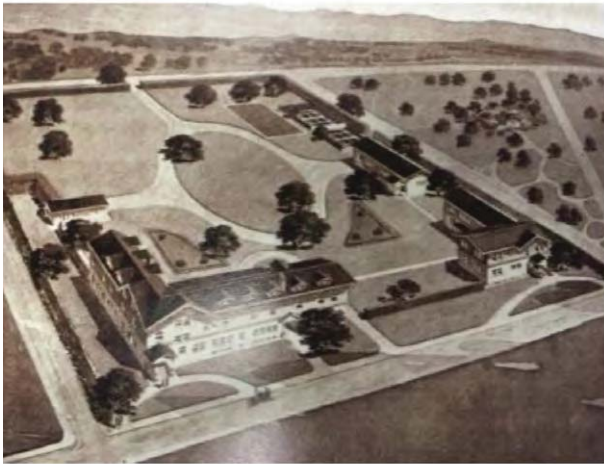
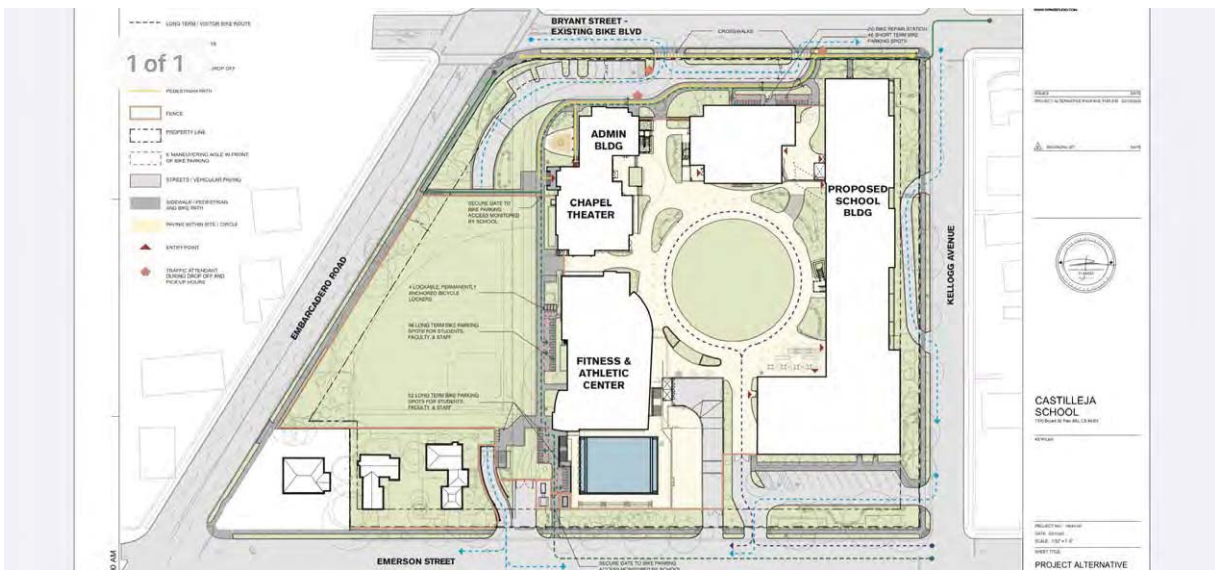


Figure 4 Castilleja School 1910 (Croll and Pang 2007)



It is understandable with the growing student population that more buildings had to be built. But extending the present facade beyond what exists now into a longer monolithic building in the most recent proposal is overwhelming and unacceptable and inconsistent to this residential neighborhood. This goes against Policy L-6 of mixed-use areas.

Policy L-6: Where possible, avoid abrupt changes in scale and density between residential and non-residential areas and between residential areas of different densities. To promote compatibility and gradual transitions between land uses, place zoning district boundaries at mid-block locations rather than along streets wherever possible.

With regard to bike safety, I and many of my friends have seen countless incidents of near misses of bicyclist being hit at the corner of Embarcadero and Bryant. I am shocked to see that in the FEIR this was reported:

**Bryant Street Collision Analysis**

The collision history for the segment of Bryant Street between Embarcadero Road and Kellogg Avenue was reviewed to determine the number of collisions during a recent three-year period and to potentially identify trends based on the collision history. This information is based on records available from the California Highway Patrol as published in their Statewide Integrated Traffic Records System (SWITRS) reports from March 30, 2015 to March 31, 2018. A single non-injury collision occurred along the study segment during this period. This collision occurred between a vehicle and a fixed object and did not involve a bicycle.

Finding – Given the relatively small number of documented crashes and the lack of any crashes involving bicycles along the segment of Bryant Street between Embarcadero Road and Kellogg Avenue, a safety concern involving bicycles along the study segment has not been demonstrated.

On February 13, 2018 this accident happened and was written about in the news:  
<https://palaltoonline.com/news/2018/02/13/injury-collision-blocks-embarcadero-road>

As stated here, two men were injured and sent to the hospital. One was a teacher who was hospitalized for several days. His injuries were severe enough that he was not able to return to teach for quite a while. It is surprising that this major incident was completely overlooked. This begs the question how many other incidents from 2015-2018 were not included in the FEIR.

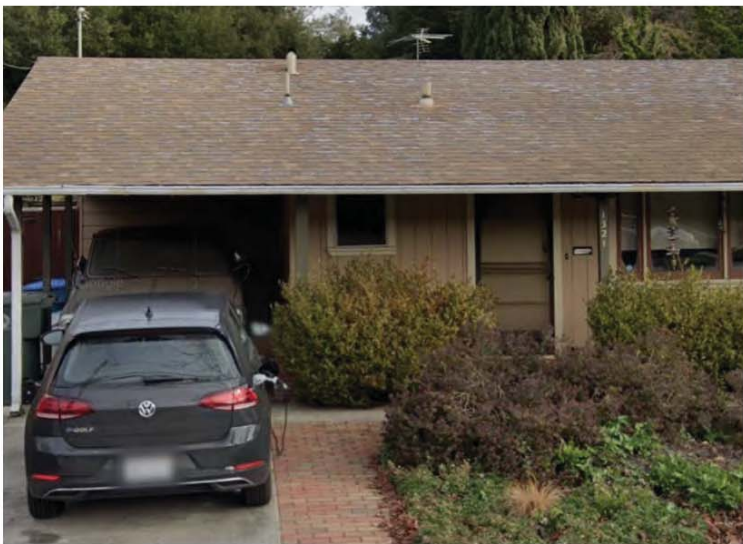
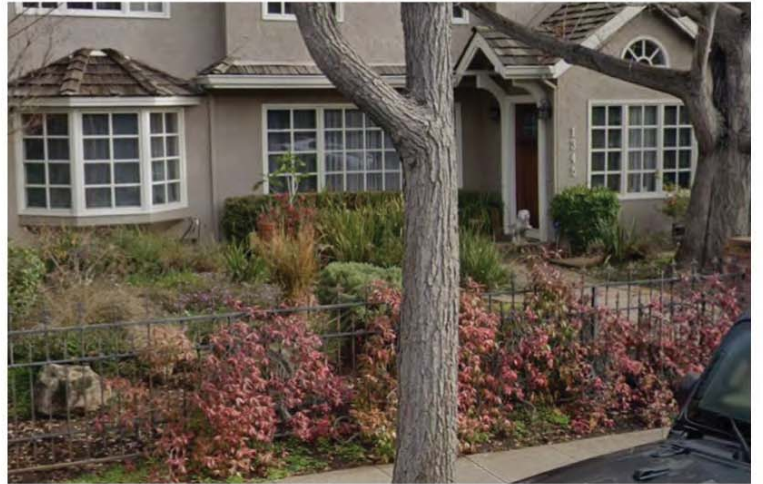
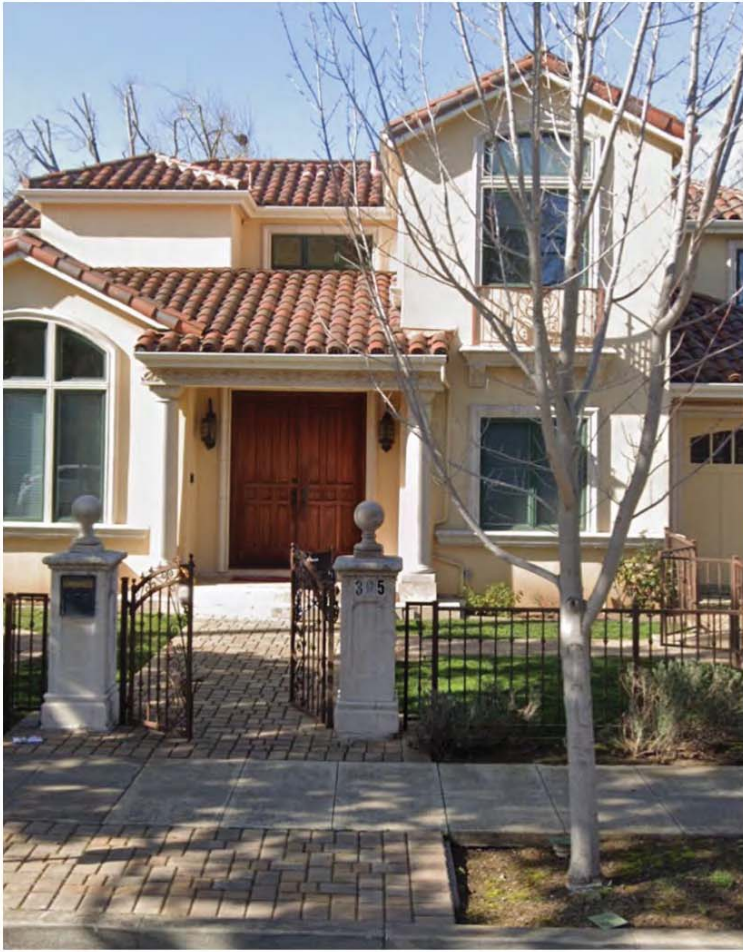
As I remember, the traffic was redirected through Emerson past my house and around to Kellogg to avoid the area. Just one incident can impact the neighborhood's living condition due to the fact that Castilleja is embedded deeply into a residential neighborhood and its narrow streets cannot handle this type of emergency traffic. Think of what could happen if there was a emergency on campus. Is this campus with a proposed garage equipped to bring in emergency vehicles onto the property in a timely manner especially if the roads are backed up? This is only one example of how our living conditions can be severely impacted by safety issues around the school. This will be exacerbated by the construction and traffic flow into and out of an underground garage on a major Bike Safety Boulevard.

And with administrators, teachers, parents and children coming to the campus via 3 drop offs and a proposed underground garage entering onto the Bicycle Safety Boulevard the extra traffic will also introduce congestion, pollution as well as safety hazards on all sides of the campus. These issues are severe impacts to ensuring livable conditions which the ARB strives in accordance with the Comprehensive plan.

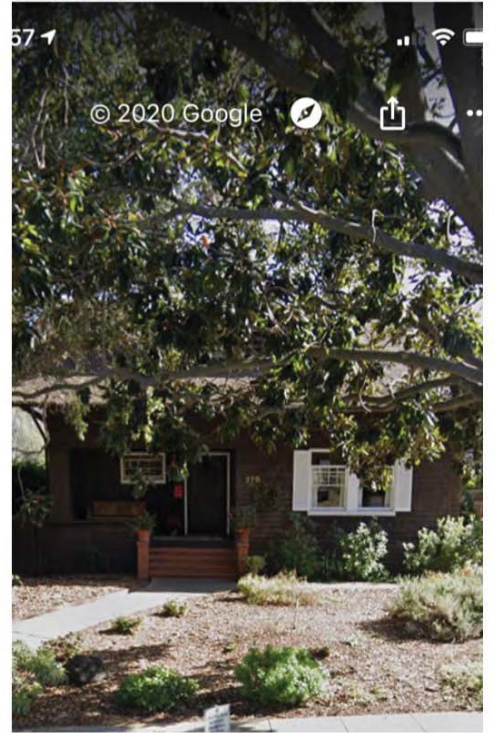
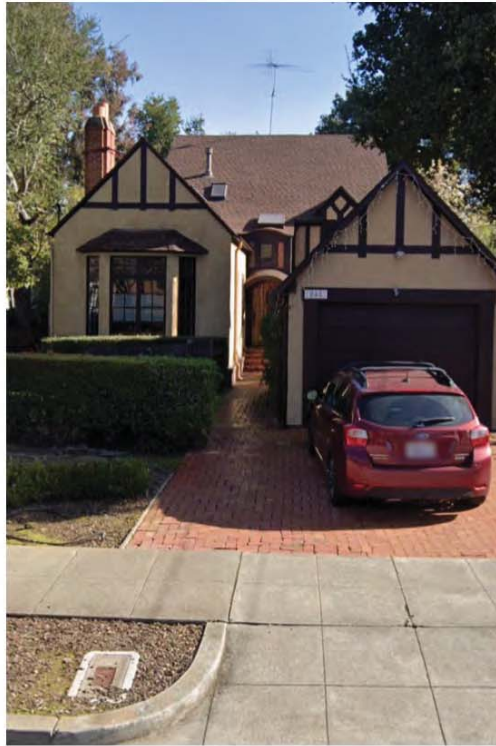
Underground garages are not allowed to be in R1 zoned neighborhoods and for good reason. They cause disruption in traffic, are not aesthetically pleasing even if you lace it up with greenery, and are not consistent with a Single Family zoned neighborhood. I suggest that a no garage option be returned to the table and studied to provide a more sensible, less impactful alternative more consistent with a Single Family Neighborhood.

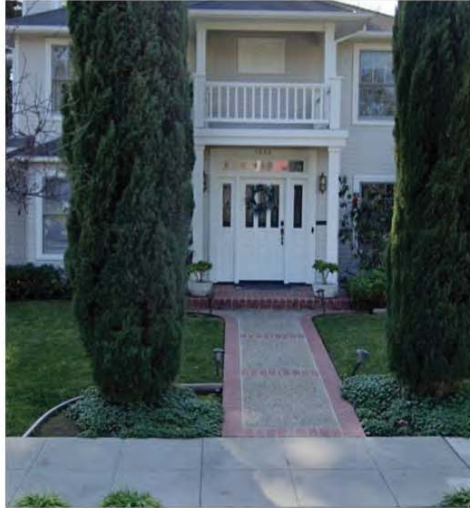
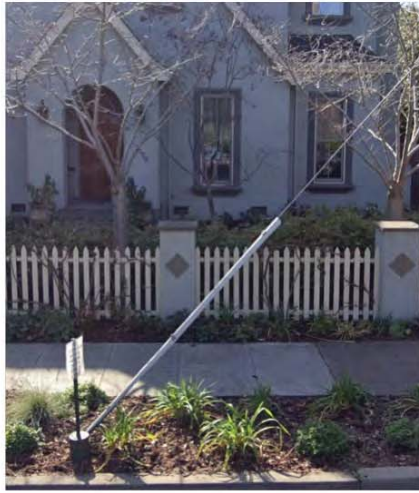
And the major structures to be rebuilt on Bryant and Kellogg should be redesigned with more pass through views of greenery and open space and be built in a style more compatible to the Administration and Chapel buildings in the manner which Gustave Laumeister first envisioned when he created the campus for Ms Mary Lockey more than 100 years ago.

