



Planning & Transportation Commission

Staff Report (ID # 7794)

Report Type: Action Items **Meeting Date:** 3/8/2017

Summary Title: Castilleja EIR Scoping Meeting

Title: 1310 Bryant Street [16PLN-00258]: The Planning and Transportation Commission Will Hold a Public Scoping Meeting on the Notice of Preparation for an Environmental Impact Report for the Castilleja School Expansion Project. Public Input is Encouraged. For More Information, Please Visit the Webpage at http://www.cityofpaloalto.org/gov/topics/castilleja_school/default.asp or Contact Amy French at amy.french@cityofpaloalto.org.

From: Hillary Gitelman

Recommendation

It is recommended that the Planning and Transportation Commission (PTC) take the following action(s):

1. Conduct a meeting to allow the public to participate in an Environmental Review Scoping Meeting for the Castilleja School Expansion project.

Report Summary

Castilleja School is a private, all-girls school in Palo Alto. The school seeks city approval to expand its enrollment and for a major phased renovation of the school property. As currently proposed, different aspects of this project will require review by the PTC, the Architectural Review Board, and ultimately, a decision by the City Council.

As part of the review process, the City is preparing an Environmental Impact Report (EIR) to evaluate potential environmental impacts pursuant to the California Environmental Quality Act (CEQA). Staff and its consultants have identified several environmental issues that warrant further analysis and review. This preliminary review, an Initial Study (IS), is attached to this report as Attachment B.

The purpose of this public meeting is to provide interested persons an opportunity to comment on environmental issues they think the city should examine or study in the EIR. This type of meeting is referred to as a scoping meeting in CEQA and is required for certain projects. While not legally required for this project, having an opportunity like this for early public consultation can be helpful to all parties.

The PTC's role in this meeting is to provide an opportunity for public comment and to offer its own perspective about issues that should be studied. Importantly, this meeting is not intended to serve as a forum for dialogue about the merits of the project. In fact, the PTC's own purview on the project is limited to the anticipated parcel map. There will be future, noticed, public hearings that will provide an opportunity for public comment on the proposed project.

Background

Project Information

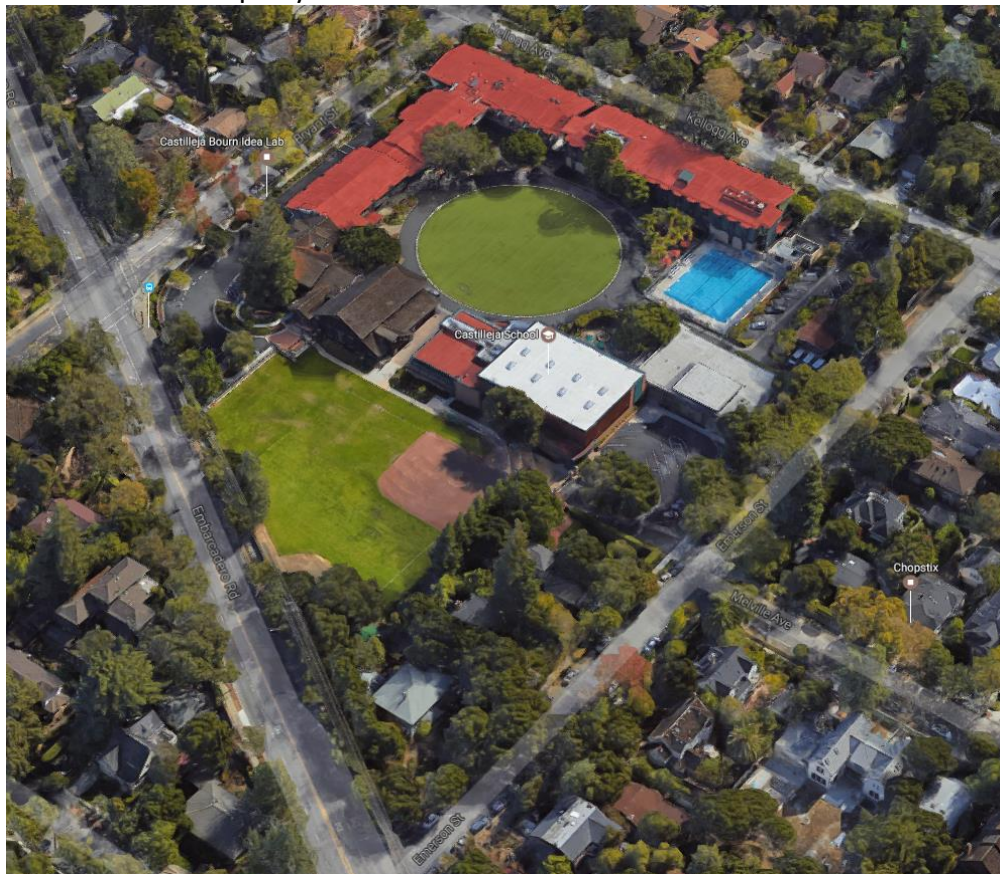
Owner:	Castilleja School
Architect:	Steinberg
Representative:	Kathy Layendecker
Legal Counsel:	Mindie Romanowski

Property Information

Address:	1310 Bryant Street, and 1235 and 1263 Emerson Street (all owned by Castilleja and located within R-1 (10,000) Zone District)
Neighborhood:	Seale Addition (located south of Embarcadero Rd west of Alma St)
Lot Dimensions & Area:	Project site is 286,783 sf comprised of three parcels. • APN 124-12-034 (1310 Bryant, school site) frontages: 500' on Kellogg Av; 406.6' on Bryant St; 429.4' on Embarcadero Rd.; 430' on Emerson St. • Project site includes two additional parcels, 100 feet deep adding 180' of frontage to Emerson St. for Castilleja School (site's total frontage on Emerson would be 610'): ○ APN 124-12-031 (1235 Emerson, "Emerson House" aka 'Lockey/Alumnae House', 75' on Emerson St, a rental housing unit on a nonconforming 7,500 sf lot) ○ APN 124-12-033 (1263 Emerson, "Head's House", 105' on Emerson St, no longer used as a housing unit).
Housing Inventory Site:	No
Located w/in a Plume:	No
Protected/Heritage Trees:	Yes
Historic Resource(s):	Yes. The administration building and former chapel are listed historic resources (Category 3) on the City's Historic Resources Inventory. Other buildings on Castilleja property are more than 45 years but are not listed on any inventory. Attachment E provides a brief summary of the campus' development history.

Existing Improvement(s):	Approximately 105,700 square feet of floor area above grade, plus basement area below grade; buildings are one, two and three stories; established at current address in 1910
Existing Land Use(s):	Private all-girls school and housing
Adjacent Land Uses & Zoning:	North: single family residential; R-1(10,000) i.e. 10,000 sf min lot size West: Single family residential; R-1 i.e. 6,000 sf minimum lot size East: single family residential (R-1 10,000) South: single family residential (R-1 10,000)
Special Setbacks:	Embarcadero Road 24 feet

Aerial View of Property:



Land Use Designation & Applicable Plans/Guidelines

Zoning Designation:	R-1 (10,000), Single Family Residential with 10,000 sf min. lot size
Comp. Plan Designation:	Single Family Residential
Context-Based Design:	Not Applicable in R-1 Zoning Code Regulations
Downtown Urban Design:	Not Applicable
SOFA II CAP:	Not Applicable
Baylands Master Plan:	Not Applicable
ECR Guidelines ('76 / '02):	Not Applicable
Proximity to Residential Uses or Districts (150'):	Yes, residences on project site and across all bounding streets
Located w/in AIA	Not Applicable

(Airport Influence Area):

Prior City Reviews & Action

City Council:	None.
PTC:	None.
HRB:	None.
ARB:	None. Prior projects on campus were reviewed by the ARB.
Other:	Code Enforcement Case related to exceeding student enrollment cap of CUP issued in 2000; Penalties were paid for exceeding the cap; submittal of CUP revision application required for City to consider allowing enrollment exceeding the cap.

Project Description

The Castilleja School has been located at its current site in a single family R-1(10,000) zoning district for over 106 years. It currently serves grades six through 12. A brief summary of the history of the campus and City approvals is provided as Attachment E to this report. Under the current zoning code, a Conditional Use Permit (CUP) is required for the establishment and amendment of private school use in the R-1 zones. The applicant, Castilleja School Foundation, requests an increase in student enrollment from the current CUP cap of 415 students (and current enrollment of 438 students) to a maximum of 540 students over the course of a phased implementation plan requiring Architectural Review approval. The applicant's narrative about the project, as of June 2016, is attached to this report (Attachment F).

Castilleja School Foundation (CSF) proposes to increase enrollment by 27 students each year and make the increases contingent on strict transportation demand measures such as a "cap" on student trips by automobile, as well as on specific physical improvements to the site. There would be no change to the amount of above-grade floor area that exists on the site, however there would be an increase of approximately 26,700 sf below-grade academic space and a below-grade parking structure. The existing above-grade floor area is approximately 105,700 square feet (sf). The building coverage is proposed to be reduced on the site by approximately 1,200 sf.

The school's facilities include an administrative building, a maintenance facility, a chapel theater, classrooms, a gymnasium, pool, above ground parking areas, athletic fields, and a dining hall. The project proposal is to demolish two homes on adjacent Castilleja-owned parcels (at 1235 and 1263 Bryant) and merge the two parcels into the Castilleja campus parcel to create a below grade garage. In a future phase, Castilleja would demolish four existing buildings and replace them with a single building. The applicant seeks to expand enrollment and redevelop the existing campus in three construction phases:

- 1. Construct a below-grade parking structure under the merged parcels to accommodate 130 vehicles, re-route drop-off and pick-up through the garage, and increase enrollment to a maximum of 490 students;**

2. **Relocate the existing pool, complete bikeway station on Bryant Street Bicycle Boulevard, and increase enrollment to a maximum of 520 students; and**
3. **Relocate deliveries and waste pick-ups further from the street and below grade, reduce number of food service deliveries by 10%, implement a sustainability plan, and increase enrollment to a maximum of 540 students.**

The applicant also proposes to increase the number of off-street parking spaces from 73 to 170; 130 spaces would be located below ground and 40 spaces would be in surface parking lots. The amount of open space would also increase by 6,182 square feet. Finally, the project includes a Transportation Demand Management Plan to offset transportation impacts and a proposal for no net new automobile trips, as well as a Sustainability Program. These submittals are found on the website.

The following discretionary applications would be subject to Council review and decision in conjunction with a decision on the EIR:

- **Conditional Use Permit (CUP) and Variance:** The process for evaluating a CUP amendment application and a Variance request is set forth in the Palo Alto Municipal Code (PAMC) Chapter 18.77. Variance and CUP applications are evaluated to specific findings. All findings must be made in the affirmative to approve the project. The CUP is a request to expand enrollment in phases associated with future Architectural Review processes. In response to the Notice of Incomplete, the applicant communicated to staff that an application for a Variance will be submitted to request setback encroachments for the proposed below-grade parking garage.
- **Preliminary Parcel Map with Exceptions:** In response to the Notice of Incomplete, the applicant indicated a proposal to submit an application for a Parcel Map with Exception. The exception would be to allow the R-1 (10,000) zoned lot supporting the school, already greater than the maximum residential lot size of 10,000 sf, to be increased in size to add the two Emerson Street fronting parcels. The maximum lot size in the R-1 (10,000) Zone is 19,999 square feet. The map would also enable the consolidation of small lots underlying the existing campus site. The proposal is to remove the rental housing unit at 1235 Emerson and the former housing unit at 1263 Emerson (in use for other school functions for the past six years) in order to place a below-grade parking garage beneath the existing school site parcel and the two Emerson Street parcels. While 1235 Emerson is smaller than the minimum lot size for the R-1(10,000) zone district, 1263 Emerson (at 10,500 sf) exceeds the minimum lot size for the zone district.
- **Architectural Review (AR):** The process would include review and recommendation by the ARB to Council of the Phase 1 proposal and concepts for a phased development Master Plan prior to PTC review of the draft EIR. The HRB would also conduct reviews of the project, since Castilleja School is a listed historic resource on the City's inventory of

historic resources. The ARB's formal review of the conceptual master plan and underground garage plan would focus on a first phase to:

- (1) remove two residential buildings at 1235 Emerson Street (rental home) and 1263 Emerson Street ("Emerson House" on GIST map), or as noted on plans, Locket Alumnae House and Existing Head's House, and
- (2) construct a below-grade garage of approximately 50,500 sf for 130 parking spaces below contiguous Castilleja-owned parcels, in order to increase on-site parking by 133%, and re-route circulation, and enable an associated enrollment cap of 490 students.

Additional AR phases would be associated with requested student enrollment caps of 520 and 540, which would be contingent upon approval of these future AR applications. For the purposes of Environmental Review, while the AR application is focused on the more detailed first phase, the concepts for future phases that constitute the "master plan" are also being studied and reviewed at the same time; the 'totality' of the project must be considered at this time as related to the requested increase in enrollment.

Environmental Review

As noted, the purpose of this PTC meeting is to conduct a Scoping Session to "kick-off" the environmental impact report preparation process. Attachment D is provided as a primer on the environmental review report process for this project.

The subject project has been preliminarily assessed in accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the City. The Scoping Session is the first stage in the environmental review process when the Lead Agency has determined an Environmental Impact Report (EIR) is required for the project. The attached Draft Initial Study (IS, Attachment B) and Notice of Preparation (Attachment C) were circulated to the State Clearinghouse and notice was provided as per CEQA guidelines.

Initial Study

The attached IS does not provide any analysis or substantial evidence for the topics that will be evaluated in the EIR. The IS notes the project has the potential to result in significant impacts and that it could meet specific conditions set forth in CEQA (as further described in Attachment D), necessitating detailed analysis. It is possible that sufficient mitigation measures could be developed to reduce impacts to 'less than significant' levels. It is also possible that mitigation measures would not reduce impacts and that Council could consider adopting a Statement of Overriding Considerations.

The Draft IS identifies several topic areas needing further study, and several potential adverse impacts upon the environment; it was published on January 23, 2017. The IS notes the project as having potentially significant impacts in the following categories: Aesthetics, Air Quality,

Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Land Use and Planning, Noise, Transportation and Traffic, and Tribal Cultural Resources. The City's consultant is having separate technical studies prepared by subject matter experts. These include a historic resources evaluation and a traffic study. The scope for the traffic study is attached to this report (Attachment K). The applicant is also preparing a geotechnical study for the City's review and use as a source document for the Draft EIR. The applicant is studying the potential for relocation of the Emerson access ramp to align with Melville Avenue, which would likely result in reconfiguration of below-grade parking spaces. The applicant is also preparing revisions to the plans to describe the revised proposal for the Circle. These proposals would be analyzed by the City and City's consultant, with potential for revisions to the technical studies.

The Architectural Review Board (ARB) and Historic Resources Board (HRB) will also review the IS and project and will have the opportunity to comment on the Draft EIR. The recommendations of the ARB, HRB, and PTC will be forwarded to Council, who will be the decision-making body for the project and will make the final determination with respect to the EIR and project. The Council may approve or deny the project. If the Council approves the project, the Council may adopt mitigation measures to lessen the identified environmental effects; Council may also consider making a statement of overriding considerations related to impacts that are not mitigated to "less than significant" status.

Notification, Outreach & Comments

Notice of the scoping meeting for the EIR this project was published in the *Palo Alto Weekly* on January 20, 2017 which is 19 or more days in advance of the meeting. The City's webpage provided an announcement as well, and postcards were mailed January 23, 2017, which is 17 days in advance of the meeting. In response to a request for extension of the comment period, staff issued a revised Notice of Preparation (NOP) to extend the comment period to March 15, 2017. The original NOP was forwarded to the State Clearinghouse allowing a 30-day comment period (Attachment M).

The applicant provided information about the multiple outreach meetings Castilleja has conducted over the past several years. A summary of outreach efforts prior to submittal of the application is found on the City's website for this project: http://www.cityofpaloalto.org/gov/topics/castilleja_school.asp. Additional outreach meetings have taken place since the application was submitted. Staff has also met with neighbors separately and initial neighbor comments (Attachment I) were shared with the applicant. The neighbors had also presented concerns to Council in early 2016 (Attachment J). These neighbor comments are linked to the website.

Additionally, staff attended one meeting Castilleja School held in on campus in advance of the removal of an on-site Redwood Tree. The date of that meeting was October 18, 2016. Prior to the meeting, a tree removal permit was filed and approved, based on the applicant's arborist report of September 2016 (<http://www.cityofpaloalto.org/civicax/filebank/documents/54272>). Following the community meeting, a second arborist report was prepared for a neighbor to

further study the tree; the study is found at <http://www.cityofpaloalto.org/civicax/filebank/documents/54449>.

Finally, many public comments on the project collected prior to the printing of this staff report are attached (Attachments N and O). Comments submitted at a later time will be provided at PTC members' places and the public table in the Council Chambers. Any comments on the IS and scope of the EIR received by staff up until March 15, 2017 will be forwarded to the City's consultant for consideration during preparation of the draft EIR.

Report Author & Contact Information

Amy French, AICP, Chief Planning Official
(650) 329-2336
Amy.french@cityofpaloalto.org

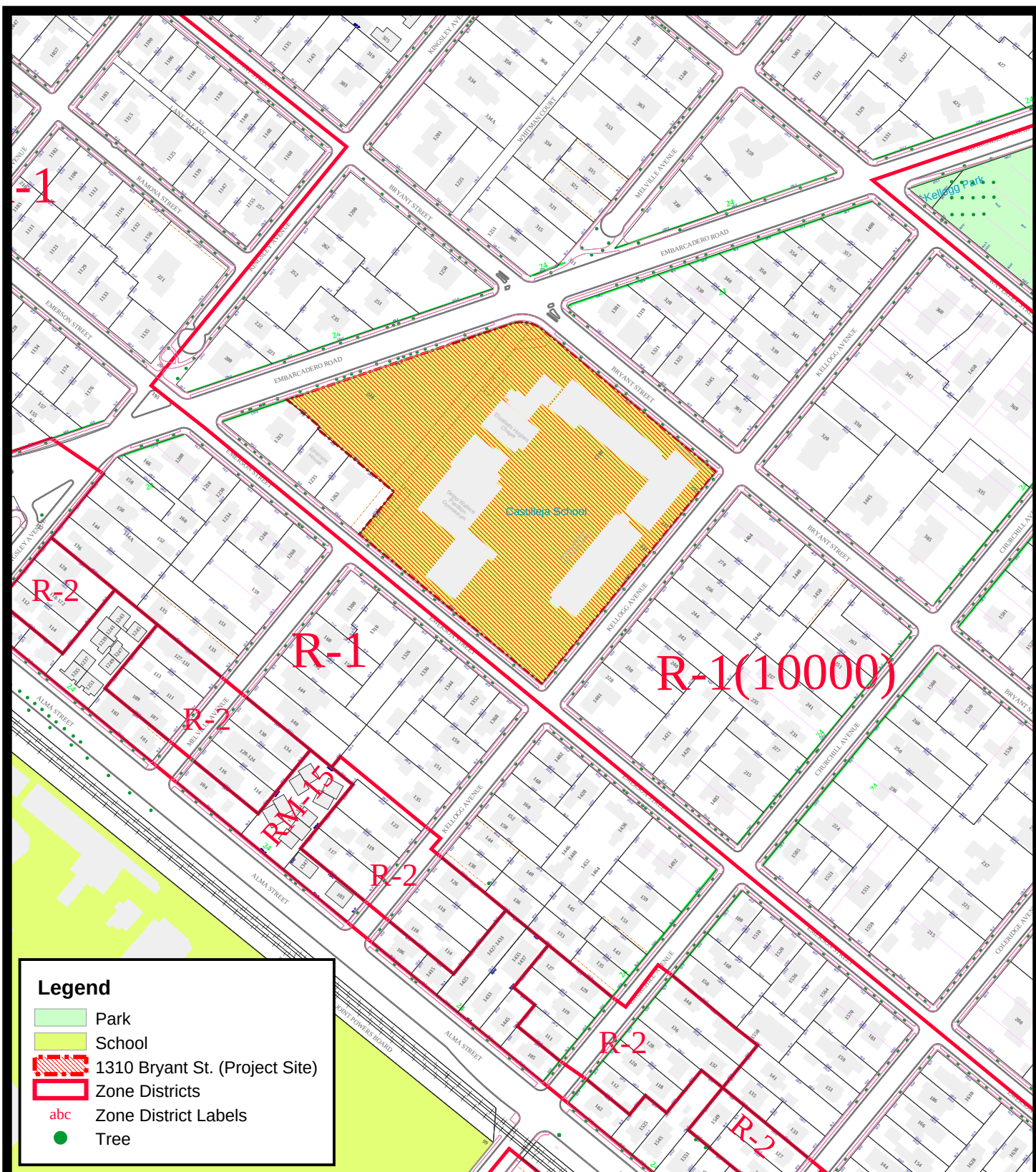
PTC¹ Liaison & Contact Information

Jonathan Lait, AICP, Assistant Director
(650) 329-2679
jonathan.lait@cityofpaloalto.org

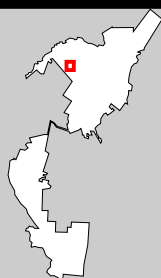
Attachments:

- Attachment A: Location Map (PDF)
- Attachment B: Initial Study (PDF)
- Attachment C: Notice of Preparation (DOCX)
- Attachment D: A CEQA Process Summary for PTC Scoping Session on Castilleja (DOCX)
- Attachment E: History of Campus Development and CUPs (DOCX)
- Attachment F: Applicant Narrative June 2016 (PDF)
- Attachment G: Applicant Letter August 2016 Regarding Enrollment and Applicant Email 1-31-17 (PDF)
- Attachment H: Scanned Project Plans (PDF)
- Attachment I: Neighbors Submittal July 25, 2016 (PDF)
- Attachment J: Statement to Council Members 3.10.16 TS City Council Letter Sept 11 2016 (PDF)
- Attachment K: W-Trans Scope 10-21-16 (PDF)
- Attachment L: Neighbors' Attorney's Letter to French. January 30 2017 and Response to Neighbors Attorney's Letter January 31, 2017 (PDF)
- Attachment M: Filing with State Clearinghouse (PDF)
- Attachment N: Castilleja Support Emails as of February 1, 2017 (PDF)
- Attachment O: Neighbor Emails as of February 1, 2017 (PDF)
- Attachment P: Castilleja NOP Jan 2017 revised (PDF)
- Attachment Q: Stan Shore February 1 email (PDF)
- Attachment R: Castilleja Correspondence Feb. 2 through Feb 8 (PDF)
- Attachment S: Correspondence with residents February 6 through March 1 (PDF)
- Attachment T: Comments from DTSC(PDF)

¹ Emails may be sent directly to the PTC using the following address: planning.commission@cityofpaloalto.org



The City of
Palo Alto



1310 Bryant St.
Castilleja School
(Project Site)
with
Zoning Districts
Area Map

This map is a product of the
City of Palo Alto GIS



0' 250'

**Castilleja School
Conditional Use Permit and Master Plan
Initial Study**

Prepared for:

City of Palo Alto
250 Hamilton, 5th Floor,
Palo Alto, California 94301
Contact: Amy French, Chief Planning Official

Prepared by:

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

JANUARY 2017

TABLE OF CONTENTS

<u>Section</u>	<u>Page No.</u>
ACRONYMS AND ABBREVIATIONS	II
1 INITIAL STUDY CHECKLIST	1
2 SUMMARY OF FINDINGS	5
2.1 Environmental Factors Potentially Affected.....	5
2.2 Environmental Determination.....	5
3.1 Aesthetics.....	7
3.2 Agriculture and Forestry Resources.....	8
3.3 Air Quality	9
3.4 Biological Resources	12
3.5 Cultural Resources	16
3.6 Geology and Soils	17
3.7 Greenhouse Gas Emissions.....	18
3.8 Hazards and Hazardous Materials	19
3.9 Hydrology and Water Quality.....	23
3.10 Land Use and Planning	27
3.11 Mineral Resources	28
3.12 Noise	28
3.13 Population and Housing.....	30
3.14 Public Services.....	31
3.15 Recreation	32
3.16 Transportation and Traffic	33
3.17 Tribal Cultural Resources	34
3.18 Utilities and Service Systems.....	35
3.19 Mandatory Findings of Significance.....	38
4 REFERENCES AND PREPARERS	40
4.1 References Cited	40
4.2 List of Preparers.....	41
 FIGURES	
Figure 1 Regional Location.....	43
Figure 2 Site and Vicinity	45
Figure 3 Aerial Map	47
Figure 4 Comprehensive Plan and Zoning Designations	49

Castilleja School Initial Study

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ACM	Asbestos containing material
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BMP	Best management practices
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
LCM	Lead-containing materials
NPDES	National Pollution Discharge Elimination System
O3	Ozone
PCB	Polychlorinated biphenyls
PM10	Coarse particulate matter
PM2.5	Fine particulate matter
RWCQB	Regional Water Quality Control Board
TDM	Transportation Demand Management

Castilleja School Initial Study

1 INITIAL STUDY CHECKLIST

This Initial Study evaluates the potential environmental effects that would result from the proposed remodeling of the Castilleja School. This Initial Study has been prepared to satisfy the environmental review requirements under the California Environmental Quality Act (CEQA) applicable to the City of Palo Alto consideration of the proposed project.

1. Project title:

Castilleja School Conditional Use Permit and Master Plan

2. Lead agency name and address:

City of Palo Alto
Department of Planning and Community Environment
250 Hamilton, 5th Floor,
Palo Alto, California 94301

3. Contact person and phone number:

Amy French, Chief Planning Official
(650) 329-2336

4. Project location:

1310 Bryant Street and 1235 and 1263 Emerson Street, Palo Alto, CA 94301. Project site is 286,783 square feet comprised of three parcels: (1) APN 124-12-034 (1310 Bryant, school site), (2) APN 124-12-031 (1235 Emerson, “Emerson House” aka ‘Lockey/Alumnae House’, 75’ on Emerson St), and (3) APN 124-12-033 (1263 Emerson, “Head’s House’, 105’ on Emerson St).

5. Project sponsor’s name and address:

Castilleja School Foundation
Kathleen Layendecker
1310 Bryant Street, Palo Alto, CA 94301

6. General plan designation:

Single Family Residential

Castilleja School Initial Study

7. Zoning:

R-1(10,000)

8. Description of project:

Location:

The proposed project will occur at the existing Castilleja school in Palo Alto, California, as shown in Figure 1, Regional Location, and Figure 2, Site and Vicinity. Construction and operation educational facilities is allowed under the project site's single-family residential land use designation and R-1(10,000) zoning designation.

Objectives:

1. Increase parking on-site.
2. Improve vehicular, pedestrian, and bicycle access for students and staff.
3. Reduce the number of service deliveries and relocate deliveries within the campus to decrease nuisance effects to neighbors.
4. Provide new structures that integrate state-of-the-art technology and teaching practices and retain flexibility to adapt to unanticipated changes.
5. Achieve better architectural compatibility with the adjacent neighborhoods and improve site aesthetics through landscaping.
6. Increase student enrollment from 438 to 540 students (the City Manager authorized enrollment of 438 students in excess of the 2000 Conditional Use Permit cap of 415 students, based upon (1) successful TDM/trip reduction and (2) entering into the Conditional Use Permit amendment process)
7. Ensure no increase in vehicle trips to and from the campus during AM and PM peak hours relative to existing (baseline) traffic volumes.
8. Improve the campus's sustainability and energy efficiency.

Description:

Castilleja School is an all-girls private school in Palo Alto that has been educating 6th to 12th grade girls since 1907 and has been located at the current site since 1910. As shown in Figure 3, Existing Site, the school's facilities include administrative buildings, chapel theater, classrooms, a gymnasium, pool, above ground parking area, playing area, and

Castilleja School Initial Study

track. The project proposal is to demolish two homes on adjacent Castilleja-owned parcels (at 1235 and 1263 Bryant) and merge the two parcels into the Castilleja campus parcel via Parcel Map with Exception, and demolish four existing buildings within the current campus and replace them with a single building. The applicant seeks to expand enrollment and redevelop the existing campus in three construction phases:

1. Construct a below-grade parking structure under the merged parcels to accommodate 130 vehicles, re-route drop-off and pick-up through the garage, and increase enrollment to a maximum of 490 students;
2. Relocate the existing pool, complete bikeway station on Bryant Street Bicycle Boulevard, and increase enrollment to a maximum of 520 students; and
3. Relocate deliveries and waste pick-ups further from the street and below grade, reduce number of food service deliveries by 10%, implement sustainability plan, and increase enrollment to a maximum of 540 students.

In order to accomplish the proposed project, Castilleja School Foundation has submitted an application to amend the school's existing Conditional Use Permit and an Architectural Review application. Including future phase construction of a new campus building, the project would result in an increase in the total building square footage within the campus by 26,700 square feet, all of which would be below grade - above grade the square footage would remain the same. The applicant also proposes to increase the number of off-street parking spaces from 73 to 170. Of these, 130 would be below ground and 40 of which would be in surface parking lots. This would reduce the number of above ground spaces by 33 spaces. The amount of open space would also increase by 6,182 square feet. Finally, the school has proposed to meet a "no new AM or PM Peak hour trips" standard as a condition of project approval and the project includes a Transportation Demand Management Plan to achieve this. The project also includes implementation of a Sustainability Program at the school.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The project site is surrounded by residential land uses, predominantly single-family residences. Embarcadero Road, a residential arterial, forms the northern boundary of the project site.

Castilleja School Initial Study

- 10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

The proposed project would not require discretionary approvals from any agency other than the City of Palo Alto.

- 11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?:**

No tribes that are traditionally and culturally affiliated with the project area have requested consultation pursuant to Public Resources Code section 21080.3.1.

2 SUMMARY OF FINDINGS

2.1 Environmental Factors Potentially Affected

This Initial Study considers the environmental issues identified in Appendix G of the CEQA Guidelines. Where impacts have the potential to be significant, those impacts will be analyzed within the project Environmental Impact Report (EIR).

2.2 Environmental Determination

As shown in the Initial Study, the proposed project has the potential to have some significant impacts. Therefore, in the areas identified below, an EIR is appropriate to evaluate the potentially significant impacts.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| ☒ Aesthetics | ☐ Agriculture and Forestry Resources | ☒ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☒ Geology and Soils |
| ☒ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials | ☐ Hydrology and Water Quality |
| ☒ Land Use and Planning | ☐ Mineral Resources | ☒ Noise |
| ☐ Population and Housing | ☐ Public Services | ☐ Recreation |
| ☒ Transportation and Traffic | ☒ Tribal Cultural Resources | ☐ Utilities and Service Systems |
| ☐ Mandatory Findings of Significance | | |

Castilleja School Initial Study

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☒ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

1/23/17

Date

Chief Planning Official

Title

Castilleja School Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS:

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

- a) *Would the project have a substantial adverse effect on a scenic vista?*
- b) *Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*
- c) *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*
- d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The proposed project has the potential to have significant impacts and thus Aesthetics will be analyzed in the project EIR.

Castilleja School Initial Study

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The proposed project site is located in an urban area and is currently developed. The site is not identified as prime farmland, unique farmland, or farmland of statewide importance and the project site is not under a Williamson Act contract (DOC 2014). It is designated Single Family Residential in the City's General Plan. The site is not planned for or used for any agricultural purposes and there are no agricultural uses in the vicinity. The

Castilleja School Initial Study

proposed modifications to the existing facility on the project site would not result in the conversion of any agricultural land, conflict with any agricultural use, or conflict with a Williamson Act contract. Therefore, **no impact** would occur as a result of the proposed project.

c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

The project site is not zoned as forest land, does not contain forest land or forest resources, and does not support any forest uses. The proposed modifications to the existing facility on the project site would not result in the conversion of any forest land to a non-forest use. Therefore, **no impact** would occur as a result of the proposed project.

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

The site is located in an urban area and does not support any farmland, agricultural, or forest uses. The proposed modifications to the existing facility on the project site would not result in conversion of any farm, agricultural, or forest land to non-agricultural or non-forest uses. Therefore, **no impact** would occur as a result of the proposed project.

Mitigation Measures

No mitigation measures are necessary.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☒	☐	☐	☐

a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

The project site is located within the Santa Clara Valley, which is part of the San Francisco Bay Area Air Basin. The Bay Area Air Quality Management District (BAAQMD) has the primary responsibility for ensuring that the San Francisco Bay Area Air Basin attains and maintains compliance with federal and state ambient air quality standards. The BAAQMD regulates air quality through its permit authority over most types of stationary emission sources and through its planning and review process. The BAAQMD adopted the Bay Area 2005 Ozone Strategy (BAAQMD 2006) and the Bay Area 2010 Clean Air Plan (BAAQMD 2010), which are the applicable air quality plans for the region. These plans account for air quality emissions based on the land uses and zoning designated by the City. The uses on the project site are consistent with the designated land use and zoning and the project would not change the land use on the project site. Therefore, the project is consistent with these plans and the impact would be **less than significant**.

b) *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

c) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Castilleja School Initial Study

d) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

The San Francisco Air Basin is designated nonattainment for the federal 8-hour ozone (O₃) standard, and is attainment or unclassified for all other federal standards. The area is designated nonattainment for state standards for 1-hour and 8-hour O₃, 24-hour coarse particulate matter (PM₁₀), annual PM₁₀, and annual fine particulate matter (PM_{2.5}). The BAAQMD has adopted CEQA Guidelines (BAAQMD 2011) that establish air pollutant emissions thresholds that identify whether a project would violate any applicable air quality standard or contribute substantially to an existing or projected air quality violation.

The proposed project would expand existing school capacity by 102 students and would implement Transportation Demand Management measures to ensure that traffic volumes associated with the school would not increase. The school capacity screening size established by the BAAQMD for operational impacts is 2,460 students for a junior high and 2,390 students for a high school. The proposed project would accommodate many fewer students than the screening size, and thus would have a less than significant impact on air quality during project operation.

However, it is possible that the project would exceed air quality standards during construction, resulting in potentially significant impacts. Thus, the air quality impacts of project construction will be analyzed in the project EIR.

e) *Would the project create objectionable odors affecting a substantial number of people?*

The project is not considered an odor generating facility as described in the BAAQMD CEQA Guidelines (BAAQMD 2011). The project would not generate odors that could affect a substantial number of people and there would be no impact during project operation. However project construction could generate objectionable odors that could affect the residential and commercial neighbors of the project site. The potential construction odor impacts of the project will be analyzed in the project EIR.

Castilleja School Initial Study

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

- a) ***Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

The project site has been developed and operated as a school since the early 1900s. The project site does not contain any habitats or biological resources with the potential to support any plant or wildlife species that are designated as threatened or endangered; however, there is potential for nesting birds to be present in trees on site that are proposed for removal or may be trimmed or otherwise affected by construction and there is potential for roosting bats to be present within the existing building. Many species of

Castilleja School Initial Study

migratory birds are considered to have special-status under the federal Migratory Bird Treaty Act while bats are protected under the California Fish and Game Code.

If the proposed tree removal results in take of any migratory bird (as defined in federal code 50 CFR 10.13.), the effect would be considered a significant impact. In conformance with the California State Fish and Game Code and the provisions of the Migratory Bird Treaty Act, the project shall implement Mitigation Measure BIO-1 to reduce the impact to a less-than-significant level by requiring surveys by a qualified technician to evaluate the potential presence of nesting birds prior to tree removal and requiring protection of any active bird nest during construction.

If the proposed building demolition resulted in the removal or disturbance of roosting, this would be a significant impact. Mitigation Measure BIO-2 requires the project applicant to complete a bat survey prior to demolition, and identifies protocols to be followed to ensure that impacts to bats are avoided. With implementation of Mitigation Measures BIO-1 and BIO-2, the project's potential impacts to special status species would be **less than significant**.

- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*
- c) *Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The project site was originally developed in 1910. The project site does not contain any riparian habitat, sensitive natural community, or federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, the proposed project will have **no impact**.

- d) *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation; they may be continuous habitat or discrete habitat islands that function as stepping stones for wildlife dispersal. Because the project site is surrounded by existing roads and

Castilleja School Initial Study

development, it does not function as a potential wildlife corridor or habitat linkage. Therefore, the project will have a **less-than-significant impact**.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

The project would require removal of trees regulated under the City's Tree Ordinance. The project's impact on tree resources is potentially significant and will be analyzed in the project EIR.

- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans within the City of Palo Alto. Therefore, the project would have **no impact** related to conflict with the provisions of such plans.

Mitigation Measures

Mitigation Measure BIO-1: If feasible, vegetation on the project site shall be removed outside of the bird-nesting season. If the start of site clearing, tree removal, or building demolition occurs between February 1 and August 31, a pre-construction survey for nesting birds protected under the Migratory Bird Treaty Act shall be conducted by a qualified biologist to identify the location of nests in active use that were established prior to the start of project implementation activities. The pre-construction survey shall take place no more than 7 days prior to initiation of construction. All trees and shrubs on the site and on adjacent properties shall be surveyed, with particular attention to any trees or shrubs that would be removed or directly disturbed. If an active nest of a protected bird is found on site, the biologist shall, in consultation with the California Department of Fish and Wildlife (CDFW), determine whether construction work would affect the active nest or disrupt reproductive behavior. Criteria used for this evaluation shall include presence of visual screening between the nest and construction activities, and behavior of adult birds in response to the surveyors or other ambient human activity. If construction could affect the nest or disrupt reproductive behavior, the biologist shall, in consultation with CDFW, determine an appropriate construction-free buffer zone around the nest to remain in place until the young have fledged or other appropriate protective measures are taken to ensure no take of protected species occurs.

If it is determined that construction will affect an active raptor nest or disrupt reproductive behavior, then avoidance is the only mitigation available. Construction shall

Castilleja School Initial Study

not be permitted within 300 feet of such a nest until a qualified biologist determines that the subject nests are no longer active.

Prior to issuance of a demolition permit or tree removal permit, the City of Palo Alto (City) shall verify that pre-construction surveys have been conducted within 10 days of the proposed start of demolition. If active bird nests are present, the City shall verify that CDFW has been consulted and either determined that construction will not affect an active bird nest or that appropriate construction-free buffer zones have been established or other appropriate protective measures have been taken.

Mitigation Measure BIO-2: No earlier than 30 days prior to initiation of demolition activities, a pre-construction survey shall be conducted by a qualified biologist (i.e., a biologist holding a California Department of Fish and Wildlife (CDFW) collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle bats) to determine if active bat roosts or maternal colonies are present on or within 300 feet of the demolition area.

Should an active maternity roost be identified, the roost shall not be disturbed and demolition and construction within 300 feet of the maternity roost shall be postponed or halted until the juveniles have fledged and the roost is vacated, as determined by a qualified biologist. Consultation with CDFW shall also be initiated. Under no circumstance shall an active roost be directly disturbed.

If nonbreeding bat hibernacula are found on the project site, the individuals shall be safely evicted under the direction of a qualified bat biologist and with consultation with CDFW. These actions shall allow bats to leave during nighttime hours, thus increasing their chance of finding new roosts with a minimum of potential predation during daylight.

If it is determined that demolition or construction will not affect roosting behavior or disrupt a maternal colony, demolition or construction may proceed without any restriction or mitigation measure.

If it is determined that demolition or construction will affect an active bat roost or disrupt reproductive behavior, then avoidance is the only mitigation available. Under no circumstance shall an active roost be directly disturbed. Demolition or construction within 300 feet shall be postponed or halted until the roost is naturally vacated as determined by a qualified biologist.

Prior to issuance of a demolition permit, the City of Palo Alto (City) shall verify that pre-construction surveys have been conducted within 30 days of the proposed start of demolition. If bats are present, the City shall verify that CDFW has been consulted and

Castilleja School Initial Study

either determined that construction will not affect an active bat roost or disrupt a maternal colony, or that individuals in a nonbreeding bat hibernacula have been safely evicted.

Due to regulations from the California Health Department, direct contact by construction workers with any bat is not allowed.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	☒	☐	☐	☐

a-d) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

a-d) The proposed project has the potential to have significant impacts and thus Cultural Resources will be analyzed in the project EIR.

Castilleja School Initial Study

3.6 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☒	☐	☐	☐
ii) Strong seismic ground shaking?	☒	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv) Landslides?	☒	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☒	☐	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☒	☐	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

a-d) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**
- ii) Strong seismic ground shaking?**
- iii) Seismic-related ground failure, including liquefaction?**

Castilleja School Initial Study

iv) Landslides?

Would the project result in substantial soil erosion or the loss of topsoil?

Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

a-d) The proposed project has the potential to have significant impacts and thus Geology and Soils will be analyzed in the project EIR.

e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

The project site is currently operated as a school and relies on the City's sewer system in order to manage its waste water. There is no septic tanks on the project site nor would the proposed project require the use of alternative waste water disposal systems; therefore, the project would have **no impact**.

3.7 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

a))Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Although the project would not increase the total square footage of the school buildings, it would accommodate an increase in enrollment of 102 students. The project would

Castilleja School Initial Study

reduce energy use at the campus by replacing four buildings with a new, more energy efficient, building. Additionally the project would implement Transportation Demand Management measures to ensure there is no increase in traffic over existing conditions. These factors would limit the potential for the project to result in increased greenhouse gas emissions. Further, the BAAQMD screening sizes for operational impacts related to greenhouse gas emissions is 46,000 square feet for junior high schools and 49,000 square feet for high schools. The proposed project is below these screening sizes. Operation of the proposed project would have a less than significant impact related to greenhouse gas emissions.

However, the proposed project has the potential to result in significant impacts due to greenhouse gas emissions during construction and these potential impacts will be analyzed in the project EIR.

3.8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

The project involves demolition of four existing buildings and the replacement of which by one singular building. The above ground square footage of the project is expected to remain the same while the below ground square footage would increase by 26,700. During construction, there is the potential for short-term use of hazardous materials and fuels including diesel fuel, gasoline, and other oils and lubricants. These hazardous materials would be handled, transported and disposed of in compliance with all existing local, state and federal regulations. Operation of the proposed project would not require the routine, use, transport or disposal of hazardous waste other than typical household materials, such as cleaning supplies. The types and quantities of these common household materials stored, used, and disposed of on-site would not increase substantially and would not pose a health risk to those utilizing the project site or adjacent users.

The original main buildings present on the project site were constructed in 1910. Due its early date of construction, the buildings may contain asbestos containing materials (ACMs) and lead-based paints. Demolition of the existing buildings could result in hazards related to the release or disposal of these hazardous materials. Mitigation Measure HAZ-1 would require surveys and proper disposal methods to ensure that impacts remain **less than significant**.

b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

As the school was originally built in 1910, there is a potential for ACMs, lead-based paints or other hazardous building materials to be present on the project site. Improper disposal of these hazardous materials during construction could lead to an accident causing the release of hazardous materials into the environment. Mitigation Measure

Castilleja School Initial Study

HAZ-1 requires proper disposal methods, which would ensure that impacts would remain **less than significant**. Operation of the school does not include activities that could result in a release of hazardous materials into the environment.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

The project site is a private school serving grades 6 through 12. The nearest off-site school is Palo Alto High School, approximately a quarter mile to the east. Additionally Stanford University is located just over a third of a mile away from the project site. Operation of the proposed project would not require the use of acutely hazardous materials beyond common household materials, such as cleaning supplies, used currently. During construction, there is a potential for hazardous building materials to be encountered, which could be released into the air and would require proper transportation and disposal off-site. Transportation and disposal of these materials would be required to comply with all local, state and federal regulations, some of which are expressed in Mitigation Measure HAZ-1. With implementation of this mitigation measure, which would ensure that appropriate measures are used to control the hazardous materials such that they are not released into the environment, students at the project site and nearby schools would not be exposed to hazardous materials, substances, or waste and this impact would be **less than significant**.

- d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The project site and surrounding sites are not on the Department of Toxic Substance Control's EnviroStor list; thus, it is not expected that the project would create a significant hazard to the public or the environment (DTSC, 2016). Therefore, the project will have **no impact** related to being located on or adjacent to a known hazardous materials site.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*

There are no airports within 2 miles of the project site and the site is not identified within a safety zone in the Palo Alto Airport Land Use Compatibility Plan. The Palo Alto

Castilleja School Initial Study

Airport is located approximately 2.5 miles east of the project site. Therefore, **no impact** related to safety hazards associated with aircrafts would occur.

- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

The nearest private airstrip to the project site is a helipad on the Stanford Medical building approximately 1.33 miles west of the project site. The helipad is for use by emergency helicopters only. The proposed project would increase the number of students at the project site but would not change the existing land use of the site, which has served as a school since 1910. Therefore, impacts related to hazards associated with a private airstrip are **less than significant**.

- g) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The proposed project involves modifications to the existing school facilities at the project site. The project would increase the school's capacity but would implement Transportation Demand Management measures to ensure that the volume of AM and PM peak hour traffic trips accessing the site would not increase relative to existing conditions. The project would also alter vehicular access to the site, including access points for delivery trucks. This change in traffic patterns could interfere with emergency response or emergency evacuation plans. Therefore, this potential impact will be evaluated in the Transportation and Traffic section of the project EIR.

- h) *Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

The project site is located in an urban area that is not identified as a high or medium fire hazard on the map in Section 18.4.2.2.3 in the Santa Clara County Hazard Mitigation Plan (Santa Clara County, 2012). Therefore, **no impact** related to fire risks would occur.

Mitigation Measures

Mitigation Measure HAZ-1: Prior to building demolition, the project applicant shall demonstrate to the satisfaction of the City of Palo Alto that a survey of the existing buildings has been conducted by a qualified environmental specialist who meets the requirements of the current U.S. Environmental Protection Agency regulations for suspected lead-containing materials (LCMs), including lead-based paint/coatings; asbestos containing materials (ACMs); and the presence of polychlorinated biphenyls

Castilleja School Initial Study

(PCBs). Any demolition activities likely to disturb LCMs or ACMs shall be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work. If found, LCMs and ACMs shall be disposed of properly. If PCBs are found, these materials shall be managed in accordance with the Metallic Discards Act of 1991 (California Public Resources Code, Sections 42160–42185) and other state and federal guidelines and regulations. Demolition plans and contract specifications shall incorporate any necessary abatement measures in compliance with the Metallic Discards Act, particularly Section 42175, Materials Requiring Special Handling, for the removal of mercury switches, PCB-containing ballasts, and refrigerants.

3.9 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

a) Would the project violate any water quality standards or waste discharge requirements?

f) Would the project otherwise substantially degrade water quality?

The project site is fully developed and the proposed project would not substantially change the amount of impervious surface area on the project site. The project site consists of 148,000 square feet of buildings and 73 surface parking stalls. The project is proposing to add 26,700 square feet of interior space (all below grade), as well as reducing surface parking to 40 surface parking stalls (while providing 130 new below grade parking stalls) and increasing open space by 6,182 square feet. This translates to a 0.06% increase of permeable surfaces. The project would not alter existing grades in the area and would not change the drainage patterns on the site or lead to increased erosion or sedimentation. The National Pollution Discharge Elimination System (NPDES) program administered by the Bay Area Regional Water Quality Control Board (RWQCB) regulates Stormwater runoff water quality to control and reduce pollutants to water bodies from surface water discharge. The RWQCB worked with cities and counties throughout the region to prepare and adopt a Regional Municipal Stormwater Permit (Regional Permit). The Regional Permit for the City identifies minimum standards required for new development and redevelopment within the City limits. Additionally, the City's standard conditions of approval include requirements for projects to develop and implement best management practices (BMPs) to control erosion during construction and permanent features to treat stormwater during project operation. The project would be required to comply with all city, state and federal standards pertaining to stormwater runoff and water quality. Therefore, impacts would be **less than significant**.

Castilleja School Initial Study

- b) *Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?*

As stated above in item (a), the project would slightly decrease impervious surface area, which would not substantially change the area available for groundwater recharge. The project would not rely on groundwater for its water. Therefore, the project would have no **impact** on groundwater supplies or groundwater recharge.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*
- d) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

The project site is completely developed and there are no streams or rivers located on or adjacent to the project site that would be altered during project construction. The project proposes to slightly reduce the square footage of impervious surface area to the project site. The project would not substantially alter the existing drainage pattern of the site. This incremental change in impervious surface area would not substantially alter the rate or amount of runoff resulting in flooding on- or off-site or increase erosion or siltation on- or off-site. The project would have a **less than significant** impact related to alteration of the existing drainage pattern, increases in surface runoff, and potential to contribute to flooding.

- e) *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The proposed project would slightly decrease impervious surface area and increase open space on the project site. This minor decrease in impervious surface area would allow for a slight decrease in the rate and volume of stormwater runoff from the site. The project would have **no impact** related to exceeding the capacity of the existing stormwater drainage system.

Castilleja School Initial Study

- g) *Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*
- h) *Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

The project does not propose to construct housing and is not located within a 100-year flood hazard zone (FEMA 2014). There would be **no impact** related to placing housing within a 100-year flood hazard area.

The project site is not located within a 100-year flood hazard area in the map in Section 18.4.2.2.7 in the Santa Clara County Hazard Mitigation Plan (Santa Clara County, 2012). The project is not located within a 100-year flood hazard area and would have **no impact** related to placing structures within a 100-year flood hazard area that would impede or redirect flood flows.

- i) *Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*

The project site is not located near a levee or dam and is not within an area identified as a dam failure inundation area on the map in Section 18.4.2.2.7 in the Santa Clara County Hazard Mitigation Plan (Santa Clara County, 2012). The project site is not subject to flooding and construction of the project would result in **no impact** associated with exposure of people to flood-related hazards.

- j) *Inundation by seiche, tsunami, or mudflow?*

The project site is located in Palo Alto on relatively flat ground and is not within close proximity to an open body of water or a hillside; therefore, there is no risk for seiche, tsunami, or mudflow hazards. **No impacts** related to these hazards would result from implementation of the proposed project.

Castilleja School Initial Study

3.10 Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☒	☐	☐	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

a) *Would the project physically divide an established community?*

b) *Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

Figure 4 identifies the Comprehensive Plan land use designations and zoning designations for the project site and surrounding properties. 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.

c) *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans within the City of Palo Alto. Therefore, the project would have **no impact** related to conflict with the provisions of such plans.

Mitigation Measures

No mitigation measures are necessary.

Castilleja School Initial Study

3.11 Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The project site is designated Single Family Residential by the Palo Alto General Plan and has been used as the site for the Castilleja girls' school since 1910. There are no known mineral resources within the project site and no mineral recovery activities have been known to occur on site. The proposed modifications to the existing facilities on the project site would not adversely affect any mineral resources of value to the state or region. The project would have **no impact** related to mineral resources.

Mitigation Measures

No mitigation measures are necessary.

3.12 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE – Would the project result in:				
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a) *Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

b) *Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

c) *Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

d) *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

The proposed project has the potential to have significant noise impacts and thus noise impacts will be analyzed in the project EIR.

e) *Would the project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

f) *Would the project be within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

Castilleja School Initial Study

The proposed project is not located within an airport land use plan or within two miles of a public or private airport/airstrip, other than the emergency helipad at the Stanford Medical building approximately 1.33 miles from the project site. The proposed modifications to the existing facility at the project site would result in **no impacts** associated with exposure to noise from airports and airstrips.

3.13 Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING – Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

- a) *Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

The proposed project would increase the school's student capacity and is expected to require a slight increase in school staff. However, the project would not construct new housing, would not generate a substantial number of new jobs, and would not extend new roads or infrastructure to the site or any adjacent undeveloped or underdeveloped areas. Thus, the project would be unable to encourage further growth, neither directly nor indirectly. Thus, the project would have **no impact**.

- b) *Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?***

- c) *Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?***

The proposed project does not involve the demolition of housing and thus will not displace people or housing. Thus, the project will have **no impact**.

Castilleja School Initial Study

3.14 Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☒	☐

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection? Police protection?

The project site currently operates as a private school and receives services from the City Fire and Police Departments. The project would add approximately 26,700 square feet to the project site and increase enrollment by 102 students but would not cause a substantial increase in the population that would demand additional service. The project would have a **less than significant** impact on the provision of fire protection and police services.

Schools?

The project would expand an existing school but would not generate a new population that would increase the demand for local schools; in fact, the proposed expansion of the school would allow for an increase in enrollment at the campus of 102 new students. Therefore, the project would have **no impact** on other schools in the area.

Parks?

The project would not generate a new population that would increase the demand for local parks. Expanding the school would allow the facility to increase enrollment by 102 students. This would not cause a substantial increase in the population that would require parks. Furthermore, the school provides its own range of recreational and open space

Castilleja School Initial Study

services for its students. The City's standard conditions of approval require fees to address any increased need for parks. Payment of the development fees for parks would ensure that the project's impact is **less than significant**.

Other public facilities?

The project would not generate a new population that would increase the demand for other public facilities. The City's standard conditions of approval require fees to address any increased need for community facilities. Payment of development fees for community facilities and libraries would ensure that the project's impact on these services is **less than significant**.

3.15 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

The proposed project includes its own recreation areas to support the students living and attending the school. The reconfiguration of the campus and recreational facilities is included in the proposed project and the environmental impacts associated with this reconfiguration are discussed in the corresponding sections of this Initial Study and will be addressed in the individual chapters of the project EIR. As the school would provide its own recreation areas, there would be **no impact** on existing neighborhood and regional parks.

Castilleja School Initial Study

3.16 Transportation and Traffic

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☒	☐	☐	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
e) Result in inadequate emergency access?	☒	☐	☐	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐

- a) *Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*
- b) *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Castilleja School Initial Study

- c) *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*
- d) *Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
- e) *Would the project result in inadequate emergency access?*
- f) *Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

The proposed project has the potential to have significant impacts and thus Traffic and Transportation impacts will be analyzed in the project EIR.

3.17 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial pursuant to criteria set forth in subdivision (c) of public resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

Castilleja School Initial Study

a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

b) A resources determined by the lead agency, in its discretion and supported by substantial pursuant to criteria set forth in subdivision (c) of public resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Although no Native American tribes that are traditionally and culturally affiliated with the project area have requested notification from the City of Palo Alto regarding proposed projects, analysis of the potential for the project to have significant impacts to Tribal Cultural Resources will be analyzed in the project EIR.

3.18 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

- a) *Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*
- b) *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*
- e) *Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Wastewater from the project site is treated at the Regional Water Quality Control Plant owned and operated by the City. The Regional Water Quality Control Plant is permitted under NPDES permit No. CA0037834. Wastewater flows on the project site are treated at the Regional Water Quality Control Plant in accordance with the NPDES permit. The project would expand the existing school, allowing for enrollment of an additional 102 students. The project would also replace four existing buildings with one new structure. The new building would include water-efficient toilets and faucets to help reduce on-site water consumption and wastewater generation. The expanded school would connect to existing wastewater infrastructure and all flows would be directed to the Regional Water Treatment Plant. The project applicant would be required to submit calculations prepared by a registered engineer to show that the on-site and off-site sewer systems are capable of serving the needs of the development and adjacent properties, prior to issuance of building permits. This would ensure that sufficient wastewater infrastructure and capacity exists to serve the projected demand and this impact would be **less than significant**.

Castilleja School Initial Study

- c) *Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

The expansion of the existing school would not require additional stormwater infrastructure. The project would decrease impervious surface area on the project site by 0.06 percent, which would result in a slight reduction in the rate and volume of stormwater runoff. The project would not require construction or expansion of existing facilities. The project would be adequately served by existing infrastructure and the impact would be **less than significant**.

- d) *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

Expanding the existing school would slightly increase water demand at the project site. The project would replace older fixtures with newer water efficient fixtures, which would reduce the project's water demand. Additionally, standard conditions of approval require the applicant to submit calculations by a registered civil engineer to show that the on-site and off-site water systems are capable of serving the needs of the development and adjacent properties during peak flow demands. This would ensure that sufficient water supply is available to serve the project site and the impact would be **less than significant**.

- f) *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

The expansion of the existing school would not generate an additional population that would generate additional solid waste. Waste generated in the City is sent to the Sunnyvale Material Recovery Transfer station and ultimately the Kirby Canyon Landfill (Permit 43-AN-0008). The Kirby Canyon Landfill can accept 2,600 tons per day and has a remaining capacity of 16,191,600 cubic yards (CalRecycle 2015). The project's current solid waste generation is adequately served by the landfill and the project's solid waste generation is not expected to change substantially as a result of the proposed project. Therefore, the project would have a **less-than-significant** impact.

- g) *Would the project comply with federal, state, and local statutes and regulations related to solid waste?*

The project would be required to comply with the green building requirements set forth in the Green Building programs required by the State of California and the City of Palo Alto. The project is proposed to attain a LEED Silver certification. This would ensure that water conservation and solid waste reduction measures are included in the project

Castilleja School Initial Study

and that the project meets all local, state and federal regulations related to solid waste. Therefore, impacts would be **less than significant**.

3.19 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

- a) *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*
- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*
- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

The proposed project has the potential to have significant impacts as identified throughout this Initial Study. These potentially significant impacts will be analyzed in

Castilleja School Initial Study

the project EIR. Cumulative impacts will be discussed within the appropriate chapters; all impact discussions will include both direct and indirect effects.

4 REFERENCES AND PREPARERS

4.1 References Cited

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

BAAQMD (Bay Area Air Quality Management District). 2006. *Bay Area 2005 Ozone Strategy*. Vol. 1. Final. Adopted January 4, 2006. Accessed January 2016.
http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Plans/2005%20Ozone%20Strategy/adoptedfinal_vol1.ashx.

BAAQMD. 2010. *Bay Area 2010 Clean Air Plan*. September 15, 2010. Accessed January 2016.
<http://www.baaqmd.gov/~media/files/planning-and-research/plans/2010-clean-air-plan/cap-volume-i-appendices.pdf?la=en>.

BAAQMD. 2011. *California Environmental Quality Act Air Quality Guidelines*. May 2011.

CDC (California Department of Conservation). 2014. “Santa Clara County Important Farmland Map 2012” [map]. 1:100,000. California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. June 2013. Accessed December 2016. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/sc112.pdf>.

California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.

California Public Resources Code, Sections 42160–42185. Metallic Discards Act of 1991.

CalRecycle 2017. Solid Waste Facility Listing: Kirby Canyon Recycle and Disposal Facility. <http://www.calrecycle.ca.gov/SWFacilities/Directory/43-AN-0008/Detail/> Accessed January 2017.

City of Palo Alto 2011. Comprehensive Plan Land Use Designation Map updated 3/11/2011

DTSC, 2017. EnviroStor database. <http://www.envirostor.dtsc.ca.gov/public/> Accessed January 2017.

FEMA (Federal Emergency Management Agency). 2014. “National Flood Hazard Layer kmz files” [Google Earth data]. April 2014.

Santa Clara County, 2012. *Santa Clara County Hazard Mitigation Plan*.

4.2 List of Preparers

DUDEK
853 Lincoln Way, Suite 208
Auburn, California 95603

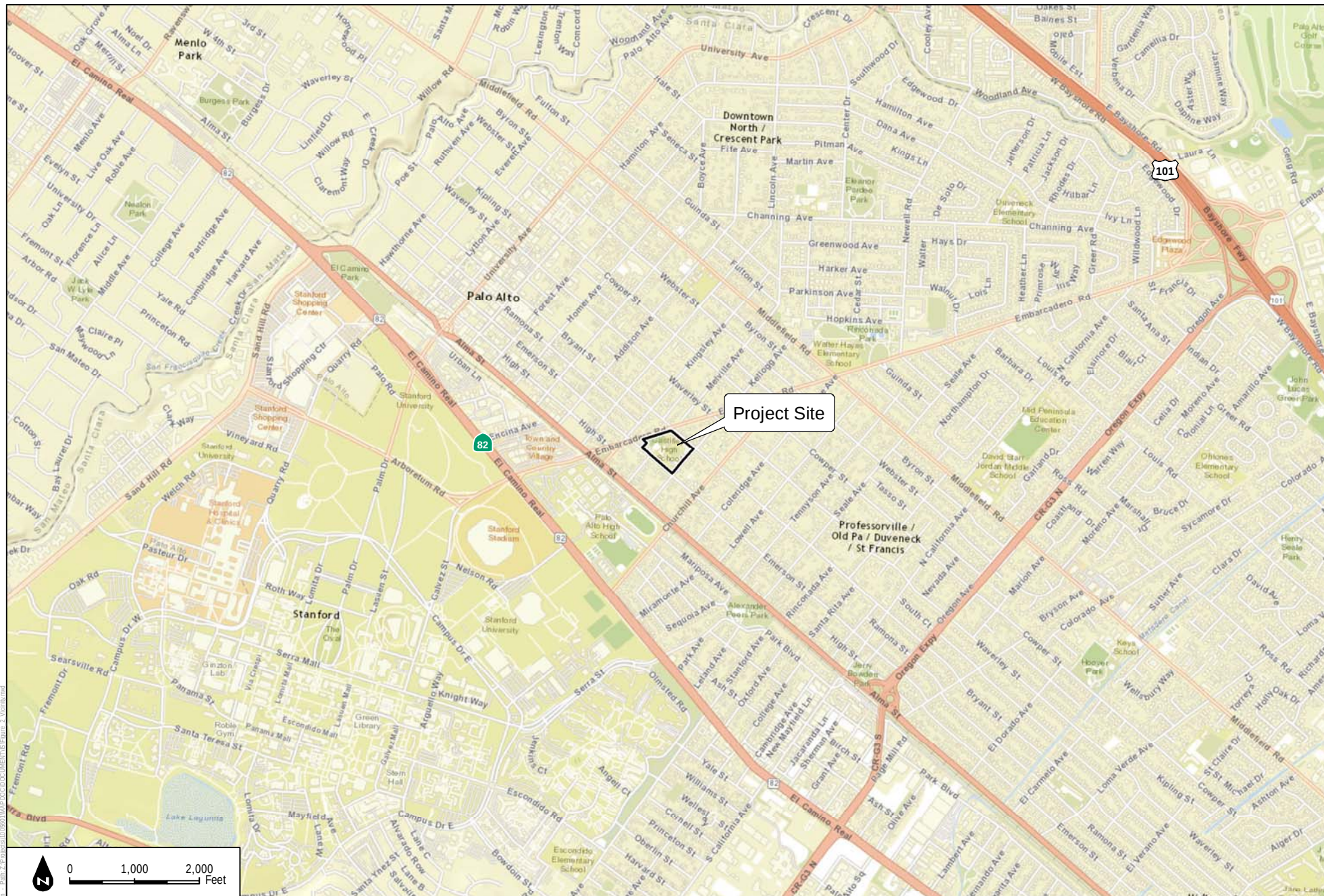
Katherine Waugh, AICP, Senior Project Manager
Kimberly Asbury, Environmental Analyst

Castilleja School Initial Study

INTENTIONALLY LEFT BLANK

Castilleja School Initial Study

INTENTIONALLY LEFT BLANK



SOURCE: ESRI 2015

DUDEK

Castilleja School Conditional Use Permit and Master Plan Initial Study

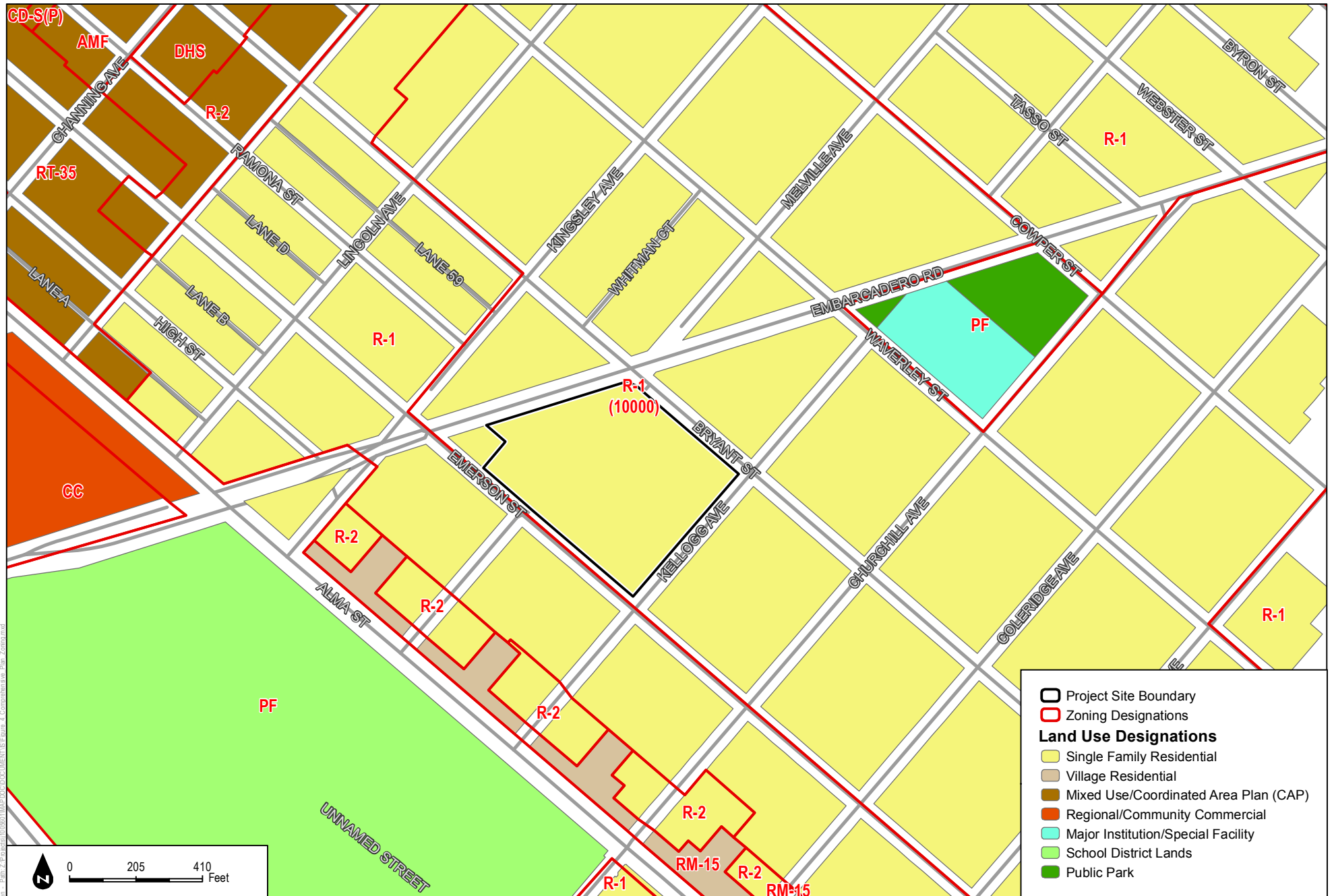
Figure 2
Vicinity Map

Castilleja School Initial Study

INTENTIONALLY LEFT BLANK

Castilleja School Initial Study

INTENTIONALLY LEFT BLANK



SOURCE: City of Palo Alto

Castilleja School Conditional Use Permit and Master Plan Initial Study

Figure 4
Land Use and Zoning Designations

Castilleja School Initial Study

INTENTIONALLY LEFT BLANK

City of Palo Alto
Development of Planning and Community Environment

California Environmental Quality Act

NOTICE OF PREPARATION

TO: Responsible and Trustee Agencies, Organizations, and Interested Parties

FROM: City of Palo Alto
250 Hamilton Avenue
Palo Alto, California 94301
Contact: Amy French, Chief Planning Official

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Castilleja School Conditional Use Permit Amendment, Master Plan, Parcel Map with Exception and a Variance to allow the pedestrian access and vehicle ramp into the subterranean garage to encroach into the Embarcadero Road special setback and the Emerson Street side setback, and some subterranean parking to encroach into the Embarcadero Road and side setbacks.

AGENCIES: The City of Palo Alto requests that public agencies provide comments regarding the scope and content of the EIR as it relates to an agency's statutory responsibilities in connection with the proposed project in accordance with California Code of Regulations, Title 14, Section 15082(b).

ORGANIZATIONS AND INTERESTED PARTIES: The City of Palo Alto requests comments and concerns from organizations and interested parties regarding the environmental effects associated with construction and operation of the proposed project.

PROJECT TITLE: Castilleja School

PROJECT LOCATION: 1310 Bryant Street and 1235 and 1263 Emerson Street, Palo Alto, CA 94301. Project site is 286,783 sf comprised of three parcels: (1) APN 124-12-034 (1310 Bryant, school site), (2) APN 124-12-031 (1235 Emerson, "Emerson House" aka 'Lockey/Alumnae House', 75' on Emerson St), and (3) APN 124-12-033 (1263 Emerson, "Head's House", 105' on Emerson St).

PROJECT DESCRIPTION: Castilleja School is an all-girls private school in Palo Alto that has been operating since 1907. Currently, the school serves grades 6 through 12. The school's

facilities include an administrative building, a maintenance facility, a chapel theater, classrooms, a gymnasium, pool, above ground parking areas, athletic fields, and a dining hall. The project proposal is to demolish two homes on adjacent Castilleja-owned parcels (at 1235 and 1263 Bryant) and merge the two parcels into the Castilleja campus parcel via Parcel Map with Exception, and demolish four existing buildings and replace them with a single building. The applicant seeks to expand enrollment and redevelop the existing campus in three construction phases:

1. Construct a below-grade parking structure under the merged parcels to accommodate 130 vehicles, re-route drop-off and pick-up through the garage, and increase enrollment to a maximum of 490 students;
2. Relocate the existing pool, complete bikeway station on Bryant Street Bicycle Boulevard, and increase enrollment to a maximum of 520 students; and
3. Relocate deliveries and waste pick-ups further from the street and below grade, reduce number of food service deliveries by 10%, implement sustainability plan, and increase enrollment to a maximum of 540 students.

In order to accomplish the proposed project, Castilleja School Foundation has submitted an application to amend the school's existing Conditional Use Permit and an Architectural Review application. Including future phase construction of a new campus building, the project would result in an increase in the total building square footage within the campus by 26,700 square feet, all of which would be below grade - above grade the square footage would remain the same. The applicant also proposes to increase the number of off-street parking spaces from 73 to 170. Of these, 130 would be below ground and 40 of which would be in surface parking lots. This would reduce the number of above ground spaces by 33 spaces. The amount of open space would also increase by 6,182 square feet. Finally, the project includes a Transportation Demand Management Plan to offset transportation impacts and a proposal for no net new automobile trips, as well as a Sustainability Program. Additional project details and figures are provided in the Initial Study, which is available for review at the City of Palo Alto website for this project: http://www.cityofpaloalto.org/gov/topics/castilleja_school.asp

POTENTIAL ENVIRONMENTAL EFFECTS: As documented in the Initial Study, the following areas of potentially significant environmental impact will be analyzed in the Draft EIR: Air Quality (project construction only), Biological Resources (trees and migratory birds), Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Land Use and Planning, Noise, Traffic, and Tribal Cultural Resources. Potential cumulative impacts and potential for growth inducement will be addressed; alternatives, including the No Project Alternative, will be evaluated.

SCOPING MEETING: The City of Palo Alto will hold a scoping meeting as part of the Planning and Transportation Commission's regularly scheduled meeting on February 8, 2017.