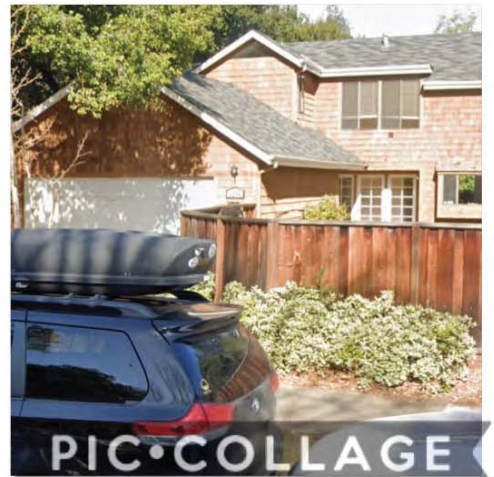
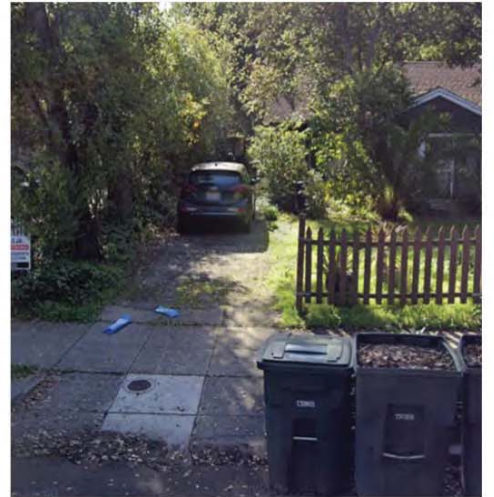
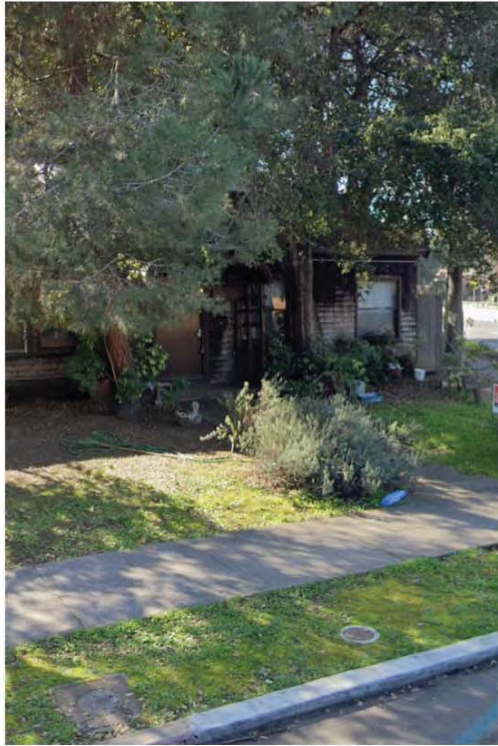
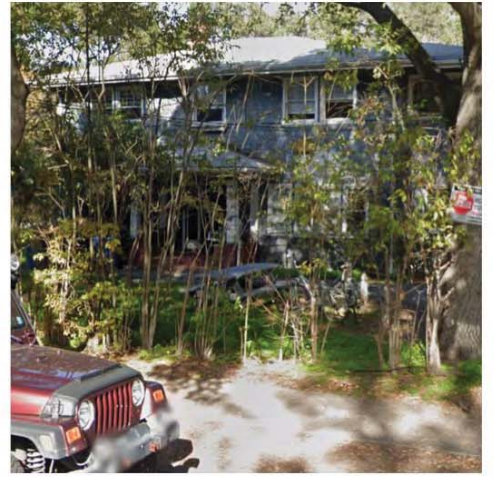
Thank you,  
Kimberley Wong at 1260 Emerson Street, Palo Alto



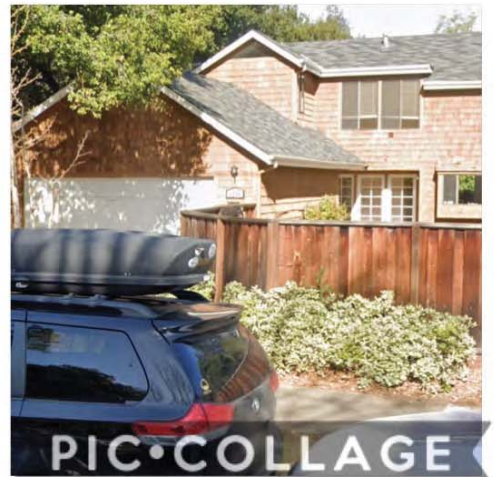
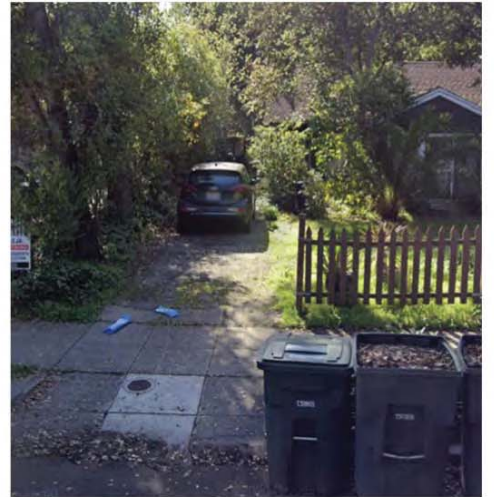
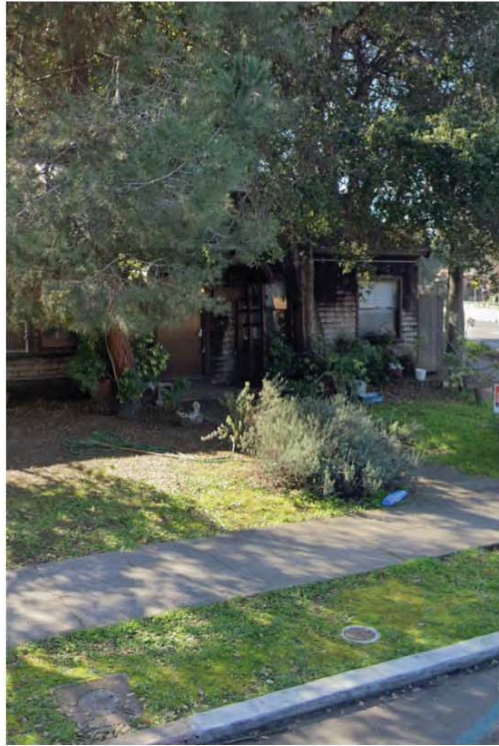
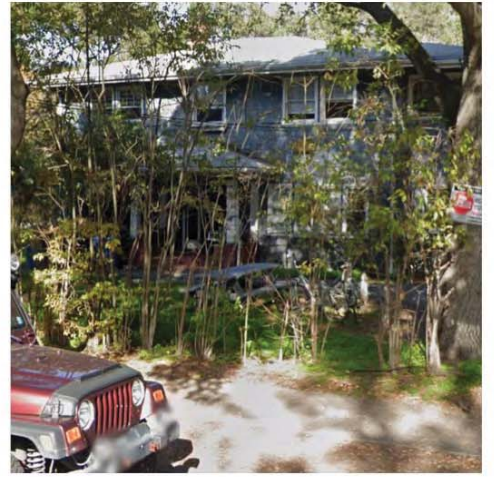


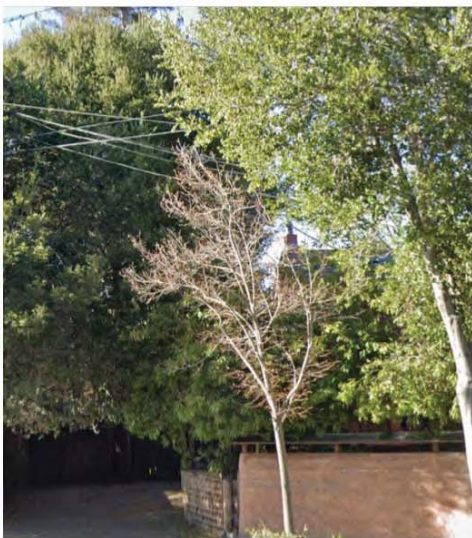
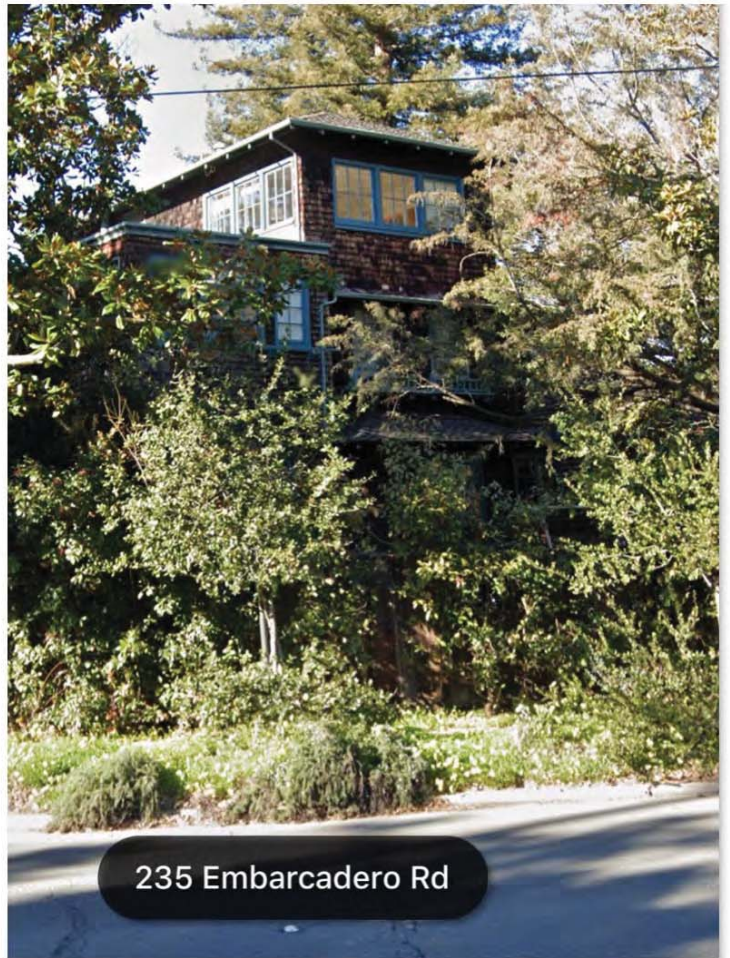






PIC • COLLAGE





From: [Andie Reed](#)  
To: [Architectural Review Board](#); [Planning Commission](#); [Council, City](#); [Castilleja Expansion](#)  
Subject: EIR conflicting Mitigation Measures  
Date: Wednesday, August 19, 2020 9:23:12 AM

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Comment Letter C45.4 regarding Mitigation Measures:

There are 3 impacts noted in the Draft EIR as "significant and unavoidable". The Final EIR includes an option that was not included in the Draft EIR but that has now risen to the top as the school's alternative of choice because, so the FEIR states, the school will disburse the traffic and thus mitigate these traffic problems.

It is important to note that the Disbursed Circulation/Reduced Garage still contains an underground garage exit facing Emerson and Melville, leading into Embarcadero and Alma respectively, which the FEIR states will cause delays and increased traffic (Table MR5-2, school daily trips of 1,477). Added to the underground garage are the loop driveways at Bryant and Kellogg, and not mentioned but still important are driveway entrances on both Kellogg and Emerson Streets into a parking lot on the corner and also a delivery driveway on Emerson.

Table 1-2 in the Revised DEIR states that Impact 4-2 Create Land Use Incompatibility or physically divide an established community will be mitigated using Measure 4a to reduce this traffic impact. Mitigation Measure 4a is totally concerned with Events traffic. The school has over the years continually abused its Conditions of Approval by hosting 10x as many events as the current CUP allows, and now is claiming to reduce events from 100 to 90. This mitigation measure is not related in any way to the traffic caused by this Disbursed Circulation/Reduced Garage option.

In fact, in the Response to my Comment Letter C45.4-1, the Final EIR states "The DEIR concluded that the project would result in a significant and unavoidable land use compatibility impact for the **sole reason the project would generate a substantial increase in daily traffic volumes on the sedent of Emerson Street between Melville Avenue and Embarcadero Road...** Not because of events, but because of daily traffic. This contradicts the Mitigation Measures described above.

This Final EIR is inadequate because of the Disbursed Circulation/Reduced Garage alternative being submitted very late in the process without allowing for a Public Comment period, as required by CEQA, and because Mitigation Measures, an example of which is described above, do not relate to the very grave and overwhelming daily traffic issues introduced by this overreaching expansion plan.

Thank you for your consideration of my input.

Andie Reed  
Melville Ave

--

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

From: [Andie Reed](#)  
To: [Architectural Review Board](#); [Planning Commission](#); [Castilleja Expansion](#); [Council, City](#)  
Subject: Castilleja FEIR  
Date: Wednesday, August 19, 2020 9:12:35 AM

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Comment Letter 45.2-10:

## Events

It is important to re- state that using a reduction to 90 events per school year from the current 100 as a mitigation for traffic congestion is misleading and inaccurate. The school is not allowed 100 events per year but has been holding them anyway, despite continuous complaints from the neighbors over many years. There is not ONE school, public or private, in a residential neighborhood in Palo Alto without large acreage to absorb it, that allows weeknight and weekend events. The Conditions of Approval allow 5 major events and several other” .

The Response states that there is “no quantitative limit on the number of and frequency of special events”. That statement is factually inaccurate. It is true that the current Conditions do not do a good job describing the allowed numbers (the Conditions allow 5 major and “several” other events”), but the intent is clear. “Several” does not, in anyone’s book, mean 100, so one has to rely on intent. The Response ignores the intent, and that is inadequate. I point out a set of letters to the PNQL attorney from the Planning Director agreeing with the neighborhood group that “the **INTENT IS TO LIMIT THE NUMBER AND SIZE OF EVENTS**” and a letter from the Planning Director to the School’s attorney that the intent is being misinterpreted. This correspondence, from Feb 2018, has been brought to the attention of City staff and the EIR report preparers ignore these facts. The current CUP also states no back-to-back weekends and no Sundays and etc., but none of that has ever been abided by.

This is the context under which the report uses 100 events as a baseline, and it should be pointed out to the public and the decision makers that the EIR and the Comment Response statement makes a mockery of the Current Conditional Use Permit which the school has disregarded with impunity.

Please limit the school’s events to 10 to 20 or define very specifically its Hours of Operation.

Thank you,

Andie Reed

--

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

From: [Jeff Levinsky](#)  
To: [Architectural Review Board](#)  
Subject: Castilleja's Proposed Underground Garage Should Count as Floor Area  
Date: Wednesday, August 19, 2020 8:56:43 AM

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Dear Architectural Review Board Members:

The plans for Castilleja do not count the underground garage as gross floor area. However, our municipal code states clearly that in the R-1 zone in which Castilleja sits, parking structures and garages do count as gross floor area. Here are the relevant code sections, no doubt familiar to anyone who has looked at our city's definitions of "gross floor area," with highlights added:

18.04.030(a)(65)(C): Low Density Residential Inclusions and Conditions

In the RE and R-1 single-family residence districts and in the R-2 and RMD two-family residence districts, "gross floor area" means the total covered area of all floors of a main structure and accessory structures greater than one hundred and twenty square feet in area, **including covered parking** and stairways, measured to the outside of stud walls, including the following:

...

(iii) Carports and **garages shall be included in gross floor area;**

Last year, I asked the EIR to address whether Castilleja's garage needed to be counted then as gross floor area, per the above laws. The EIR is required by law to respond it but included no discussion of the above code sections. The staff report does not either.