The meeting will start at 6:00 p.m. and will be held at the City of Palo Alto Council Chambers, located in City Hall at 250 E. Hamilton Avenue. The meeting agenda will be posted to the City's website: <http://www.cityofpaloalto.org/gov/boards/ptc/default.asp>. Interested parties are welcome to attend and present environmental information or concerns that you believe should be addressed in the EIR.

This NOP and Initial Study as well as future CEQA documents for this project will be available for review at the City's website for this project:

http://www.cityofpaloalto.org/gov/topics/castilleja_school.asp

If you require additional project information, please contact Amy French, Chief Planning Official, at amy.french@cityofpaloalto.org

PUBLIC REVIEW PERIOD: This NOP is available for public review and comment pursuant to California Code of Regulations, Title 14, Section 15082(b), for 30 days. The comment period for the NOP begins January 23, 2017 and ends on February 22, 2017. Due to the limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

RESPONSES AND COMMENTS: Please indicate a contact person for your agency and send your responses and comments to:

Amy French, Chief Planning Official
City of Palo Alto PCE Department
250 Hamilton Avenue
Palo Alto, California 94301
(650) 329-2336
amy.french@cityofpaloalto.org

Attachment D: Summary for Castilleja School Environmental Review pursuant to the California Environmental Quality Act (CEQA)

Qualified Professional Retained

The determination of whether the Castilleja School project may have a significant effect on the environment is a critical step in the CEQA process, and one that requires professional knowledge and judgment, as described in CEQA Guidelines Section 15064 found here: http://ceres.ca.gov/topic/env_law/ceqa/guidelines/art5.html

The determination should be based on information in the record and, to the extent feasible, on scientific and factual data. Generally, an environmental professional with specific training in a particular area of environmental review can make this determination. This determination is made prior to and separate from the development of mitigation measures for the project.

The City, as the “Lead Agency” for the environmental review, has retained the professional firm Dudek to prepare an Initial Study (IS) and Draft Environmental Impact Report (EIR).

Environmental Review Process – Initial Study

Preparation of an Initial Study is not a requirement for a project determined to require preparation of an Environmental Impact Report (EIR). The Draft IS was prepared as a communication tool for the public to understand what will be studied in the EIR. It should be noted that an IS is neither intended nor required to include the level of detail included in an EIR¹.

The purpose of the Castilleja School Initial Study is to focus the EIR on the effects determined to be significant and identify and explain the effects determined not to be significant² (an example in the case of Castilleja School is the topic of Agriculture). The purpose of the IS is also to enable the applicant to modify the project to mitigate adverse impacts that require preparation of an EIR. The IS format is a standard checklist, which Dudek used in this case; the checklist notes the following categories as having potentially significant impacts:

- Aesthetics,
- Air Quality (construction only),
- Cultural Resources,
- Geology and Soils,
- Greenhouse Gas Emissions (construction only),
- Land Use and Planning,
- Noise,
- Transportation and Traffic, and
- Tribal Cultural Resources.

¹ CEQA Guidelines Article 5 Section 15063 item a.3

² CEQA Guidelines Section 15063 c.3.

Palo Alto required the applicant to submit data and information to enable preparation of the initial study³. Any person may submit data and information in any form to assist the Lead Agency in the preparation of the Initial Study. Staff forwards to the consultant data and information as appropriate. During or immediately after preparation of an Initial Study, staff may consult with the applicant to determine if the applicant is willing to modify the project or reduce or avoid the significant effects identified in the initial study.⁴ Staff met with the applicant on January 12, 2017 to discuss several design changes the applicant is exploring.

Determination of Potential Environmental Effects

If there is substantial evidence the project may have a significant effect on the environment, the agency must prepare an EIR⁵. This determination is to be based to the extent possible on scientific or factual data. The significance of an activity can vary with its setting (eg. an activity that may not be significant in an urban area may be considered significant in a rural area, or residential neighborhood in this case.) There are also “thresholds of significance”⁶; the City has developed these thresholds to assist the staff and decision-makers to determine the potential effects caused by projects.

Mandatory Findings of Significance

There are “Mandatory Findings of Significance”⁷. If any of the specific conditions would result from a proposed project, the project is considered to have a significant effect on the environment. The conditions are identified on the CEQA Appendix G checklist:

(1) The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife population, cause a fish or wildlife species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, significantly reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory.

(2) The project has possible environmental effects which are individually limited but cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects and the effects of reasonably foreseeable probable future projects (as defined in CEQA Guidelines Section 15130 http://ceres.ca.gov/topic/env_law/ceqa/guidelines/art9.html).

(3) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

³ CEQA Guidelines 15063 e

⁴ CEQA Guidelines 15063 g

⁵ CEQA Guidelines 15064 a1

⁶ CEQA Guidelines 15064.7

⁷ CEQA Guidelines 15065

The Draft Initial Study finds the project has the potential to result in significant impacts and that it could meet the above conditions, and thus detailed analysis is needed. It is possible the City could find sufficient mitigation measures to reduce impacts to less than significant levels and in the end, the City Council could support findings that none of the above conditions are met.

Environmental Impact Report Notice of Preparation (NOP)

CEQA Guidelines Article 7 describes the EIR process. The decision to prepare an EIR usually is made at the conclusion of the Initial Study. Because the City has decided to prepare an EIR, a Notice of Preparation (NOP) was prepared, describing probable environmental effects of the project; the NOP was filed with the state Office of Planning and Research (OPR). Within 30 days of receiving the notice of preparation, responsible agencies are required to provide responses regarding significant impacts and reasonable alternatives and mitigation measures. There is no other agency that has discretionary approval authority over the project. There are agencies that may review the documents for this project, including the State Office of Historic Preservation (OHP), regional transportation agencies, Caltrans and Caltrain, and the Air Quality Board.

EIR Scoping Session – Goals and Proposed EIR Contents

This public meeting is a scoping session to ‘kick-off’ the Environmental Impact Report (EIR) process. The goals of the scoping session include:

- (a) inform the public what potential impacts the project may have on the environment,
- (b) identify what the City proposes to study related to those potential impacts, and
- (c) hear public testimony as to the topic areas for further study and potentially resolve concerns of interested parties on environmental grounds.

Early public consultation and a scoping session is advisable where people are concerned about a project’s environmental effects⁸ and the session can allow these persons to help the City identify a range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the EIR. The scoping session also allows the City to identify which detailed study issues have been deemed not important to study for the particular project, such as Agriculture.

EIR Contents

CEQA Guidelines Article 9 prescribes the contents of EIRs. The City has requested that the applicant provide information beyond what was submitted at the time of application, to clarify the project and help with the preparation of the draft EIR. The city requested additional information in the “notice of incomplete (NOI)” provided to the applicant after the application was submitted, and in the addendum to the NOI. Examples of studies the applicant is preparing are the geotechnical study and the noise study. The applicant had previously submitted an Arborist Report and other studies and reports. The Arborist Report submitted with the application caused the Urban Forestry staff to request an additional study of Redwood tree

⁸ CEQA 15083 item 1

#112; the additional study determined the tree was hazardous, and would need to be removed prior to an event that could cause serious damage.

In addition to these studies the applicant prepared and is preparing to assist with preparation of the draft EIR, the City's consultant is preparing technical studies including a traffic analysis report and a historic evaluation of the two homes on the site that are proposed to be removed to make way for an underground parking garage.

Next Steps in EIR Process

The City will work with the consultant to ensure the draft EIR is thorough and accurate. The Notice of Availability of the draft EIR will be posted on the City's website and the draft EIR would be distributed to the local libraries and made available at the Development Center and City Hall Planning offices. The City would provide notification that documents are available for review so that interested parties may comment. Public hearings would be held to allow discussion of and comments to be made regarding the document's studies and findings, along with review of the project applications.

Evaluation of Comments and Responses

As described in CEQA Guidelines Section 15088, the City evaluates comments on environmental issues and prepares written responses to comments received during the noticed comment period, or as may be extended. When comments are received from public agencies, the City is required by CEQA to provide responses to those agencies at least ten days prior to EIR certification.

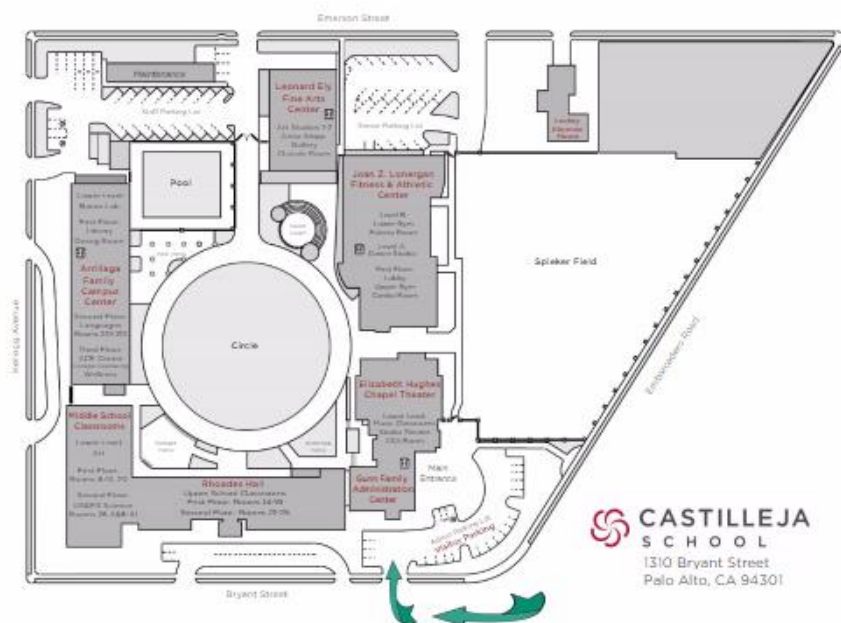
Recirculation of an EIR is required when significant new information is added to an EIR after notice of the draft EIR is given and before certification. Information can include changes to project, environmental setting, additional data or other information. New information is not significant unless the 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 feasible way to mitigate or avoid such effect that the applicant has declined to implement. There are tests for "significant new information" set forth in the CEQA guidelines. Clarification or amplification of an EIR would not require recirculation of an EIR.

Final EIR and Certification

Before City Council can approve the project, it must certify the Final EIR as completed in compliance with CEQA and as reflecting the Lead Agency's independent judgment and analysis. The Council, in approving a project following certification of an EIR, would need to approve a monitoring program for any mitigation measures identified in the EIR. If the Council finds there will be remaining significant and unavoidable effects (after mitigation measures are applied) on the environment, the Council may decide these are acceptable effects due to 'overriding concerns'. The Council must then make a statement of overriding considerations in that case, and these must be supported by substantial evidence in the record. Finally, a notice of determination must be filed following the Council's decision on the project.

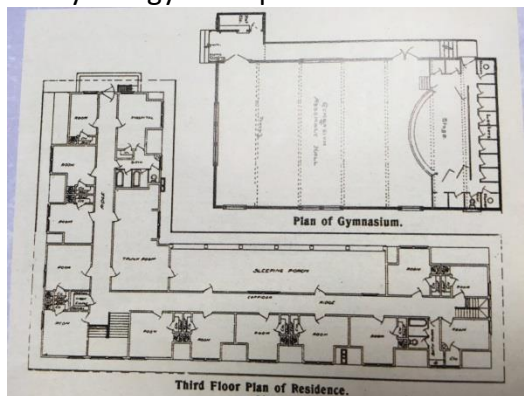
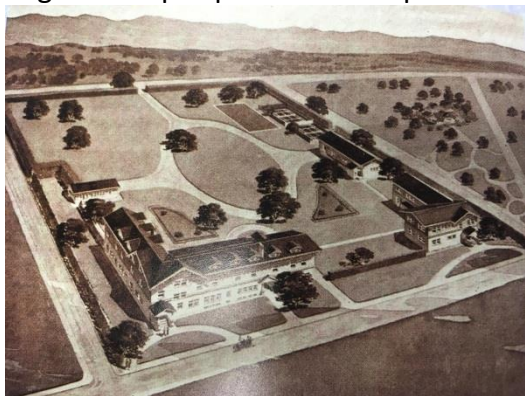
ATTACHMENT E: History of Castilleja Campus and Enrollment

Castilleja Campus Today



Original Campus

Castilleja School first opened August 1907; the original location was 1121 Bryant Street. In August 2010, the school moved to 1310 Bryant Street, into four new structures; a three-story dormitory, a recitation building, a domestic science building and a gymnasium. Images of the original campus plan and floor plans of the original dormitory and gym are provided below.¹



1920's through 1950's

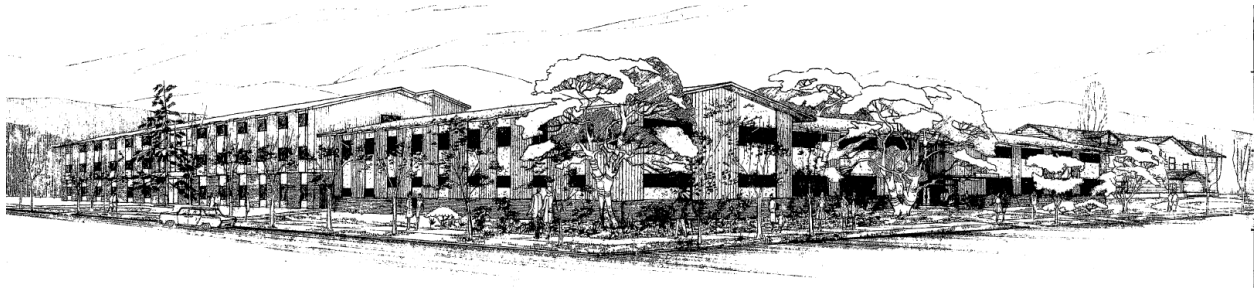
In the 1920's, the pool and chapel were added, along with a science lab, the Orchard House, and an auditorium. Enrollment declined during the Great Depression and war years; by 1947,

¹ Photos captured from the book "Castilleja, Celebrating a Century" by Sara Croll and Heather Allen Pang, available at the Palo Alto Historical Association).

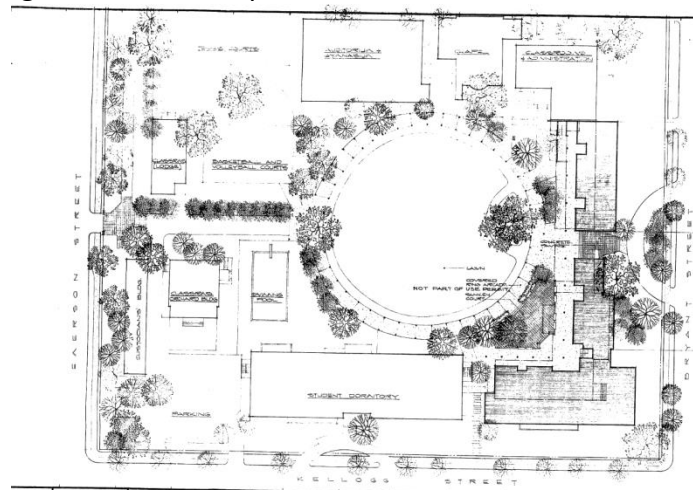
the enrollment for Kindergarten through 12th grade was 235 students. In 1958, the lower grades (first through fourth) were dropped from the program; it became more of a college preparatory program and the program was restricted to 7th through 12th grades by 1962, and more buildings were added.

1960's

In the 1960's, a classroom and dormitory building fronting Kellogg Ave. was approved and built; called the Arrillaga Family Campus Center, and completed in 1962; the dormitory housed 90 students. In 1965, a classroom/dormitory building (fronting Kellogg Avenue and Bryant Street) was built to connect the administration building to the Kellogg-fronting dormitory, as pictured below.

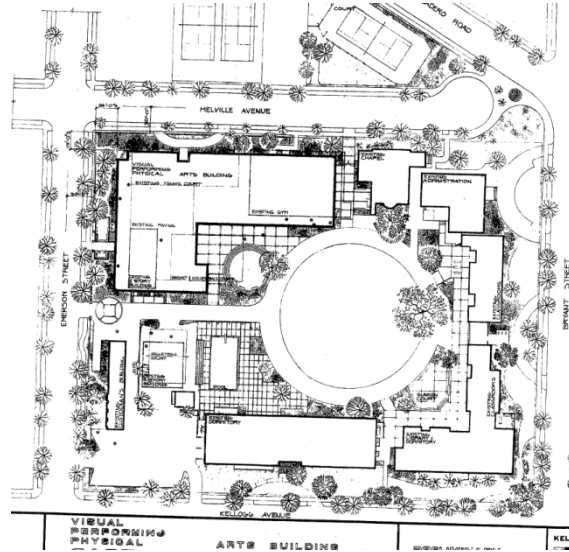


In 1967, the school built a new library and Rhoades Hall, containing 20 classrooms to accommodate a projected enrollment of 300 students. The above street view shows the 1965 classroom/dormitory building at the corner; Rhoades hall connects the 1965 building to the administration building. Below is a site plan from 1967.

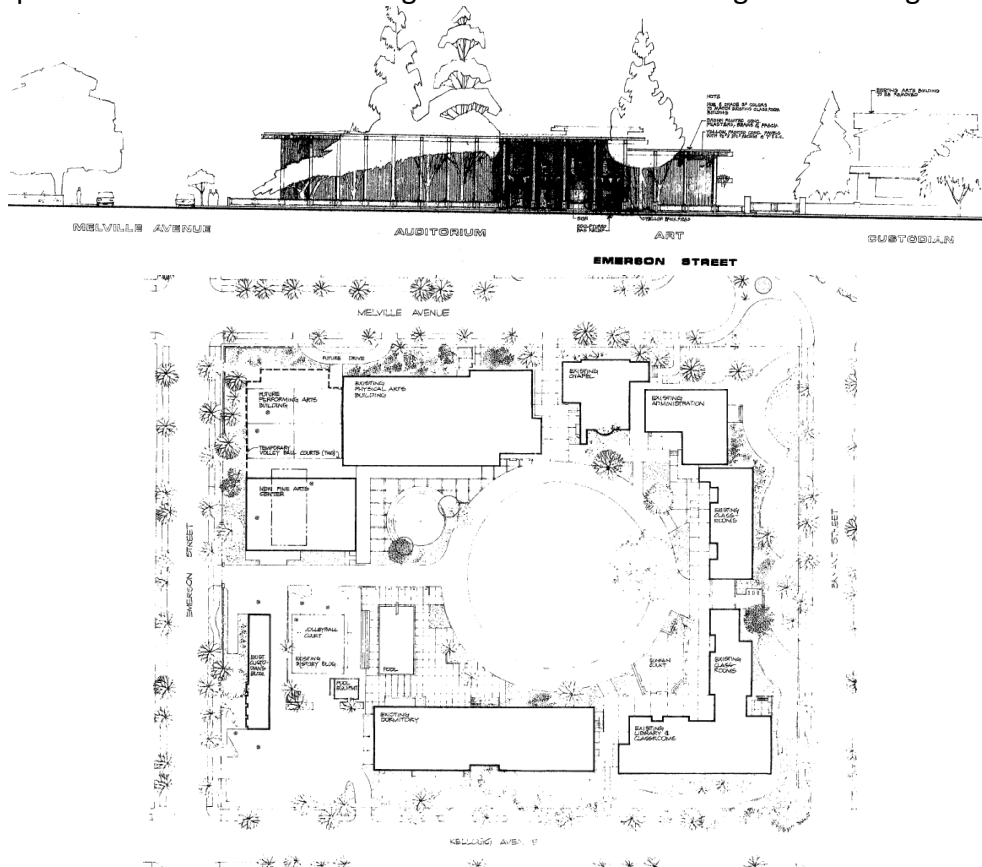


1970s

In 1974, the school proposed a building for the visual, performing and physical arts. At that time, Melville Avenue still crossed Emerson, tennis courts were located between Melville Avenue and Embarcadero Road; Melville Avenue provided 30 on-street parking spaces (as seen in below image).

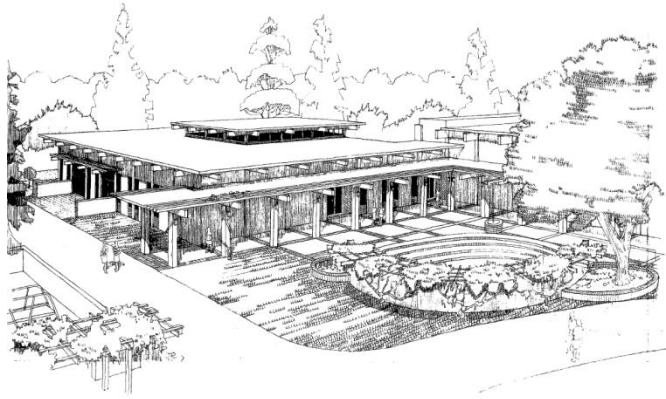


In 1977, the school built the gymnasium (the Seipp-Wallace Pavilion) and in 1978, the school requested permits for a Fine Arts building and attached Performing Arts Building.



1980s

In 1980, the school built the Ely Fine Arts Center. An image of the approved fine arts building is below:



Also in 1980, the school renovated the Chapel to become an auditorium and where the performing arts building had been planned, a parking lot for 28 spaces was installed instead.

History of Conditional Use Permits

The first CUP (file #60-UP-3) was issued by the City's Zoning Administrator in 1960, along with a Variance (file #60-V-3) for the three-story dormitory that violated the height limit. The permits allowed classrooms, administrative offices, auditorium, library, dorm kitchen and dining room, social room, gymnasium, swimming pool, tennis courts, caretaker's quarters, shop and garage, and the 41' tall dormitory. The City issued another CUP in 1965.

CUPs in the 1970s

The 1974 CUP was conditioned to go to the Architectural Review Board (ARB), and included these conditions of approval (COA):

- COA#3: Every effort shall be made to minimize traffic and prevent on-street parking congestion.
- COA# 4: All construction and development shall comply with all applicable codes and ordinances and with the requirements of the Fire Chief.

The City issued a third CUP in 1979 CUP for a building addition to the chapel, with requirements for providing 52 parking spaces, screened as approved by the ARB, designated student pick-up and delivery areas, and compliance with prior CUP conditions.

CUPs in the 1990s

In the early 1990's, sixth grade class was added back into the program. In 1991-92, the City abandoned the Melville Avenue right-of-way between Emerson and Bryant Streets, and approved a fourth CUP for Castilleja to use the abandoned area subject to the establishment of a 28-space parking lot. The City also approved a Tentative Map to merge five parcels with the abandoned Melville right-of-way, and a fence height Variance.

ENVIRONMENTAL ASSESSMENT

MAR 19 2 58 PM '92

Project Description/Title: 1) Abandonment of Melville Avenue right-of-way between Emerson Street and Bryant Street; 2) Tentative Map to merge 5 existing parcels with the Melville Avenue right-of-way, and adjust a property line at 211 Melville Avenue; 3) Conditional Use Permit for the reuse of the Melville Avenue right-of-way by an existing private school plus an addition of a parking lot; and 4) Variance to exceed the maximum fence height regulations on the street side yard and rear yard of the resulting parcel.

The City also approved a softball field on the new area; the 1992 plan showed redwood screen trees as a buffer for the homes on Emerson Street. The 1992 CUP also included a condition related to Transportation Demand Management (TDM):

3. Prior to conclusion of Spring session 1993, the applicant shall submit a transportation demand management program which identifies strategies to significantly reduce demand for on-site and on-street automobile parking. This plan should be a student effort and shall explore encouraging students and faculty to use alternatives to the single-occupant automobile, including incentives for bicycling and using mass transit. This plan shall be reviewed and approved by the Zoning Administrator and implemented immediately unless otherwise specified. The Transportation and Planning Divisions will provide resources, ideas and assistance in this student project.

The City issued a fifth CUP in 1995 (file #95-UP-47) that allowed Castilleja to convert the dormitory into a library, classrooms and offices for a maximum of 385 students (approximately 154 middle school and 231 high school by the year 2000) through 1999. The 1995 CUP noted an amendment would be needed to exceed 385 students. In 1999, still with 385 students and 90 staff members, Castilleja requested to increase enrollment by 30 middle schoolers, from 385 to 425 students in total.

CUPs of the 2000s

The City issued the sixth CUP (file #00-UP-23), allowing 415 students, subject to implementation of a TDM program. Then in 2007, the school added basement area below the physical arts building, with no adjustment to the CUP.

The City also issued additional CUPs for temporary events (such as graduations) over several decades.

**Castilleja School Conditional Use Permit and Master Plan Narrative
June, 2016**

I. Application Overview Castilleja School, an all-girls, 6th-12th grade independent school bounded by Embarcadero Road, Bryant Street, Kellogg Avenue, and Emerson Street in Palo Alto, seeks approval for a new Conditional Use Permit and Master Plan to allow for the continued education of young women at our current location. Having spent the last three years in conversation with our neighbors, Castilleja School is submitting a Conditional Use Permit and Master Plan application that addresses both the potential impacts to the neighborhood and our long-term needs for campus modification and enrollment growth. An example of our approach includes a traffic reduction enforcement program which imposes serious and meaningful penalties if Castilleja does not perform as predicted. While Castilleja clearly understands that issues and concerns may arise during the City and public review, we have endeavored to provide a substantial and complete proposal that demonstrates our commitment to our neighbors and the City as a whole.

As this application will set forth, Castilleja specifically seeks to: i) Increase enrollment from 438¹ to 540 students, adding no more than 27 students per year; and ii) Mitigate traffic impacts – through robust Transportation Demand Management – to maintain conditions equivalent to those experienced by neighbors since Castilleja implemented our TDM program in 2013; and iii) Obtain approval of a phased new Master Plan, with Phase 1 to include ARB approval of an underground parking garage.

¹ See City of Palo Alto letters dated Feb. 28, 2014 and November 5, 2015 (Tab B, “City of Palo Alto Letters”), which outline an enrollment limit construct allowing Castilleja to maintain current enrollment at 438 students, until such time as sufficient analysis is conducted for a formal CUP and Master Plan application.

II. Executive Summary: A New CUP Enrollment Cap with Accountability Measures and Master Plan Implications As articulated in Section V (“The Case for Increased Enrollment”), there is a convincing need for increased enrollment, some of which is tied to certain elements of the proposed Master Plan discussed in Section IV (“Master Plan”), (i.e. the underground parking garage, lowered pool, and below grade loading dock), and which are linked to programmatic impact reductions and monitoring mechanisms. **In order to support and accommodate the proposed growth while reducing the school’s impact on its neighbors, the school’s proposal includes the following commitments, monitoring mechanisms, and consequences:**

Commitments- *In order for Castilleja to grow to 540 students, the school will make the following commitments:*

Figure 1 Castilleja School Enrollment Commitments

Master Plan Features	Enrollment Cap
Build underground parking garage Reroute drop-off and pick-up through garage	490
Lower pool below grade Complete bike way station on Bryant Street Bicycle Boulevard	520
Lower Circle below grade Relocate deliveries and waste pick-ups further from street and below grade Reduce number of food service deliveries by 10% Implement sustainability plan	540

In addition to the above, Castilleja will:

- (1) Maintain peak trips at ≤ 440
- (2) Add students gradually – no more than 27 per year
- (3) Establish hours of school operations and limit number of special events (see **Tab C**, “Summary of Proposed Hours of Operations”)

Monitoring Measures and Consequences-

- (1) Submit to annual audits of the school’s enrollment by independent firm. A fine of \$500 per school day will be levied if the school is in violation of enrollment cap
- (2) Submit to bi-annual peak trip audits by independent firm
 - a. 1st peak trip count above 440 – add additional TDM measure
 - b. 2nd consecutive peak trip count above 440 – add more intensive TDM measure
 - c. 3rd consecutive peak trip count above 440 – reduce enrollment by 5 students in next admission cycle

Special Events- Castilleja recognizes that it is not only our daily operations that contribute to area impacts but also special events on evenings and weekends. As a point of reference, **Tab D** contains Castilleja’s sample list of Special Events (events with > 50 outside guests) for a typical year, with estimated number of outside guests and timeframe.

To reduce impacts, Castilleja proposes the following limitations on events and activities, in general, and Special Events specifically:

1. No school events on Sundays
2. Athletic competitions limited to weekdays and completed by 8 pm
3. Limit number of Special Events (events with > 50 guests) to 90 events per school year and require parking on Spieker Field as needed
5. No events to be held on campus which do not directly relate to Castilleja.

III. Castilleja School Background

A. School History, Mission, and Purpose Founded in 1907 in Palo Alto by Mary Lockey, Castilleja is the only non-sectarian all-girls middle and high school in Northern California. After Lockey graduated from Stanford University in 1902, she was encouraged by Stanford's first president, David Starr Jordan, to start a school that would offer girls a comprehensive college preparatory education. Mary Lockey identified a set of core values, the 5 Cs (conscience, character, courtesy, charity, and courage), and created an educational program based around those values. For nearly 110 years, Castilleja has been committed to academic excellence for girls using those same values.

Today, Castilleja is at the forefront of 21st century education, incorporating local and global experiential learning, technology, and leadership opportunities into our curriculum. Castilleja students are inspired, challenged, and prepared, not only for college, but also for a lifetime of learning, leading, and doing. *The Wall Street Journal* identified Castilleja as one of the world's top fifty schools for our success in preparing students to enter top American universities. In 2015, *Niche* rankings recognized Castilleja as the best private school for academics in the United States.

While sensitive to the changing character of the City of Palo Alto, Castilleja is faced with growing demand for all-girls education. At our current size, Castilleja is unable to meet that demand and each year must turn away nearly 300 talented candidates. Constrained by our enrollment cap, Castilleja's enrollment has not kept pace with the growing number of school-aged children in our community. As of 2016, Castilleja had grown by just 46 girls or 12% since 2000. At the same time, the enrollment in Palo Alto Middle and High schools increased by 30%.

Castilleja's CUP and Master Plan will allow Castilleja to better fulfill its mission – to educate motivated young women to become confident thinkers and compassionate leaders with a sense of purpose to effect change in the world. Enhanced facilities, combined with a robust TDM program, will accommodate more students and allow Castilleja to continue to deliver our nationally-recognized educational program while honoring our place in Palo Alto history and reducing our impact on our neighborhood and the environment.

B. Evolution of Campus and CUP History Castilleja, founded in Palo Alto at 1121 Bryant in 1907, was established as a school to offer young women a comprehensive education, at a time when educating young women was rare. Shortly thereafter, in 1910, Castilleja relocated to its current location at 1310 Bryant Street. At that time, neither Palo Alto's zoning code, nor many of the homes which currently define the neighborhood, were

in existence. Much like the surrounding neighborhood, over the years, Castilleja has evolved.

Castilleja was first required to obtain a Use Permit in 1960 (60-UP-3) to permit the construction of dormitories needed for boarding school students. Between 1960 and 1996, several additional Use Permits were issued, including those for a Fine Arts Building (74-UP-4); Chapel Rehabilitation and Additions (79-UP-25); Parking Areas (91-UP-53); and a Softball Field with associated parking (92-UP-40). In 1995, Castilleja sought a Use Permit (95-UP-47) to convert the dormitory building into a library, classrooms, offices, and other uses, as well as to permit 385 students to enroll at the school by the year 1999. In addition, the 1995 Use Permit required Castilleja to seek an amendment in 1999, if it sought to increase the student population beyond 385. In 1999 (99-UP-48), a use permit was sought and approved to remodel the Administration Building and impose TDM requirements, followed by a use permit in 2000 (00-CUP-23) permitting a student population of 415 (see **Tab E** for 99-UP-48 and 00-CUP-23).

During the 2011-2012 academic school year, Castilleja's analysis of the 2010-2011 enrollment data revealed that the student population exceeded the 2000 Use Permit enrollment limitation of 415 students. At that time, Castilleja informed the City that our enrollment exceeded the 2000 enrollment limit and commissioned a traffic analysis in April, 2012 to prepare for a new CUP application.

At the City's request, Castilleja provided the City with a Compliance Report (See Binder 2) and supporting documentation, which analyzed, item-by-item, the school's compliance with each condition of the 2000 Use Permit. The Compliance Report revealed that, in addition to the enrollment violation, five (5) other conditions associated with the 2000 Use Permit were only partially complied with.² As a consequence of the over-enrollment, the City (i) levied a monetary fine against Castilleja in the amount of \$385,000 and subsequently reduced it to \$265,000 (to align with the number of instructional days during which the School had violated the maximum enrollment); (ii) required Castilleja to mitigate traffic impacts (going forward) to a level equivalent to or less than those at an enrollment of 385 in 2000; (iii) set forth a construct for a phased enrollment decline; and (iv) required that Castilleja apply for a new Conditional Use Permit in 2015-2016.

To meet the City's mandate, from 2013 through present Castilleja has successfully mitigated traffic impacts through robust Transportation Demand Management, in compliance with the City requirement. Consistent with discussions with the City, Castilleja has also reduced our enrollment to 438 and is holding at this level while the school pursues this application for a new Use Permit to gradually increase enrollment to 540 students, based on specific milestones.

² A 2013 audit of all Conditions of Approval showed partial conformance with Five (5) Conditions of Approval and compliance with all remaining Conditions of Approval. The Five (5) partially conforming Conditions of Approval included Condition 5.0 (incorporating the TDM program into Board Policy); 5.7 (twice daily parking monitoring); 5.11 (annual review of TDM program); 5.22 (notice to Zoning Administrator of bi-annual neighbor meetings); and 5.28. (hire traffic monitors for events with 50-100 attendees). A description of each Condition of Approval, the partial conformance by Castilleja, and Castilleja's commitment to rectify those deficiencies were included in the August 15, 2013 Compliance Report and the October 25, 2013 Memorandum to the City from Nanci Kauffman, Head of School. Both items were provided to the City of Palo Alto in 2013, and are included with this Application. A conformance report for the 2015-2016 academic year shows complete conformance.

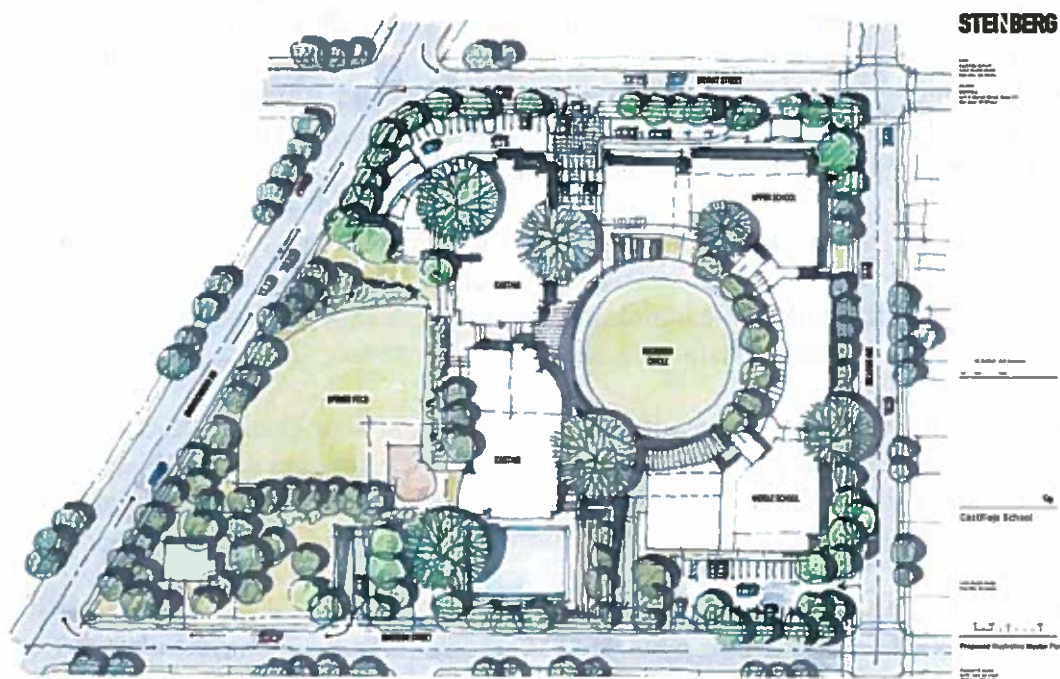
IV. The Master Plan

A. Project Summary Castilleja School plans to replace four current buildings that have outlived their useful life with one energy-efficient building in generally the same location. The gymnasium, chapel theatre, and administration buildings would be retained and substantially unaltered, given these structures were built or remodeled within the last decade.