The EIR does contain two arguments that the underground garage is not floor area. Here's the first:

The garage space would not count towards the site's FAR because it would be below ground and thus is assessed in accordance with Municipal Code Section 18.12.040(b), which states that basements are not included in the gross floor area of buildings in the R-1 district provided that they comply with the patio and lightwell requirements described in Section 18.12.090.

(from page 2-82, Castilleja School Project Final EIR, July 2020)

The above is incorrect because it fails to mention that 18.12.090 also says:

(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 by



other provisions of this code.

Castilleja's proposed underground garage is not under a building footprint. It's under a playing field. Under the EIR's notion that it should be treated as a basement, it is then not allowable at all. I think the better interpretation is that it is not a basement but is a garage and thus must be counted as gross floor area.

Ironically, the other municipal code section the EIR cites above, namely 18.12.040(b), explicitly states that garages do count in gross floor area. Here's the entry from the table in that section explaining what is and is not gross floor area:

**TABLE 3  
SUMMARY OF GROSS FLOOR AREA FOR SINGLE FAMILY RESIDENTIAL DISTRICTS**

Description	Included In GFA	Excluded from GFA
Third floor equivalent, where roof pitch is > 4:12		* up to 200 sq. ft. of unusable space
Garages and carports	*	
Porte cochères		

In other words, if you simply read the very code sections that the EIR cites to claim that the garage is not gross floor area, both actually indicate that it is.

The EIR makes a second argument:

This interpretation of Municipal Code Section 18.12.060(e) is consistent with how the City has applied this section to other non-residential uses in the R-1 zone, such as the Kol Emeth synagogue on Manuela Road.

(from page 2-82, Castilleja School Project Final EIR, July 2020)

Kol Emeth does have an underground garage and is zoned R-1, but this is not a relevant argument. Here is 18.12.060(e):

#### Underground Parking

Underground parking is prohibited for single-family uses, except pursuant to a variance granted in accordance with the provisions of Chapter 18.76, in which case the area of the underground garage shall be counted in determining the floor area ratio for the site.

The above governs a prohibition for single-family use underground parking and how it may be exempted. Neither Kol Emeth nor Castilleja are being treated by the city as single family uses. So how the city has applied (or rather not applied) 18.12.060(e) to Kol Emeth does not enable Castilleja's garage to ignore the other laws that require its garage be counted as gross floor area. In fact, I did not spot in Kol Emeth's staff reports any mention of those three other laws,

as cited above, that mandate counting covered parking and garages in R-1 as gross floor area, namely:

18.04.030(a)(65)(C),  
18.04.030(a)(65)(C)(iii), and  
18.12.040(b) Table 3

Absent evidence that the Kol Emeth project ever considered these rules and offered a deliberative interpretation of how its garage was not subject to them, it clearly cannot serve as a precedent. Rather, we all know that zoning laws are sometimes overlooked and Kol Emeth appears merely to represent one more such case. How its circumstances, which are not even the same as Castilleja's, would have been evaluated under those laws is unknown.

You are being asked to make findings including (from packet page 18):

1)The design is consistent with applicable provisions of the Palo Alto Comprehensive Plan, Zoning Code, coordinated area plans (including compatibility requirements), and any relevant design guides.

Your packet page 19 comments that:

AR Finding #1 is to compare the project with Zoning Code development standards and Comprehensive Plan policies.

As explained above, and as I think you all know well as local architects, our Zoning Code states that Castilleja's underground garage is in fact gross floor area. The plans, staff report, and EIR are incorrect in not showing it as such. Until that's remedied, finding #1 cannot be made.

Respectfully,

Jeff Levinsky

From: [jcpoppy55@comcast.net](mailto:jcpoppy55@comcast.net)  
To: [Architectural Review Board](#)  
Subject: Castilleja Expansion is Wrong for Palo Alto  
Date: Tuesday, August 18, 2020 10:39:58 AM

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Hello ARB,

Thank you for your time to analyze this project. The volume of paperwork is staggering, and there are many items that are missing, being avoided, or misrepresented.

At a high level, the project flies in the face of the City's Comp Plan which prizes vibrant residential communities, reduced traffic, and enhanced bicycle and pedestrian infrastructure.

Adding an underground garage on the Bryant Bike Boulevard is absurd! The school has over 100 events a year, not just dropoffs and pickups for school. This will endanger cyclists and limit the viability of a bike route used by middle and high school students and commuters. Why make such an exception for an elitist institution that pays no taxes?

Furthermore, there are many more proposed exemptions, variances, and code violations that still exist in the project which includes, but is not limited to:

1. PA Muni Code 18.12.60 "Underground parking is prohibited for single-family uses, except pursuant to a variance granted in accordance with the provisions of Ch 18.76 (CUP), in which case the area of the underground garage shall be counted in determining the FAR". The school is not including garage in FAR, violating this code section, and is not asking for a variance for the garage.
2. The school is proposing 30,000 more above-ground square feet than is allowed by current Code (18.12.040, Table 2) Per the school's own Request for Variance, Mar 22, 2018, they are currently at .42 and Code states .3026 FAR for this site. School proposing to demolish old buildings and build new but keep grandfathered .42.
3. The school should be required to go through a variance process like any other applicant (no variance submitted for garage facility).

The plans for the proposed expansion went through many changes after the DEIR and the FEIR has made some hasty patchwork to try to resolve many important issues that should be studied and verified, especially with regard to traffic and safety.

The 'No Garage Option' was not studied in the DEIR and the planning department has made a poor retroactive attempt to address this by making it sound like homes and trees would have to be sacrificed. That is not the case. There is no mandate that says the school must expand beyond current enrollment levels. A small increase may

work but the existing site can work with upgrades. There is no need for the garage and the multitude of other variances.

Regards,  
Jim Poppy  
Melville Avenue, Palo Alto

From: [Vic Befera](#)  
To: [Architectural Review Board](#)  
Subject: Castilleja FEIR - meeting topic 8.20.20  
Date: Monday, August 17, 2020 10:53:32 PM

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To the Architectural Review Board:

At 94 I am perhaps the oldest resident and one of the longest neighbors of Castilleja School, and can offer a historical perspective spanning over 50 years of dealing with the school.

In 1968, when it was still a small boarding school with limited enrollment of students, many living in resident dormitories, the school blended easily with the character and charm of old Palo Alto. However, when the school converted to a day school it began an explosion of new enrollment that continues to the present. Traffic and parking problems erupted, with illegal parking, blocked driveways, noisy delivery trucks, and weekend social and athletic events lasting long into the night. Parents bringing and picking up students both mornings and afternoons double-park, clogging streets. Our appeals for relief to the school went unheeded. Elsewhere you can read details of the city-imposed student enrollment cap and traffic demands management requirements – which we neighbors negotiated over 18 months in 1998-1999 - and the school’s flagrant, years-long code violations.

Now Castilleja, bursting at the seams, is embarked upon a proposed multi-million dollar expansion and campus redevelopment while requesting yet another increase in enrollment, despite the City’s unequivocal statement in 2000 that *“any subsequent request for additional students will not be favorably looked upon by the City. ... the City is not willing to continue to approach increasing school enrollment for Castilleja School in an incremental manner.”* What neighbors accepted as a final directive has been blithely ignored by the school and gone unenforced by the city.

Demolition and construction in several phases will become a multi-year ordeal of dust, noise, and traffic dislocation. A proposed underground parking garage entered on Bryant Street will endanger bikers traveling via the Bryant Street Bike Boulevard. The Environmental Impact report is unblinking: it will cause “significant and unavoidable increase in traffic.” The growth will impact cross-town traffic on Alma Street, Embarcadero Road, Bryant Street, and other school access thoroughfares. Congestion delays and accidents are inevitable, especially when heavier traffic resumes after the coronavirus pandemic abates. This neighborhood dispute becomes a serious city-wide problem.

The pricey, elite private school with tuition rivaling Stanford’s is in fact a “non-profit” commercial business operating in one of the city’s earliest residential zones. It pays income or property taxes, yet enjoys full city services of police and fire protection. Lacking adequate

campus parking, it forces many students, teachers, staff, and visitors to park on city streets.

Architecturally the outsized expansion design will bring a sterile, industrial look and big box wholesaler exterior with a jarring contrast to the patina of age in surrounding homes.

I applaud the school's impeccable scholastic ranking. Quality education of our children is of supreme importance in a democratic society. Unfortunately Castilleja's management has lost our trust with its broken promises and lack of transparency in flouting city codes. A school that professes to teach high standards of integrity and morality and good citizenship to young minds has flunked Ethics 101.

Long after we have all passed from the scene, the deeds of your commissions for planning, architecture, and traffic will endure permanently. Ask yourselves what course is best for the face and future of Palo Alto.

Vic Befera  
1404 Bryant Street  
Palo Alto CA 94301

From: [Hank Sousa](#)  
To: [Architectural Review Board](#); [Planning Commission](#)  
Subject: Response to Comment Letter C52.2  
Date: Monday, August 17, 2020 6:13:19 PM

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Dear ARB and PTC Members,

Regarding the Final EIR, in my comment response, C52.2-4, the report preparer talks about the additional 679 extra cars on Emerson between Melville and Embarcadero. The DEIR concludes this is significant and unavoidable but the impact would be avoided under the Disbursed Circulation/Reduced Garage Alternative. What is this based on? There was no public discussion of the alternative and in particular no discussion of Kellogg, Bryant, and Emerson drop off lanes in conjunction with the proposed underground garage entrances and exits. In particular it looks like a drop off lane has been added to the area of Emerson and Kellogg but does not appear to be mentioned at all. This makes the FEIR inadequate. Shouldn't an amended or supplemental EIR be added before it can be called Final?

Thank you,  
Hank Sousa  
160 Melville Ave.

From: [Rebecca Sanders](#)  
To: [Architectural Review Board](#)  
Subject: Please stomp the brakes on Castilleja  
Date: Monday, August 17, 2020 2:59:28 PM

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Dear Architectural Review Board Members:

I live over in Ventura and am a staunch supporter of public schools. Even though Castilleja's part of town is off my radar for the most part, I have to speak my peace about what appears to be bullying tactics and out and out lying by Castilleja administration in order to stuff an oversized expansion onto the posh school's small footprint in a heavily saturated residential neighborhood in our city.

I have followed the Castilleja expansion plans and the answer is simple. If they want to grow, they should buy a second campus and move or split the school. Other private schools like Menlo and Woodside Priory have large campuses. The current campus is just too small to accommodate what could otherwise be seen as noble plans — if these plans didn't completely change the livability and the character of the adjacent neighborhoods. Also there is nothing noble about ducking the law by consistently being out of compliance by having too many enrolled students and then not paying the fines that are due the city. I don't see why we should cut a deal with Castilleja when they have been in violation of our laws for years.

Why does Castilleja have to ruin the neighborhood? I mean the underground parking garage, really? 1400 car trips a day? 400 at peak commute times? The traffic is traditionally a nightmare over on Embarcadero with racing cut through traffic in and around Castilleja. This will only add to the traffic and congestion.

The scale and massing of the proposal is way out of proportion to the surrounding area, like dropping a strip mall right into a bucolic neighborhood. Plus there is no benefit to the city. They don't pay taxes do they, and they'll be adding to the strain on our infrastructure without any benefit to the community. Did I hear that only 1 in 4 of the students hail from Palo Alto so we have all these folks pouring into our city who don't really live here, right? What if they poured into a campus that was closer to a highway like 280 or 101? Wouldn't that be better?

Please deny the applicant. Tell them to scale it way back or just do the right thing and find another campus. They have pots of money and a wealthy clientel. If they moved to the outskirts of the city, we could use that property for housing, which we desperately need.

Thank you for your consideration of my concerns.

Becky Sanders  
Ventura



From: [richard.mamelok](mailto:richard.mamelok)  
To: [Architectural Review Board](#)  
Subject: Castilleja project  
Date: Monday, August 17, 2020 1:17:41 PM

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## RE Castilleja expansion and campus footprint

We do not support the increased in enrollment and its attendant expansion of their physical footprint, specifically the plan for a garage (revised plan currently under review) for the following reasons:

- The expansion is not consistent with maintaining the feel of a residential neighborhood.
- The school's plan for expansion is likely to increase traffic around the school despite efforts to prevent that; there is no precedent for an increase in a physical plant leading to decreased traffic.
- The inevitable changes to crossing the railroad tracks at Churchill Avenue will also affect traffic in the area in yet undetermined ways and therefore an additional action that would affect traffic is ill advised at this time
- While Castilleja provides a good education for those who can attend, Castilleja is NOT a community resource, claims to the contrary notwithstanding.
  - A large majority of its students do not live in Palo Alto
  - The school does not pay taxes to support infrastructure.
  - Their programs featuring guest speakers are not open to the public.
- The city staff and ultimately the city council should protect neighborhoods and act in the interest of the city's citizens, not in the narrow interest of a private entity that contributes little to the palo alto community at large.

Richard D. Mamelok, MD and Midori Aogaich, MD  
364 Churchill Avenue  
Palo Alto, CA 94301  
mobile: +1 650 924 0347  
[mamelok@pacbell.net](mailto:mamelok@pacbell.net)

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From: [richard.mamelok](mailto:richard.mamelok)  
To: [Planning Commission](#)  
Subject: Castilleja  
Date: Monday, August 17, 2020 10:44:43 AM

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## RE Castilleja expansion and campus footprint

We do not support the increased in enrollment and its attendant expansion of their physical footprint, specifically the plan for a garage (revised plan currently under review) for the following reasons:

- The school's plan for expansion is likely to increase traffic around the school despite efforts to prevent that; there is no precedent for an increase in a physical plant leading to decreased traffic.
- The inevitable changes to crossing the railroad tracks at Churchill Avenue will also affect traffic in the area in yet undetermined ways and therefore an additional action that would affect traffic is ill advised at this time
- While Castilleja provides a good education for those who can attend, Castilleja is **NOT** a community resource, claims to the contrary notwithstanding.
  - A large majority of its students do not live in Palo Alto
  - The school does not pay taxes to support infrastructure.
  - Their programs featuring guest speakers are not open to the public.
- The city staff and ultimately the city council should protect neighborhoods and act in the interest of the city's citizens, not in the narrow interest of a private entity that contributes little to the palo alto community at large.

Richard D. Mamelok, MD and Midori Aogaichi, MD  
364 Churchill Avenue  
Palo Alto, CA 94301  
mobile: +1 650 924 0347  
[mamelok@pacbell.net](mailto:mamelok@pacbell.net)

From: [Andie Reed](#)  
To: [French, Amy](#)  
Cc: [Architectural Review Board; Planning Commission](#)  
Subject: Castilleja Expansion FAR  
Date: Monday, August 17, 2020 9:44:09 AM  
Attachments: [RomanowskiFARVarianceRequest2018.pdf](#)  
[MoncharshFARrebuttal2018.pdf](#)  
[FARLyzwaMar292020.tif](#)

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Hi Amy,  
CC: ARB and PTC

1. As I am reading through your Staff Report for the upcoming meetings, I notice on Packet Pages, 14, 17, and 25 you use the term Gross Floor Area in your discussions of the school's Request for Variance for increased Floor Area Ratio. I understand that the Municipal Code uses that term to define how to calculate the Floor Area Ratio, meaning generally above grade square footage. The school is requesting an increase of FAR from .30 (allowed under current Municipal Code) to .43 (existing conditions). I attach the school's (Ms. Romanowsky's) Request for Variance and our (Ms. Moncharsh's) rebuttal.