Significant among the improvements proposed in the Master Plan (see **Tab F**) is the construction of an underground parking garage to house 130 spaces below the playing field (Spieker Field on Figure 2 below). The playing field would be replaced in generally the same location over the underground garage and used for event parking as needed. The underground garage and the 40 surface spaces within the campus yield a total of 170 on-site spaces, resulting in a 133% increase in off-street parking.

Castilleja has worked extensively with its neighbors to develop a Master Plan that balances numerous and often-competing objectives. While no solutions are perfect, the Master Plan concentrates site access near Embarcadero to lessen the impact on neighborhood streets. Service delivery facilities are relocated below grade and away from the perimeter of campus to lessen neighborhood disruption. The Circle (the school's center of campus) and the pool are also proposed below grade to reduce noise in the surrounding neighborhood. Most drop-offs and pick-ups will occur in the underground garage via a one-way traffic pattern starting at Bryant just off Embarcadero and exiting on Emerson (see **Tab G**). Cars would only be allowed to turn right entering and exiting the campus, keeping much of Castilleja-related traffic out of the neighborhood. The following figure illustrates the proposed Master Plan and drop-off/pick-up traffic flow:

Figure 2



2.1

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

Figure 3

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

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

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

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

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

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

a whole and - given the global reach of Castilleja's alumnae - others far beyond the bounds of Silicon Valley.

The details of our proposed sustainability plan that would be implemented as part of Master Plan construction are contained in the attached report titled: Master Plan Sustainability Road Map (see Tab H). Highlights include:

- 1) Achieving LEED Platinum once Master Plan is completed;
- 2) Extensive use of photovoltaic panels;
- 3) Net zero energy usage: the new building's annual energy demand will be met with clean, renewable energy sources;
- 4) Reduction by 10% of food service deliveries by implementing additional sustainable practices in food preparation and storage;
- 5) Furtherance of a TDM program that caps peak hour trips at 440;
- 6) Providing 100 bicycle parking spaces on site and building a public bicycle way station on the Bryant Street Bicycle Boulevard.

E. Project Benefits With the exception of the gymnasium and administration buildings, most of Castilleja's campus buildings are over 50 years old. Having outlived their useful lives, the buildings are not energy-efficient and do not meet 21st century pedagogical needs. The Master Plan and CUP, as proposed, would fulfill Castilleja's long term goals, obviating the need for further significant changes to either enrollment or campus configuration for decades to come. The following illustrates the benefits resulting from the implementation of the Master Plan:

1. Provides Infrastructure to Sustain Castilleja's Pedagogical Mission: Buildings will be designed to integrate state-of-the-art technology and teaching practices, as well as to be flexible to adapt to unanticipated changes.
2. Better Compatibility with Neighborhood: Proposed new buildings will incorporate architecture more compatible with the adjacent neighborhoods.
3. Sustainability and Energy Efficiency: The Master Plan will adopt aggressive sustainability goals, such as building to LEED Platinum specifications, and will commit to net zero energy consumption for our new building.
4. Expanded Landscaping: Perimeter landscaping will be enhanced with a significant number of additional drought-tolerant specimen-sized trees and shrubs to further enhance neighborhood compatibility and promote sustainability (see Tab I, "Arborist Reports").
5. Increased Parking: The Master Plan will expand capacity to contain nearly all employee, student, and visitor parking on-site.

6. **Reduced Service Delivery:** Through a combination of increased food storage capacity and installation of a loading dock, the new Master Plan will significantly reduce the number of deliveries to campus.

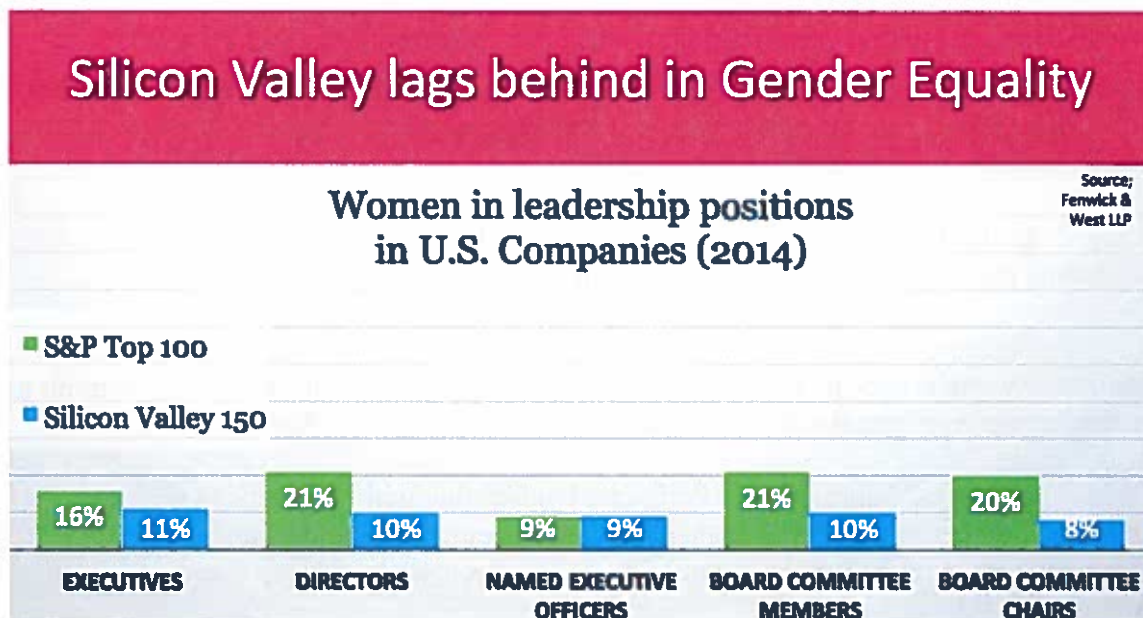
7. **Transportation Demand Management (TDM):** Castilleja will maintain vehicle trip conditions experienced since the school's TDM program was deployed and will not expand enrollment unless results can be verified. TDM measures currently in place and anticipated in the Master Plan are discussed in greater detail below in Section VI.

8. **Certainty:** The Master Plan provides for all current and anticipated pedagogical needs for decades.

V. The Case for Increased Enrollment

A. The Demand Quantified Economic gender inequality, both nationally and in Silicon Valley, is well documented. In 2014, women accounted for only 16% of executive positions in S&P top 100 companies. Astonishingly, that number is even lower in Silicon Valley, where only 11% of executive positions were held by women. When women account for over 50% of the total population, it is clear that more educational resources are needed to help ensure that women are equally represented in leadership and technological roles in our culture. Just as Castilleja has contributed to transforming gender balance on college campuses (from 15% of women attending college at the time of the school's founding to 100% of Castilleja graduates today), Castilleja is educating young women to assume leadership positions in greater numbers.

Figure 4



B. Educational Demand Increasing Demand for both private and public education in our community has steadily increased over the last several decades. Since 2000, Palo Alto Unified School District enrollment has increased 30% and Castilleja's student applications have increased 37%, while Castilleja has grown our student population by just 12%. Clearly the demand for quality education in our region will continue to grow and access to educational opportunities will need to grow as well.

C. Phased Enrollment Plan Castilleja commits to grow gradually over multiple years, adding no more than 27 students in any given year. Moreover, Castilleja would not increase enrollment unless traffic impacts remain at levels achieved under the existing TDM program and the proposed Master Plan milestones (see Figure 1) are met.

Figure 5



In order to verify Castilleja's TDM performance and enrollment, a variety of metrics and protocols will be implemented to ensure compliance with the CUP. While not a complete list, Castilleja agrees to the following measures:

1. Construction of underground parking garage before enrollment increases begin; and
2. Annual audits of enrollment by independent 3rd party firm; and
3. Bi-annual traffic and parking counts by independent 3rd party firm; and
4. Specific limit to number of special events.

Castilleja proposes a TDM enforcement program that focuses on dramatically increasing the intensity of TDM program measures, to drive vehicle trips down to predicted levels. The summary of Castilleja's suggested enforcement program creates tiers of increased TDM measures, including additional shuttles, increased remote parking lots, and enrollment reductions; the program is discussed in greater detail below.

VI. Transportation Demand Management (TDM) Program

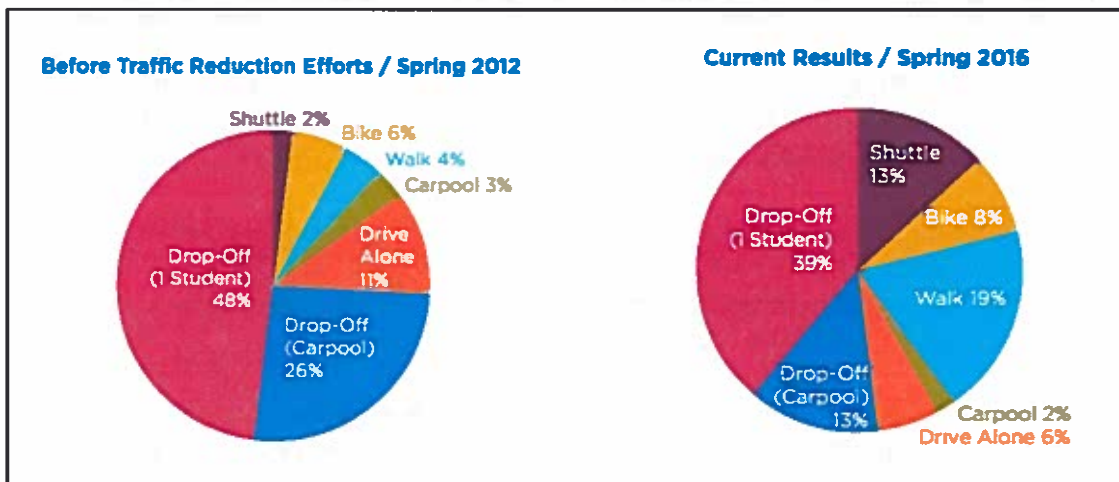
A. Traffic reduction measures in place In the Fall of 2012, Castilleja began its aggressive implementation of TDM measures to reduce vehicle trips associated with drop-off/pick-up, employees, visitors, special events, and service deliveries. In the Spring of 2012, with a 433 enrollment, 1.18 vehicle trips per student was measured by traffic engineers Fehr & Peers and reported to the City of Palo Alto by transportation demand management consultants Nelson Nygaard. By the Fall of 2015, with a 438 enrollment, 0.91 peak trips per student (398 peak trips) was generated and verified by Fehr & Peers. These results were maintained in a subsequent count in the Spring of 2016, demonstrating that existing TDM measures are working, and that additional measures will offset potential additional trips related to enrollment increases (see [Tab J](#) for past TDM results and [Tab K](#) for new TDM Plan).

Existing TDM measures are listed below:

1. Two bus routes
2. Shuttle service between Castilleja and Caltrain Station
3. Remote employee parking within walking distance of school
4. Event parking on Spieker Field
5. Mandatory employee TDM participation
6. Reduction in food service deliveries

Vehicle trip reductions were achieved by modifying commute behaviors, which resulted in a significant mode shift away from single passenger vehicle drop-off and pick-up. The following pie charts show the decrease in drive-alone behaviors and the increase in bicycle, pedestrian, and transit usage since 2012.

Figure 6

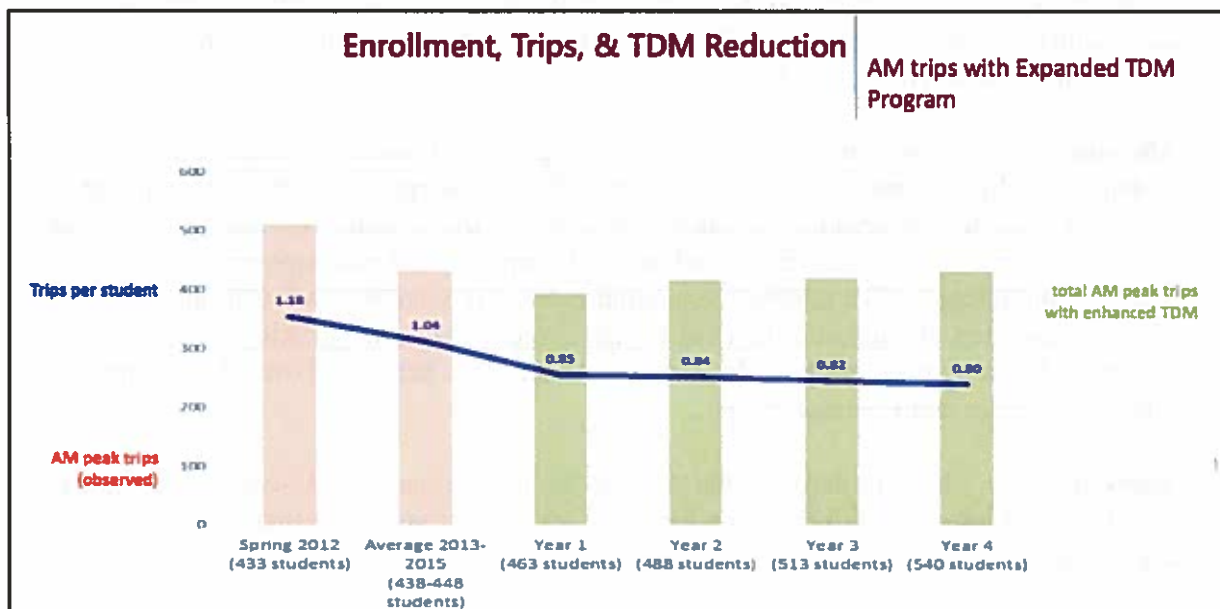


B. Future traffic reduction measures In order to maintain peak trips below 440, Castilleja is prepared to implement one or more of the following additional TDM measures:

1. Add bus route(s)
2. Implement afternoon bus service
3. Establish second remote parking location with shuttle service to school
4. Expand carpooling through better ride matching
5. Further reduce truck deliveries

C. Anticipated Trip Reduction Performance Castilleja will generate less traffic at its expanded 540 enrollment than was generated in 2012 with a 433 enrollment. This is achieved by significantly reducing trips per student. As discussed above, 1.18 trips per student was verified in 2012 and was reduced to 0.91 per student in 2015. Expressed in terms of total trips, Castilleja generated 511 peak-hour trips in 2102 at a trip rate of 1.18; Castilleja is expected to generate 440 or fewer peak-hour trips at a trip rate of 0.81 with an enrollment of 540. The following figure indicates historical and forecasted declines in peak hour trips per student.

Figure 7



VII. Embarcadero Access Study

In October 2015, the City of Palo Alto requested Castilleja School perform a traffic study analyzing the feasibility of access to the campus from Embarcadero Road before submitting its Conditional Use Permit application. The purpose of this section is to summarize the findings of this study. The complete report can be found behind [Tab L](#).

Castilleja engaged Fehr & Peers, a traffic engineering firm with extensive experience working in Palo Alto, to conduct the study. In consultation with the City's transportation staff, Fehr & Peers developed the following alternatives for purposes of this study:

Alternative 1. Embarcadero Access w/Widening. This alternative provides driveway access from Embarcadero Road with drop offs occurring within an underground parking structure. Embarcadero Road maintains four travel lanes (2 w/b and 2 e/b). A left-turn lane is added to access the underground parking garage. This alternative requires widening on the south side of Embarcadero Road between Emerson and Bryant.

Alternative 2. Embarcadero Access w/3 lane Embarcadero. This alternative provides driveway access from Embarcadero Road, with drop-offs occurring within an underground parking structure. Embarcadero Road is reduced to 3 travel lanes (2 w/b and 1 e/b) and adds a left-turn lane from Embarcadero (w/b) to access the underground garage driveway. No widening of Embarcadero Road is required.

Alternative 3. Emerson/Bryant Access w/3 lane Embarcadero. This alternative provides access to the underground parking structure from driveways on Emerson and Bryant just off Embarcadero, with drop-offs occurring within the underground garage. Embarcadero is reduced to 3 travel lanes (2 w/b and 1 e/b). The e/b lane would be sufficient to add proposed bicycle lane on Embarcadero. Westbound traffic would turn left onto Bryant to enter the campus.

Alternative 3b. Emerson/Bryant w/3 lane Embarcadero. This alternative maintains the same configuration as Alternative 3 above with the exception of the addition of a left-turn from Embarcadero (w/b) onto Emerson.

Alternative 4a. Bryant Street Access/Emerson Egress w/4 lane Embarcadero (no widening). This alternative has no driveway on Embarcadero; all access is via Bryant Street, as close to Embarcadero as safety permits. All traffic exits via Emerson Street and is forced to turn right only at Embarcadero. All drop-offs and pick-ups occur in the underground garage. This alternative maintains two Embarcadero w/b through-lanes, two e/b through-lanes, and left-turn lanes at Bryant Street. This configuration would accommodate a planned e/b bicycle lane on Embarcadero between Town & Country Shopping Center and Emerson Street.

Alternative 4b. This alternative is the same as 4a but assumes a yield-controlled right-turn onto Embarcadero from n/b Emerson Street. This alternative shows that a stop sign would control the right turn movement.

Assumptions

1. Trip generation assumptions used for this study are based on the extensive driveway vehicle counts monitored by Fehr & Peers over the past several years. Fehr & Peers has extensive experience monitoring traffic patterns at Castilleja, allowing them to provide the most accurate data available.

2. Fehr & Peers also utilized the City of Palo Alto Comprehensive Plan Traffic Model Update, prepared by the City's contractor Hexagon Consultants, to predict growth in background traffic growth. The Hexagon study predicts a 29% to 32% increase by 2030; Fehr & Peers' Traffic Model Update used 31% to calculate background traffic growth.

3. A trip cap of 440 total trips during any peak hour was used to reflect the measured and verified Transportation Demand traffic reductions made by Castilleja. Enrollment of 540 students was used to reflect the enrollment increase requested in this CUP application.

4. Fehr & Peers prepared a trip distribution for school traffic based on student zip code and city of residence in 2012. Using this distribution pattern, revised trip distributions were prepared for each alternative, which shows 95% of school traffic accessing Castilleja from Embarcadero Road.

Findings In summary, the analysis concludes that the 31% projected background traffic growth will cause queuing spillback resulting in Embarcadero Road delays with or without any Castilleja increase in enrollment. Figure 8 provides a comparison of the performance of the alternatives.

Figure 8

Intersection	Existing		Alt 1		Alt 2		Alt 3a		Alt 3b		Alt 4a		Alt 4b	
	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
Bryant & Embarcadero														
Westbound Left-turn to Bryant	✓	✗	--	--	--	--	✗✗	✗✗	✗✗	✗	✗	✓	✗	✓
Eastbound Left-turn to Bryant	✓	✓	✗	✗	✗	✗	✗	✗✗	✗	✗✗	✗	✗	✗	✗
Eastbound Through Traffic	✓	✓	✗	✗	✗✗	✗✗	✗	✗✗	✗	✗✗	✓	✓	✓	✓
Northbound Right-turn	✓	✓	✓	✓	✓	✓	✗	✗	✗	✗	✓	✓	✓	✓
Embarcadero Entrance														
Westbound Left-turn - Inbound	--	--	✗	✗✗	✗	✗✗	--	--	--	--	--	--	--	--
Northbound Right-turn - outbound	--	--	✓	✗	✗✗	✗✗	--	--	--	--	--	--	--	--
Emerson & Embarcadero														
Westbound Left-turn to Emerson	--	--	--	--	--	--	--	--	✓	✓	--	--	--	--
Northbound Right-turn	✓	✓	✓	✓	✓	✓	✓	✗	✓	✗	✓	✓	✗	✗✗
✓ minimal queuing / spillback ✗ moderate queuing / spillback ✗✗ long queues / spillback														

As a result of the Embarcadero access study, Castilleja modified our Master Plan to reflect Alternative 4b).

VIII. Parking

A. Underground Parking Construction of underground parking garage before enrollment increases begin. The 130-space underground parking garage and 40 surface parking spaces, yielding 170 on-site capacity, will enable Castilleja to self-park.

B. Surface Parking Additional on-site parking will limit the need for significant street parking on Castilleja frontage of neighborhood streets.

C. Residential Permit Parking (RPP) To the extent that the City pursues RPP in our neighborhood, Castilleja would support implementation of the program. An RPP program would likely eliminate long-term non-residential street parking during the week, similar to the RPP program instituted in the Downtown area.

IX. Outreach and Neighborhood Involvement

A. Neighborhood Input Construct Over the past 3 years, Castilleja has engaged in a myriad of communication and outreach activities regarding the CUP and Master Plan to disseminate information to and solicit input from the immediate and greater neighborhood. This outreach has included the following activities: eight (8) large neighborhood meetings, nine (9) neighbor focus groups, and seventeen (17) small neighborhood task-force meetings facilitated by licensed facilitator Geoff Ball of Geoff Ball & Associates; a dedicated neighborhood web portal (www.castilleja.org/neighborhood); and direct mail and email communications. Via the portal, we will continue to provide the neighborhood, community groups, and interested parties with future dates of public hearings and a link to the project documents when made available. In addition, we will engage with any interested associations who seek to learn about our endeavor and/or seek to provide feedback.

B. Master Plan Input With the assistance of Geoff Ball, a licensed facilitator, we have engaged in a neighborhood dialogue which involved the exhaustive study of all campus access points, distribution of traffic, and the placement of service and other noise generating activities. See [Tab M](#) for a summary of neighbor input as well as Master Plan and operational solutions aimed to address their concerns.

X. Summary

- Castilleja can modernize its facilities while improving neighborhood conditions
- Phased enrollment growth will occur only:
 - as Master Plan milestones are met, including completion of an underground parking garage; and
 - as long as trip counts remain below 440 as verified by 3rd parties
- Overwhelming admissions demand can be better accommodated, giving more girls and young women access to quality education
- Enforcement and monitoring will be built into Castilleja's program so enrollment will not increase unless performance is verified
- All feasible Master Plan alternatives have been exhaustively studied and trade-offs have been evaluated.

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
LEIGH F. PRINCE
GREGORY K. KLINGSPORN
NICOLAS A. FLEGEL
KRISTINA B. ANDERSON

SARAH E. KERN
JENNIFER A. BEYERS
KIMBERLY B. SAMEK

OF COUNSEL
KENT MITCHELL

RETIRE
JOHN D. JORGENSEN
MARGARET A. SLOAN

MARVIN S. SIEGEL
(1936 - 2012)

August 18, 2016

VIA EMAIL - Amy.French@cityofpaloalto.org

Amy French
Chief Planning Official
City of Palo Alto
250 Hamilton Ave.
Palo Alto, CA 94301

Re: Castilleja Enrollment

Dear Amy:

Per the City's mandate, this letter is intended to inform the City of the 2016-2017 student enrollment, taken from Castilleja's database, and on behalf of Castilleja, I hereby confirm that no more than 438 students are enrolled for the 2016-2017 school year.

As background, in December 2013, the City requested that Castilleja provide a revised attendance reduction plan as a result of its overenrollment. In January 2014, Castilleja submitted a revised Enrollment Reduction Plan along with a robust Transportation Demand Management Program (TDM). The following month, the City's Advance Planning Manager, Steven Turner, confirmed that Castilleja's revised Enrollment Reduction Plan was acceptable, in part. Specifically, he confirmed that "the enrollment reduction plan for the 2014-15 school year, which provides a reduction of four students below the current enrollment of 448, is acceptable." Within the letter, he "also determined that the enrollment reduction plan for the 2015-16 school year, which provides a reduction of six students below the 2014-15 enrollment of 444 students, is

acceptable.” Additionally, Mr. Turner confirmed that “[f]uture enrollment caps will be determined by the outcome of a process to amend the school's Conditional Use Permit (CUP).” A copy of Steven's February 2014 letter, is attached as Exhibit A.

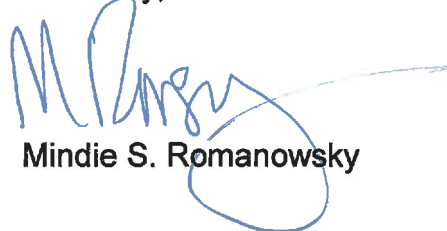
In accordance with the terms of the February 2014 letter from Mr. Turner, in September 2014, Castilleja submitted proof of enrollment for the 2014-15 school year, demonstrating and confirming that no more than 444 students were enrolled. Again, in September 2015, Castilleja submitted proof of enrollment for the 2015-16 school year, confirming that no more than 438 students were enrolled.

In the Fall of 2015, based on neighbor input, City staff encouraged Castilleja to study vehicular access from Embarcadero Road prior to submitting its application for a new CUP. Then, in November 2015, Jim Keene confirmed the construct in Steve Turner's letter which stipulated that Castilleja maintain enrollment at or below 438 students and continue to operate its TDM program as future enrollment caps will be determined by the outcome of the CUP process. Mr. Keene's letter is attached as Exhibit B.

On June 30, 2016, Castilleja submitted its application for a CUP, which is currently under review by staff.

Castilleja will continue the successful implementation of its TDM program and will maintain its enrollment of 438 students while the CUP is processed. Please let me know if you have any questions or need additional information concerning this matter.

Sincerely,



Mindie S. Romanowsky

Attachments

cc: Kathy Layendecker (Castilleja School)



PLANNING & COMMUNITY ENVIRONMENT

**CITY OF
PALO ALTO**

250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301
650.329.2441

February 28, 2014

Nanci Z. Kauffman
Head of School
Castilleja School
1310 Bryant Street
Palo Alto, CA 94301

Re: City Response to January 20, 2014 Memorandum from Castilleja School

Dear Ms. Kauffman:

The City is in receipt of your memorandum dated January 20, 2014 in response to the City of Palo Alto's December 20, 2013 regarding Castilleja School's Enrollment Reduction and Transportation Demand Management Plan. The City continues to appreciate the work of Castilleja School (School) staff to address the issues. The intent of this letter is to provide the City's response to the items contained in the January 20 letter and communicate the appropriate next steps to resolve the school's conformance issues. In summary, the City does not entirely accept the School's enrollment reduction plan. The City is aware of the School's student programming needs and is therefore agreeable to the short-term enrollment reductions as described below. However, the City also believes that a longer term solution is needed as well. It is the City's opinion that the process to amend the School's Conditional Use Permit is the best way to fully analyze the current operations of the School and address the impacts that affect the adjacent residential neighborhood.

Enrollment Reduction Plan

The City has determined that the enrollment reduction plan for the 2014-15 school year, which provides a reduction of four students below the current enrollment of 448 students, is acceptable. The City has also determined that the enrollment reduction plan for the 2015-16 school year, which provides a reduction of six students below the 2014-15 enrollment of 444 students, is acceptable. The School must provide enrollment information sufficient to demonstrate that no more than 444 students will be enrolled at the beginning of the 2014-15 school year. In addition, the City may request enrollment information throughout the school year to confirm that enrollment has not exceeded the 444 students. The City has not determined that the proposed future school year reductions are acceptable. Future enrollment caps will be determined by the outcome of a process to amend the school's Conditional Use Permit (CUP).

Transportation Demand Management Plan

The Transportation Demand Management (TDM) Plan, as described in the memorandum dated October 24, 2013 prepared by Nelson\Nygaard Consulting Associates is acceptable, in that the elements of the TDM plan appear to be adequate in achieving a 20% trip reduction (for a total of 456 AM peak trips) as compared to the amount of trips generated by 385 students without a TDM plan in place (511 AM peak trips). The City also finds that the monitoring plan as described in the January 16, 2014 memorandum



CityOfPaloAlto.org

Printed with soy-based inks on 100% recycled paper processed without chlorine.

Exhibit A

prepared by Nelson\Nygaard Consulting Associates is acceptable. The City will work with you to implement the monitoring plan and the data collection efforts in order to accurately assess TDM plan performance.

Amendment to the Conditional Use Permit

In the January 20 memorandum, you indicate a willingness to work with the City to outline a process to apply for a new CUP in January of 2015, for the 2015-16 academic year. The City is agreeable to this proposal, provided that the following occur:

1. The school follows the Enrollment Reduction Plan for the 2014-15 and 2015-16 school years as described above, and
2. That the Transportation Demand Management (TDM) program proposed by the school achieves the trip reductions as described in the memorandum from Nelson/Nygaard dated January 16, 2014 for the 2013-14 and 2014-15 school years.

The process to amend the CUP would begin upon the submittal of a complete CUP amendment application to the City's Planning department. A decision to amend the CUP would be made by the Director of Planning and Community Environment. This decision may be appealed to the Planning and Transportation Commission and City Council, which would conduct public hearings to accept testimony from the public. The City Council would make the ultimate decision on the CUP amendment.

If the request for an amended CUP is denied by the City Council (or alternatively if it is determined that either the TDM trip reductions or the Enrollment Reduction Plan has not or cannot be achieved), the City will begin the CUP revocation process as described in Palo Alto Municipal Code, Section 18.77.110. In addition, if the School cannot achieve TDM and/or enrollment goals, the City will assess fines for each instructional day that the School remains in violation of the maximum enrollment as of October 25, 2013.

Thank you for your continued efforts to respond to the City's concerns. The City recognizes the long history of the School in Palo Alto and the importance of the educational programs it provides to the community. Although the City is limited in our ability to affect the School's educational mission, we have a responsibility to ensure that the school is operating in a manner that is respectful of the immediate neighborhood. The City is confident that the School will act quickly to implement the enrollment reduction and TDM plans described in this letter. Please contact me as soon as possible if you have any questions.

Sincerely,



Steven Turner
Advance Planning Manager

cc. James Keene, City Manager
Hillary Gitelman, Director, Planning and Community Environment
Cara Silver, Senior Assistant City Attorney
Mindie S. Romanowsky, Jorgenson, Siegel, McClure & Flegel LLP



OFFICE OF THE CITY MANAGER

CITY OF
**PALO
ALTO**

250 Hamilton Avenue, 7th Floor
Palo Alto, CA 94301
650.329.2392

November 5, 2015

Nanci Kauffman
Head of School
Castilleja School
1310 Bryant Street
Palo Alto, CA 94301

Subject: Conditional Use Permit (CUP) and Master Plan

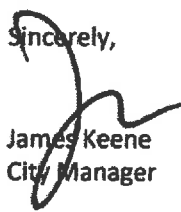
Dear Ms. Kauffman: *Nanci*

Thanks to you and your team for meeting with Planning Director, Hillary Gitelman and myself recently. We appreciated the opportunity to hear about your outreach to Castilleja's neighbors and your interest in pursuing an updated master plan for the site via the Conditional Use Permit (CUP) process.

As we discussed at our meeting, we believe the potential for vehicular access from Embarcadero Road should be fully explored to determine its feasibility. Hillary would be happy to coordinate a meeting between your traffic consultant and the City's new Chief Transportation Official, Joshua Mello, to discuss the scope of the analysis.

As suggested in your letter of October 30, 2015, we acknowledge that additional time will be needed for this analysis prior to submitting a formal CUP application to reflect existing and/or future student enrollment. Thank you for your commitment to keep enrollment at 438 students and maintain your robust TDM program during this period. We also appreciate your continued efforts to obtain and respond to the neighbors' feedback.

Sincerely,


James Keene
City Manager

Cc: Hillary Gitelman, Planning Director
Molly Stump, City Attorney



CityOfPaloAlto.org

Printed with soy-based inks on 100% recycled paper processed without chlorine.

Exhibit B

French, Amy

From: Mindie S. Romanowsky <msr@jsmf.com>
Sent: Tuesday, January 31, 2017 12:04 PM
To: French, Amy
Subject: Castilleja

Dear Amy-

On behalf of Castilleja School, based on the notice of incomplete for the Castilleja project- and the feedback contained therein- it has become clear that in addition to Castilleja's application for a CUP and Master Plan, we also need to include additional application requests for the project, as follows:

- **Parcel Map with Exception.** This is in response to comments from Public Works whereby we cannot build across property lines and we need to merge existing lots to accommodate the proposed site plan.
- **Variance** to allow pedestrian access and vehicle ramp into the subterranean garage to encroach into the Embarcadero Road special set back and the Emerson street side setback and some subterranean parking to encroach into the Embarcadero Road and side setbacks. This request is in response to comments from the Planning Department related to the proposed location and configuration (i.e. Parking space locations) of the proposed subterranean garage and access thereto.

Of important note, the above requests were included in the Notice of Preparation for the Environmental Impact Report and will be reviewed pursuant to CEQA, accordingly.

Castilleja intends to provide further application materials and findings in support of the above listed application items, in the forthcoming weeks.

Thank you.
Mindie Romanowsky.