You and I have had many discussions over the years about Floor Area Ratios, because I disagree with the school's and Dudek's suggestion that the school's FAR doesn't include the underground garage, which is not under any buildings (as in a basement) and according to 18.12.060(e) should be included in FAR (I include local architect letter), which would bring proposed FAR to .55. In square footage, for purposes of determining Floor Area Ratio, Code allows 86,800. The school's Request for Variance is asking for 116,000, an increase of 29,200 square feet (33%).

2. As I am studying the WRNS plans, I notice they use the same words, Gross Floor Area, but in architectural terms, it appears to describe total square footage, above grade and below grade combined. Plans Page G..001 (<http://cityofpaloalto.org/civicax/filebank/documents/76996>) shows gross floor area existing as 160,200 and gross floor area proposed as 192,200, an increase of 32,000, or 20%, useable floor area. Also, it should be kept in mind that the garage has an additional useable floor area of 32,500. Although it mentions below grade parking spaces, the square footage of the underground is not addressed by WRNS on this sheet G..001 for some reason I cannot understand, maybe because they didn't design the underground garage?

I bring this up because of the confusion we have had with the terms being used in the Staff Report meaning one thing, and in the WRNS plans meaning another thing, and that is likely confusing for many people reading the plans and not seeing the underground garage square footage included in the sheet G..001 at all. It is pertinent for the decision-makers, for informational purposes, to see clearly that the school is asking for 64,700 in additional useable total floor area (40%), including above grade and below grade square footage and including the underground garage, over what the school currently has.

I think it would be helpful to mention this in your presentation.

Thank you,  
Andie

--

Andie Reed CPA  
160 Melville Ave

Palo Alto, CA 94301  
530-401-3809

**JORGENSEN, SIEGEL, McCLURE & FLEGEL, LLP**  
**ATTORNEYS AT LAW**

1100 ALMA STREET, SUITE 210  
MENLO PARK, CALIFORNIA 94025-3392  
(650) 324-9300  
FACSIMILE (650) 324-0227  
www.jsmf.com

WILLIAM L. McCLURE  
JOHN L. FLEGEL  
DAN K. SIEGEL  
DIANE S. GREENBERG  
JENNIFER H. FRIEDMAN  
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CARA E. SILVER

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ADAM LAZAR

OF COUNSEL  
KENT MITCHELL  
LEIGH F. PRINCE

RETIREE  
JOHN D. JORGENSEN  
MARGARET A. SLOAN

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

March 22, 2018

Ms. Amy French, AICP  
Chief Planning Official  
Palo Alto City Hall, Planning & Community Environment  
250 Hamilton Avenue, 5th Floor  
Palo Alto, CA 94301

**Re: Castilleja School Request for Variance to Maintain Existing Above  
Grade Floor Area at 1310 Bryant Street and 1235, 1263 Emerson  
Street, Palo Alto ("Property"); [16PLN-00258] [SCH#2017012052]**

Dear Ms. French:

In connection with the above referenced application, Castilleja School ("Castilleja") seeks to remove five (5) buildings that have outlived their useful life ("Old Buildings") and replace them with an energy efficient, 'net-zero ready' building that will contain updated, seismically sound classrooms and learning spaces intended to be architecturally compatible with the surrounding neighborhood ("New Building"). The Master Plan also proposes for Castilleja to retain its administrative/chapel building and gymnasium, construct an underground parking garage and improve the Property to both offset school related impacts and provide amenities to benefit the community, which include landscaping, the preservation of mature trees, and the construction of a ½ acre community park as well as a public bike pavilion. In demolishing the Old Buildings and repurposing the square footage into the New Building, the resulting above grade floor area of the school will match that which exists today.<sup>1</sup> However, as discussed in this letter, as a result of the unintended consequences resulting from the lower permitted

<sup>1</sup> Based on approved use permits and as-built plans available in the City archives, the current above grade total floor area for the Old Buildings totals 84,572 square feet and the above grade square footage for the New Building is proposed to be 84,572 square feet, as is shown on the proposed Master Plan.

Floor Area Ratio ("FAR") levels of the current R-1 (10,000) Zone ("Zone") Residential Development Standards, the above grade floor area will exceed the current limit. That said, decommissioning the Old Buildings to create a single New Building will yield increased open space and community benefits at the Property,<sup>2</sup> as further described below.

On behalf of Castilleja, this letter serves as a formal request for a variance to allow Castilleja to maintain its existing above grade floor area at the Property, by demolishing the Old Buildings and re-purposing the square footage to create a new, seismically sound, 'net-zero ready' energy efficient building with updated classrooms and learning spaces to support girl's education in the City of Palo Alto ("City") for the 21-century learning and beyond.

#### **Unique History of the Castilleja School Property.**

The City has historically issued Castilleja use permits to both operate as a school and build the necessary structures and improvements to support school use. Many of the existing structures on campus were built prior to the City's adoption of the current maximum FAR standards. Other structures were constructed after the City's adoption of the current maximum FAR standards, but with a use permit making the additional square footage permissible. The controlling Castilleja use permits allow the school to exceed the maximum FAR for the Zone. Nevertheless, going forward, rather than employ the use permit as a tool to authorize school use and to establish square footage development parameters (as has been the City's historic practice), the City requests that Castilleja apply for a variance as a legal tool under the Palo Alto Municipal Code ("PAMC"), to maintain its existing floor area.

#### **Particular Location of Castilleja's Property within the Neighborhood.**

The maximum FAR limitations for the Zone were developed approximately 80 years after Castilleja first occupied their site. By way of background, maximum FAR limitations are generally developed for residential use and do not directly translate to the development of a school with its unique programmatic needs. The same is true of other zoning limitations within the Zone, such as the maximum lot size (19,999 SF), which would not, as a practical matter, support the physical space requirements of any school. Recognizing that school use is compatible with residential use, the Zone prescribes that schools are conditional uses and provides for the approval of the allowable building size or site area to support the needs of a school. That said, modern zoning limitations have brought unintended consequences related to Castilleja's use and development of its site, in that the application of the zoning standards yields disparate treatment of the school site (as discussed below) compared to the surrounding neighborhood, which grew up around Castilleja, over time.

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<sup>2</sup> Current open space at the Property is 116,203 SF and the proposed open space at the Property will be 126,621 SF.

The application of zoning has the unintended consequence of disproportionately constraining the Property compared to other lots in the vicinity, particularly with regard to the maximum permitted floor area. In addition, the City's past approval of FAR above the residential maximum is a unique circumstance supporting a variance which would permit Castilleja to maintain the status quo related to floor area.

**Legal Findings in Support of a Variance.**

The variance provisions of PAMC Section 18.76 030 provide an alternative mechanism when strict application of the zoning regulations would subject development of a site to substantial hardships, constraints or practical difficulties that do not normally arise on other sites in the same vicinity and zoning district. Variances may be granted from strict application of zoning regulations, such as the residential FAR limitation for Castilleja, described herein, where specific legal findings can be made. The findings required by the PAMC to grant a variance allowing Castilleja to maintain its existing and permitted FAR, and the basis for making those required findings, are discussed below.

**1. "Because of special circumstances applicable to the Property, including, but not limited to, size, shape, topography, location or surroundings, the strict application of requirements and regulations substantially deprives the Property of privileges enjoyed by other property in the vicinity and in the same zoning district."**

Castilleja comes to the City with noteworthy circumstances related to the size, location, and surroundings of its Property. The school has occupied its site since 1910, before the present residential neighborhood developed around the school, and prior to the establishment of modern zoning regulations, minimum/maximum lot sizes and/or maximum FAR standards. Since zoning took effect, Castilleja has operated as a conditionally permitted school use, in accordance with the requirements of the Zone. Over time, the surrounding land was subdivided and homes were built, but the size and shape of Castilleja's Property remains particularly unique when compared to the surrounding parcels. To be specific, the Property is 286,783 square feet (6.58 acres), but the maximum lot size in the Zone is 19,999 SF (.46 acres) and the average lot size is much smaller (appearing to range between 8,000-12,000 square feet (.18 - .28 acres). [See map of the Zone, attached as Exhibit A]. It is undisputable that Castilleja's Property is 266,784 square feet (6.12 acres) larger than the prescribed maximum lot size for the Zone and, even from a high-level review of the other properties shown in Exhibit A, the Property is substantially greater in size than any other lot for the entire Zone.



The case law on the subject of variances prescribes that granting a variance is grounded in conditions peculiar to the specific property, as distinguished from other properties within the zone or vicinity. The cases emphasize the **disparities** between properties, not the treatment of any individual property's characteristics in the abstract. (See *Eskeland*, 224 Cal.App.4th at 951; see also *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 520; see also *Committee to Save Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1182, 1183).

Exhibit A clearly illustrates the Property's unique characteristics as distinguished from other properties within Zone and surrounding vicinity. By way of specifics, the second largest lot within the Zone (after Castilleja's Property) is located at 1140 Cowper Street (currently occupied by a church) with a lot size of 100,188 SF (2.3 acres), less than half the size of the Property. The largest residential lot size in the Zone appears to be located at 537 Coleridge Ave., with a lot size of 50,965.2 (1.17 acres), about 1/6<sup>th</sup> the size of the Property. The extreme disparity in lot sizes is particularly detrimental to the Castilleja Property because of the formula prescribed by the Zone to calculate permitted FAR. The formula calculates permitted FAR at .45 for the first 5,000 square feet, and then it drops to .30 for additional square feet. As properties increase in size, the maximum permitted FAR decreases. The calculations on the chart below show how this formula creates a disparate hardship unique to the Castilleja Property.

Lot Size	Maximum Permitted SF (5000 * .45) +(Lot Size-5000)* .3)	Maximum Permitted FAR (Maximum Permitted SF/Total Lot SF)
10,000 SF	3750 SF	.375
15,000 SF	5250 SF	.35
20,000 SF	6750	.3375
25,000 SF	8250	.33
50,000 SF	15750	.315
100,000 SF	30750	.3075
200,000 SF	60750	.303
286,783 SF	86,784.9	.3026

As evidenced in the above table, if the average lot size within the Zone is approximately 10,000 SF, the maximum permitted FAR for the majority of lots in the Zone yields a FAR of at least 7.2% more than permitted for the Property. Thus, Castilleja's uniquely large Property yields disparate treatment related to its development, by its very nature.

Due to its size and the FAR discrepancies described above, the strict application of the PAMC's site development regulations would deprive Castilleja of privileges enjoyed by other property owners in the Zone. Furthermore, the City has historically and thoughtfully approved FAR above the maximum limits for the school. The strict application of the maximum FAR for the Zone would deprive the school of its longstanding historic and permitted use of its Property.

Taking into consideration the aforementioned unique circumstances, Castilleja has designed a site plan to maintain the current approved floor area at the Property through its proposal to demolish the Old Buildings and repurpose that square footage into the New Building. The New Building will meet current building code and seismic safety requirements. It will also incorporate environmental design standards to promote sustainability. Additionally, the proposed plan increases the amount of open space by over 24,000 SF and improves the residential feel of the school within the neighborhood by removing antiquated institutional buildings and replacing them with an architecturally compatible building, designed to include variegated building facades to break up the bulk and mass of the building, as well as compatible building materials which take cues from and serve to complement the surrounding homes.

**2. Granting the variance 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 or in the same zoning district.**

Granting a variance will not affect substantial compliance with the zoning code as the Master Plan substantially complies with the regulations of the Zone, including the building height, setback, parking, allowable site coverage, and open space requirements. The proposed site coverage is 5% less than the maximum allowable site coverage limitation in the Zone<sup>3</sup>. The proposed open space will be accomplished by decommissioning the floor area of the Old Buildings and repurposing the square feet into the New Building.

The request to maintain the above grade floor area is not a special privilege rather it is a request to maintain the status quo as it relates to FAR and to improve the open space characteristics of the Property. As described above, the City has historically allowed (via use permits which run with the land) an expanded allowable building site and size to support school use. This variance does not propose an increase to the existing above-grade floor area and all above grade setbacks and other site development standards<sup>4</sup> are met or exceeded.

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<sup>3</sup> The allowable site coverage for the Property is 100,374 SF (35%) and the proposed site coverage is 83,043 SF (30%).

<sup>4</sup> Note: In connection with the proposed underground parking garage, Castilleja has applied for a Variance for below grade setback encroachments.

**3. Granting the variance is consistent with the Palo Alto Comprehensive Plan and purposes of Title 13 (Zoning).**

The proposed Master Plan is consistent with certain Land Use Goals and Policies, as set forth in the Palo Alto Comprehensive Plan, as follows:

- **Land Use Goal L-2: “An enhanced sense of ‘community’ with development designed to foster public life and meet citywide needs and embrace principles of sustainability.”**

Certain Master Plan amenities are made possible by decommissioning the Old Buildings and repurposing the floor area into the New Building, allowing for more site improvements and fostering an enhanced sense of community. For example, the Master Plan proposes a public bike pavilion at the corner of Bryant and Kellogg to serve as a way station for bicyclists on the Bryant Bike Blvd with repair tools and other features, which may include water or air stations. Additionally, the school intends to construct a ½ acre community park at Emerson Street and Melville Avenue.

Maintaining the floor area at the Property but repurposing the square footage from the Old Buildings into the New Building allows for the implementation of sustainability measures for the New Building which include extensive façade shading by means of deep roof overhangs and solar shading screens, renewable energy solar panels, high efficiency and noise mitigation glazing, natural lighting for all teaching spaces and shared spaces through skylights or wall glazing, durable and sustainable exterior siding materials, locally sourced interior finishes, water efficient plumbing fixtures, graywater irrigation, and extensive landscaping with water run-off mitigation. As a further way to meet citywide needs, offset Master Plan impacts and embrace sustainability principles, Castilleja will implement a robust and forward-thinking Transportation Demand Management (“TDM”) Program which will not only improve the neighborhood experience by reducing the transportation impacts, but the will serve as a model for reducing citywide traffic and parking concerns.

In order to serve a citywide need of providing a non-sectarian, 6<sup>th</sup>-12<sup>th</sup> grade alternative education for girls (whereby 25-30% of Castilleja students reside in Palo Alto), Castilleja must continue to modify and refine its educational curriculum and facilities to grow with the necessary adjustments of middle and high school educational demands. Without the ability to adapt its facilities for increased safety, sustainability and appropriate programmatic space, Castilleja will be hindered from meeting the citywide need to supply a learning environment which enables a single gender non-sectarian 21<sup>st</sup> century education to members of the Palo Alto community.

- **Land Use Goal L-3: “Safe, attractive residential neighborhoods, each with its own distinct character and within walking distance of...schools and/or other public gathering places.”**  
The design and location of the New Building is envisioned to be compatible with the neighborhood. Specific architectural features include large roof overhangs with exposed wood beams, façades scaled to the size of neighboring residences, trellised patios and outdoor covered areas, and use of exterior materials predominant in the neighborhood. Enabled by the design and location of the New Building, public open space is increased and includes the addition of a community park at Emerson Street and Melville Avenue. The improved seismic and general safety of the New Building renders the school and the surrounding neighborhood, a safer place.
- **Land Use Policy L-6.1: “Promote high-quality design and site planning that is compatible with surrounding development and public spaces.”**  
Removing the Old Buildings that are outdated and substantially lower quality than buildings built to current standards will meet the promulgated policy of high quality design and site planning. As is articulated above, the goal of the New Building is to specifically create a design on campus that is more consistent with the surrounding neighborhood look and feel, while meeting the current design guidelines set forth in the PAMC today. Both the concept of the underground garage and its proposed location take the circulation and parking of cars away from the neighborhood such that the school use can be more compatible with its residential neighbors. Furthermore, the demolition of the Old Buildings and the construction of the New Building allows for a site plan which moves bus drop off and pick up internal to the site, and the loading, delivery and trash functions to move off City streets and onto the school Property, below grade, to reduce neighborhood congestion and noise.
- **Land Use Policy L-9.6: “Create, preserve and enhance parks and publicly accessible, shared outdoor gathering spaces within walking and biking distance of residential neighborhoods.”**  
Removing the Old Buildings and replacing them with a single New Building allows for the creation of increased public access to the Property, due to the creation of increased open space. The Master Plan adds a new ½ acre community park at Emerson Street and Melville Avenue as well as a public bicycle pavilion. The park and bike pavilion, are intended to be public benefits and will be open and accessible to all members of the community. Castilleja's goal is to create a more welcoming environment with enhanced views and gathering spaces.