Mindie S. Romanowsky
Jorgenson, Siegel, McClure & Flegel LLP
1100 Alma Street, Suite 210
Menlo Park, CA 94025
Ph: 650-324-9300
Fx: 650-324-0227
Email: msr@jsmf.com

PALO ALTO, CALIFORNIA
06.30.2016

[illegible]

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85																

[illegible][illegible]

Castilleja School

2000-2001

Title Sheet

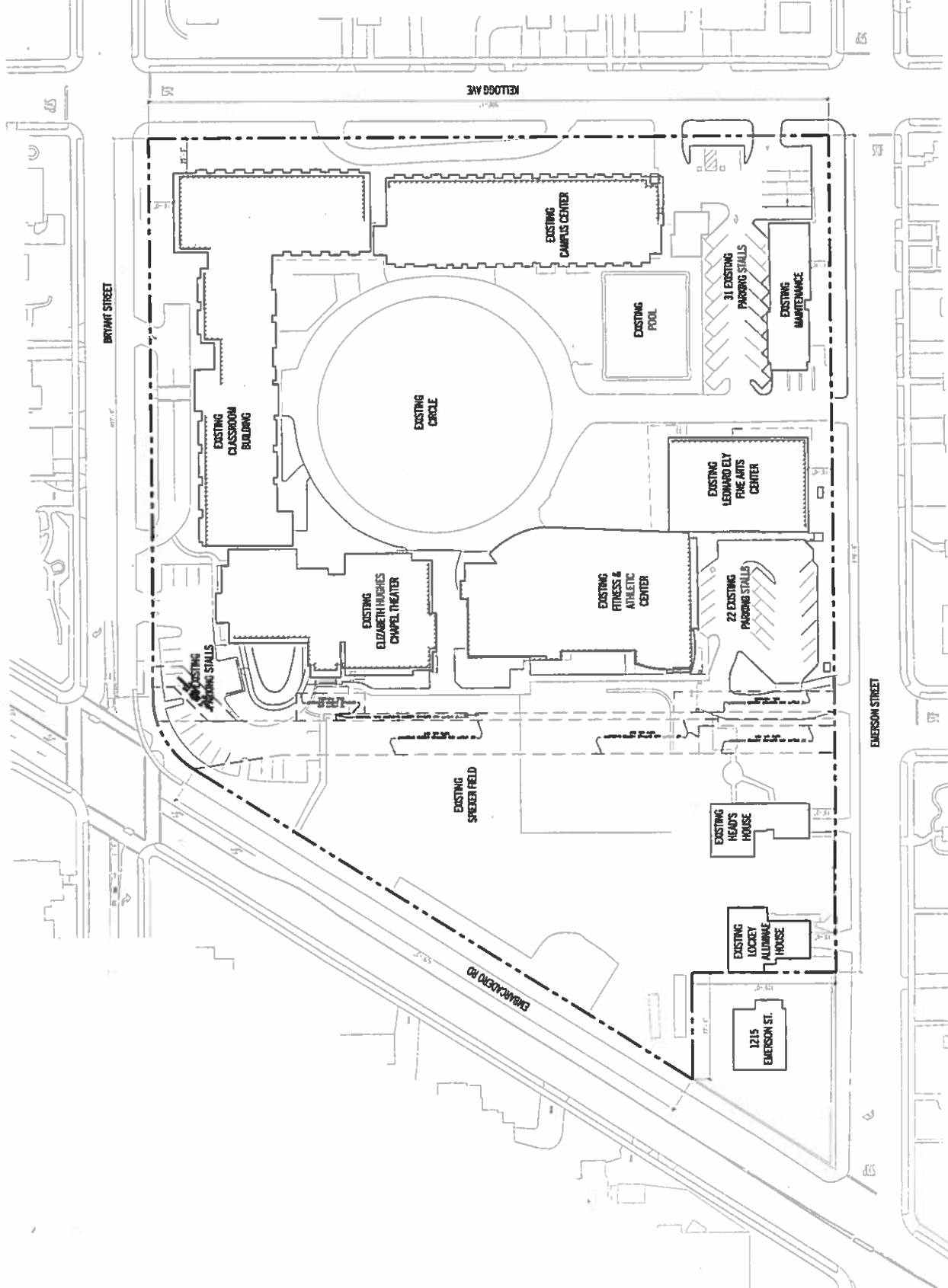
100% COTTON
 100% COTTON
 100% COTTON

1.0

STEINBERG

125 S. Market Street
San Jose, CA 95130

Existing School
1215 Emerson St.
Pasadena, CA 91107
Drawing
1215 Emerson St. School
1215 Emerson St. School
1215 Emerson St. School



Castilleja School

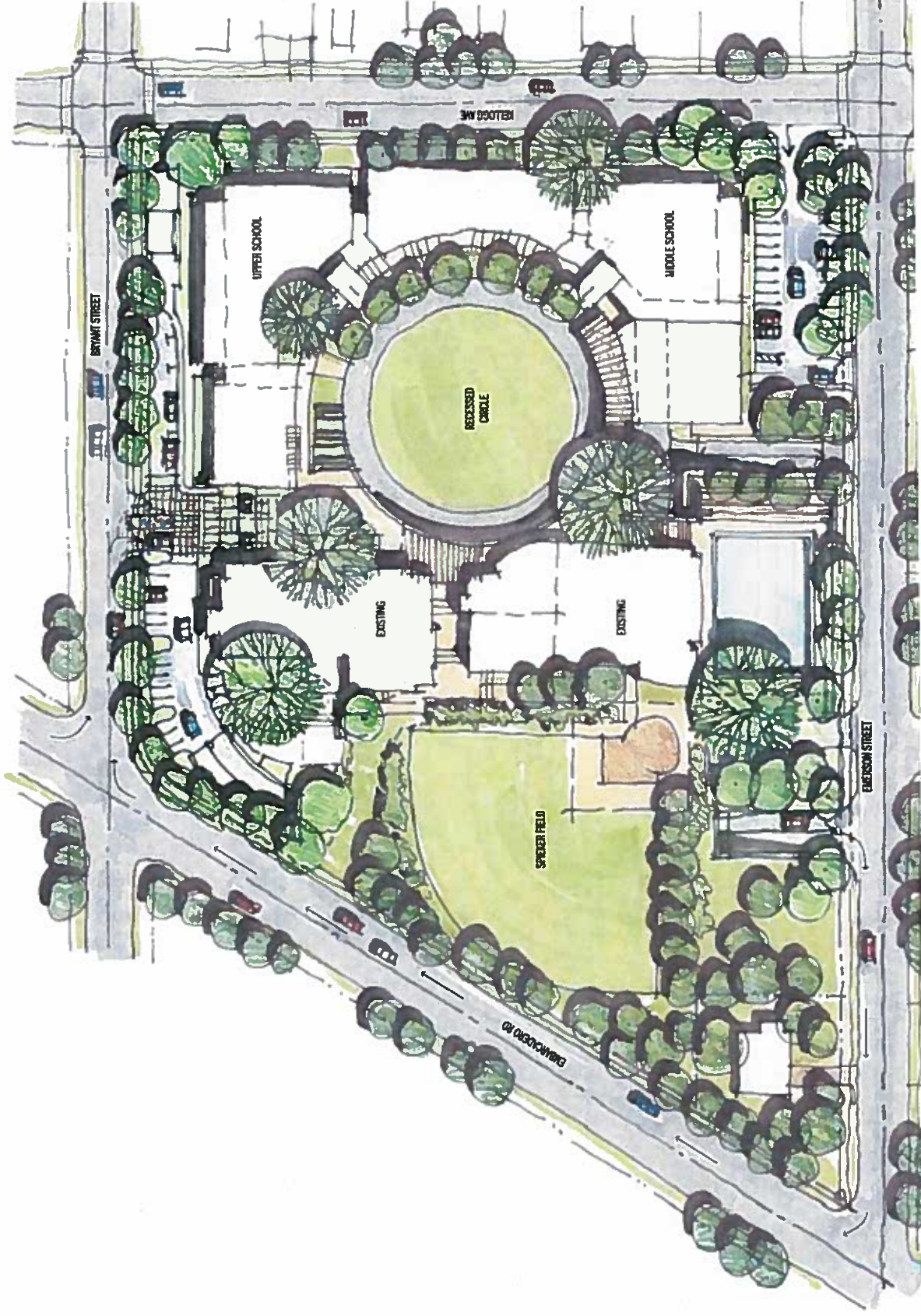
1215 Emerson St.
Pasadena, CA 91107

1" = 10' 0"

Existing Site Plan

1215 Emerson St.
Pasadena, CA 91107

Castilleja School
1113 Bryant Street
San Jose, CA 95128
Phone: (408) 921-1111
Fax: (408) 921-1112
Email: info@castilleja.org
Website: www.castilleja.org



Castilleja School

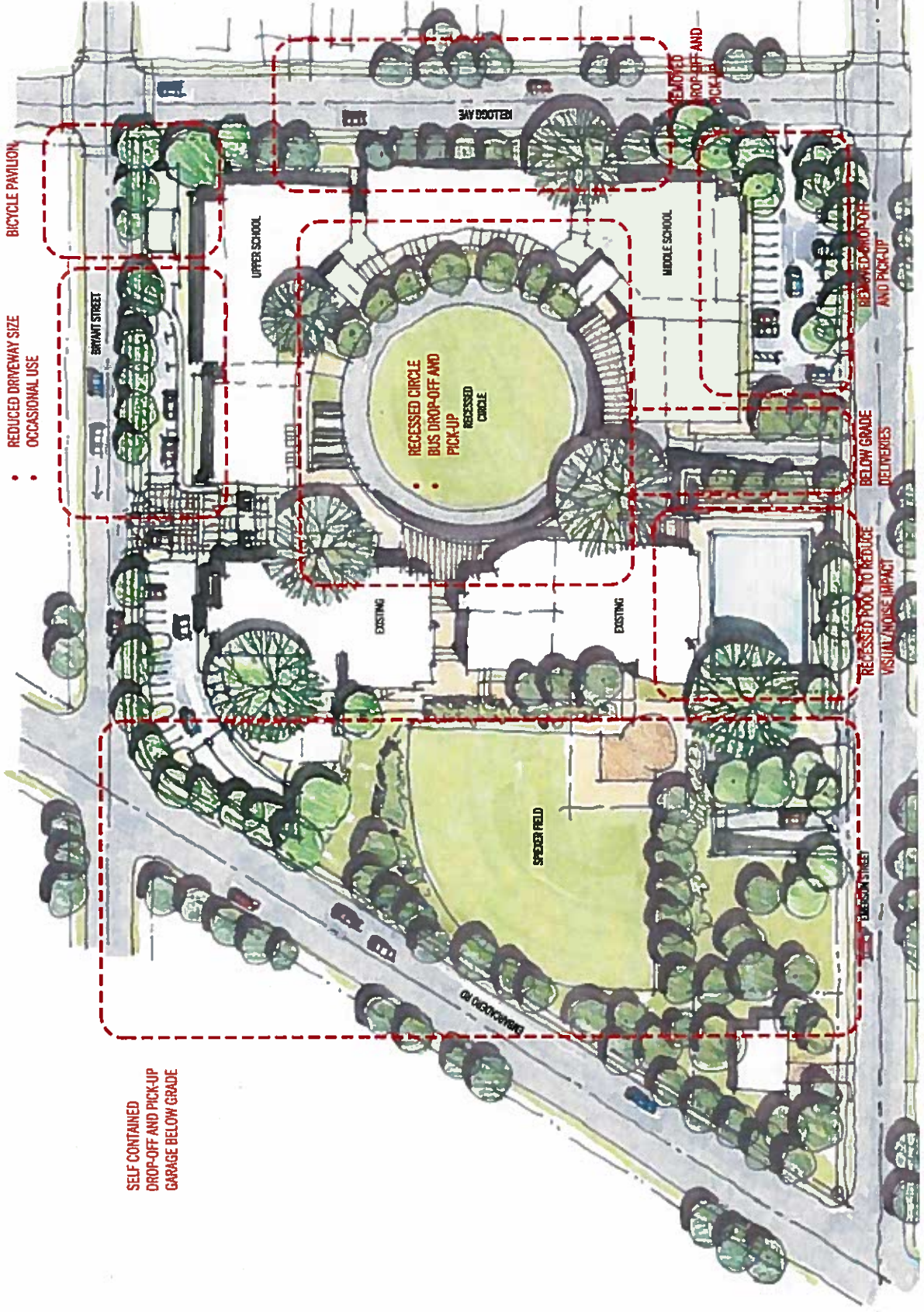
1113 Bryant Street
San Jose, CA 95128

Scale: 1/8" = 1'-0"

Proposed Illustrative Master Plan

Scale: 1/8" = 1'-0"

Castilleja School
1115 Bryant Street
Foster, CA 95630
Phone: 916.338.1100
Fax: 916.338.1101
www.stenberg.com
1115 Bryant Street
Foster, CA 95630



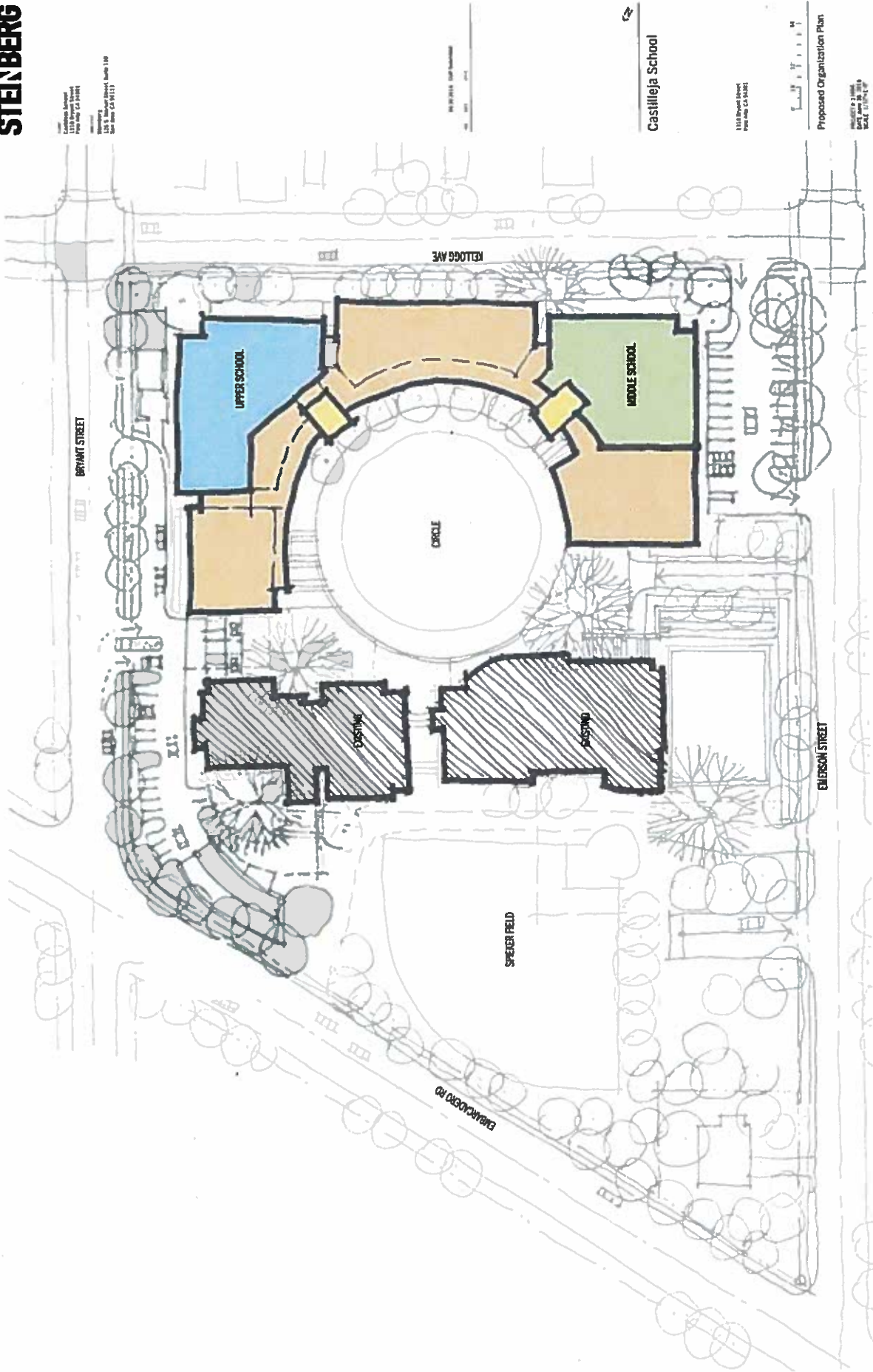
Castilleja School

1115 Bryant Street
Foster, CA 95630



Neighborhood Impact
Mitigation Components
PROJECT: 1115 BRYANT
SCALE: 1/8" = 1'-0"

Castilleja School
 1115 Bryant Street
 San Jose, CA 95128
 408.281.1111
 www.castilleja.org



Castilleja School

1115 Bryant Street
 San Jose, CA 95128
 408.281.1111
 www.castilleja.org

Proposed Organization Plan

Scale: 1" = 100'

Castilleja School
1118 Bryant Street
San Jose, CA 95128
Phone: (408) 921-1118
Fax: (408) 921-1119

Project: 1118
Site: 1118
Scale: 1/4" = 1'-0"

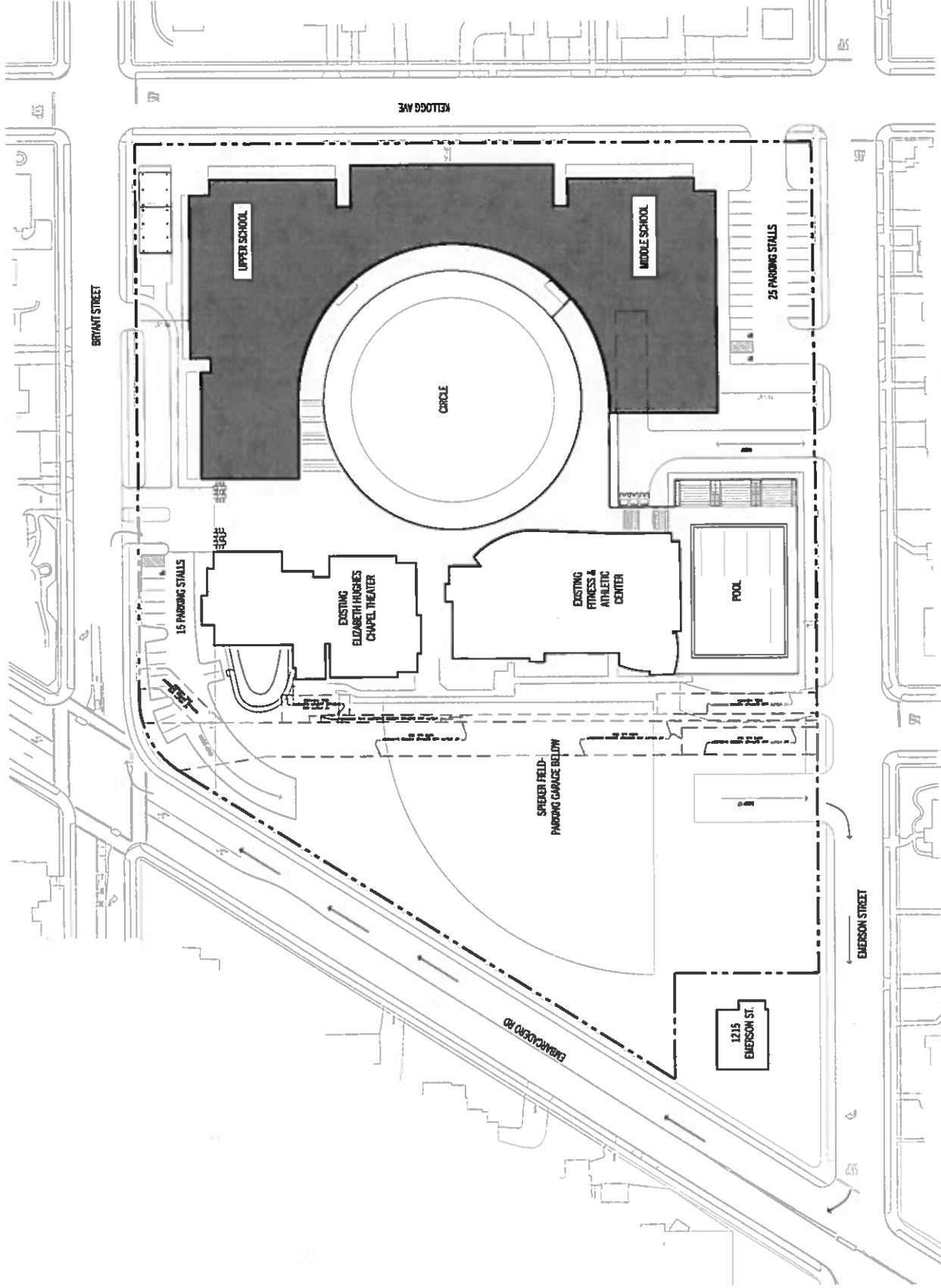
1118 BRYANT STREET
SAN JOSE, CA 95128

Castilleja School

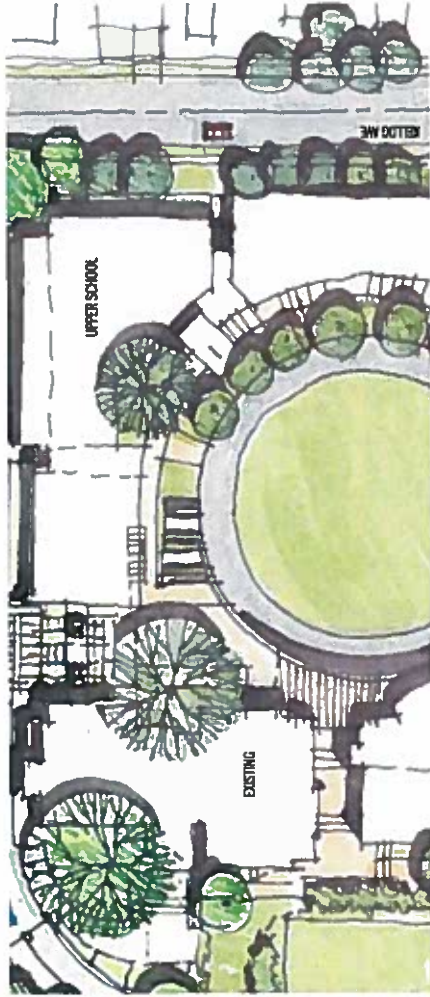
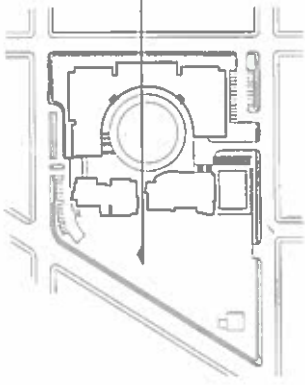
1118 BRYANT STREET
SAN JOSE, CA 95128

HARDLINE MASTER PLAN

PROJECT: 1118
SHEET: 001 OF 001
SCALE: 1/4" = 1'-0"



Castilleja School
1210 Baywood Street
Palo Alto, CA 94301
Phone: 650.321.1234
Fax: 650.321.1235
www.stenberg.com



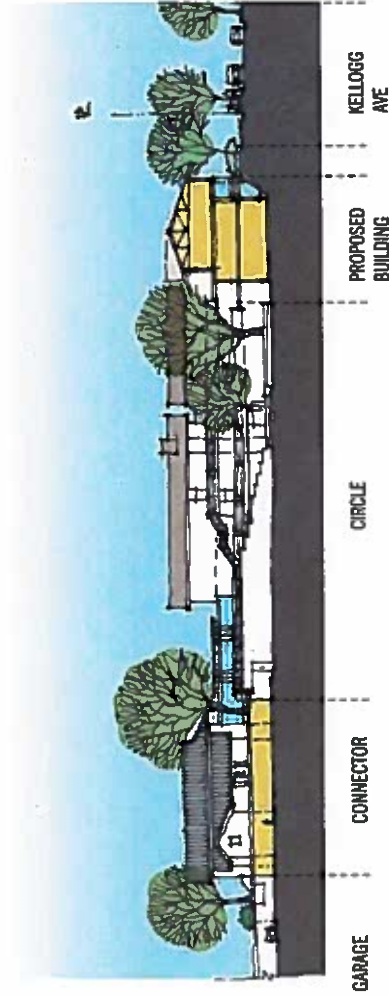
1210 Baywood Street
Palo Alto, CA 94301
Phone: 650.321.1234
Fax: 650.321.1235
www.stenberg.com

Castilleja School

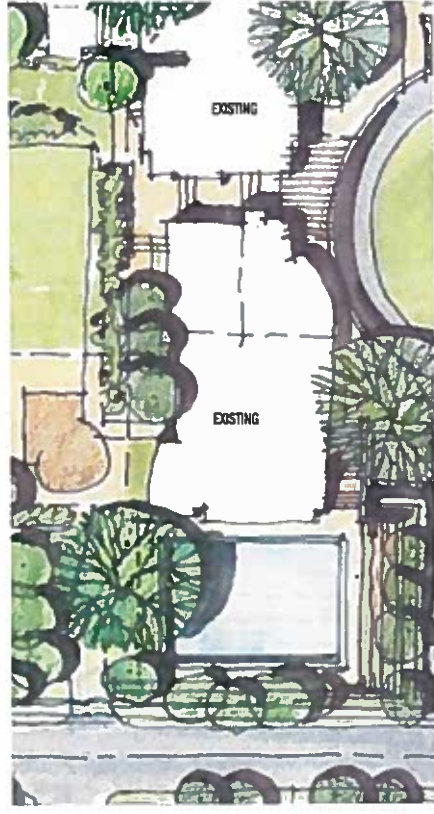
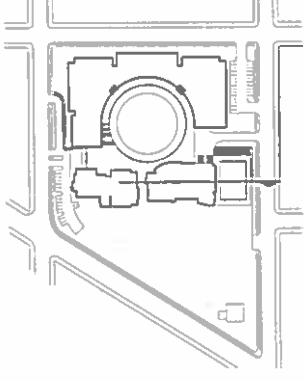
1210 Baywood Street
Palo Alto, CA 94301
Phone: 650.321.1234
Fax: 650.321.1235
www.stenberg.com

Circle Section

1210 Baywood Street
Palo Alto, CA 94301
Phone: 650.321.1234
Fax: 650.321.1235
www.stenberg.com



Lead
Castilleja School
1110 Bryant Street
San Jose, CA 95128
Phone: 408.951.1100
Fax: 408.951.1101
www.stenberg.com
Project
Castilleja School, San Jose, CA
Site Plan, CA 95128



1110 BRYANT STREET
SAN JOSE, CA 95128

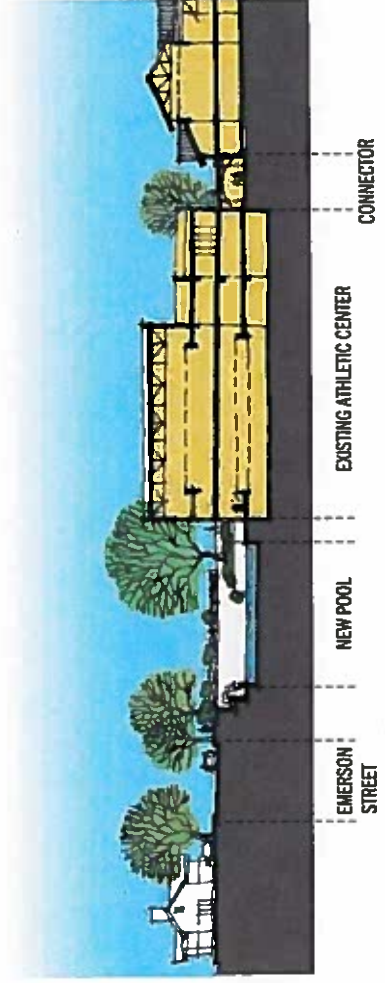
1110 BRYANT STREET
SAN JOSE, CA 95128

Castilleja School

1110 Bryant Street
San Jose, CA 95128

Pool Section

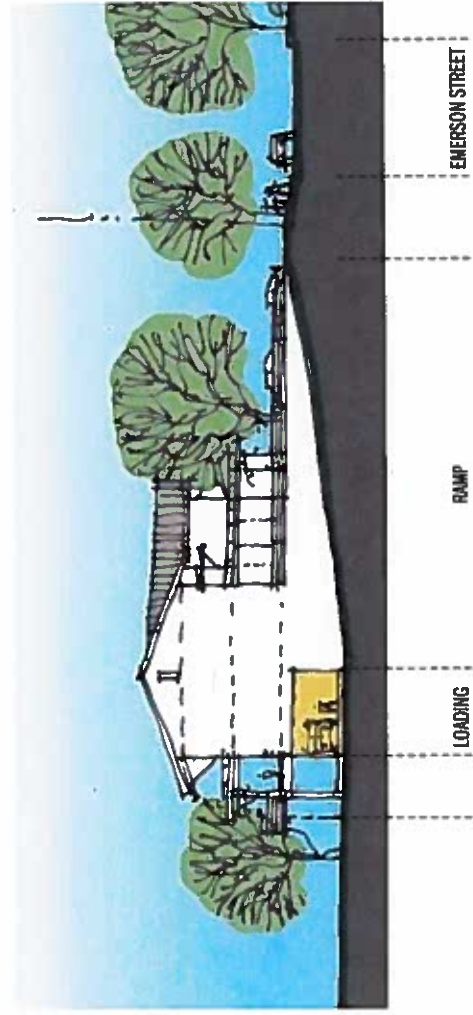
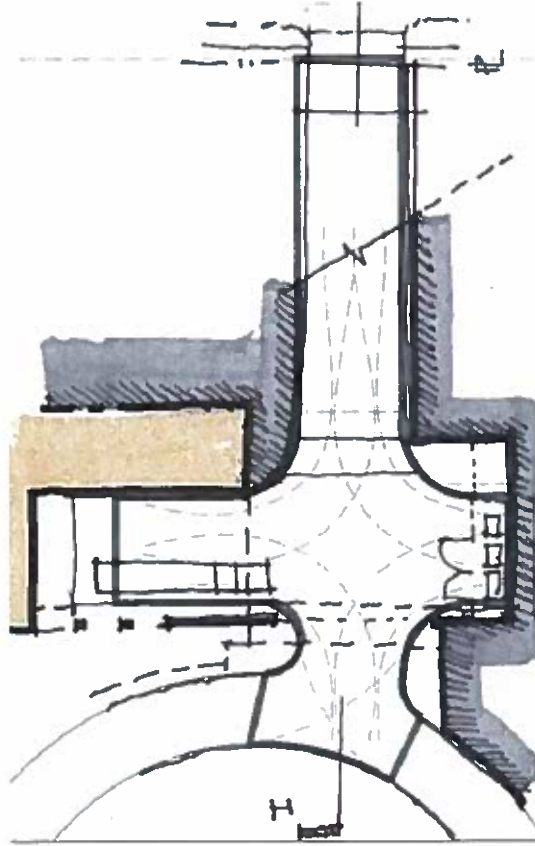
1110 BRYANT STREET
SAN JOSE, CA 95128
SCALE: 1/8" = 1'-0"



Castilleja School
1133 Bryant Street
Palo Alto, CA 94304
www.stenberg.com
1133 Bryant Street, Suite 100
Palo Alto, CA 94304

06/28/2016 CDP Revisions

10' 0" 1/4" 1/8" 1/16"



Castilleja School

1133 Bryant Street
Palo Alto, CA 94304

Ramp Section

1133 Bryant Street
Palo Alto, CA 94304
SCALE: 1/8" = 1'-0"

Castilleja School
1218 Bryant Street
San Jose, CA 95128
Phone: (408) 281-1111
Fax: (408) 281-1112
www.castilleja.org

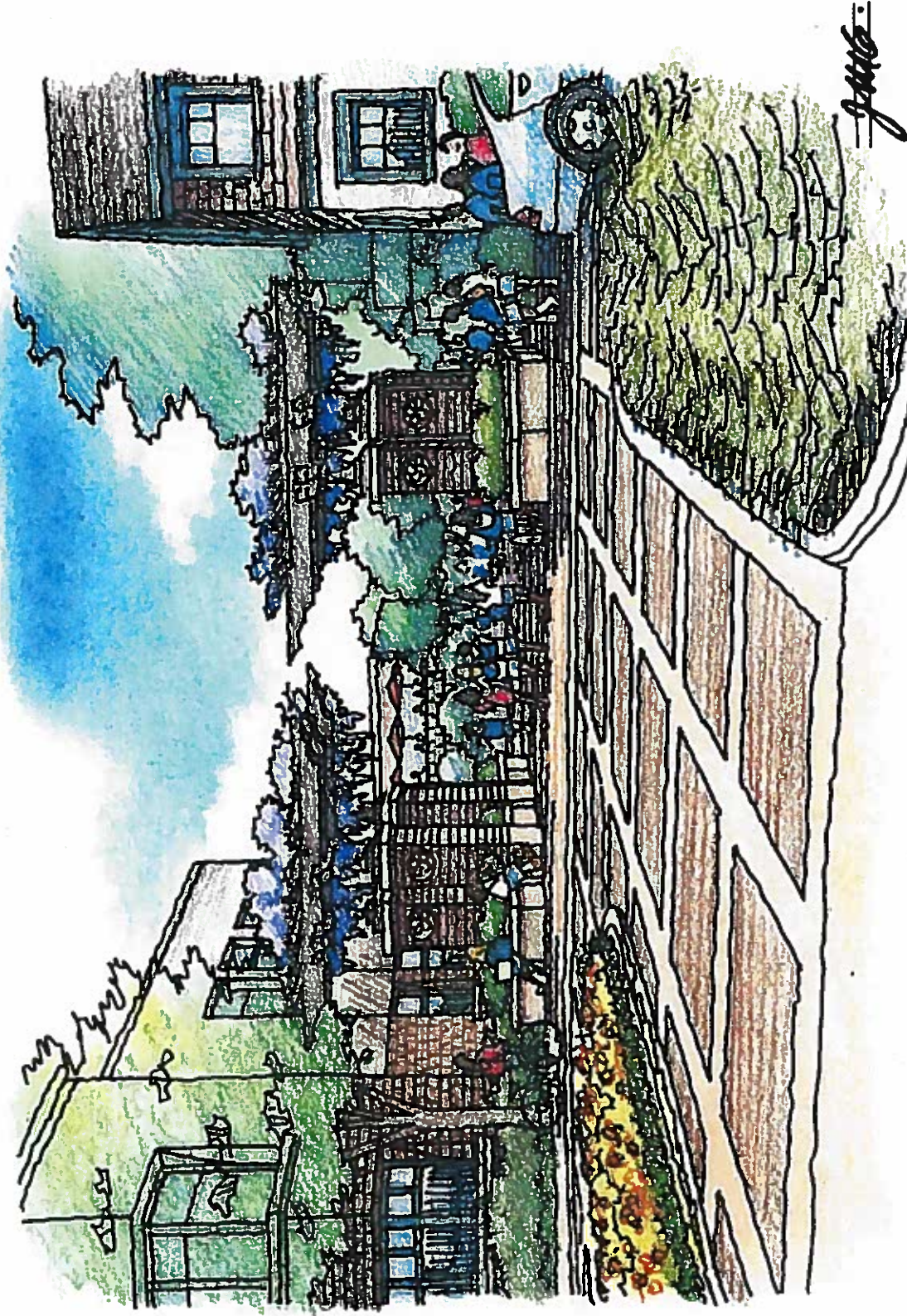
1218 Bryant Street
San Jose, CA 95128

Castilleja School

1218 Bryant Street
San Jose, CA 95128

Artwork

Project: 1218
Date: 04/18/14
Scale: 1/8"



gms

100%
 Castilleja School
 1000 1st Street
 San Jose, CA 95128
 Phone: (408) 281-1111
 Fax: (408) 281-1112
 Email: info@castilleja.org
 Website: www.castilleja.org

100%
 Castilleja School
 1000 1st Street
 San Jose, CA 95128
 Phone: (408) 281-1111
 Fax: (408) 281-1112
 Email: info@castilleja.org
 Website: www.castilleja.org

100%
 Castilleja School
 1000 1st Street
 San Jose, CA 95128
 Phone: (408) 281-1111
 Fax: (408) 281-1112
 Email: info@castilleja.org
 Website: www.castilleja.org

100%
 Castilleja School
 1000 1st Street
 San Jose, CA 95128
 Phone: (408) 281-1111
 Fax: (408) 281-1112
 Email: info@castilleja.org
 Website: www.castilleja.org

100%
 Castilleja School
 1000 1st Street
 San Jose, CA 95128
 Phone: (408) 281-1111
 Fax: (408) 281-1112
 Email: info@castilleja.org
 Website: www.castilleja.org



gato

Castilleja School
1218 Bryant Street
Fremont, CA 94539
Phone: (415) 871-1100
Fax: (415) 871-1101
www.castilleja.org

08/22/2018 10:07 AM

Castilleja School

1218 Bryant Street
Fremont, CA 94539

The Circle

08/22/2018 10:07 AM
08/22/2018 10:07 AM
08/22/2018 10:07 AM



Castilleja School
1115 Bayview Street
San Jose, CA 95128
Phone: (408) 921-1111
Fax: (408) 921-1112
Email: info@castilleja.org

08/28/2013 10:00 AM

08/28/2013 10:00 AM

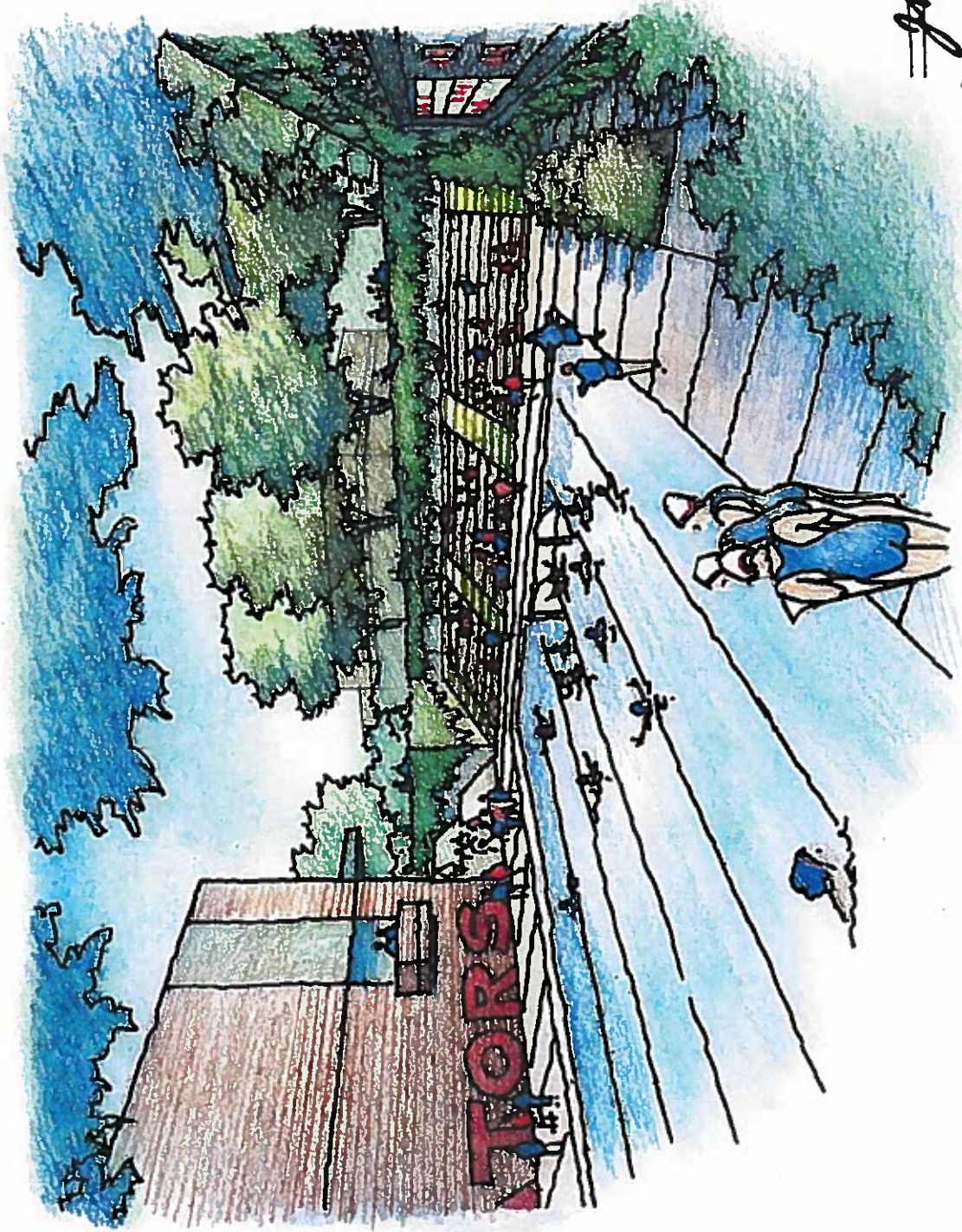
Castilleja School

1115 Bayview Street
San Jose, CA 95128

Recessed Pool

PROJECT: 1115
DATE: 08/28/2013
SCALE: 1/8"

gms



City of Palo Alto

Tree Protection - It's Part of the Plan!