The Master Plan is also consistent with the purpose of the Zone, which is to "create, preserve, and enhance areas suitable for detached dwellings with a strong presence of nature and with open area affording maximum privacy and opportunities for outdoor living and children's play." The proposal, with its open campus and creation of a public park and bike amenity will foster areas suitable for outdoor living and children's play. Further, there has been great emphasis placed on the preservation of mature trees in order to maintain and enhance the strong presence of nature and afford maximum privacy for the surrounding residential neighborhood, which remains suitable for detached dwellings. Another intent of the Zone is to "create and preserve variety among neighborhoods, to provide adequate open area, and to encourage quality design." The school adds variety to the neighborhood, while providing a green space open to the public as well as high-quality design, as is evidenced in the Master Plan application.

**4. Granting the variance will not be detrimental or injurious to property or improvements in the vicinity, will not be detrimental to the public health, safety, general welfare or convenience.**

Approving the variance enables the construction of the New Building which is designed to be visually compatible with the residential character of the neighborhood and allows for increased open space, as well as the addition of a community park. Maintaining the existing floor area at the Property will not be detrimental to public health, safety, general welfare, or convenience. To the contrary, the Master Plan has been thoughtfully designed to comply with the parking requirements on site (via an underground parking garage) with circulation having little impact on the surrounding neighborhood. The New Building will be seismically sound bringing safety to the students as well as the surrounding neighborhood. In addition, maintaining the floor area at the Property but repurposing the square footage from the Old Buildings into the New Building allows for the implementation of robust sustainability measures as discussed above, which contributes to the public health and general welfare of the neighborhood.

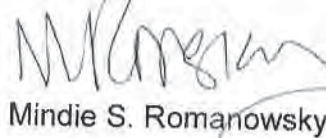
In totality, a variance to maintain the existing FAR on the Property would not be detrimental or injurious to property or improvements in the surrounding vicinity while ensuring that the Property is not treated disparately from the surrounding property. The location and design of the New Building would allow bus drop-off and pick-up to move internal to the site, and for loading, delivery and trash functions to move off City streets and onto the school Property, below grade, to reduce neighborhood congestion and noise, while enhancing safety in the neighborhood. The protection of mature trees at the Property has been carefully studied and prioritized and the proposed landscaping will be thoughtfully designed for neighborhood compatibility. Taken in totality, Castilleja

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is confident these design considerations will promote public health and safety for the vicinity while enhancing the general welfare of the neighborhood.

For the foregoing reasons, there is substantial evidence by which the City can make the necessary findings to approve the variance to maintain the existing above grade floor area at the Property. Castilleja respectfully requests that the City make the findings and grant the variance.

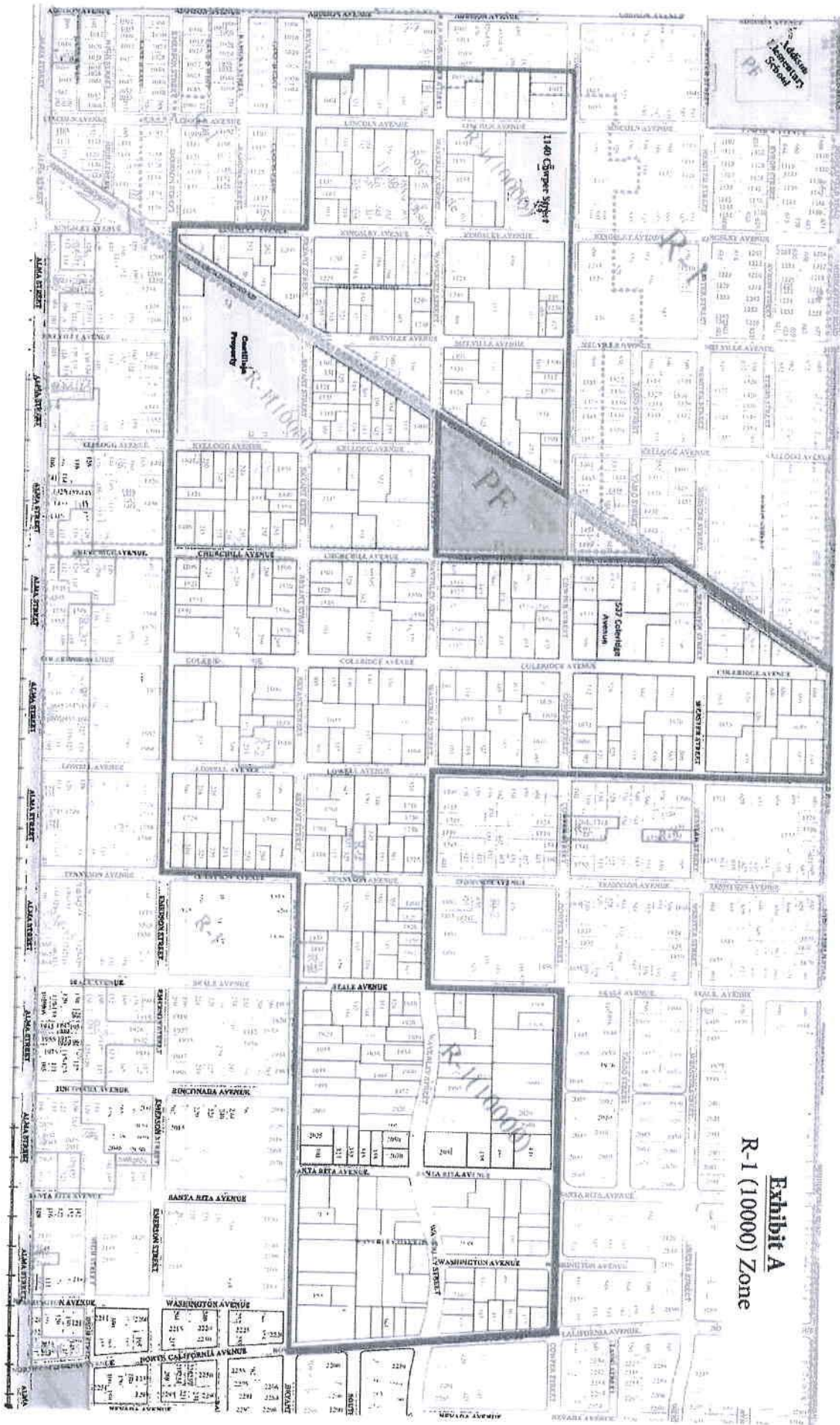
Sincerely,



Mindie S. Romanowsky

cc: Hillary Gitelman, Director of Planning & Community Environment  
Jonathan Lait, Assistant Director of Planning and Community Environment  
Nanci Kauffman, Head of Castilleja School  
Kathy Layendecker, Associate Head of School for Finance and Operations

Enclosure: Exhibit A [R-1 (10,000) Zone]



**Exhibit A**  
**R-1 (10000) Zone**

DONNA M. VENERUSO (d.'09)  
LEILA H. MONCHARSH

LAW OFFICES  
VENERUSO & MONCHARSH  
5707 REDWOOD ROAD, SUITE 10  
OAKLAND, CALIFORNIA 94619  
TELEPHONE (510) 482-0390  
FACSIMILE (510) 482-0391  
Email: 101550@msn.com

September 18, 2018

Amy French, Chief Planning Official  
City of Palo Alto  
250 Hamilton, 5<sup>th</sup> Floor  
Palo Alto, CA 94301

Re: Castilleja School Application for Variance for One 84,572 Square Foot Building in Violation of Zoning Code Floor Area Ratio Restriction

Dear Ms. French:

My client, PNQL, opposes Castilleja School's application for a zoning variance allowing construction of an 84,572 square foot institutional above-ground structure, which exceeds the allowable floor area ratio (FAR) under the zoning code. Castilleja is also not entitled to the variance because the proposed structure violates the Comprehensive Plan. The proposed building is incompatible with the surrounding residential neighborhood. Granting the variance would illegally bestow a special privilege on Castilleja since the city has not allowed other properties in the same zone and vicinity to exceed the FAR restriction in the zoning code.

Furthermore, if Castilleja eventually moves in the future, the city could find itself burdened with an 84,572 square foot structure on the property that will be hard to repurpose due to its size. Developers generally are hesitant to pay the repurpose or demolition costs for such a large building. Today's decisions about the configuration of the property may well dictate the city's options for future uses of the property. The city council should deny the request for a variance.

**A. Requested Variance for A Combined Building of 84,572 Square Feet**

On March 22, 2018, Castilleja applied for a variance that would facilitate demolishing five existing buildings and then combining the square footage of those five demolished buildings into one new large building. The school believes that the city planner's decision to require a variance is due to "unintended consequences because the floor area ratio" will exceed the current FAR for residential properties in the R-1 zone. It argues that the construction of the 84,572 square foot building is necessary because the older buildings it wishes to demolish cannot be brought up to today's green and seismic building standards. Further, the community will receive benefits because the single structure will allow for a half-acre community park and a public bike pavilion. Castilleja also argues that historically, the city has granted permits for Castilleja's requests to develop its property as it wishes. Therefore, reasons Castilleja, the city should issue a variance now and continue allowing Castilleja to develop its property as it pleases. We disagree with the school's analysis.



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The city planning department is requiring a variance because the square footage of the proposed new large building violates the zoning code. The five buildings Castilleja wishes to demolish were constructed on the school property before Palo Alto adopted a particular type of density restriction into its zoning code. The use of the FAR calculation was incorporated into city zoning codes during the 20th century as a way for cities to control rapid growth. Today, city planners use it for restricting planning permissions, setting a limit on the "load factor" generated by new developments, beyond which the proposed project may place undue stress on a city and its public infrastructure. The calculation also allows cities to control the density of use in given zones. By containing the size of a building on a given lot, the FAR restriction allows the city to limit the number of persons who will be using that building.

It appears that the five buildings Castilleja wishes to demolish would not be permitted today without a variance because their square footage would violate the current zoning code FAR for the zone where the school is located. Combining the square footage of all the five buildings Castilleja wishes to demolish and placing the square footage all in one huge building does not prevent the need for a variance from the FAR restriction. It would just convert five small buildings into one huge, very institutional appearing building, in the middle of a single-family residential neighborhood.

As of this writing, Castilleja has not yet submitted plans showing the details of the proposed 84,572 square foot building. Therefore, the planner cannot determine by how much the proposed new building exceeds the FAR for the zone. However, there is no dispute from Castilleja that its proposed project requires a variance for the proposed 84,572 square foot building.

Castilleja did not include the 84,572 square foot building in its plans to help the neighborhood by providing a park and bicycle way station. It is driven exclusively by the school's desire to increase the number of students and employees. That desire and the rest of the reasons Castilleja offers to support its request for a variance do not justify granting one, which will open the door for other institutions in the same zone and vicinity to claim they are also entitled to the equal privilege. Eventually, the FAR would become meaningless. As shown below, Castilleja has not met its burden to demonstrate with facts and law that it is eligible for a variance under the city's zoning code.

#### **B. Castilleja Has Failed to Demonstrate that It Is Entitled to A Variance**

The city code provides that variance permits are intended to address unique constraints that would make it a hardship for the developer to comply with the zoning code restrictions:

The purpose of a variance is to:

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- (1) Provide a way for a site with special physical constraints, resulting from natural or built features, to be used in ways similar to other sites in the same vicinity and zoning district; and
- (2) Provide a way to grant relief when strict application of the zoning regulations would subject development of a site to substantial hardships, constraints, or practical difficulties that do not normally arise on other sites in the same vicinity and zoning district.

(Section 18.76.030)

No particular physical constraints or hardships are preventing the campus from being used in ways similar to other sites such that it would qualify for a variance from the zoning FAR restriction. Therefore, Castilleja is not entitled to the grant of one.

**a. There are no unique physical constraints on the Castilleja campus**

Castilleja argues that it meets the criteria because it has a unique history. It built its structures before the city's adoption of the zoning code with FAR density restrictions. After the passage of the zoning code, the city allowed the school to build and remodel structures in compliance with a conditional use permit but did not enforce the FAR restriction. Further, the FAR applies to residential properties, not institutions. (3/22/18 Letter, page 2<sup>1</sup>.) However, the burden was on Castilleja to show that its physical constraints due to natural or built features prevented it from being used in ways similar to other sites in the same vicinity or zoning district. (*Walnut Acres Neighborhood Assn. v. City of Los Angeles* (2015) 235 Cal.App.4th 1303, 1313-1315 (*Walnut Acres*)). The city historically allowing Castilleja to construct larger buildings than would be permitted today does not meet that test.

**b. There is no showing that Castilleja would suffer a substantial hardship without a variance**

Castilleja contends that if the city denied a variance from the FAR restriction, it would disproportionately constrain Castilleja's property compared to other parcels in the vicinity. (Letter, page 3.) However, zoning regulations are designed to restrict the use of properties. Whether they do so disproportionately is not relevant to the legal requirement that the applicant demonstrates "substantial hardship" to qualify for a variance. For example, hardship is something that would prevent profitability. *Walnut Acres, supra*, is instructive. In that case, the developer applied for permits to build a 50,289 square foot eldercare facility in a low-density

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<sup>1</sup> All citations to a "Letter" are referring to the one written by Castilleja's attorney, Mindie Romanowsky, to city planner Amy French and dated March 22, 2018.

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residential neighborhood, similar to the one surrounding Castilleja. The Los Angeles zoning code restricted the FAR to 12,600 square feet. The developer argued that the growing demand for senior care was so great that if it reduced the square footage to comply with the zoning code, it could only provide 16 rooms instead of 60 rooms and thus, would deprive Los Angeles of needed senior services. The city council granted the variance requested by the developer and the neighborhood association filed a lawsuit. The superior court ruled in favor of the neighbors and set aside the permit. The court of appeal rejected the property owner's reasons for its appeal because there was no substantial evidence of a hardship:

There was no evidence that a facility with 16 rooms could not be profitable. Eldercare homes apparently include small homes with four to 10 beds, according to the zoning administrator's report. There was no evidence that necessary support services demanded additional rooms in order to generate a profit. Just as in *Stolman v. City of Los Angeles*, supra, 114 Cal.App4th at page 926, there was no "information from which it [could] be determined whether the profit [was] so low as to amount to 'unnecessary hardship' "

(*Walnut Acres*, supra, at page 1315.)

Like the developer in *Walnut Acres* Castilleja submits no evidence that if it is required to construct buildings on its property that comply with the FAR restriction it will become unprofitable or that running a private school, of necessity requires larger structures than the FAR limitation would allow. Accordingly, it has not demonstrated that it will suffer "substantial hardships, constraints, or practical difficulties that do not normally arise on other sites in the same vicinity and zoning district." (Zoning Code Section 18.76.030.<sup>2</sup>) Accordingly, the city council should deny Castilleja's request for a variance to construct an 84,572 square foot structure.

There also is no showing by the school that the FAR would only apply to residences and not to institutions. Typically, the city would apply the FAR limitation to the institution's location. We expect that the FAR applicable to institutions in downtown Palo Alto or its industrial area would be more flexible for an institution wishing to build there than a FAR that applies to single-family zones. There is nothing in Castilleja's argument that shows complying with the current FAR would prevent the school from using its property due to physical or natural constraints, which do not exist for other similar properties. Nor does it show that compliance with the FAR restriction would create a hardship that would not apply to other institutions in the same zone and vicinity. The school's problem is that it wants to re-arrange its structures so that it can accommodate a much higher enrollment than what it has now, but that is the very reason for

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<sup>2</sup> All section references are to the Palo Alto Zoning Code.

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the FAR restriction – to prevent a high level of density incompatible with the institution's surrounding neighborhood.

Without the variance requirement, and just relying on the existing conditional use permit for density, as the school would prefer, the school would be able to keep seeking modifications of its conditional use permit for more enrollment. The variance requirement prevents the school from building its property to accommodate unfettered growth that depends on the "politics of the day." Instead, the variance restriction relates to the city's interest in not having the project site use excessive city resources, to the detriment of the overall, surrounding infrastructure maintained by the city. For example, the larger the allowable density, the more people who can be on the campus. That means more cars parking on the streets, more traffic for students and employees on city streets, and more city services to maintain those streets, provide protection, arrange for garbage disposal, and the like.

It is not in the city's interest to grant a variance. Furthermore, the city council does not have the factual or legal basis for making the findings for granting a variance.

**C. The City Council Does Not Have a Basis for the Findings  
Necessary to Grant a Variance**

The zoning code only allows the city council to grant an application for a variance by making specific findings. It would have to find, in relevant part, *all* of the following:

1. That there are special physical circumstances that exist on the property which would cause the strict application of the FAR to deprive Castilleja of privileges enjoyed by other property in the vicinity and the same zoning district as Castilleja's property;
2. That the special personal circumstances peculiar to Castilleja does not form any consideration for granting a variance;
3. That the granting of the application would not affect substantial compliance with the zoning regulations;
4. That the grant of a variance will not 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;
5. That the granting of the variance is consistent with the General Plan; and

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6. That the granting of the application will not be detrimental or injurious to property or improvements in the vicinity, will not be detrimental to the public health, safety, general welfare, or convenience.

(Section 18.12.030, subd. (c).)

**1. There are no unique physical circumstances that exist on Castilleja's property which would cause the strict application of the FAR to deprive Castilleja of privileges enjoyed by other property in the vicinity and the same zoning district as Castilleja's property**

On page 3 of the Letter, it correctly states that the school's parcel is different from the parcels with housing because it is much larger in square feet, but that is irrelevant when determining whether a variance would grant a privilege to Castilleja that is not enjoyed by other property in the same zone and vicinity. Castilleja had the burden to list properties in the same zone and vicinity where the city has granted the privilege of exceeding the FAR. It has failed to do so. For that reason alone, the city council should deny the application for a variance.

Castilleja relies on several cases to support its position that in considering whether to grant a variance, it should look at the "disparities between properties, not the treatment of any individual property's characteristics in the abstract." (Letter, page 4.) That is true but is out of context. A city can properly grant a variance when strict enforcement of the FAR restriction would prevent safety problems or a property owner from enjoying the same amenities enjoyed by owners of properties in the same zone and vicinity.

For example, in *Eskeland v. City of Del Mar* (2014) 224 Cal.App.4th 936, cited by Castilleja, the appellate court upheld the grant of a variance, keeping in mind that other houses in the same area were able to build with amenities that the property owner wanted to include in his rebuilt home. The variance application requested a variance from the setback zoning restriction so that the owner of a house could rebuild it on a very steep hillside. The city based its decision to grant a variance because the steepness of the hill restricted its development potential. Unlike Castilleja, the property owner demonstrated that without a variance, he could not construct a house with the same amenities as other houses within the same area. The lack of a variance would restrict him to build a house that would adversely impact the steep slope and landform. Also, if the city denied the variance, the driveway to the house would be "very steep and dangerous." (*Id.* at 952.)

In *Save Hollywood Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, another case cited by Castilleja, the appellate court upheld the grant of a variance from the three-foot setback requirement and the height restriction because there was an adequate showing of substantial hardship if the city had denied it. The property owner had constructed a wooden fence

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on top of a 1920s historic masonry wall, instead of three feet back from the wall. (*Id.*, at page 1172.) The court concluded that there was evidence of hardship if the city had required a three-foot setback. The subject property was a three-parcel site without a backyard, and all of the property faced a winding street. Much of the yard was below grade, which made enforcing the three-foot setback problematic. (*Id.*, at page 1184.) Also, the three-foot setback, if applied, would cause a gap between the wall and yard, which would cause a safety hazard:

Further, the property sits below grade on a winding street, and enforcing the requirement would create a more significant risk by providing a gap between the wall and yard into which persons and debris could fall. The fact that other properties in the area may have a similar below-grade configuration and do not have such fences does not detract from the necessity of ameliorating the substantial safety hazard which would remain if the City strictly enforced the setback requirement.

(*Id.*, at page 1184.)

Castilleja's third cited case also does not support its position that the city should compare the size of residential lots and the size of Castilleja's property, and on that basis alone, grant a variance from the FAR restriction. In *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506 (*Topanga*), the California Supreme Court determined that the city did not make sufficient findings to support the grant of a variance, allowing a 93-space mobile home park within an acreage zoned for light agriculture and single-family houses with a one-acre minimum lot size. (*Id.*, at page 510.) The court recounted the support for granting the variance, including the desirability of satisfying a growing demand for new low-cost housing, presumably through use of mobile homes, that the project could provide a fire break, and that other uses such as for single-family houses would necessitate costly grading. (*Id.*, at page 520.) Then, the court explained that these considerations were legally irrelevant:

These data, we conclude, do not constitute a sufficient showing to satisfy the (cite) variance requirements. [Variances are permitted] "only when, because of special circumstances applicable to the property, . . . the strict application of the zoning ordinance deprives such property of privileges enjoyed by other property in the vicinity and under identical zoning classification." This language emphasized disparities between properties, not the treatment of the subject property's characteristics in the abstract. It also contemplates that at best, only a small fraction of any one zone can qualify for a variance.

(*Id.*, at page 520.)

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250 Hamilton, 5<sup>th</sup> Floor  
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Here, Castilleja has not shown in what way it cannot construct its improvements by staying within the FAR restriction. It also has not demonstrated that other properties near it have been allowed to build in contravention to those restrictions. Thus, there is no substantial hardship preventing Castilleja from constructing new buildings due to safety problems, land configuration limitations, or otherwise as occurred in two of its cited cases. Nor has it shown that the city has waived the same restrictions for surrounding property owners.

Like the developer in *Topanga*, Castilleja has only come up with irrelevant arguments to support its variance application. For example, it argues that the following supports its position: the difference in the square footage of surrounding properties compared with its square footage, the history of the city granting permits for buildings on the site, that the new building will be seismically up-to-date, that the new plan will be beneficial to the neighborhood, and that the building will be architecturally attractive. (Letter, page 5.) None of these arguments suffice to show that the school cannot build on its campus without a variance.

Castilleja argues that it needs the variance to meet current code and seismic standards, but it does not show why the lack of a variance prevents it from upgrading its existing buildings or constructing one or more new buildings less than 84,572 square feet and complying with the FAR limitation. Increasing square footage with a new plan that incorporates this large, institutional building may be an advantage, but it does not satisfy any legal requirement for obtaining a variance from the FAR restriction. Similarly, even if Castilleja believes that the new, sizeable institutional building will be attractive and compatible with the neighborhood, that also does not qualify as showing “substantial hardship” or that the neighbors are receiving some advantage that Castilleja does not enjoy.

The city council should deny the variance application.

**2. Granting the variance will affect substantial compliance with the regulations and will constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity or same zone**

Castilleja contends that its master plan substantially complies with the zoning code (Letter, page 5.) Its contention evidences a lack of reality. A project that substantially meets the zoning code is one that requires a building permit, not a slew of discretionary permits including variances that are exceptions to the rules for the zone. Here, Castilleja is requesting a conditional use permit, encroachments into public easements, a variance to construct a building that violates the FAR, and for another variance to get around the setback requirements by encroaching into the sidewalk for a proposed underground garage. The city does not have to grant any of these permits – each is discretionary. These requested permits represent privileges that the city could grant, not rights that the city must grant to Castilleja. They are also privileges that Castilleja has

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failed to show nearby neighbors are enjoying. PNQL is aware of nobody else in the neighborhood, who has exceeded the FAR or obtained a variance to do so.

The fact that historically, the city has granted permission to build out the site in a way that exceeds the current FAR restriction is not a legally cognizable reason to grant a variance, as discussed above. Castilleja has cited no cases that would support such an interpretation of the city's requirement to make specific findings. For this reason, also, the city should deny the application for a variance.

### **3. Granting the Requested Variance is Inconsistent with the Comprehensive Plan**

Castilleja references goals and land use policies in its Letter (page 7) to support the construction of the proposed 84,572 square foot building. However, policies, not goals, are binding upon the city. (See definitions of "policies" and "goals" on page 6 of the Comprehensive Plan (CP). Also, the CP contains several "elements," and the planner has to consult each in determining whether the application for a variance violates the CP. Below are the relevant sections from each, the housing and land use elements:

**Policy H1.4** Ensure that new developments provide appropriate transitions from higher density development to single-family and low-density residential districts to preserve neighborhood character. (Housing Element.)

An 84,572 square foot building next to a residential neighborhood does not conform with the above policy. The policy requires avoiding placing large buildings in close proximity with single-family homes in a neighborhood such as the one surrounding Castilleja, which is low-density, residential.

**Policy L-1.1** Maintain and prioritize Palo Alto's varied residential neighborhoods while sustaining the vitality of its commercial areas and public facilities. (Land Use element.)

**Policy L-1.5** Regulate land uses in Palo Alto according to the land use definitions in this Element and Map L-6.

**Policy L-1.6** Encourage land uses that address the needs of the community and manage change and development to benefit the community.

**Policy L-1.7** Use coordinated area plans to guide development, such as to create or enhance cohesive neighborhoods in areas of Palo Alto where significant change is foreseeable. Address both land use and transportation, define the desired character and urban design traits of the areas, identify opportunities for public open space, parks and recreational opportunities,



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address connectivity to and compatibility with adjacent residential areas; and include broad community involvement in the planning process.

Policy L-1.11 Hold new development to the highest development standards in order to maintain Palo Alto's livability and achieve the highest quality development with the least impacts.

These policies, above, demonstrate that the city has prioritized its residential neighborhoods. Given the city's problems with providing sufficient housing, these policies require preservation of existing housing and avoidance of disturbing the characteristics of residential areas. Part of maintaining these neighborhoods is assuring that substantial buildings, with questionable future uses, are not placed near single-family houses. The institutional structure that Castilleja seeks to build will not contribute to maintaining the residences around it. When Castilleja is done with the site and moves on to another one, the proposed campus will present problems for repurposing it into much-needed housing. The demolition cost of a substantial institutional building is sufficient to discourage developers from building on the site.

Policy L-2.3 As a key component of a diverse, inclusive community, allow and encourage a mix of housing types and sizes, integrated into neighborhoods and designed for greater affordability, particularly smaller housing types, such as studios, co-housing, cottages, clustered housing, accessory dwelling units and senior housing.

Policy L-2.7 Support efforts to retain housing that is more affordable in existing neighborhoods, including a range of smaller housing types.

Policy L-2.8 When considering infill redevelopment, work to minimize displacement of existing residents.

Policy L-2.9 Facilitate reuse of existing buildings.

Policy L-3.1 Ensure that new or remodeled structures are compatible with the neighborhood and adjacent structures.

The subject neighborhood includes a mixture of cottages, small single-family houses, small to medium sized apartment buildings, rentals, and secondary units. If the city continues to allow Castilleja to "institutionalize" the neighborhood by tearing down housing for its institutional uses, building large institutional buildings, and disturbing the neighborhood with its activities, eventually the city will lose this diverse residential neighborhood. It is evident from a site visit that over time, the school has already encroached deeply into the neighborhood. The

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city should follow the above policies and stop the encroachments, including allowing construction of a huge institutional building and garage in the middle of the neighborhood.

Castilleja's argument that it wishes to tear down old buildings for seismic and code reasons violates policy L2.9, which requires the city to facilitate reuse of existing buildings. The proposed huge building also directly violates L-3.1 because its proposed new building is not compatible with the surrounding single-family housing, which is why it is seeking a variance from the FAR restriction.

**Ordinance No. 5446:** In May 2018, Palo Alto citizens gathered sufficient signatures to place an initiative on the ballot to cap the amount of office and R/D (research and development) development at 850,000 square feet. On July 30, 2018, the Palo Alto City Council passed Ordinance 5446, amending portions of the 2030 Comprehensive Plan to include this cap. The Ordinance contains the following finding:

2. Palo Alto Cannot Tolerate More Traffic: According to the City's own study, there are already about three jobs in the City for every employed resident. As a result, the City has one of the highest commuter ratios in the nation for cities with populations of more than fifty thousand. Excessive new office/R&D development in Palo Alto-as the recently adopted 2030 Comprehensive Plan allows-will lead to even more jobs and thus exacerbate traffic congestion and parking shortages in the City. Two-thirds of City residents cite these issues as major concerns. (Ordinance 5446, page 2.)

While the Ordinance caps new office and R&D development, it includes the finding above, indicating an intention to reduce traffic from commuters in the city. The only reason Castilleja is seeking to construct an 84,572 square foot building is because of its concomitant plan to add over 100 more students and eventually become a school of 540 students, along with employees to serve them. A substantial institutional building accommodating increased enrollment on the campus will further add to traffic congestion from commuter students and employees, in contradiction to the citizens' amendment to the Comprehensive Plan.

Castilleja cites two other CP policies, but they are relevant to different parts of Palo Alto than residential neighborhoods. (Letter, page 7.) Policy 6.1 applies to Employment Districts -- the design of buildings and public space (CP, pages 45-46) and Policy 9.6 applies to Parks and Gathering places - public streets and public spaces (CP, pages 50-51). Furthermore, Castilleja's arguments under these two policies are illogical and irrelevant to the legal test for whether the city should grant a variance.

For example, Castilleja contends that demolishing older buildings and building one new colossal structure will allow "for more site improvements and foster[] an enhanced sense of

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community” including a bike pavilion at the corner of Bryant and Kellogg and a half-acre community park at Emerson Street and Melville Avenue. Castilleja does not explain how any of these items will build a sense of community. The neighbors never requested a bike waystation or a park open to the public. A park in the midst of housing can become a nuisance very quickly due to noise, lack of supervision and maintenance, and inappropriate behavior by patrons, especially after dark. To PNQL’s knowledge, no neighbor has asked for inclusion of either a public park or bike waystation in the school’s master plan. The residents are not looking for a “sense of community” that would mean expanding their involvement with people who do not live in the neighborhood or opening up their neighborhood for public uses for “a more welcoming environment with enhanced views and gathering spaces.” (Letter, page 7.) As would be true with any neighborhood, the residents desire a peaceful place to live, not a way to open up their neighborhood to the public.