Make sure your crews and subs do the job right!

Fenced enclosures around trees are essential to protect them by keeping the foliage canopy and branching structure clear from contact by equipment, materials and activities, preserving roots and soil conditions in an intact and non-compacted state, and identifying the Tree Protection Zone (TPZ) in which no soil disturbance is permitted and activities are restricted, unless otherwise approved. An approved tree protection report must be added to this sheet when project activity occurs within the TPZ of a regulated tree.

For detailed information on Palo Alto's regulated trees and protection during development, review the City Tree Technical Manual (TTM) found at www.cityofpaloalto.org/trees/

TREE ENCLOSURE STATEMENT

1. I, the undersigned, am the owner or authorized agent of the project described in the project description and am responsible for the completion of this statement.

2. I have reviewed the City of Palo Alto Tree Protection Manual (TPM) and understand the requirements for tree protection during development.

3. I have identified all trees on the project site that are regulated trees and have determined the Tree Protection Zone (TPZ) for each tree.

4. I have designed and installed tree enclosures for all regulated trees on the project site.

5. I have provided a copy of this statement to the City of Palo Alto and have received approval for the tree enclosures.

6. I understand that the City of Palo Alto may require additional measures to protect trees during development.

7. I agree to comply with all requirements of the City of Palo Alto Tree Protection Manual (TPM) and to maintain the tree enclosures throughout the project.

8. I agree to provide a copy of this statement to the City of Palo Alto upon completion of the project.

9. I agree to provide a copy of this statement to the City of Palo Alto upon completion of the project.

10. I agree to provide a copy of this statement to the City of Palo Alto upon completion of the project.

City of Palo Alto

Tree Protection Manual

Table of Contents

- 1. Introduction
- 2. Purpose
- 3. Scope
- 4. Definitions
- 5. Tree Protection Zones (TPZ)
- 6. Tree Enclosures
- 7. Tree Removal
- 8. Tree Relocation
- 9. Tree Preservation
- 10. Tree Protection during Construction
- 11. Tree Protection during Landscaping
- 12. Tree Protection during Maintenance
- 13. Tree Protection during Demolition
- 14. Tree Protection during Other Activities
- 15. Tree Protection during Emergency Situations
- 16. Tree Protection during Other Situations
- 17. Tree Protection during Other Situations
- 18. Tree Protection during Other Situations
- 19. Tree Protection during Other Situations
- 20. Tree Protection during Other Situations

Table 1-1: Tree Protection Zones (TPZ) for Regulated Trees

Tree Species	TPZ Diameter (ft)	TPZ Area (sq ft)
Redwood	100	7,850
Sequoia	100	7,850
Coastal Redwood	100	7,850
California Redwood	100	7,850
Big Tree	100	7,850
Elm	50	1,960
Oak	50	1,960
Maple	50	1,960
Pine	50	1,960
Juniper	50	1,960
Cypress	50	1,960
Yew	50	1,960
Boxwood	50	1,960
Holly	50	1,960
Privet	50	1,960
Spirea	50	1,960
Hydrangea	50	1,960
Philadelphus	50	1,960
Deutzia	50	1,960
Abutilon	50	1,960
Malva	50	1,960
Rosa	50	1,960
Georgina	50	1,960
Camellia	50	1,960
Hydrangea	50	1,960
Philadelphus	50	1,960
Deutzia	50	1,960
Abutilon	50	1,960
Malva	50	1,960
Rosa	50	1,960
Georgina	50	1,960
Camellia	50	1,960

Table 1-2: Tree Protection Zones (TPZ) for Regulated Trees

Tree Species	TPZ Diameter (ft)	TPZ Area (sq ft)
Redwood	100	7,850
Sequoia	100	7,850
Coastal Redwood	100	7,850
California Redwood	100	7,850
Big Tree	100	7,850
Elm	50	1,960
Oak	50	1,960
Maple	50	1,960
Pine	50	1,960
Juniper	50	1,960
Cypress	50	1,960
Yew	50	1,960
Boxwood	50	1,960
Holly	50	1,960
Privet	50	1,960
Spirea	50	1,960
Hydrangea	50	1,960
Philadelphus	50	1,960
Deutzia	50	1,960
Abutilon	50	1,960
Malva	50	1,960
Rosa	50	1,960
Georgina	50	1,960
Camellia	50	1,960

Table 1-3: Tree Protection Zones (TPZ) for Regulated Trees

Tree Species	TPZ Diameter (ft)	TPZ Area (sq ft)
Redwood	100	7,850
Sequoia	100	7,850
Coastal Redwood	100	7,850
California Redwood	100	7,850
Big Tree	100	7,850
Elm	50	1,960
Oak	50	1,960
Maple	50	1,960
Pine	50	1,960
Juniper	50	1,960
Cypress	50	1,960
Yew	50	1,960
Boxwood	50	1,960
Holly	50	1,960
Privet	50	1,960
Spirea	50	1,960
Hydrangea	50	1,960
Philadelphus	50	1,960
Deutzia	50	1,960
Abutilon	50	1,960
Malva	50	1,960
Rosa	50	1,960
Georgina	50	1,960
Camellia	50	1,960

Table 1-4: Tree Protection Zones (TPZ) for Regulated Trees

Tree Species	TPZ Diameter (ft)	TPZ Area (sq ft)
Redwood	100	7,850
Sequoia	100	7,850
Coastal Redwood	100	7,850
California Redwood	100	7,850
Big Tree	100	7,850
Elm	50	1,960
Oak	50	1,960
Maple	50	1,960
Pine	50	1,960
Juniper	50	1,960
Cypress	50	1,960
Yew	50	1,960
Boxwood	50	1,960
Holly	50	1,960
Privet	50	1,960
Spirea	50	1,960
Hydrangea	50	1,960
Philadelphus	50	1,960
Deutzia	50	1,960
Abutilon	50	1,960
Malva	50	1,960
Rosa	50	1,960
Georgina	50	1,960
Camellia	50	1,960

Table 1-5: Tree Protection Zones (TPZ) for Regulated Trees

Tree Species	TPZ Diameter (ft)	TPZ Area (sq ft)
Redwood	100	7,850
Sequoia	100	7,850
Coastal Redwood	100	7,850
California Redwood	100	7,850
Big Tree	100	7,850
Elm	50	1,960
Oak	50	1,960
Maple	50	1,960
Pine	50	1,960
Juniper	50	1,960
Cypress	50	1,960
Yew	50	1,960
Boxwood	50	1,960
Holly	50	1,960
Privet	50	1,960
Spirea	50	1,960
Hydrangea	50	1,960
Philadelphus	50	1,960
Deutzia	50	1,960
Abutilon	50	1,960
Malva	50	1,960
Rosa	50	1,960
Georgina	50	1,960
Camellia	50	1,960

Project Data

Table 1-6: Tree Protection Zones (TPZ) for Regulated Trees

Tree Species	TPZ Diameter (ft)	TPZ Area (sq ft)
Redwood	100	7,850
Sequoia	100	7,850
Coastal Redwood	100	7,850
California Redwood	100	7,850
Big Tree	100	7,850
Elm	50	1,960
Oak	50	1,960
Maple	50	1,960
Pine	50	1,960
Juniper	50	1,960
Cypress	50	1,960
Yew	50	1,960
Boxwood	50	1,960
Holly	50	1,960
Privet	50	1,960
Spirea	50	1,960
Hydrangea	50	1,960
Philadelphus	50	1,960
Deutzia	50	1,960
Abutilon	50	1,960
Malva	50	1,960
Rosa	50	1,960
Georgina	50	1,960
Camellia	50	1,960

Table 1-7: Tree Protection Zones (TPZ) for Regulated Trees

Tree Species	TPZ Diameter (ft)	TPZ Area (sq ft)
Redwood	100	7,850
Sequoia	100	7,850
Coastal Redwood	100	7,850
California Redwood	100	7,850
Big Tree	100	7,850
Elm	50	1,960
Oak	50	1,960
Maple	50	1,960
Pine	50	1,960
Juniper	50	1,960
Cypress	50	1,960
Yew	50	1,960
Boxwood	50	1,960
Holly	50	1,960
Privet	50	1,960
Spirea	50	1,960
Hydrangea	50	1,960
Philadelphus	50	1,960
Deutzia	50	1,960
Abutilon	50	1,960
Malva	50	1,960
Rosa	50	1,960
Georgina	50	1,960
Camellia	50	1,960

T-1



Special Tree Protection Instruction Sheet

City of Palo Alto

All other tree-related reports shall be added to the space provided on this sheet (adding as needed).
Include this sheet(s) on Project Sheet Index or Legend Page.
A copy of T-1 can be downloaded at <http://www.cityofpaloalto.org/cityweb/filebank/filedownload.asp?fileID=6460>



T-1

City of Palo Alto

Tree Protection - It's Part of the Plan!

Make sure your crews and subs do the job right!

Fenced enclosures around trees are essential to protect them by keeping the foliage canopy and branching structure clear from contact by equipment, materials and activities, preserving roots and soil conditions in an intact and non-compacted state, and identifying the Tree Protection Zone (TPZ) in which no soil disturbance is permitted and activities are restricted, unless otherwise approved. An approved tree protection report must be added to this sheet when project activity occurs within the TPZ of a regulated tree.

For detailed information on Palo Alto's regulated trees and protection during development, review the City Tree Technical Manual (TTM) found at www.ci.paloalto.ca.us/trees/.

Apply Tree Protection Report on sheet(s) T-2
Use additional "T" sheets as needed

Project
Data



T-2

All other tree-related reports shall be added to the space provided on this sheet (adding as needed).
Include this sheet(s) on Project Sheet Index or Legend Page.
A copy of T-1 can be downloaded at
<http://www.ci.paloalto.org/civica/filebank/blobload.asp?BlobID=6460>

Special Tree Protection Instruction Sheet
City of Palo Alto



T-2

PROJECT DATA

GARAGE AREA	50,500 SF
PARKING SPACE	132
NATURAL VENTILATION	
PRE-METER WALL AREA	10,000 SF
WALL OPENING AREA	2,500 SF (25% = 30% JOC)
PRE-METER WALL LENGTH	120 FT
WALL OPENING LENGTH	500 SF (49% = 40% JOC)

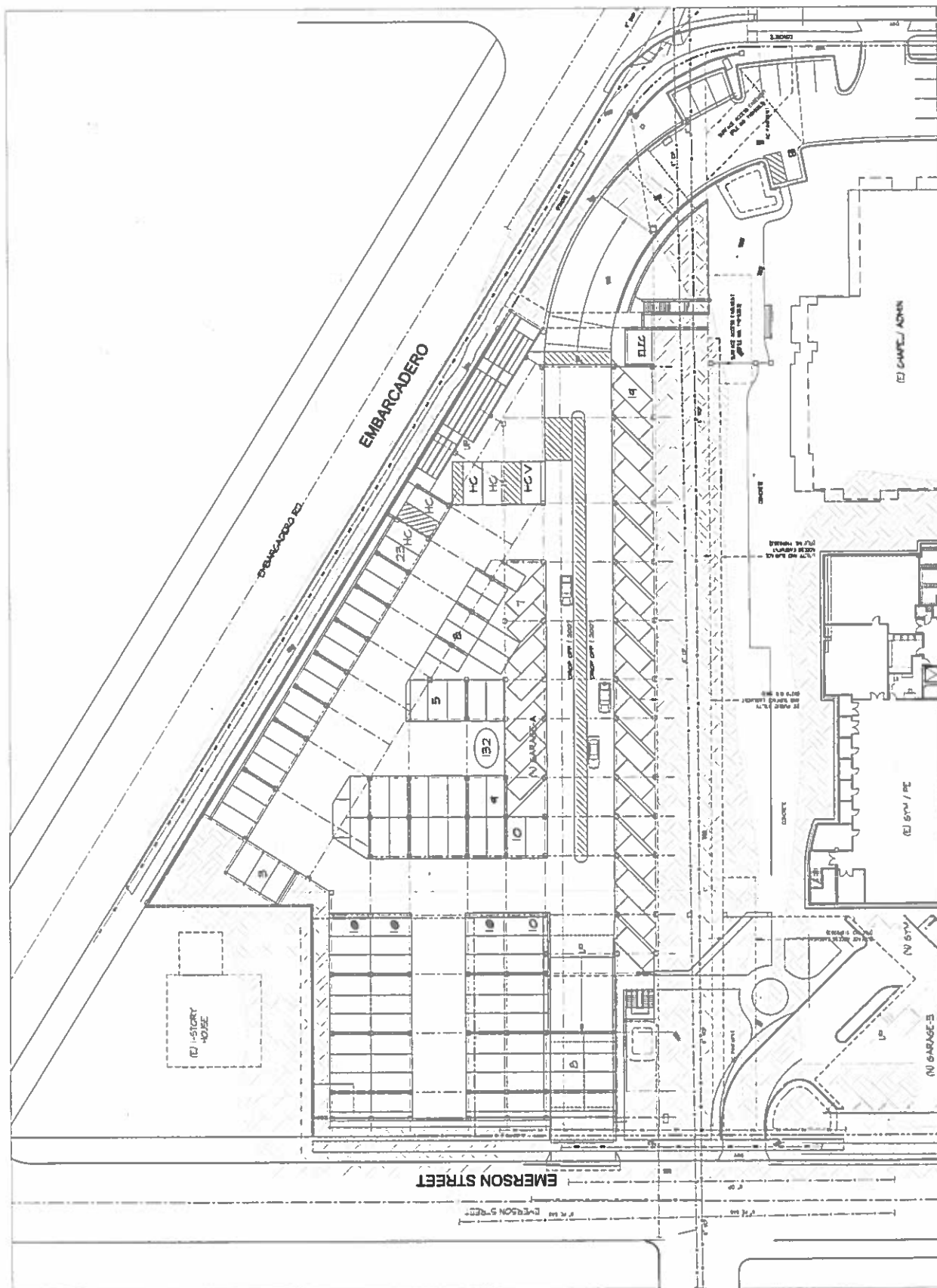
**CASTILLEJA SCHOOL
NEW PARKING GARAGE**

PALO ALTO, CA

No.	Date	Issues and Revisions	By
GARAGE A			
SITE PLAN			
LOWER LEVEL			

Project Number:	2014A111
Date:	05/04/2018
Scale:	1:30'-0"

A2-1



SITE PLAN - LOWER LEVEL/ GARAGE-A

SCALE 10 20 30 40



TRUCK MANEUVERING CASTILLEJA SCHOOL PALO ALTO, SANTA CLARA COUNTY, CA



PA-TRUCK-6122



CPA GREEN WASTE



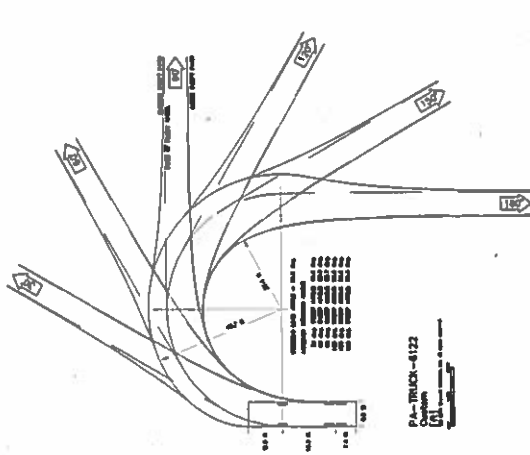
BUS-46



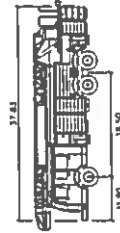
WB-40

SHEET INDEX

- C-0 TITLE SHEET
- C-1A PA TRUCK 6122 HORIZONTAL MOVEMENTS
- C-2A PA TRUCK 6122 VERTICAL PROFILE
- C-1B CPA GREEN WASTE HORIZONTAL MOVEMENTS
- C-2B CPA GREEN WASTE VERTICAL PROFILE
- C-1C BUS-45 HORIZONTAL MOVEMENTS
- C-2D BUS-45 VERTICAL PROFILE
- C-1D WB-40 HORIZONTAL MOVEMENTS
- C-2D WB-40 VERTICAL PROFILE

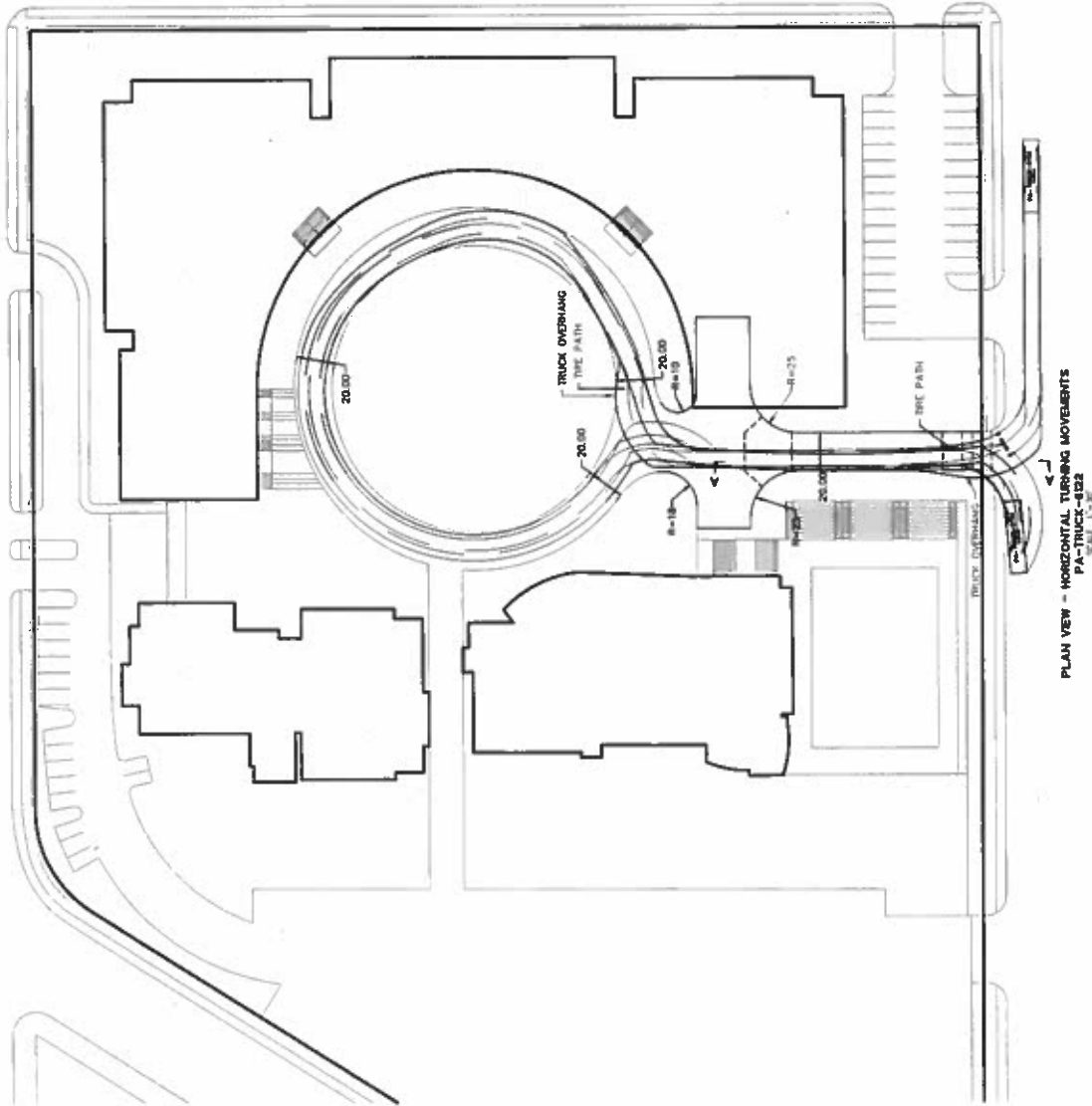


PLAN VIEW - TURNING MOVEMENT DIAGRAM
PA-TRUCK-6122
SCALE: 1" = 20'

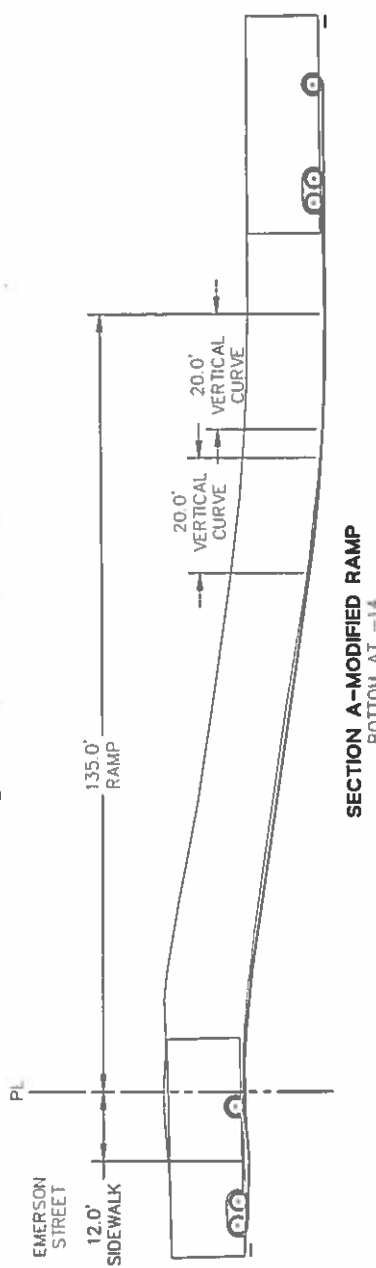
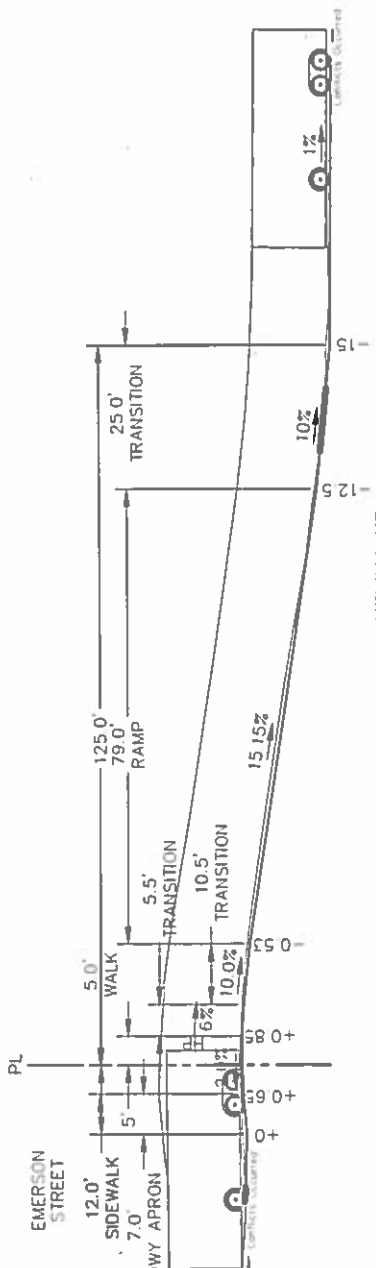
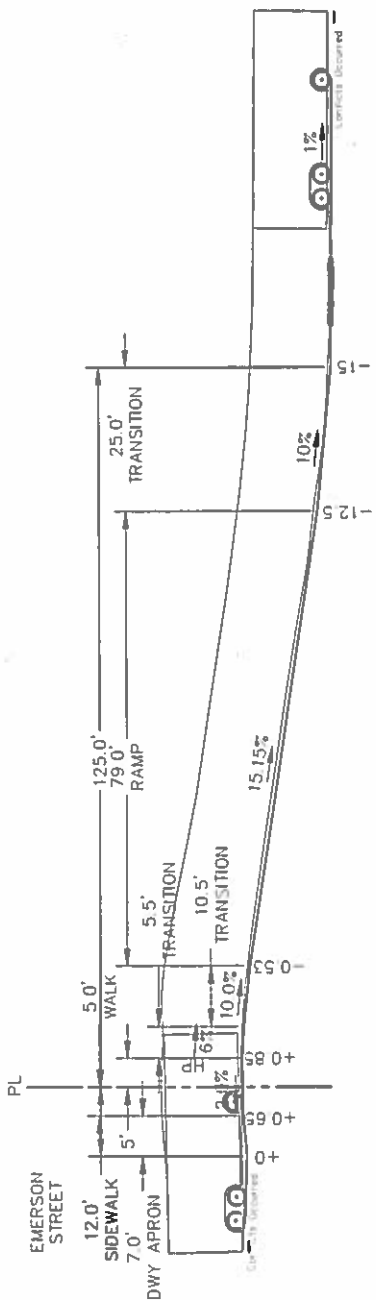


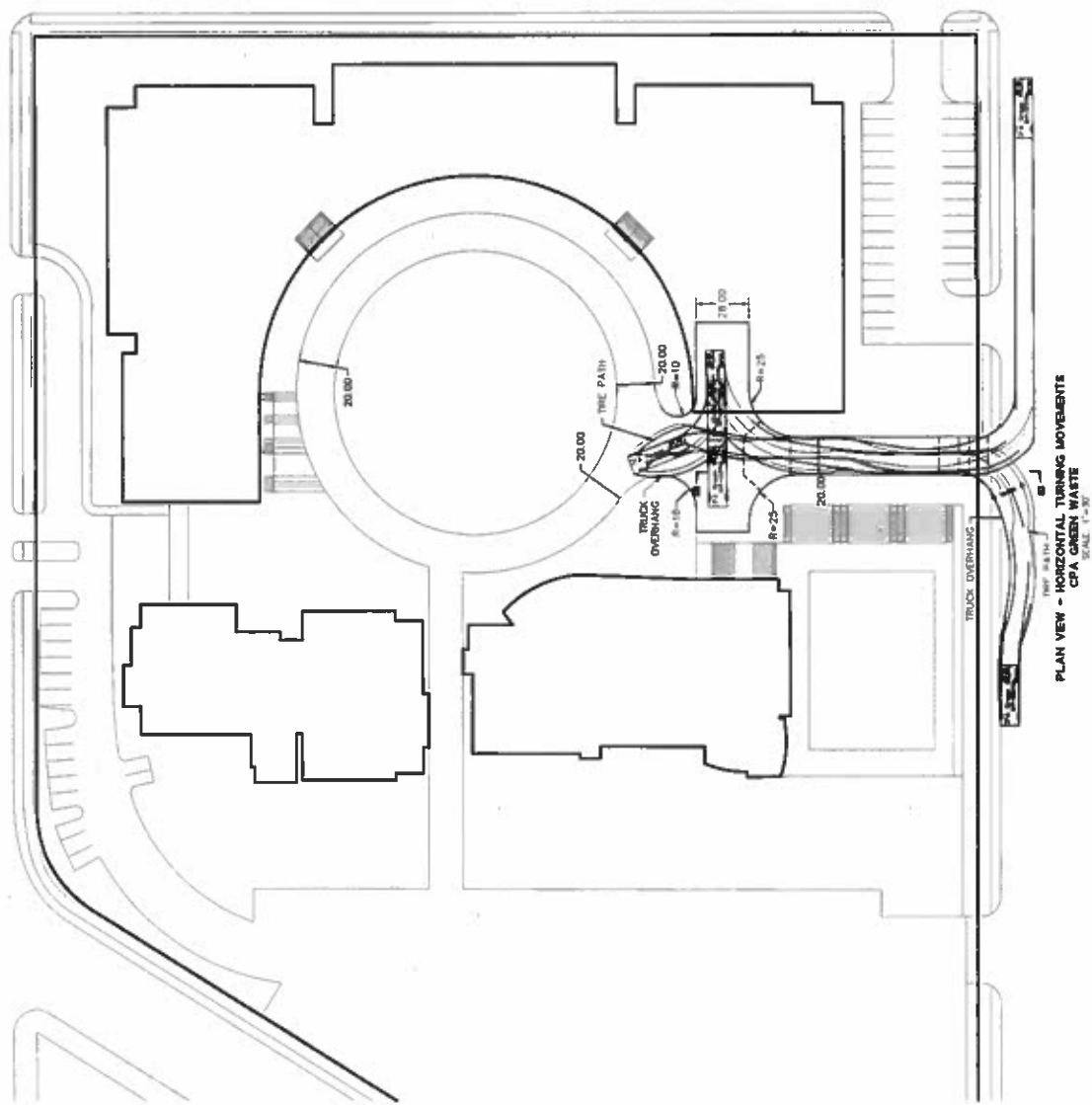
PA-TRUCK-6122
Scale: 1" = 20'

Steering Angle: 30.5°

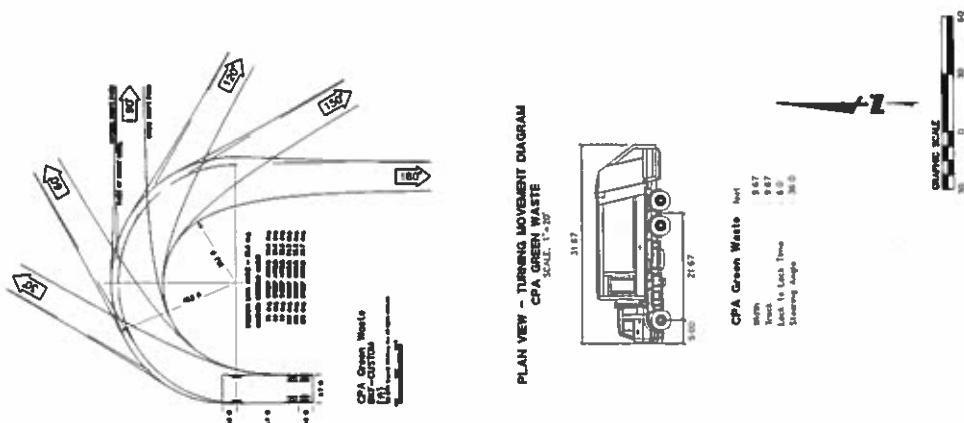


PLAN VIEW - HORIZONTAL TURNING MOVEMENTS
PA-TRUCK-6122
SCALE: 1" = 20'

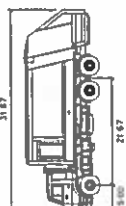




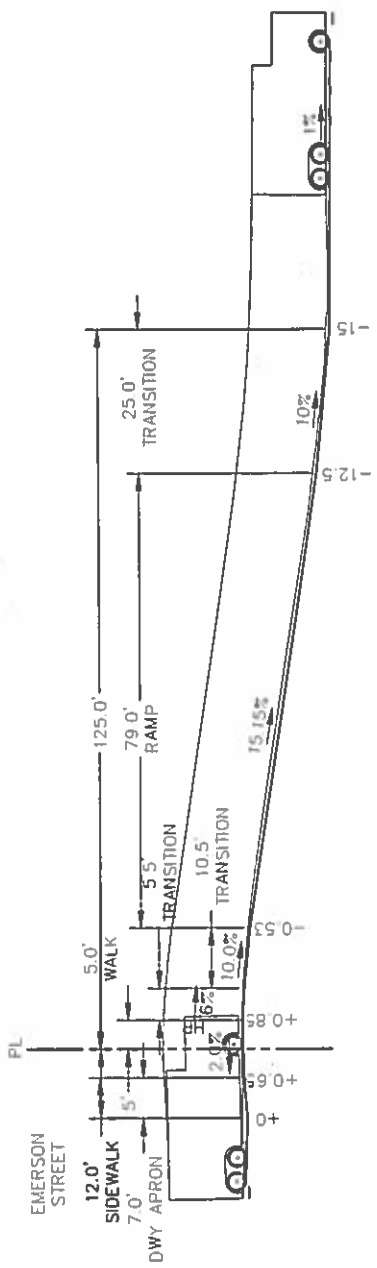
PLAN VIEW - HORIZONTAL TURNING MOVEMENTS
CPA GREEN WASTE



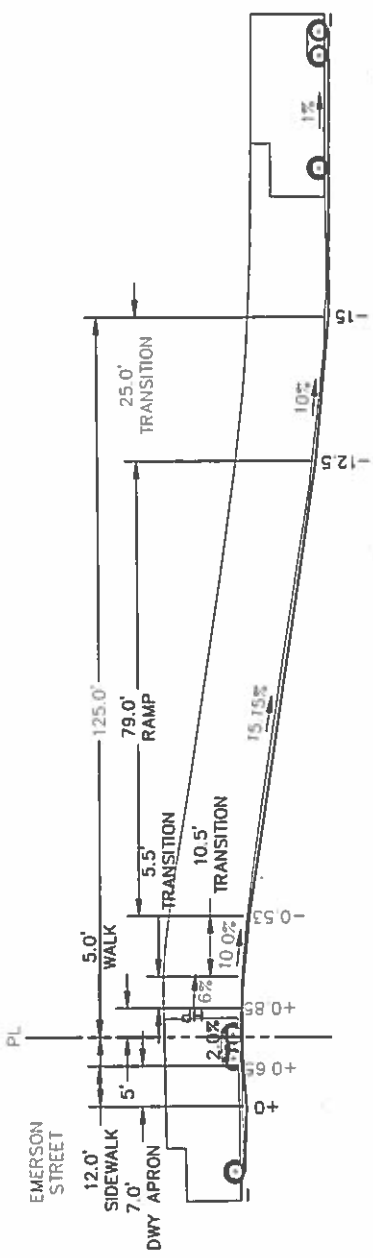
PLAN VIEW - TURNING MOVEMENT DIAGRAM
CPA GREEN WASTE
SCALE: 1"=20'