Castilleja describes all of the design features it intends to include in the new building as positive improvements. (Letter, pages 6-8.) The CP stresses the importance of maintaining and reusing existing buildings. Castilleja presents no evidence that it cannot remodel its existing structures with the improvements Castilleja describes. Moreover, as shown above, a robust transportation demand management plan, an excellent education for young girls, an underground garage, increased open space, and the like are not relevant to the legal question of whether the city should grant a variance from the FAR restriction.

Contrary to its claim that it complies with the R-1 zone restrictions, Castilleja’s proposed master plan violates its zoning prohibition against the encroachment of schools into this primarily residential zone. Its proposed master plan proposes demolition of two houses with no replacement housing:

The R-1 single-family residential district is intended to create, preserve, and enhance areas suitable for detached dwellings with a strong presence of nature and with open area affording maximum privacy and opportunities for outdoor living and children's play. Minimum site area requirements are established to create and preserve variety among neighborhoods, to provide adequate open area, and to encourage quality design. Accessory dwelling units, junior accessory dwelling units and accessory structures or buildings are appropriate. *Community uses and facilities, such as churches and schools, should be limited unless no net loss of housing would result.* (3/22/18 letter, page 8; Zoning Code, section 18.12.010, subd. (a) – emphasis added.)

Castilleja attempts to get around the zoning restriction by arguing that it is contributing to the neighborhood a park and a bike waystation, which does not address the R-1 intent that the neighborhood consists of primarily single-family housing. It also does not address the loss of housing at a time when the need is at an all-time high in Palo Alto.

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**4. Granting the variance would be detrimental and injurious to property in the vicinity and to the general welfare**

As discussed above, placing large, institutional buildings near residential neighborhoods presents two problems: 1) they are incompatible in size and design, and 2) they are challenging to repurpose given their surroundings. While Castilleja emphasizes that one colossal building will allow for a community park, the neighbors do not want a park, and it should not be up to Castilleja to force one upon them. The CP requires reuse of existing buildings to prevent waste and excessive filling of land dumps. The growth of the school population is the underlying cause for a substantial institutional structure, and with increased enrollment comes exacerbation of noise, deliveries, traffic, and the like.

For all for the above reasons, the city council should refuse to grant a variance.

**D. The City Must Include in the DEIR A Discussion About the Impacts of the Master Plan Due to it Not Conforming with the Zoning and Comprehensive Plan**

As I understand the timeline, the variance issue arose after the scoping session. Dudek completed the initial study in January 2017, and the Notice of Scoping Session was dated February 8, 2017. However, the application for a variance as to the new building was not sent to the city until a year later on March 22, 2018. PNQL did not realize that Castilleja planned to seek a variance to the FAR restriction at the time of the scoping comment period and public hearings. This is primarily due to Castilleja dribbling its plans and documents to the city, instead of having all of its documents ready for submission when the planner requested them. Even at this very late date, the plan showing the 84,572 square foot proposed structure has not been submitted to the city and therefore, it has not been made available to the public.

Under "Land Use and Planning," Dudek, the author of the Initial Study (3.10) states: "The proposed project has the potential to have significant impacts related to compatibility with neighboring land uses and thus land use impacts will be analyzed in the project EIR." (Page 31.) It concludes that no mitigations are necessary. However, it does not identify the conflict between the proposed project with the CP and the zoning code. The Initial Study requires study if the project would:

Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including . . . general plan . . . zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

CP policy L-2.9 (facilitating reuse of buildings) and L-3.1 (compatibility with adjacent structures) are related to environmental effects. L-2.9 removes the need for unnecessary disposal

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of building materials, and L-3.1 applies equally to the preservation of historic districts and structures, which are evident in the neighborhood surrounding Castilleja. Ordinance 5446, by its terms, was designed to make changes to the CP as a way to reduce traffic impacts, an environmental effect.

We look forward to the city council requiring Castilleja to submit a revised master plan that does not include requests for variances. Thank you for considering our comments.

Very truly yours,



Leila H. Moncharsh,, J.D., M.U.P.  
Veneruso & Moncharsh

LHM: lm

cc: Clients

Amy French (amy.french@cityofpaloalto.org)  
Jonathan.Lait (jonathan.lait@cityofpaloalto.org)  
James Keene (james.keene@cityofpaloalto.org)  
Ed Shikada (ed.shikada@cityofpaloalto.org)  
Molly Stump (molly.stump@cityofpaloalto.org)

**JORGENSEN, SIEGEL, McCLURE & FLEGEL, LLP**

**ATTORNEYS AT LAW**  
1100 ALMA STREET, SUITE 210  
MENLO PARK, CALIFORNIA 94025-3392  
(650) 324-9300  
FACSIMILE (650) 324-0227  
www.jsmf.com

WILLIAM L. McCLURE  
JOHN L. FLEGEL  
DAN K. SIEGEL  
DIANE S. GREENBERG  
JENNIFER H. FRIEDMAN  
MINDIE S. ROMANOWSKY  
DAVID L. ACH  
GREGORY K. KLINGSPORN  
NICOLAS A. FLEGEL  
KRISTINA A. FENTON  
CARA E. SILVER

JENNIFER A. BEYERS  
KIMBERLY B. SAMEK  
ADAM LAZAR

OF COUNSEL  
KENT MITCHELL  
LEIGH F. PRINCE

RETIRE  
JOHN D. JORGENSEN  
MARGARET A. SLOAN

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

October 9, 2018

**VIA EMAIL: Amy.French@cityofpaloalto.org**

Ms. Amy French, AICP  
Chief Planning Official  
Palo Alto City Hall, Planning and Community Environment  
250 Hamilton Avenue, 5<sup>th</sup> Floor  
Palo Alto, CA 94301

Re: Response to PNQL Letter (dated September 18, 2018) regarding Castilleja School Request for Variance to Maintain Existing Floor Area Ratio ("Variance Request") at 1310 Bryant Street and 1235, 1263 Emerson Street, Palo Alto ("Property"); [16PLN-00258; SCH#2017012052] ("Application")

Dear Ms. French:

On behalf of my client, Castilleja, I write to respond to a letter sent to the City on September 18, 2018, by Preserve Neighborhood Quality of Life ("PNQL"). As you are aware, the letter states that the City Council should refuse to grant the school a variance and demands that Castilleja revise its Master Plan application so as not to include a variance.

Castilleja has gone to lengths to make certain that the project complies with all legal requirements and meets the highest environmental standards. Although we view the PNQL letter as premature given that the school is in the midst of a thorough environmental review in accordance with the California Environmental Quality Act ("CEQA"), we feel compelled to briefly reiterate a few points for the record:

- Castilleja's Master Plan is currently the subject of a comprehensive environmental review, which will result in the publication of a Draft Environmental Impact Report ("DEIR").
- Upon publication of the DEIR, as mandated by CEQA, there will be ample opportunity for members of the public to review the findings and comment on the application, including the variance.

Ms. Amy French, AICP  
October 9, 2018  
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- These comments, as well as staff recommendations, will be considered as part of an overall approval process that will require review by the Planning and Transportation Commission and the City Council.
- During the public hearing process, we look forward to outlining the strong legal and factual underpinnings which support our variance request.

As we await the DEIR and the public comment process, Castilleja remains confident that its ultimate project will comport with the findings required by City Codes and will be supported by CEQA. Over the next few months, we look forward to going through the very public and transparent City process as any other applicant would.

Sincerely,

  
Mindie S. Romanowsky

cc: Client  
Jonathan Lait  
James Keene  
Ed Shikada  
Molly Stump  
James R. Sutton, Esq.

Michael M. Lyzwa Sr.  
Architect  
144 Kingsley Avenue  
Palo Alto, Ca. 94301

March 28, 2020

Dear PNQL,

PNQL is requesting a professional opinion regarding the numbers the school is using for Palo Alto Municipal Code allowed FAR and their proposed FAR. As neighbors who live in the area surrounding Castilleja School, you have asked me, as a licensed architect currently living and working in the city of Palo Alto, to write to discuss Floor Area Ratios regarding the school's latest set of expansion plans submitted to the city of Palo Alto on 2/10/2020.

Below is the result of my review:

Table 2 of PAMC 18.12.040 requires that buildings on a lot size of 268,783 may have a floor area ratio of .303. The lot square footage is 268,783, and **proposed** above ground school buildings is 115,895, per 2/10/20 school plan submission, page G.001, which results in an FAR of .43.

Castilleja **currently** has a floor area ratio of .43, according to figures supplied by the school and published in the DEIR. Castilleja is requesting a variance to re-build the new school with an FAR of .43. Per 18.70.100(e) the school, which is demolishing 5 school buildings to reconstruct, would require reconstruction to be subject to current "applicable laws regulations and procedures", or a FAR of .303.

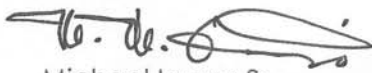
Additionally, per PAMC 18.12.060 (e), the school is required to add any underground garage square footage (35,310 square feet) to the FAR, which would require them to request a variance for an FAR of .56, which is a much bigger ask, almost doubling what muni code allows in this very large lot.

See attached calculations.

The school submitted a "request for variance" on March 22, 2018, asking for a floor area ration of .43 to be allowed, but the plans do not take the underground garage's square footage into consideration. The proposed FAR is .56.

In my opinion, in order for the school to maximize their school above ground square footage, the underground garage should be removed from the plans. Otherwise, the school buildings need to be reduced in size to allow for this facility and still keep within municipal code.

Very truly yours,



Michael Lyzwa Sr.  
Architect





From: [Andie Reed](#)  
To: [Architectural Review Board](#)  
Subject: Castilleja Neighbors" Packet  
Date: Friday, August 14, 2020 8:53:42 PM  
Attachments: [ARB-PNQLpacketAug2020.PDF](#)

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**CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.**

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Dear ARB members,  
(David and Peter already received hard copies of this packet today)

Here is some background on our neighborhood group PNQLnow.org. We have been organized for more than 4 years. We hope it will give you context as you review the Castilleja project, and will help you understand our perspective as we try to get the school and the City to limit the scope of the project.

Thanks,  
Andie  
PNQLnow.org

--

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



August 11, 2020

Dear Architectural Review Board Member,

We are a loosely organized group of neighbors of Castilleja who have been meeting and working together over the past 4 – 5 years to limit the expansion plans.

Attached is an introduction to who we are and what many of our neighbors are in agreement about, written by 10 of us who live on the surrounding streets. We are in the process of gathering signatures as we see the project working its way through the system and disagree with its overreaching aspects.

The attached Castilleja Neighbors Summary Statement and the additional 2 documents will give you our perspective and how we have tried to reasonably influence the process and get our concerns addressed.

Thank you.

*A. Reed Hank Sousa*

Andie Reed

Hank Sousa

PNQL steering committee members

**Proposed Castilleja School Expansion**  
**Summary Statement Prepared by Neighbors**

**Situation:** Castilleja, a private middle and high school located in an R-1 neighborhood, has submitted to the City of Palo Alto a proposal to significantly remodel its campus and increase enrollment by 30% (plus unspecified increases in faculty/staff).

Neighbors, who have already borne the brunt of the private school's significant growth over many years, challenge Castilleja's plan to increase the size and scope of its operation on this very small parcel. We urge the City to deny approval of an enrollment increase, and not permit the outsized redevelopment proposals, for the following reasons:

1. **Traffic congestion, crowded street parking, bike safety concerns on Bryant St. Bike Blvd.** Palo Alto seeks fewer traffics issues, not more. **75% of Castilleja's students and staff commute from outside Palo Alto**, with 4 car trips/day/student (drop-off and pick-up) adding congestion to all our main arteries. The neighborhood absorbs unrelenting impact from traffic, busses, parking, deliveries, events, sport meets, and more, on days, nights, weekends, and throughout the summer.
2. **Outsized nature of the project:** The school is proposing 200,000 sf of buildings on a one-block (268,000 sf) lot. For comparison, imagine a Costco ... or two City Halls or Home Depots ... located on one small block in a residential neighborhood.
3. **Castilleja's Conditional Use Permit (CUP) is far more lenient than neighboring private schools' permits.** Other private schools in Palo Alto and nearby towns are held to much stricter standards, such as specified hours of operation, less density, few or no night events, and none allow an underground garage in a residential neighborhood. Why is Castilleja exempt from similar conditions? No local private schools are permitted more than 20 events per year, Castilleja hosts 100+ events per year.
4. **The City should enforce its own Muni Code/Comprehensive Plan statutes.** Castilleja's use does not satisfy the City's definition of an R-1 conditional use which per PAMC 18.76.10 will "not be detrimental to the public health, safety, general welfare, or convenience (in the vicinity)" and shall "be located and conducted in a manner in accord with the Palo Alto Comprehensive Plan." The Comp Plan states that the city "seeks to promote community /commercial uses but not at the expense and quality of the residential neighborhoods." When the school was founded, it was a small boarding school. Its growth and future plans far exceed what is appropriate for this site.
5. **City's prior directive assuring the neighborhood of no future expansion.** In 2000, Palo Alto Planning Director John Lusardi was forceful in his CUP approval letter to Castilleja: "*The approved Conditional Use Permit does not provide for any increase in students over 415, and any subsequent request for additional students will not be favorably looked upon by the City. ... the City is not willing to continue to approach increasing school enrollment for Castilleja School in an incremental manner.*" The neighbors did not realize this cap would be ignored by Castilleja starting in 2001, and violations would go unenforced by the City. Why would the City ignore its own 2000 directive, favoring the school's desire to grow over the needs of Palo Alto residents?
6. **Continuous Violation -** Castilleja has exceeded its existing enrollment cap for the last 19 years, collecting millions of dollars from over-enrollment. The City is unable to enforce CUP violations, and neighbors have no viable enforcement or compliance leverage. Neighbors have no confidence that future CUP conditions will be met, nor that conditions will be improved with a significant increase in students, plus accompanying parents, teachers, staff, and visitors, coming daily to this small section of Palo Alto.

For years neighbors have asked the school to work together in good faith, asking the school to reduce enrollment to the allowed level, and institute a robust shuttle by which ALL students/staff would be delivered to campus. Instead the school has moved ahead with outsized plans, far more expansive than other schools are allowed (see chart attached.)

NO neighborhood would welcome this type of unbridled growth from a private entity in its midst. The City Council has an obligation to protect and preserve the rights of its citizens, and to enforce its own codes.

We urge the City to oppose this application. If the school wishes to expand, the City should require it to follow the example of other private schools and divide into two appropriately-sized campuses, or move to a larger location which will support as

many students as it desires, or require ALL arrivals/departures by shuttle from a satellite parking area, significantly reducing the impact not only on this neighborhood, and the Bike Boulevard, but on all Palo Altans.

Thanks for your time and attention.