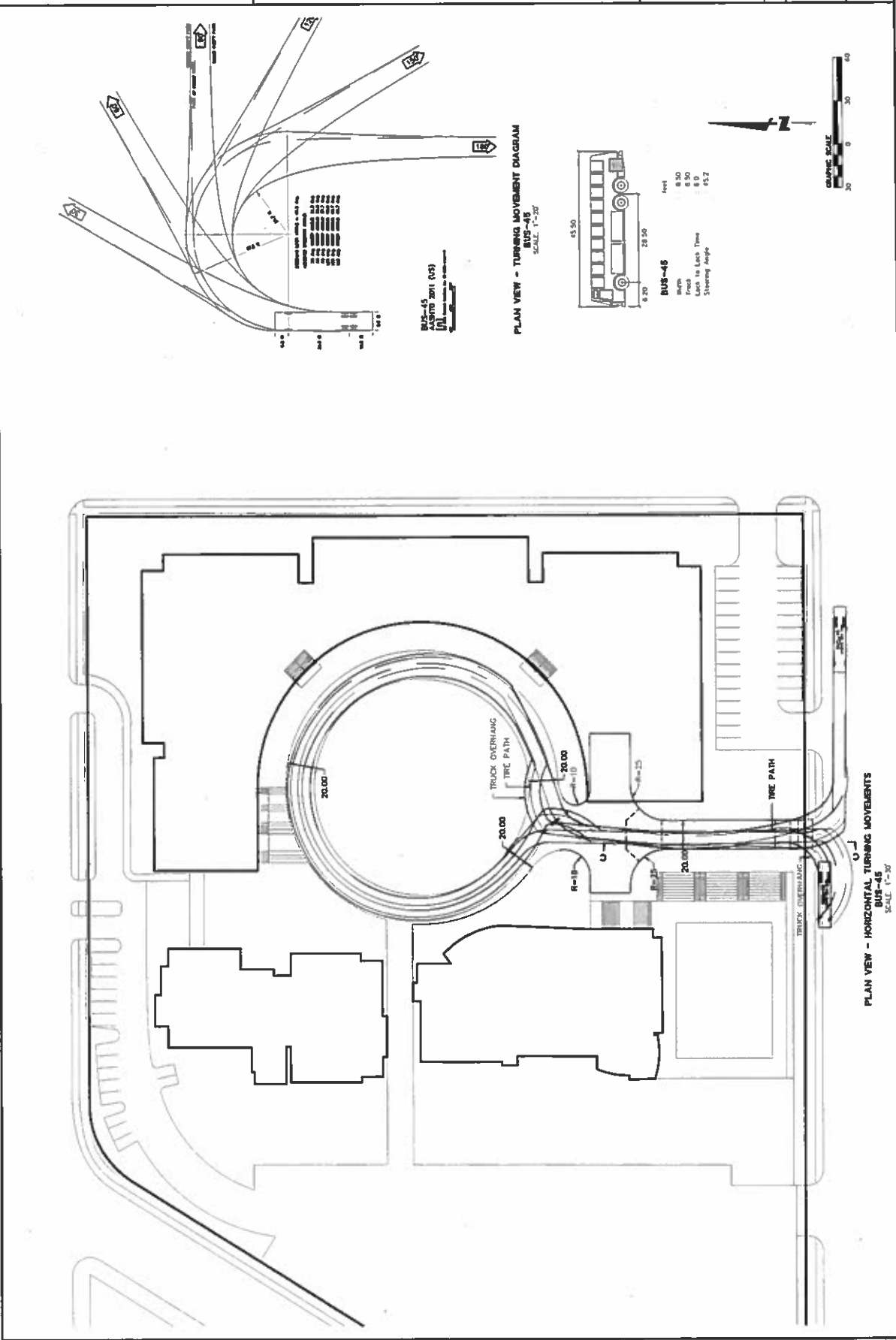
CPA Green Waste	Year
Waste	967
Truck	967
Load to each time	60
Clearing Angle	300

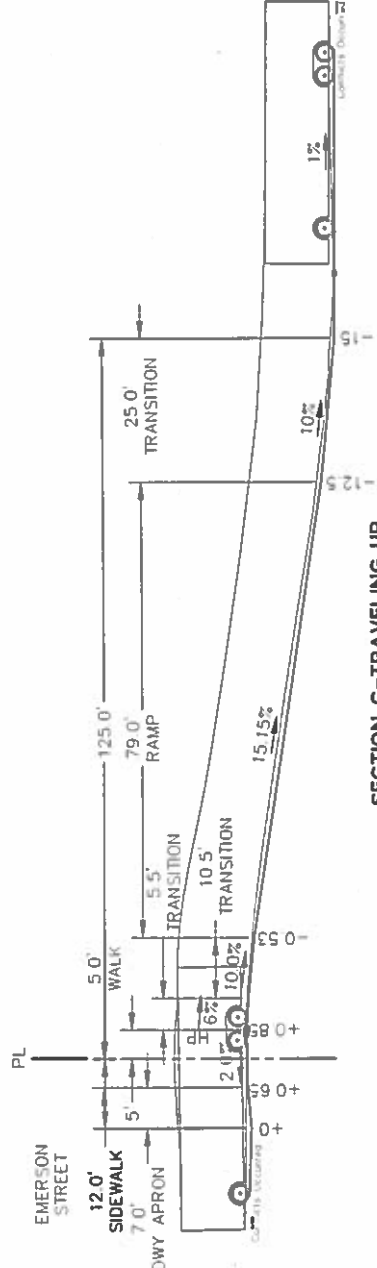
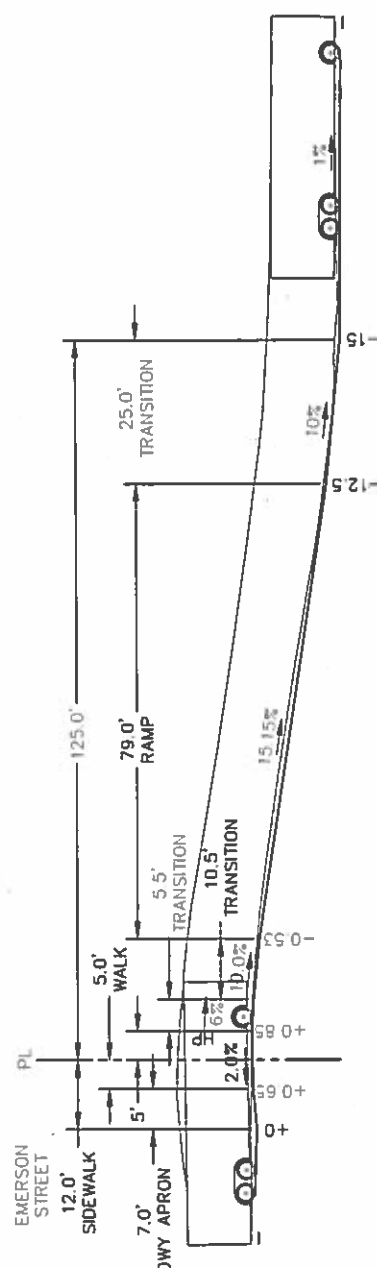


SECTION B - TRAVELING DOWN

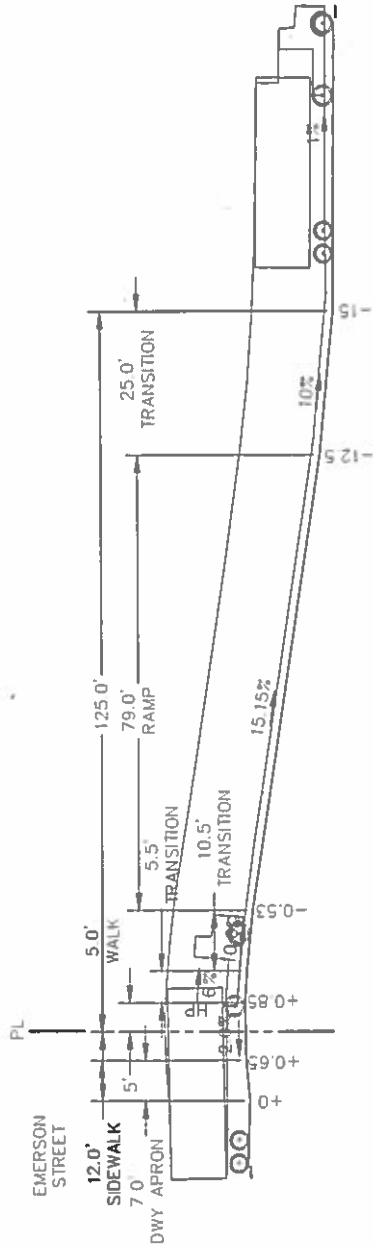


SECTION B - TRAVELING UP

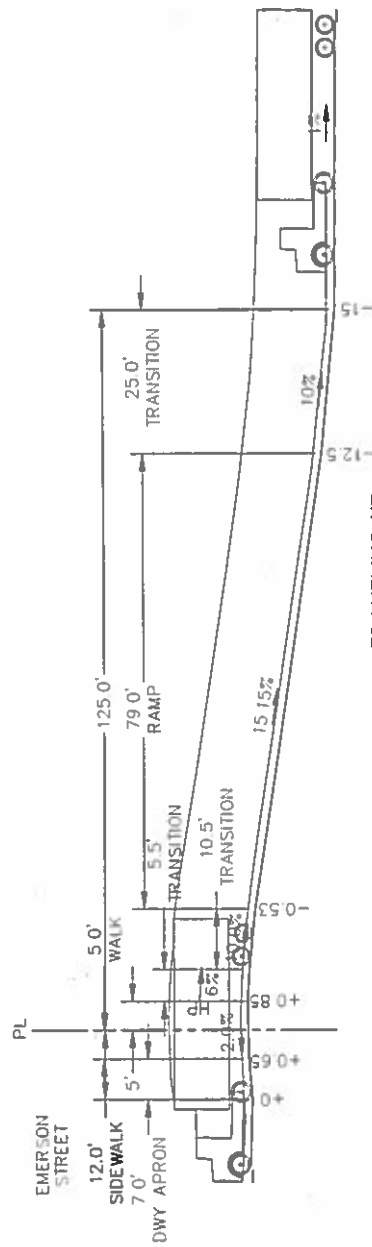




04-23



SECTION D-TRAVELING DOWN



SECTION D-TRAVELING UP



**Agenda for meeting with Amy French
and Small Neighborhood Working Group**
July 25, 2016

RE: Castilleja School's CUP Amendment and Development Application (the "Application")

Introductions & Brief History:

Small Neighborhood Working Group: Tom Shannon, Alan Cooper, Carla Befera, Bruce McLeod

- Tom & Carla met with Jim Keene and Hillary Gitelman last October 2015.
- Alan and two other neighbors met with Joshua Mello, Hillary Gitelman, Amy French & Jarrett Mullen to discuss transportation issues last March 2016
- Small neighborhood group meetings with Castilleja over last 3 years did not achieve much collaboration; No real proposals from Castilleja until last 6 months.
- Many residents against any increased enrollment.
- Overarching Neighborhood Goal – to improve our neighborhood to reflect the conditions of nearby R-1 neighbors such as Lowell and Tennyson Avenues.

Questions related to Castilleja's Application

1. Compliance with Palo Alto Comprehensive plan: Does Castilleja have to comply with existing codes and ordinances for the zoning designation on the property - R-1, 10000 sf single family lots (e.g., Setbacks, height limitations, FAR.)? Castilleja's Application does not comply with these existing codes.
2. Neighbors question many square feet of buildings can a 6 acre parcel handle in an R-1 Zone and not diminish the quality of life for the surrounding residents? **Reason:** Neighbors don't want to live across the street from an industrial size complex. We feel we live in an R-1 neighborhood. Neighbors conclude that Castilleja's 6th –12th grade school with an enrollment of 415 students is already too big to be located on 6 acres in an R-1, 10,000 single family lot zoning neighborhood.
3. Confirm that Tab sections referred to in the Application are in binder? Will these be uploaded?

Corrections needed in the Application:

4. Castilleja be required to correct enrollment numbers given in the Application. Resubmit the Application with corrected enrollment numbers. The school should be requesting an enrollment increase from 415 to 540 students, not from 438 to 540 students.
Justification: The existing CUP authorizes only 415 students.
5. Correct the proposed growth rate graph to 25 students/year starting with 415 students.
Justification: Castilleja stated to neighbors that the proposed growth would be no more than 25 students / year. The Application now reads "no more than 27 students per year."

Requests from Castilleja neighbors – Perceived deficiencies:

6. Castilleja be required to verify numbers given in the Application. All of the numbers and representations in the Application should be verified with detailed diagrams and calculations. **Justification:** We document several incorrect numbers (as noted below) and see many potential errors and issues in the Application that will affect project design.

7. How did Castilleja arrive at the following:

- a. The number of 105,710 sq. ft. as the size of the current buildings above grade?**
Castilleja should detail this calculation for each building.

Justification: When residents asked the City for the total square footage of the campus, the City could not find any plans in the City archives to document what the existing total square footage is.

- b. The number of 105,710 sq. ft. as the size of the future buildings above grade?**
Castilleja should detail this calculation for each building.

Justification: They have proposed to lower the grade by 15 feet (i.e. lowering the circle 15') making floors currently shown below grade would now be above grade making the total at-or-above grade square footage much larger.

- c. The number of 16,000 cubic yards of cut material?** **Justification:** A rough calculation based on the satellite photo in the Application, pacing off distances, depths from diagrams in the 5-yr plan yield a cut figure of about 57,000 cubic yards of material to be removed. This is a huge discrepancy from the Application and will have potential huge geotechnical ramifications, as noted below.

- d. The estimated 55-60 db noise level at nearby residences cited in the report?**
Castilleja should provide the studies, existing or newly done, to back up these numbers.

Justification: Real noise levels seem/feel much higher to neighbors than those stated. Water polo matches in the current pool completely disrupt the neighborhood. Large 16 & 18 wheel truck deliveries and trash pick-ups every day, often at 6 am utilizing residential streets, are very disruptive to neighbors.

8. Castilleja be required to submit a full EIR report with the Application that has geotechnical and other studies that will generate detailed worksheets, diagrams and calculations to support their Application and the 5-year construction plan.
The geotechnical report should have information from drilling probes to:

- a. Evaluate geologic hazards due to soil instabilities and potential subsurface sand flows. Geological impacts – seismicity, neighborhood subsidence, soil excavations.**
- b. Evaluate hydrologic conditions of the site and the impact on groundwater flow and potential groundwater contamination and localized neighborhood subsidence.**
- c. Evaluate earthquake hazards on new buildings with unbutressed lower floors, and on greater potential for liquefaction at the site and consequent settlement of neighborhood houses.**
- d. Evaluate the potential for uncovering archaeological Indian sites that would slow or terminate excavation and construction.**
- e. The large number of construction vehicles (e.g., 2000+) moving thru the area will have a huge potential impact on noise, pollution, particulate matter, traffic, road damage and more. Evaluate impacts of construction vehicles and construction activities on local traffic flow, noise levels, air quality (from dirt and exhaust fumes), road deterioration from heavy trucks, costs to the city for repairs, etc. for the 3-5 years that the construction project would take.**

- f. Castilleja made representations in neighborhood meetings that they would complete a full EIR.
- g. The massive proposed excavations (e.g., 57,000 cu. yds. = 2000+ large-truck loads) have the potential for major earth movement and ground-water contamination and modification that needs to be addressed.
- h. Transportation & Traffic issues: Measuring traffic on residential streets over a 24x7 period(s) that incorporates different scenarios with and without Castilleja in session for: Regular school sessions, Summer school session, Weekday events, Evening events and Weekend events.
- i. Noise related to rooftop HVAC equipment and post construction school operations – trucks, cars, deliveries, large school assemblies and school sports activities.
- j. Impact of services on residential streets to implement master plan and operate school.
- k. Appropriateness of a 415 student school use on 6 acres in a R-1 zone. EIR to evaluate the proposed increase in enrollment and size of the school buildings and the intensity of impact generated on the neighborhood.
- l. Aesthetics and contextual visual impacts of school buildings on surrounding residences (i.e. proposed design, heights & setbacks of the structures).

9. **Castilleja be required to provide a detailed timeline of construction for the new buildings (e.g., parking garage, classrooms, pool, etc.) and how they will mitigate impacts on the surrounding neighborhood.** Will all truck and construction traffic be required to access the site from Embarcadero Road as was required for the major construction along Page Mill Road at Hanover?

Justification: Neighbors have serious concerns about disruptions, traffic impacts, noise, pollution, safety over the stated 3-5 year term of construction. Prior construction of the gymnasium complex was handled poorly and over an extended period due to geotechnical problems.

10. **Castilleja be required to provide a detailed report showing the exact number of people they employ as staff (not just FTE) and statistics as to where their staff and students live. Justification:**

- a. Castilleja has represented that 72% of the student body resides outside of Palo Alto. No stats have been presented as to how many people work at Castilleja and where staff lives. With this large number of students and staff coming from outside of Palo Alto, the traffic and circulation issues have a huge negative impact on the neighborhood. To fairly assess this impact, Castilleja should accurately report the numbers, so that the City and neighbors can insist that a significantly larger percentage of students and staff reside in Palo Alto?
- b. Castilleja cites in the Application that they have 122 FTE. To accurately assess parking and traffic levels, the City and neighbors should know the exact number of people coming and going to the campus. The 122 number needs to be changed to reflect actual total employees. Note that two (2) part-time faculty or staff actually has more impact by generating a minimum of 2 or more car trips/day as compared to one full-time faculty or staff employee that remains on campus for the entire day.

11. **Castilleja be required to submit a detailed plan on how to handle the students during construction.** If the school is proposing to move their student body to trailers on half the site while the garage is being built (as they have stated) - it means ALL traffic, drop offs, pick-ups and most importantly ALL parking will be on neighborhood streets, with no on-field parking for events, no on-site parking at all – an enormous disruption to the neighborhood for up to five years.

Proposed Castilleja School Expansion of 125 Students
Summary Statement for City Council Prepared by Neighbors
March 10, 2016

Situation: Castilleja recently announced a proposal to increase enrollment to 540 students – 125 more than the current CUP max of 415 students, amounting to a 30% increase, the largest ever proposed.

Neighborhood Goal: Seeking Council's attention to neighbors' stated interest in restricting Castilleja's current and future negative impacts. While we appreciate Castilleja's mission to deliver a top notch education to young women, we ask the council to deny approval of an enrollment increase beyond the current cap of 415 for the following reasons:

1. **Traffic congestion, on-street parking:** Castilleja juniors, seniors, staff, visiting parents, sports participants, test-takers, lecture attendees, etc. drive to school and park on neighborhood streets not just 5 days, but 7 days a week, with events occurring mornings, afternoons, evenings, weekends and throughout the summer. 73% of Castilleja's enrollment comes from outside Palo Alto, so the majority of this traffic is externally generated. The neighborhood bears all the impact of the school's traffic, busses, parking, deliveries, events – and is now facing spillover parking from those in downtown/Professorville seeking parking outside the permit zone. These streets are corridors for local residents walking to public schools (Addison, Paly, Walter Hayes, Jordan), as well as a major bike boulevard (Bryant Street). Neighbors hear brakes squeal and horns honk every day; the situation has become unsafe for local children and adults.
2. **Comparison:** Other private schools in Palo Alto are held to stricter standards. The CUP for Stratford School at Garland, operating on 10 acres, allows a max of 482 students (48 students/acre), hours are 8am–4pm, evening activities are NOT permitted, street parking is not allowed. **Castilleja is currently at 73 students/acre, no limit on evening/weekend events. It is seeking to increase to 90 students/acre.** Paly HS is approx 64 students/acre. Castilleja, a middle school and a high school, is already too large for its 6 acre, one-block parcel. No other middle & high school campus on the Peninsula operates on this small of a plot. In Palo Alto, middle schools are on 20+ acres and high schools are on 30+ acres, with parking.
3. **City's prior directive:** In 2000, traffic and parking congestion were already beyond intolerable. 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."*
4. **Palo Alto Municipal Code and Comprehensive Plan:** Castilleja's use no longer satisfies the City's definition of an R-1 conditional use. Per the PAMC, a CUP will "not be detrimental to the public health, safety, general welfare, or convenience (in the vicinity)" and it 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."
5. **Continuous Violation -** Castilleja has exceeded the existing CUP enrollment cap of 415 for the last 16 years, and to this day continues in violation with its current 438 students. At \$42,000 tuition per student, the school has collected some \$20 million in revenue from over-enrollment in the past 16 years. The school ignored many other current CUP requirements - until it sought another amended CUP. Neighbors have had no viable enforcement leverage. Neighbors have no confidence that future CUP conditions will be met, nor that conditions can be sustained or improved with 125 additional students being delivered to this small section of Palo Alto.

If the school needs to expand to meet demands we suggest that, like many others, it consider dividing into two appropriately-sized campuses. Many thanks for your time and attention to this matter.

– Neighbors of Castilleja

September 12, 2016

Dear Members of the Palo Alto City Council,

We write to you as a group of concerned neighbors (homeowners and renters) residing near the Castilleja School. Some of us have spoken several times now before the Council regarding the negative impact on the neighborhood and our quality of life if Castilleja proceeds with a proposed enrollment increase (of 30%), campus development and expansion. While we are consistent in the message we present to the Council, we intend not simply to repeat points we have made, but to inform you of steps Castilleja is now taking as it prepares to submit a more complete CUP application to the City. We also make a public request for more complete information than we are currently receiving from City officials regarding Castilleja's actions.

We list below the seven points that we believe will lead to a more harmonious co-existence between Castilleja and the neighborhood, and that will help to preserve the residential character of the neighborhood.

1. It is critical that Castilleja be held to account and roll back its enrollment to 415 students in compliance with the 2000 CUP.

In a letter from December 2013 to Castilleja, then Advance Planning Manager Steven Turner requested an enrollment reduction plan from the school, recommending strategies such as attrition to reduce enrollment. (We might note that Mr. Turner first communicated with Castilleja regarding over-enrollment in 2002, fourteen years ago!) In February of 2014, Mr. Turner established that the reduction plan allowed for 444 students in 2014-15, and a further reduction to 438 for 2015-16. By the end of the 2015-16 academic year, Castilleja was to submit a new CUP application, at which time the City (and residents in the public hearings) could fully consider the enrollment matter. Castilleja did submit an application in June 2016; the City deemed it incomplete in various respects.

In a November 2015 letter to Castilleja, City Manager James Keene implicitly allowed the school to keep its enrollment at 438 for 2016-17, and at the moment beyond, while Castilleja conducted their analyses for a CUP application.

We would like to see the City request a more robust enrollment reduction plan – to 415, the enrollment number established by law -- for 2017-18 and beyond as Castilleja works on their new CUP application. That request should be communicated in the autumn of 2016, before the school admits its new class for 2017.

If the City does not make that request, we would like to know how precisely the City makes the decision to allow Castilleja to violate the legal CUP limit on enrollment.

2. We are adamantly against Castilleja constructing an underground garage with an entrance on Bryant and an exit on Emerson, directly across from the homes of long

time residents. If current peak period traffic sees over 400 car trips (from 7 to 8 am, for example), a 30% enrollment increase would increase the amount of traffic to even more unacceptable levels.

N.b. The underground garage and tree removal comprise Phase 1 of Castilleja's proposed development.

3. Prevent the loss of up to 168 trees (per Castilla's initial CUP application), including matured oaks and redwoods (one over 120 feet tall), that Castilleja wants to remove in order to construct the underground garage.

This issue merits some urgent attention from the City, since Castilleja has already begun the process of trenching at the perimeter of the school (presumably for analysis needed to outline in more detail Phase 1 tree removal plans). We remain unclear on whether this work received official authorization. We are also greatly concerned that the work is being done improperly and unprofessionally. On day one of the trenching operation, a neighbor observed that the trench was left unfilled and unwatered with tree roots exposed. It took this neighbor one week of persistent communication with the City to get the trench filled and watered (unfortunately, not consistently); we will wait to see how much, if any, root damage has occurred. The trees' roots are vital to their survival, providing nutrients, storage of energy, and anchoring the trees in place. The trees themselves provide obvious aesthetic and environmental benefits.

4. We need a mandatory Environmental Impact Report, paid for by Castilleja. We believe Amy French and her office are in the planning phase for this. Attention to the water table as well as tree scape will be crucial to any underground construction plans.

5. We need a "true" traffic study, monitoring traffic not just during certain hours of the day, but 24/7, including evenings and weekends for school events, as well as those events that bring parents to the school. Traffic cameras should be part of this traffic monitoring.

School traffic already puts bicyclists, pedestrians, and vehicles at risk. Palo Alto students walk or bike the Embarcadero and Bryant corridors (part of the Palo Alto School Commute Corridor Network) and should be ensured that they can do so in safety. While Castilleja parents, who are arriving from various places on the Peninsula, are currently being asked to drive around the block and return if lines are forming in the current drop off spots, this cannot be a long term solution (having parents drive round the block in bad weather, for example, adds to the risk of accident and injury).

The proposed underground garage, with its exit on Emerson and immediate right turn onto Embarcadero fails to square with a recent proposal for better bicycle lanes on Embarcadero, and will certainly add to already dense and slow traffic on that street.

6. Castilleja's multi-phase development and expansion plans will bring *years* of construction noise and pollution, heavy-duty machinery and vehicles, and additional

traffic and parking woes to our residential neighborhood. This brings absolutely no improvement to the neighborhood and significantly impacts our quality of life.

We would like to see the City discuss limits to development, expansion and remodeling on the school's grounds, given the neighborhood's R1 status.

7. The neighbors impacted by Castilleja's proposed plans need more and better access to decisions made by City officials and to communications, whether formal or informal, between the City, Castilleja and other relevant parties. Amy French's office has reported to us that they lack the staff for making all documents regarding the Castilleja project available online.

We believe that City offices in innovative and tech savvy Palo Alto should have the resources to provide residents with information, including all correspondence, in an up-to-date 21st century manner, with the appropriate links on the office's website. Amy French's letter to Castilleja regarding the incomplete application is an example of what we think should be available to the public on line.

We also need public transparency, which we currently do not have, from our City officials regarding their decision-making. How was the decision made to allow Castilleja to enroll 438 students *again* for the 2016-17 academic year? Who authorizes and oversees the trenching activity on the Castilleja perimeter? While City officials answer our initial questions, we sometimes find that we are not getting adequate (or any) explanation to further questioning on our part, especially about the legality of Castilleja's actions.

We intend to keep the City Council informed of Castilleja's ongoing actions in relation to their CUP application preparation, insofar as those actions negatively affect our neighborhood and the natural environment.

We recognize the importance of living in a society where we can have an open and ongoing dialogue with those charged with making decisions about Palo Alto's future. We appreciate your attention to our message.

Respectfully submitted by,

Names and signatures of concerned neighbors follow:

9/12/16 Letter to Palo City Council re: Castilleja
Names and signatures, continued



October 21, 2016

Ms. Katherine Waugh, AICP
Senior Project Manager
Dudek
853 Lincoln Way, Suite 208
Auburn, CA 95603

Proposal for a Transportation Impact Analysis of the Castilleja School project in Palo Alto

Dear Ms. Waugh;

W-Trans is pleased to provide this proposal to prepare a traffic impact analysis (TIA) for the Castilleja School project in Palo Alto. Our proposal is based on the Request for Proposal from Amy French of the City of Palo Alto and the project description contained therein, as well as, our understanding of the project issues and experience with similar school projects in the Bay Area. The objective of the traffic study is to evaluate the probable traffic impacts that the proposed project would have on the adjacent roadway network, and to make recommendations to mitigate any significant impacts to the roadway network.

The proposed project is an evaluation of the potential impacts of the school expanding its enrollment from 438 to 540 students. We will confirm with City of Palo Alto staff the nearby approved projects, trip generation estimate, trip reduction factors associated with transportation demand management (TDM), and trip distribution patterns prior to evaluating intersection level of service. In addition, the TIA will address project-specific issues.

Scope of Services

Task 1: Traffic Impact Analysis

Field Reconnaissance

W-Trans will conduct field reconnaissance visits for this site during the a.m. (drop-off) and mid-afternoon (pick-up) peak periods on a typical school day (Tuesday, Wednesday or Thursday with no special event, field trips, assemblies, etc.). The purpose of this task is to confirm available data and information. We will observe and note the following:

- Drop-off and pick-up operations
- On-site circulation, access and parking
- Multimodal access (bicycles, pedestrians, and transit)
- Roadway cross-section
- Intersection lane geometry and configuration
- Traffic control devices
- Surrounding land uses
- Sight distance
- Existing traffic operations' consistency with the LOS analysis calculated for this project for existing conditions

Trip Generation and Land Use Inventory

W-Trans will estimate the number of net new daily, a.m. peak hour and mid-afternoon peak hour trips that the project will add to the study area based on a three-step process; trip generation, trip distribution, and trip assignment.

The proposed development's trip generation for the weekday daily, a.m. and mid-afternoon peak hours will be calculated based on a site-specific trip generation survey. The survey will include vehicle counts on two typical school days (no field trips or special events, and when nearby PAUSD schools are in session). The surveys will be conducted between 6:00 a.m. and 7:00 p.m. to establish the a.m. and mid-afternoon peak period of generator.

To capture on-site trip generation, the surveys will be conducted via video cameras placed in strategic locations to capture all school access points (for vehicles, pedestrians and bicyclists) on Bryant Avenue, Kellogg Avenue, Emerson Street and Embarcadero Road.

To count the off-site drop-off and pick up activity, we will also set up cameras to monitor both sides of the follow street segments:

1. Embarcadero between Emerson Street and Bryant Street
2. Emerson Street (Embarcadero to Melville, Melville to Kellogg, and Kellogg to Churchill)
3. Melville Avenue (Alma Street to Emerson Street)
4. Kellogg Avenue (Alma Street to Emerson Street, Emerson Street to Bryant Street, Bryant Street to Waverly Street)
5. Bryant Street (Embarcadero to Kellogg Avenue, and Kellogg Avenue to Churchill Avenue)

The survey data will be compared to standard trip generation rates for a K-8 private school published in the latest edition of ITE's *Trip Generation*, and then a recommended trip generation rate will be reviewed with City staff prior to analysis.

Trip distribution will be based on the school attendance area and zip code data if made available.

Transportation Demand Management (TDM) Program and Surveys

We will review the school's current TDM program, and assess its effectiveness via any prior monitoring surveys, the current trip generation survey, and a new mode choice survey of the school students, faculty and staff that we will administer twice on two typical school days.

The TDM surveys will be done via a paper survey in order to gain a higher response rate compared to an electronic survey. W-Trans will work with school staff to administer the survey in classrooms, which we will prepare, deliver, and collect from the school prior to processing. Results of the two TDM surveys will inform or confirm any potential trip deductions (note that any current trip deductions will be built into the trip generation rate calculated from the trip generation survey; the TDM surveys will be used to verify the trip totals from the trip generation survey).

Study Intersections

The TIA will include analysis of the following intersections:

1. Embarcadero Road/Alma Street
2. Kingsley Avenue/Alma Street
3. Embarcadero Road/Emerson Street
4. Embarcadero Road/Bryant Street
5. Churchill Avenue /Alma Street
6. El Camino Real/Embarcadero Road
7. Middlefield Road/Embarcadero Road

Turning Movement Counts

Intersection turning movement data will be collected for all study intersections during a.m. (7:00 a.m. – 9:00 a.m.) and mid-afternoon (2:00 p.m. – 4:00 p.m.) and p.m. (4:00 p.m. – 6:00 p.m.) peak periods, including vehicle, pedestrian and bicycle counts. Note that school trips are only anticipated for the a.m. and mid-afternoon peak periods.

Auto Level of Service Analysis

The analysis time periods for this study will be the weekday a.m. and mid-afternoon peak hours. The level of service (LOS) analysis will be based on the VTA 2003 *Traffic LOS Analysis Guidelines*. The analysis of study intersections will be conducted using the 2000 *Highway Capacity Manual* (HCM) methodologies and Traffix Analysis Software using the VTA default database. The LOS results will be compiled in a table format. Comparison LOS tables will be included showing all of the LOS results for the various analysis scenarios. The traffic study will include the following traffic study scenarios with the existing intersection controls and configurations:

1. Existing Conditions
2. Existing Conditions plus Project Trips
3. Background Conditions (Existing Conditions plus Approved Project Trips)
4. Project (Background plus Project Trips)
5. Cumulative
6. Cumulative plus Project

For those intersections operating at LOS E or F under the project conditions scenario a separate LOS analysis will be conducted using mitigated conditions in order to compare the no mitigation scenario to the mitigated conditions scenario. A LOS table will be prepared showing operating conditions of all study intersections for each of the study scenarios, along with "Project plus mitigated conditions" (if mitigations required).

Project Specific Issues

For each of the scenarios listed above, W-Trans will evaluate the drop-off and pick-up circulation in and around the school campus. Also, changes (if any) to the multimodal access (bicycles, pedestrians and transit) will be evaluated and circulation will be evaluated. Sight distance at project driveways and parking adequacy (Code, demand and supply comparison) will be evaluated. The potential for neighborhood parking issues will be qualitatively discussed in the TIA.

Residential Streets (TIRE) Analysis

We will prepare a TIRE analysis to evaluate increases in vehicle trips on local residential streets. The following adjacent residential streets will be analyzed:

1. Waverley Street (Lincoln to Kingsley, Kingsley to Whitman, Whitman to Melville, Melville to Embarcadero, Embarcadero to Kellogg, Kellogg to Churchill)
2. Bryant Street (Lincoln to Kingsley, Kingsley to Whitman, Whitman to Embarcadero, Embarcadero to Kellogg, and Kellogg to Churchill)
3. Emerson Street (Lincoln to Kingsley, Kingsley to Embarcadero, Embarcadero to Melville, Melville to Kellogg, and Kellogg to Churchill)
4. Churchill Avenue (Waverly to Bryant, Bryant to Emerson, Emerson to Alma)
5. Alma Street (Lincoln to Embarcadero, Embarcadero to Kingsley, Kingsley to Melville, Melville to Kellogg, and Kellogg to Churchill)
6. Lincoln Avenue (Waverly to Bryant, Bryant to Ramona, Ramona to Emerson, Emerson to High, High to Alma)
7. Kingsley Avenue (Waverly to Bryant, Bryant to Ramona, Ramona to Emerson, Emerson to High, High to Alma)
8. High Street (Lincoln to Embarcadero)
9. Ramona Street (Lincoln to Kingsley)

To conduct the TIRE analysis, 24-hour traffic counts will be taken on each of the street segments noted above. The TIRE analysis will be conducted for each project scenario.