– *Neighbors of Castilleja (surrounding blocks)*

July 2020

Al Kenrick	Melville Ave
Amber La	Kellogg St
Andie Reed	Melville Ave
Bill Schmarzo	Emerson St
Bill Powar	Emerson St
Bruce McLeod	Bryant St (SW corner Bryant and Kellogg)
Carla Befera	Bryant St (SW corner Bryant and Kellogg)
Carolyn Schmarzo	Emerson St
Chi Wong	Emerson St
David Quigley	Emerson St.
Debby Fife	Emerson St
Diane Rolfe	Emerson St (NW corner Emerson and Kellogg)
Ed Williams	Kellogg St
Geegee Williams	Kellogg St
Han Macy	Melville Ave
Hank Sousa	Melville Ave
Jim Poppy	Melville Ave
Joan MacDaniels	Emerson St
Joseph Rolfe	Emerson St (NW corner Emerson and Kellogg)
Kathy Croce	Emerson St (SW corner Melville and Emerson)
Kimberley Wong	Emerson St (NW corner Melville & Emerson)
Lee Collins	Embarcadero St
Marie Macy	Melville Ave
Mary Joy Macy	Melville Ave
Mary Sylvester	Melville Ave
Matt Croce	Emerson St (SW corner Melville and Emerson)
Midori Aogaichi	Churchill St
Nancy Strom	Melville Ave
Nelson Ng	Emerson St
Neva Yarkin	Churchill St
Pam McCroskey	Emerson St
Patricia Wong	Emerson St
Richard Mamelok, MD	Churchill St
Rob Levitsky	Emerson Street
Robert Yamashita	Bryant St (NE corner Bryant and Kellogg)
Val Steil	Kellogg St
Vic Befera	Bryant St
Wally Whittier	Bryant St
William Macy	Melville Ave
Ying Cui	Waverley St (SW corner Embarc & Waverley)
Yoriko Kishimoto	Embarcadero St
Yuri Yamashita	Bryant St (NE corner Bryant and Kellogg)



August 13, 2020

Description of Attached Document:

The attached "Summary of Castilleja's Concerns" was prepared by parents of a former Castilleja student. Ms. Minty Sidhu went around the neighborhood and knocked on doors and got some of us to sit down with her. She felt certain this controversy could be easily solved if people sat down together. We agreed with her, and spent a few weekends with Minty and her husband, Brian Suckow to explain the neighbors' distrust and past issues with the current school administration, and how the project currently under review could have been handled better.

Ms. Sidhu and Mr. Suckow wrote up a very thoughtful summary of their understanding of the situation.

## Summary of Castilleja Neighbors' Concerns Regarding the Proposed Expansion

This summary has been prepared for the Castilleja Board of Trustees by Minty Sidhu and Brian Suckow (Parents 2012 and Palo Alto residents) based on interviews of Casti neighbors during the summer and fall of 2018. Our objective was not to find solutions, but to understand neighbors' perspectives and communicate them in a non-emotional, unbiased manner to assist the Board in deciding how to move forward.

### Foundational Issues:

While there are many issues that surfaced in our conversations, there are two foundational issues that underlie and intersect with many of the more tactical issues:

- *Fit with Residential Neighborhood:* Casti is located in a neighborhood zoned as R1 residential, and the neighbors are seeking to maintain the residential feel of their neighborhood. Most of their tactical issues come back to this key overarching issue.
- *Trust in Castilleja's Administration:* Beyond the issue of exceeding the allowed enrollment from the existing CUP (and having to be forced to gradually go back down to that level only recently), neighbors have expressed significant concerns with:
  - How Casti's administrators have portrayed neighbors' issues publicly (e.g., insisting that neighbors had asked for an underground garage when the vast majority are opposed)
  - Why Casti's administrators failed to share neighbors' previously documented feedback more broadly, including with Casti's Board
  - What Casti's ultimate expansion goals are beyond the current request to increase to 540 students, given the size of the planned underground garage

### Process Issues:

Neighbors expressed great frustration with Casti's process, though to be fair, they conceded that Casti's Administration was likely equally frustrated. Areas for improvement include:

- *Collaborative Design:* One best practice of innovative Silicon Valley companies is to bring their customers into a collaborative design process. Viewing the neighbors as one important "customer" of the Casti expansion, and giving them a seat at the design table is likely to yield a compromise that improves the outcome for both Casti and the neighbors. Neighbors don't feel they have been included in the process.
- *Improved Communication:* Neighbors indicated a feeling that the twice per year meetings mandated by the existing CUP are "check the box" sessions, in which Casti's administrators are not sincerely interested in engaging in detailed dialogue. And beyond these required sessions, there is limited opportunity for effective communication.
- *Rigorous Monitoring:* The city of Palo Alto frankly fell down in its responsibility to monitor Casti's adherence to the previous CUP. Neighbors are concerned that without a more robust process in place by the city, history could repeat itself, even with good intentions from the Casti Administration.

### Tactical Issues:

Keeping these overarching foundational and process issues in mind may help the Board better understand the reasons behind many of the tactical concerns of the neighbors. The key tactical issues arranged in decreasing priority appear to be:

1. *Underground Parking Garage:* While Casti has indicated that some neighbors preferred an underground garage, it appears that the overwhelming majority of neighbors do not. Some months back, 47 surrounding households signed a petition opposing the garage, and the Casti Administration's continued insistence that

they're adding the underground garage because the neighbors want it has further eroded trust. The main reasons why neighbors are opposed to the underground garage include:

- *Fit with Neighborhood Character:* Underground garages are not permitted in R1 residential zones, and neighbors feel demolishing residences and trees in order to add this garage will detract from the residential feel of their neighborhood.

- *Traffic flow:* Neighbors are concerned with the concentration of all traffic having to enter from Bryant (with likely significant back-ups onto Embarcadero), and exit on Emerson.

- *Emissions:* Exhaust gases from the moving and idling vehicles will have to be released above ground, and this is likely to be noisy, smelly, and again out of character with a residential zone.

- *Large Scale:* The relative increase in parking spaces with the underground garage is much higher than the relative increase in enrollment. There are currently 81 parking spaces in the existing surface parking lots, and 51 on-street spaces along the three streets abutting Casti, for a total of 132. With the new plan, the garage will have 115 spaces, the surface parking lots will decline to only 27 spaces, and the 51 on-street spaces will remain, for a total of 193 spaces. This increase from 132 to 193 represents a 46% increase in parking. However, enrollment is only increasing from the current ~440 to 540, or 23%. This much larger % increase in parking versus the % increase in enrollment prompts suspicions that even now Casti is planning a subsequent phase of expansion beyond the 540, again leading to an erosion of trust.

2. *Traffic increase:* While some neighbors voiced praise for Casti's progress in reducing traffic through their TDM program, they remain concerned that increased enrollment and staff will inevitably lead to increased traffic. Arguments that most traffic is due to Paly or Stanford miss the point. Neighbors are most concerned with traffic on the streets where they live, not just on Embarcadero. Increased enrollment is bound to increase traffic in front of their homes on Bryant, Emerson, Kellogg, and Melville. And, due to likely back-ups with the underground garage flow, many parents are likely to drop off their children along these streets, rather than waiting in line to use the underground garage.

3. *Scale of the Proposed Building:* An analogy that may not be perfectly apt but that captures the essence of the concern is that the new buildings will be like those "McMansions" single family homes that have been criticized for their large scale and lack of fit with the character of the neighborhood. Having one monolithic building that stretches almost the entire length of the Kellogg Street block, and that has a smaller setback than the existing buildings, is felt to be out of character in this residential neighborhood.

4. *Construction duration:* This is a huge project, and initial projections of 5 years with massive excavations are quite daunting from the perspective of noise, dust, and general disruption. More recently neighbors have heard of new plans that may shorten the duration to 3 years. The neighbors are supportive of Casti updating their campus, but 3 to 5 years of construction is perceived as excessive in a residential neighborhood.

5. *Events:* With roughly 100 events annually, there are many evenings and weekends when neighbors' routines are disturbed by the comings and goings of attendees at Casti's events. The current level is perceived as excessive, and out of character with an R1 zone, and there are concerns that further expansion will exacerbate this situation.

6. *Casti's Continued Expansion:* Based on Casti buying up multiple properties in the adjoining neighborhood, and the seemingly "super sized" underground garage, neighbors are concerned that shortly after expanding to 540 students, Casti has plans to further expand. When the last CUP was granted in the 1990's, the city stated that the maximum enrollment to be permitted was 415. Neighbors are wondering that if the maximum enrollment is now permitted to rise to 540, what ultimate cap on enrollment is Casti willing to commit to in their residential neighborhood?



August 13, 2020

Description of Attached Document:

During late 2017, we worked with Palo Alto Mediation Program to try to come to "the table" with Castilleja's decision makers. We met with two members of PAMP for many hours over a few weeks. They, in turn, were meeting with the school.

In order to get as best a consensus as possible among the residents surrounding Castilleja, we put together a "Neighborhood Facilitated Meeting" at the Art Center at Rinconada. We had a good turnout (35 people came) and used a PAMP facilitator to run the meeting and tally the needs and interests of the group. Ric Johnson provided the summary, with our help; see attached.

As it turned out, just before the mediation was to start, the school listed who they would send to meet with us, and it was an administrator, their PR person, and 4 parents. We were deeply disappointed (although not surprised) that they didn't take the mediation idea seriously. We had insisted all along that decision-makers from the school would be at the table. Thus, it fell apart; but we got some good input from neighbors during early 2018.



## **PNQL's Guiding Principles**

### **Neighborhood Facilitated Meeting, March 1, 2018**

1. Establish and preserve the quiet enjoyment, appearance and livability of our R-1 zoned residential neighborhood.
2. Reach an open, honest and trusting partnership between Castilleja and its neighbors that is based on mutual accountability, verifiable commitments, and detailed conceptual plans that are shared early in the planning process.

## PNQL's Prioritized Concerns

Neighborhood facilitated meeting, Mar 1, 2018

1. **Further encroachment by Castilleja will change the look and feel of the neighborhood by demolishing homes, uprooting trees, and building an underground garage.**
  - a. Removal of trees and single-family residences to construct the proposed garage will cause permanent aesthetic and environmental damage to our R-1 residential neighborhood
  - b. A garage on Emerson street would result in institutionalizing the short block of Emerson, currently a residential street, and residential rental stock will be reduced.
  - c. School has already taken the 200-block of Melville, neighbors want end to changing the face of the neighborhood by Castilleja.
2. **Too many students**
  - a. Enrollment already too high, need to reduce profile by reducing students and staff to fit this small acreage
  - b. School can split campus between grades 8 and 9 and grow, accommodating many more deserving girls.
3. **Safety issues**
  - a. Proposed garage impedes flow of traffic; more cars will enter neighborhood to drop girls; cars, pedestrians, bikes along Bryant Bike Blvd will suffer increased congestion.
  - b. Embarcadero & Emerson, Embarcadero and Bryant already are dangerous corners; yet these are listed as planned ingress and egress for garage.
4. **Inappropriate use of R-1 zoned land;**
  - a. the negative impacts from the combined impact of Castilleja's project, growing traffic from Stanford, and major infrastructure (trains) needs to be addressed in Castilleja's proposed plan.
  - b. Keeping Castilleja the historic, bucolic campus by modernizing buildings would be best-use of site and environmental sustainable; respectful consideration of neighbors needs to be a goal of the school.
  - c. Negative impacts of the high volume of drop-off and pick-up traffic on Kellogg Ave during weekdays; school needs to use shuttles, buses, and interior drop-offs
5. **Adverse impacts of too many weeknight and weekend events.**
  - a. Neighbors need quiet and relaxation during weeknights and weekends, relief from constant traffic and monitors
  - b. Neighbors are interested in the school establishing hours of operation with a set number of events that are published and adhered to.
6. **An extended period of disruption to the neighborhood caused by the proposed construction project.**
  - a. Demolition will cause pollution, excessive noise, potential de-watering
  - b. 5-6 years of construction presents risks to the health and well-being of the surrounding residents
  - c. Staging construction vehicles will damage and clog our narrow streets and possibly block driveways and impede movement.

From: [Hank Sousa](#)  
To: [Architectural Review Board](#)  
Subject: PNQL documents for you  
Date: Tuesday, August 11, 2020 3:51:03 PM

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**CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.**

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Hi Board Members:

I would like to send a packet to Grace, Alex and Osma which has some documents prepared by the neighborhood group trying to limit Castilleja's expansion plans.

I am meeting with Peter and David on Friday afternoon and will give them packets after our brief meeting. Would you three others email me your addresses and I will drop the slender packets in the mail. They are stamped and ready to go. Alternatively I can give your packets to Peter or David to pass on to you. We'd like you to have a couple of days to review them before the issue comes before you on August 20th.

Many thanks,

Hank Sousa

PNQL steering committee member

From: [Tom Shannon](#)  
To: [Architectural Review Board](#); [Planning Commission](#); [Council, City](#)  
Cc: [akcooper@pacbell.net](mailto:akcooper@pacbell.net); [carlab@cb-pr.com](mailto:carlab@cb-pr.com); [mcleod.bruce@gmail.com](mailto:mcleod.bruce@gmail.com); [Tom Shannon](#)  
Subject: Castilleja Alternative Plan - Neighbors may have a solution  
Date: Friday, August 7, 2020 2:40:00 PM  
Attachments: [Castilleja Alternative Plan - Draft 8.04.2020.pdf](#)

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To members of Palo Alto's ARB, PTC and City Council:

Attached for your review and study is a new alternative plan to Castilleja's current proposed plan. This new plan was developed by myself, a neighbor of the school, in collaboration with other nearby residents (copied on this email). As you know, the school's current plans are meeting with considerable resistance from the broader neighborhood, and its recent FEIR contains multiple "significant and unavoidable impacts" to the city and environs.

When compared to Castilleja's current plan, we think this plan is orders of magnitude more favorable to all stakeholders - Castilleja, the neighborhood, City, bicyclists, Palo Alto students commuting to Walter Hayes, Greene Middle or Palo Alto High School, cars, traffic and all surrounding residents.

Advantages of this alternative plan: it dramatically improves bicycle safety on the Bryant Street bike corridor, it greatly enhances the future possibility of using Kellogg as a safer bike corridor to Palo Alto High School, it relieves all car congestion traffic and parking on all the surrounding neighborhood streets, it eliminates the garage entrance or exit off of public streets and it could actually improve traffic flow on Embarcadero.

We hope you agree this approach has significant merit, and could deliver a win-win outcome for this thorny issue.

We welcome your study, review and comments.

Tom Shannon – 256 Kellogg Ave.  
Alan Cooper – 270 Kellogg Ave.  
Carla Befera – 1404 Bryant St.  
Bruce McLeod – 1404 Bryant St

From: [Mary Sylvester](#)  
To: [Architectural Review Board](#)  
Subject: Neighbors of Castilleja School Request a Meeting with You  
Date: Thursday, July 30, 2020 5:11:25 PM

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**CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.**

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Good Evening, Commissioners.

Now that the Castilleja FEIR has been published and is available for general review, I am writing to request a meeting with each of you to discuss the neighborhood's perspective on the document. In attendance at the meeting, will be 6-8 neighbors who are actively involved and knowledgeable about the school's project.

Given that the ARB meeting to publicly review and discuss the FEIR is occurring on August 20th, neighbors believe it is critical for us to meet with you as soon as possible. We are happy to accommodate your schedules and can meet with each of you individually or in pods of two commissioners at a time. Time is of the essence as we have the PTC meeting to review the FEIR the following week on August 26th.

Please let me know your availability for a meeting over the next week.

I look forward to hearing from you.

Appreciatively,  
Mary Sylvester  
(650) 3787-2129

On 05/29/2020 1:45 PM Architectural Review Board <[arb@cityofpaloalto.org](mailto:arb@cityofpaloalto.org)> wrote:

Thank you for your comments to the Architectural Review Board. Your e-mail will be forwarded to all Board Members and a printout of your correspondence will also be included in the next available packet.

If your letter mentions a specific complaint or a request for service, we'll either reply with an explanation or else send it on to the appropriate department for clarification.

We appreciate hearing from you.