Bike Boulevard Analysis

We will assess Bryant Street as it is an established bicycle boulevard and principle north-south city bike corridor. The TIA shall include a qualitative and quantitative assessment of potential impacts to the bicycle boulevard, as follows:

1. We will observe and summarize interactions between motorized vehicles and cyclists on Bryant Street during the site reconnaissance periods and provide qualitative assessments of the existing and existing plus project conditions based on bike boulevard guidelines.
2. We will provide quantitative speed and volume (vehicle, bicycle, pedestrian) analysis for the existing scenario, and volume analysis for the existing plus project scenario (speed prediction for existing plus project scenario is assumed not to change). We will compare the findings to established bike boulevard speed and volume thresholds. The focus of the analysis will be on Bryant Street between Embarcadero Kellogg, and also from Kellogg to Churchill.
3. We will summarize our findings in the TIA and include potential off-site improvements to address potential project-generated impacts associated with motorized vehicle speed and/or volumes.

Special Events

We will note the potential for increases in special events at the school, including their frequency and event size. This will be a qualitative narrative analysis that includes the potential increases in traffic and parking demand. If needed we will recommend adjustments to the school's TDM program to address special events.

Task 2: TIA for Administrative Draft EIR

W-Trans will prepare one Administrative Draft TIA report, including text, tables, figures and technical appendices.

Task 3: Respond to Agency Comments and Preparation of TIA for Draft EIR

W-Trans will respond to one set of consolidated non-contradictory comments on the Administrative Draft TIA and prepare a TIA for the DEIR.

Task 4: Respond to Public Comments and Preparation of Final EIR

W-Trans will respond in writing to comments received on the Draft EIR Transportation/Circulation Chapter. We have assumed preparation of comment responses as well as revisions to the responses based on City staff review, up to the allocated budget resources for this task.

Task 5: Project Administration and Meetings (5)

This work scope includes up to five meetings related to this project. These could be with project team members, public hearings, or other formal meetings.

Exclusions

Any services not explicitly identified above in Tasks 1-5 are excluded. Should any additional time be necessary to prepare the Final EIR beyond the budgeted hours (as it is unknown how many comments or the level of effort that will be required to respond to Draft EIR comments) we will request additional budget at that time, and proceed only after receiving written authorization for additional services;

Schedule

The Administrative Draft TIA report will be completed approximately twelve weeks after completion of data collection and receipt of all required project materials.

Budget

W-Trans will provide services on a time and materials basis at our current standard billing rates. The estimated maximum fee is \$90,500.

Thank you for considering W-Trans for this project. We look forward to working with you.

Sincerely,

Mark Spencer, PE
Principal
mspencer@w-trans.com

MES/PAL015.P1-4

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

January 30, 2017

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

Re: Castilleja School Expansion Plans

Dear Ms. French:

I represent a group of neighbors living in the vicinity of Castilleja School. This is to request that you continue the upcoming scoping session hearing date and the due date for written comments. The hearing date of February 8, 2017 and a comment cutoff date of February 22, 2017 do not allow sufficient time for the public to review the relevant documents, obtain expert review where necessary, and provide full comments.

The scoping session is important to my clients due to the negative impacts presented by Castilleja's expansion plans. The project, if approved, will destroy many characteristics of the surrounding residential neighborhood because it essentially encroaches an institutional use into the surrounding single-family neighborhood. The current setting is one of single family homes, at least some of which appear to be historic resources, ample trees throughout the neighborhood and streets, minor traffic uses during non-school or school event hours, quietude, and narrow streets. The proposed changes would involve removal or attempted transplanting of an enormous number of established trees, installation of an underground garage and entry to it that are consistent with a downtown or industrial location, demolition of houses to be replaced by institutional uses, increased noise during school hours and events, increased student and employee traffic, and a very long three-year construction period. These changes are very consistent with institutions that are located on large, many-acre parcels and very inconsistent with a typical school, located in a residential neighborhood.

The Notice of Preparation and subsequent documents were issued, despite that the application for development was incomplete. The documents that you requested from Castilleja in July 2016 are just now starting to trickle in, with thus far only two of them released to the public. Please see the Public Records Act request we submitted in hopes that the public will receive access to the rest of the ones you requested over five months ago. The Initial Study, which is the seminal document for the public to understand the potential scope of the EIR was not released until January 23, 2017 and is 54 pages long. The geo-tech report is nearly 100 pages long and was just released by your office on January 26, 2017. Yet, we have a hearing date of February 8, 2017, less than two-weeks from now, when my clients would like to fully participate with the decision-makers in commenting orally on the scope of the EIR. None of the rest of the documents that were requested by your department in July 2016 appear to have been provided by the institution.

Amy French, Chief Planning Official
City of Palo Alto
250 Hamilton, 5th Floor
Palo Alto, CA 94301
Re: Castilleja Project
January 30, 2017
Page 2

We also notice that there is no Identification Number on the Initial Study or any other document that was released after the Notice of Preparation was issued. Under CEQA Guideline section 15082, subdivision (e), the Identification Number should have been available shortly after you served the State Clearinghouse. This also causes concern as to whether other relevant agencies have been notified of the scoping session and comment period dates, and whether they have had, or will have, sufficient time to provide comments.

Furthermore, under Guidelines section 15082, subdivision (a)(1)(C), as the lead agency the City was required to provide the “probable environmental effects of the project” in the Notice of Preparation to responsible agencies and the Office of Planning and Research so that other agencies could “make a meaningful response.” The one paragraph in the Notice of Preparation constitutes a woefully inadequate description of the probable environmental impacts. The document with those impacts from this project is the Initial Study. However, it is unclear how other agencies are expected to participate in the scoping process when the Initial Study was not even available until six days ago. Therefore, the Initial Study and a revised notice of the scoping session for later dates (hearing and written comments), with the Identification Number should be provided to the Clearinghouse and the public.

In reviewing your timeline for the EIR process posted on the City’s website, it appears that the City’s position is that this project should be rushed through the CEQA process within a matter of a very few months. In my experience of over 20 years handling land use matters, that is either an unrealistic timetable or one that evidences an interest by the City in doing an inadequate job informing decision-makers and the public that holds them accountable regarding the environmental impacts of the project. An inadequate, rushed EIR that does not meet the informational requirements of CEQA is simply a recipe for a similar rush into litigation over those inadequacies.

For example, I see that the institution’s geo-tech report apparently does not contemplate dewatering and contends that the project will not intrude deeply enough to involve the water table. The City’s engineer discusses all of the possible needs for dewatering and methods the City generally requires. An EIR needs to thoroughly vet this issue lest it turns out that dewatering was needed and no effort was made to quantify the amount of water coming out of the project site. The EIR also needs to provide the solution to the eventuality of the pumping system wearing out or becoming non-operable.

The work done thus far on the historic resources topic is also highly problematic. In quickly reviewing your file, it contains a hodge-podge of addresses and rating sheets. One of the sheets was filled out by Michael Corbett, a well-known architectural historian here in Berkeley. As the current Vice-President of the Berkeley Architectural Heritage Association, I am very familiar with Michael’s work and what I see in the file is incredibly inadequate, and not at all

Amy French, Chief Planning Official
City of Palo Alto
250 Hamilton, 5th Floor
Palo Alto, CA 94301
Re: Castilleja Project
January 30, 2017
Page 3

consistent with a properly drafted historic report. There is also a memo that appears to state that certain structures surrounding the school are not historic resources because they are not on a registry. The law in California has been contrary to that position for many years – the issue is whether a structure is “eligible” for inclusion in a registry. (See, *League for Protection of Oakland's etc. Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896.) The environmental issue is also not restricted to the houses slated for demolition, but also involves the potential negative impact of the project on nearby historic resources.

From walking around the neighborhood, it appears that it has already been incrementally damaged by Castilleja’s expanding institutional uses. Several of the houses have been converted into either institutional uses or rentals, instead of home ownership. These conversions of needed housing, if allowed to continue, will no doubt fuel more demolitions in the future as the incremental encroachments into the residential area continue. The housing, streetscape, and history suggest that the housing and at least one major structure on the Castilleja property have historic value, both due to at least locally important architects and former residents. Yet, the City appears to be on the brink of allowing this neighborhood to become “salvage” for a private institution that only minimally serves its citizens.

Under Guideline section 15083, the City should seriously consider the benefits of a full scoping process. That section states, “Many public agencies have found that early consultation solves many potential problems that would arise in more serious forms later in the review process.” Based on my experience with CEQA, that statement rings true. Please continue the scoping session and comment due dates.

Very truly yours,

Leila H. Moncharsh

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

LHM:lm

cc: Clients
Hillary Gitelman
Planning and Transportation Commission
City Manager
Mayor
Vice-Mayor
City Council
Historic Resources board



CITY OF
**PALO
ALTO**

PLANNING & COMMUNITY ENVIRONMENT

250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301
650.329.2441

January 31, 2017

Leila H. Moncharsh, J.D., MUP
Veneruso & Moncharsh
5707 Redwood Road, Suite 10
Oakland, CA 94619

Subject: Response to your letter dated January 30, 2017

Dear Ms. Moncharsh:

Thank you for your letter regarding the Castilleja School Expansion project.

The Environmental Impact Report (EIR) scoping meeting scheduled for February 8, 2017 provides an opportunity for you and your clients to provide oral comments on topics and alternatives requiring analysis in the EIR. If you are not able to attend the scoping meeting, you may submit additional written comments before the end of the comment period. Written and oral comments will be handled the same and will inform the City's EIR analysis.

To ensure ample time for comments in response to your request, we will extend the comment period until March 15, 2017. Please see the attached revised Notice of Preparation (NOP) noting the new deadline. Consistent with the State CEQA Guidelines, the State Clearinghouse will provide a State Clearinghouse number based on their receipt of the Notice of Preparation. That number will be included on all future environmental documents.

Sincerely,

Amy French
Chief Planning Official

Attachments: Revised NOP

Cc: Hillary Gitelman
Molly Stump
Albert Yang
City Manager
Planning and Transportation Commission
City Council
Historic Resources Board

Notice of Completion & Environmental Document Transmittal

SCH#

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

2017012052

Project Title: Castilleja School Conditional Use Permit Amendment and Master Plan
 Lead Agency: City of Palo Alto Contact Person: Amy French, Chief Plng Official
 Mailing Address: 250 Hamilton Ave, 5th Floor, PCE Phone: 650. 329.2336
 City: Palo Alto Zip: 94301 County: Santa Clara

Project Location: County: Santa Clara City/Nearest Community: Palo Alto
 Cross Streets: 1310 Bryant Street and 1235 and 1263 Emerson Street Zip Code: 94301
 Longitude/Latitude (degrees, minutes and seconds): 77 ° ' " N / ' " W Total Acres: 6.6
 Assessor's Parcel No.: 124-12-034, -031, and -033 Section: Twp: Range: Base:
 Within 2 Miles: State Hwy#: 82, US 101 Waterways: San Francisquito Creek
 Airports: Railways: Caltrain Schools: Palo Alto High

Document Type:

CEQA: ☒ NOP ☐ Draft EIR NEPA: ☐ NOI Other: ☐ Joint Document
☒ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) ☐ Draft EIS ☐ Other:
☐ Mit Neg Dec Other: ☐ FONSI ☐

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation
☐ General Plan Amendment ☒ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☒ Site Plan ☐ Land Division (Subdivision, etc.) ☒ Other:

Development Type:

☐ Residential: Units Acres ☐ Transportation: Type
☐ Office: Sq. ft. Acres Employees ☐ Mining: Mineral
☐ Commercial: Sq. ft. Acres Employees ☐ Power: Type MW
☐ Industrial: Sq. ft. Acres Employees ☐ Waste Treatment: Type MGD
☒ Educational: Modernize existing private school ☐ Hazardous Waste: Type
☐ Recreational: ☐ Other:
☐ Water Facilities: Type MGD

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Fiscal ☐ Recreation/Parks ☒ Vegetation
☐ Agricultural Land ☒ Flood Plain/Flooding ☒ Schools/Universities ☒ Water Quality
☒ Air Quality ☐ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☐ Sewer Capacity ☐ Wetland/Riparian
☒ Biological Resources ☐ Minerals ☒ Soil Erosion/Compaction/Grading ☐ Growth Inducement
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Land Use
☐ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☐ Cumulative Effects
☐ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☐ Other:

Present Land Use/Zoning/General Plan Designation:

Comprehensive Plan – single family residential; zoning – R-1(10,000)

Project Description: (please use a separate page if necessary)

Castilleja School Foundation requests amendment of their existing Conditional Use Permit, a Parcel Map to consolidate the three parcels on which the campus is located into a single parcel, Architectural Review, and approval of a master plan. Construction of proposed physical improvements would occur in three phases. These include demolishing two residential structures, constructing a below-grade parking structure, relocating the existing pool, completing a bikeway station, relocating service deliveries to the parking structure, and demolishing four classroom buildings and replacing them with a single building.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

☐ Air Resources Board	☒ Office of Historic Preservation
☐ Boating & Waterways, Department of	☐ Office of Public School Construction
☐ California Emergency Management Agency	☐ Parks & Recreation, Department of
☐ California Highway Patrol	☐ Pesticide Regulation, Department of
☒ Caltrans District # <u>4</u>	☐ Public Utilities Commission
☐ Caltrans Division of Aeronautics	☒ Regional WQCB # <u>2</u>
☐ Caltrans Planning	☐ Resources Agency
☐ Central Valley Flood Protection Board	☐ Resources Recycling and Recovery, Department of
☐ Coachella Valley Mtns. Conservancy	☐ S.F. Bay Conservation & Development Comm.
☐ Coastal Commission	☐ San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
☐ Colorado River Board	☐ San Joaquin River Conservancy
☐ Conservation, Department of	☐ Santa Monica Mtns. Conservancy
☐ Corrections, Department of	☐ State Lands Commission
☐ Delta Protection Commission	☐ SWRCB: Clean Water Grants
☐ Education, Department of	☐ SWRCB: Water Quality
☐ Energy Commission	☐ SWRCB: Water Rights
☒ Fish & Game Region # <u>3</u>	☐ Tahoe Regional Planning Agency
☐ Food & Agriculture, Department of	☐ Toxic Substances Control, Department of
☐ Forestry and Fire Protection, Department of	☐ Water Resources, Department of
☐ General Services, Department of	
☐ Health Services, Department of	☐ Other: _____
☐ Housing & Community Development	☐ Other: _____
☐ Native American Heritage Commission	

Local Public Review Period (to be filled in by lead agency)

Starting Date January 23, 2017 Ending Date February 22, 2017

Lead Agency (Complete if applicable):

Consulting Firm: <u>Dudek</u>	Applicant: <u>Castilleja School Foundation</u>
Address: <u>853 Lincoln Way, suite 208</u>	Address: <u>1310 Bryant Street</u>
City/State/Zip: <u>Auburn CA 95603</u>	City/State/Zip: <u>Palo Alto CA 94301</u>
Contact: <u>Katherine Waugh</u>	Phone: <u>650.470.7751</u>
Phone: <u>530.863.4642</u>	

Signature of Lead Agency Representative:  Date: 1/23/17

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Cervantes, Yolanda

From: Wileta Burch <wiletaburch@gmail.com>
Sent: Wednesday, August 17, 2016 3:50 PM
To: French, Amy
Subject: FW: Castilleja

----- Forwarded Message

From: Wileta Burch <wiletaburch@gmail.com>
Date: Wed, 29 Jun 2016 16:01:42 -0700
To: <city.council@cityofpaloalto.org>
Conversation: Castilleja
Subject: Castilleja

Dear council members,

It is my understanding that Castilleja girls school will meet with you to discuss future plans which will include expansion and will also address the neighbors complaints of parking and noise.

Please give these plans a strong support as Castilleja is one of the most recognized schools in the country for it's academic excellence, diversity of enrollment, opportunities for the girls to give community service, travel abroad, and unparalleled preparation for a meaningful contribution beyond high school.

Since my grand daughter attended Castilleja and my daughter-in-law has been on Staff there for 20 years, my husband Jim and I were able to experience the school many times. We visited classrooms, plays, graduations, toured the facility, and met with the Chef to discuss school gardens. The excellence we saw was inspiring.

Since this school is one of Palo Alto's treasures, I hope you will support its opportunity to not only continue the current excellence but to expand it to even more girls.

Thank you. Wileta Burch
177 Hemlock Court
Palo Alto, CA 94306

----- End of Forwarded Message

Cervantes, Yolanda

From: Barbara Lindsay <blindsay@pausd.org>
Sent: Wednesday, August 17, 2016 3:40 PM
To: French, Amy
Cc: Barbara Lindsay
Subject: Support for Castilleja

From: Barbara Lindsay
Sent: Thursday, June 30, 2016 8:28 PM
To: city.council@cityofpaloalto.org
Cc: Barbara Lindsay
Subject: Support for Castilleja

Dear City Council members,

I am writing to you in support of Castilleja School's plans for the future.

As a long-time resident of Palo Alto and a veteran PAUSD teacher, I believe Castilleja is acting in good faith by working very hard on plans to minimize impact on its neighbors.

My niece attended Castilleja, and I have had many former students attend as well, but I would love to see more girls have the opportunity through the school's plan to increase enrollment and revitalize its facilities.

Castilleja is a very important part of Palo Alto's history and unique in its vision of education of girls and young women. Our city government needs to respond in good faith to allow Castilleja to take its vision into the future. I urge you to support their plans to do so.

Sincerely,

Barbara Lindsay

Dear Ms French,

August 17, 2016

As a long time resident of Palo Alto and having raised my two children here, I am writing to lend my support to the CUP Castilleja has proposed.

Palo Alto is a community that values education and I believe it is important that we have multiple options for learning. Having sent my children to Ohlone and Paly, I value the excellent public school education they had. However, I also know the value of an independent school education. I am supporting Castilleja for the girls in our community that need the kind of educational environment that Casti has to offer. As the former Director of Admission at The Girls' Middle School, I see Castilleja as more than one of the best elite independent girls school in the country. I see it as a much needed option for many adolescent girls.

Palo Alto has grown and I encourage you to please allow the valuable experience of a Castilleja education to the many girls who would benefit.

Thank you for considering my opinion,

Megan R Miller
2530 South Court
Palo Alto, 94301
650-269-7710

August 18, 2016

Dear Ms. French/To Whom It May Concern,

I am writing in support of the expansion of Castilleja School. Castilleja is a revolutionary institution. It is a place of learning, growing, and connecting. It is a place that fosters positive change and development of girls and young women. In this world we live in, there will never be too much effort put forth to uplifting women, never enough platform upon which they may share their voice, never too many glass ceilings broken. I am a woman who grew up in Palo Alto. I struggled in school with my diagnosed dyslexia and was reserved, not confident. I did not share much in class or believe in myself academically. My parents had the desire and the financial means to help me by providing me tutoring that allowed me to succeed and I recently completed a Master of Arts in Applied Behavior Analysis with an emphasis in autism. I have worked in Palo Alto at the elementary level and loved giving back to students who struggled. I was especially satisfied when I knew I was helping a young girl find her strength and voice, confidence and love of learning. Castilleja does this for so many girls of many backgrounds. It is a place that allows girls to not only survive school, but thrive. My Women's Studies background tuned me into the need to educate girls and do it well. Castilleja has done this and will continue to do so, reaching girls from many ethnic, socio-economic, and culturally diverse backgrounds. If Castilleja is granted permission for expansion, I believe the greater community will benefit.

Thank you for your time in reading this letter.

Sincerely,

Kristina K. Lindsay Madriz

Cervantes, Yolanda

From: DavidandGlowe Chang <davidandglowe@yahoo.com>
Sent: Tuesday, September 27, 2016 7:20 AM
To: French, Amy
Cc: Nancy Tuck
Subject: Castilleja Building application

Dear Amy,

Please add my name to the mailing list regarding Pro-Castilleja information.

I am a current neighbor at 1345 Bryant St. All the efforts by Castilleja have resulted in a much calmer and controlled traffic management. It has been so disappointing to find so many neighbors opposed to what Castilleja represents. California education needs all the help it can get. I applaud Nanci Kaufman's attempt to placate those neighbors concerned with the normal noise patterns of a bustling school. However, I feel it is an extraordinary burden for the school to have to remodel the property for noise control. As a school for young women, the noise level is immediately reduced as there is no football games and rallies and minimal dances. The hours of business are truly within any normal business entity. It is not the same as an eating establishment or entertainment endeavor.

I am in favor of school expansion without the herculean efforts of lowering a pool or the central campus. This money could be better spent elsewhere--even as a donation to the greater communityh/PAUSD for their improvements.

Regards,

Glowe Chang
1345 Bryant St.
Palo Alto, CA 94301
davidandglowe@yahoo.com

From: [Stan Shore](#)
To: [French, Amy](#)
Subject: 4 -5 year construction project; using CUP process to escape rezoning process.
Date: Tuesday, January 31, 2017 11:42:04 AM

Hello Amy,

This email deals specifically with Castilleja's 4 -5 year construction time table and should this be a rezoning instead of a CUP issue. Please include this email in the February 8, 2017 Palo Alto scoping meeting. This email has also been sent to many other Palo Alto residents.

I will be attending the February 8, 2016 meeting and would like time to speak to the Planning and Transportation Commission.

STATEMENT:

Palo Alto residents have been watching new fifty foot tall buildings, being constructed in many of Palo Alto commercial areas. Almost all of these 50 foot construction projects have been completed in two years or even less.

Castilleja, in a quiet residential neighborhood, proposes a two story (above ground) project that will take FOUR, FIVE and possibly SIX years to complete. Four to five or six years is horrific. Every where else in the city, construction crews complete much larger projects, in two years or less. But, Castilleja in a quiet residential neighborhood wants the community to live with four, five or even six years of cement trucks, jack hammering, cranes, excavators, bulldozers and never ending stream of trucks, an unknown number of construction crews and not to mention NOISE! NOISE! NOISE!. And most importantly four to potentially six years of construction in a quite R1 residential neighborhood. This project is insanity for a quiet residential neighborhood. This massive construction project does NOT belong in a quiet R1 zoned area.

If this project must be forced on this neighborhood, the city must demand that the entire project be completed in two years. This neighborhood is 100% opposed to four - six years of construction.

CUP vs REZONING

A project of this scale with this intensive land use, with never ending student enrollment increases, no longer falls within the CUP process. This is really a land use rezoning issue; not a CUP issue. Castilleja is using the CUP process as a loophole to bypass the rezoning process. City council should require Castilleja to role back enrollment to 415 students as set forth in the current CUP. The city should instruct Castilleja to apply for rezoning of there 6± acre parcel. The scale, intensity and impact on the community and on Palo Alto of this project is not a minor CUP change. This is a blatant re-zoning of a six acre± parcel that is being paraded to the Palo Alto community as a CUP issue. To avoid litigation, City Council needs to ask the City Attorney whether the Castilleja proposal is in fact a change in zoning.

Remember the old saying, "If it looks **like a duck**, swims **like a duck**, and **quacks like a duck**, then it probably is a **duck**.

Sincerely,

Stan Shore
Palo Alto, CA

TO: THE PALO ALTO COMMUNITY: If you would like to be removed from this data base, please send me an email requesting to be removed. If you know of other residents concerned about the Castilleja expansion, please forward this email to them.

From: French, Amy
To: ["Tom Shannon"](#)
Cc: akcooper@pacbell.net; mcleod.bruce@gmail.com; carlab@cb-pr.com
Subject: RE: Notice of Scoping Meeting for Preparation of an EIR for Castilleja
Date: Tuesday, January 31, 2017 9:58:00 AM

The notice in the Palo Alto Weekly newspaper and the city's webpage for Castilleja project, with all its followers, noted the regular start time of the Planning and Transportation Commission (PTC) meeting. PTC meetings always start at 6 pm.

The mailed cards are a courtesy, not a requirement for scoping meeting - so the lack of a statement about 6 pm general PTC meeting start time on the notice card is not a reason to not have the scoping meeting that evening. I cannot pinpoint exactly what time the scoping meeting will begin - there is another item on the agenda before Castilleja scoping meeting that will start at 6 pm and I don't know how long that item will go.

From: Tom Shannon [<mailto:tshannon2@cs.com>]
Sent: Tuesday, January 31, 2017 9:30 AM
To: French, Amy
Cc: akcooper@pacbell.net; mcleod.bruce@gmail.com; carlab@cb-pr.com
Subject: Notice of Scoping Meeting for Preparation of an EIR for Castilleja

Hi Amy,

I received the above referenced Notice in the USPS mail on January 25, 2017. There is no time listed in the Notice mailed to us. It only has the date of February 8, 2017 and the location. I went to the city's website and found out that the meeting starts at 6 pm. However, I'm wondering if the Notice should have shown a time to adequately inform neighbors?

Tom Shannon
256 Kellogg Ave

From: French, Amy
To: ["Tom Shannon"](#)
Cc: akcooper@pacbell.net; mcleod.bruce@gmail.com; carlab@cb-pr.com
Subject: RE: Castilleja Expansion - Traffic Counts
Date: Tuesday, January 31, 2017 9:30:00 AM

Thank you for your input. I forwarded your below email on the scope for Wtrans to Dudek to share with Wtrans (and asked her to be prepared to respond at or prior to the PTC scoping meeting next week). I also copied transportation staff.

From: Tom Shannon [mailto:tshannon2@cs.com]
Sent: Tuesday, January 31, 2017 9:16 AM
To: French, Amy
Cc: akcooper@pacbell.net; mcleod.bruce@gmail.com; carlab@cb-pr.com
Subject: Castilleja Expansion - Traffic Counts

Hi Amy,

Thanks for the email updating us on scoping info. One comment on the Transportation Sub-Consultant's Scope ... in addition to the traffic counts outlined in the scope, the traffic consultant needs to measure trips on days when Castilleja is CLOSED and not holding any functions at the school while Palo Alto HS is in session. Castilleja represents that some of the traffic on our streets is related to Palo Alto HS. Yet, on days when Castilleja is CLOSED and Palo Alto HS is in session, our neighborhood streets (especially Kellogg Ave.) are very quiet. Thus, we can conclude that 90% of our neighborhood traffic comes almost entirely from Castilleja's operations.

I have video recordings of what the traffic looks like on days when Castilleja is closed and Palo Alto is in session. There is no traffic to speak of on Kellogg and very little at the intersection of Kellogg and Bryant. However, I realize that traffic counts and videos from neighbors don't hold much water so I'd like to request that the traffic engineers measure the traffic impact when Castilleja is CLOSED and not holding any functions while Palo Alto HS is in session. You can find these opportunities when the school's take their breaks. Paly and Castilleja are on different "break" schedules. Please make sure Castilleja is not holding any functions on the days that the traffic engineers make the counts.

Thanks,
Tom Shannon
256 Kellogg Ave.

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

From: Castilleja Expansion <Castilleja.Expansion@CityofPaloAlto.org>
To: Castilleja Expansion <Castilleja.Expansion@CityofPaloAlto.org>
Sent: Mon, Jan 30, 2017 10:06 am
Subject: Castilleja School Project Update - Multiple Documents Uploaded

Hello,

You are receiving this email because you are subscribed to the Castilleja School Project Update email list.

Multiple documents have been uploaded to the Castilleja School web page on the City's website.

The documents are outlined below:

Castilleja School CUP Application Submittal Items

Geotechnical Report prepared by Applicant's Consultant

City Staff and Consultant Documents for Castilleja School CUP Review

Transportation Sub-Consultant's Scope

Thank you,
City of Palo Alto

From: French, Amy
To: ["Andie Reed"](#)
Subject: RE: NOP received Jan 20, 2017
Date: Tuesday, January 31, 2017 6:16:00 AM

I forwarded your comments to Katherine Waugh of Dudek, and I am attaching your email to the staff report to the Commission for the packet. There is not going to be a revised NOP or revised Initial Study. The NOP is specifically to alert agencies through the State Clearinghouse circulation process, and the public via newspaper notice, that the City intends to prepare an EIR for the project. It allows interested parties to provide input on the scope of the study ahead. I prepared a "primer" on CEQA process for the Commission report I hope will be helpful. Since the City has decided to do a Draft EIR, technically an initial study is not required to be published/circulated – and certainly not revised – it is only as a courtesy to communicate – then we take your comments and suggestions about what you feel the City should study and put that into the mix with all of the other comments and suggestions. We will explain this at the Commission hearing February 8. The meeting begins at 6 pm but there is also another item going first that night. The draft EIR will be the next time to comment on what was actually studied over the next several months.

From: Andie Reed [mailto:andiezreed@gmail.com]
Sent: Wednesday, January 25, 2017 10:14 AM
To: French, Amy
Cc: Nelson Ng; Kimberley Wong; Mary; Jim Poppy; Hank Sousa; neva yarkin; Rob Levitsky; Jacqueline Taylor; Steven M. Levitan; Polina Levitan
Subject: NOP received Jan 20, 2017

Dear Amy,

Thank you for posting the NOP for the Castilleja project. Upon review of the Notice, and to ensure that there will be a full EIR, we are hereby requesting additional areas of potentially significant environment impact be analyzed (your Pg 2, bottom third) including but not limited to:

1. Aesthetics:

Although this is not included in your NOP, we do see this in the Initial Study which we received this week, so we assume this has been added.

2. Air quality:

Needs to be studied for potential impacts after completion of this project if it were to be approved, not just during construction, as is currently stated.

3. Hydrology & water quality:

Effects of potential underground water depletion, impacts to the integrity of surrounding buildings, impermeability of garage roof and impacts of run-off, substantially altering existing drainage pattern.

4. Population and housing:

We disagree with Dudek's Initial Study on this issue. 1235 Emerson and 1263 Emerson are slated to be demolished. These beautiful old homes represent 30% of the total residences in that short block of Emerson, and

thus their demise would leave a substantial void and decimate the residential feel of the block.

5. Traffic/Transportation:

It is important that 24 hour/7 days a week car counts are conducted, not just "peak periods". Weekends and nights are very busy with school activities, far in excess of any comparable schools. We assume any traffic consultant will install automatic car counters and study total impact to the Single Family R1 neighborhood compared to surrounding streets.

6. Where can we see study of Staging Area of heavy construction equipment and mitigation plan for the 5+ years of construction for gas emissions, noise and traffic?

Please confirm back to me that these additional items will be included in the final NOP and Initial Study prior to the scoping meeting on February 8.

Thank you,

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

From: French, Amy
To: ["Levitan, Steven M."](#)
Cc: ["Nelson Ng"; roblevitsky@yahoo.com](#)
Subject: RE: Castilleja: traffic counting devices
Date: Thursday, January 26, 2017 3:54:00 PM
Attachments: [W-Trans Scope 10-21-16.pdf](#)

Yes, Steven, here is the explanation. And I am copying Nelson and Rob, who have recently emailed me with concerns regarding the project.

We are aware of the use of traffic counting devices for gathering traffic data. They were placed by the City's environmental consultant's sub-consultant to perform traffic counts. The consultant is paid by the City as an independent consultant hired to prepare an Environmental Impact Report. This traffic counting activity was identified by the Transportation Division staff as necessary to inform the environmental review process associated with Castilleja School Foundation's application. The consultant is proceeding with the scope of work.

Steven, et al, you can continue to be assured that the consultant contract is directly with the City, and not with Castilleja. The scope of work for the sub-consultant (W-trans), overseen by the City's consultant, is attached to the Planning and Transportation Commission staff report that will be published in the Commission's packet. I am attaching the scope for your information.

From: Levitan, Steven M. [mailto:steve.levitan@hoganlovells.com]
Sent: Thursday, January 26, 2017 12:23 PM
To: French, Amy
Subject: Castilleja: traffic counting devices

Amy,

I've become aware of traffic counting devices being placed on Emerson Street (12-1300 block) on both the street itself (a rubber strip) and on utility poles. Was this approved by the city? When we met in person last year with you, Hilary Gitelman, and others, you and Hilary assured us that any traffic studies would be performed by an independent consultant (working at the city's direction -- not one selected and supervised by Castilleja), with an advance opportunity for full input by the neighbors as to the nature and scope of the study, and how it would be performed. This is critically important, from the neighbors' perspective, to ensure that the data is both objective and complete. I trust that we can continue to rely on the assurances that were provided. If so, I am at a loss to understand why these devices were installed (without any notice or explanation to the Castilleja neighbors), at whose direction they were installed, and to what end? Are you able to explain?

Thank you,
Steve Levitan

About Hogan Lovells

Hogan Lovells is an international legal practice that includes Hogan Lovells US LLP and Hogan Lovells International LLP. For more information, see www.hoganlovells.com.

CONFIDENTIALITY. This email and any attachments are confidential, except where the email states it can be disclosed; it may also be privileged. If received in error, please do not disclose the contents to anyone, but notify the sender by return email and delete this email (and any attachments) from your system.

From: [Public Works](#)
To: [Public Works](#)
Subject: [Public Works Department - Public Services Bureau](#)
Date: [Thursday, January 20, 2022 12:27 PM](#)

Hi,
We are looking for a large amount of material for the City of Cambridge. Please contact us at [508-548-1234](#) or [508-548-1234](#).
Thank you for your attention to this matter.

With your attention to this matter, we are looking for a large amount of material for the City of Cambridge. Please contact us at [508-548-1234](#) or [508-548-1234](#).
Thank you for your attention to this matter.

With your attention to this matter, we are looking for a large amount of material for the City of Cambridge. Please contact us at [508-548-1234](#) or [508-548-1234](#).
Thank you for your attention to this matter.

With your attention to this matter, we are looking for a large amount of material for the City of Cambridge. Please contact us at [508-548-1234](#) or [508-548-1234](#).
Thank you for your attention to this matter.

With your attention to this matter, we are looking for a large amount of material for the City of Cambridge. Please contact us at [508-548-1234](#) or [508-548-1234](#).
Thank you for your attention to this matter.

With your attention to this matter, we are looking for a large amount of material for the City of Cambridge. Please contact us at [508-548-1234](#) or [508-548-1234](#).
Thank you for your attention to this matter.

With your attention to this matter, we are looking for a large amount of material for the City of Cambridge. Please contact us at [508-548-1234](#) or [508-548-1234](#).
Thank you for your attention to this matter.

With your attention to this matter, we are looking for a large amount of material for the City of Cambridge. Please contact us at [508-548-1234](#) or [508-548-1234](#).
Thank you for your attention to this matter.







Photo by [Name]

From: [Andie Reed](#)
To: [French, Amy](#)
Cc: [Nelson Ng](#); [Kimberley Wong](#); [Mary](#); [Jim Poppy](#); [Hank Sousa](#); [neva yarkin](#); [Rob Levitsky](#); [Jacqueline Taylor](#); [Steven M. Levitan](#); [Polina Levitan](#)
Subject: NOP received Jan 20, 2017
Date: Wednesday, January 25, 2017 10:14:11 AM

Dear Amy,

Thank you for posting the NOP for the Castilleja project. Upon review of the Notice, and to ensure that there will be a full EIR, we are hereby requesting additional areas of potentially significant environment impact be analyzed (your Pg 2, bottom third) including but not limited to:

1. Aesthetics:

Although this is not included in your NOP, we do see this in the Initial Study which we received this week, so we assume this has been added.

2. Air quality:

Needs to be studied for potential impacts after completion of this project if it were to be approved, not just during construction, as is currently stated.

3. Hydrology & water quality:

Effects of potential underground water depletion, impacts to the integrity of surrounding buildings, impermeability of garage roof and impacts of run-off, substantially altering existing drainage pattern.

4. Population and housing:

We disagree with Dudek's Initial Study on this issue. 1235 Emerson and 1263 Emerson are slated to be demolished. These beautiful old homes represent 30% of the total residences in that short block of Emerson, and thus their demise would leave a substantial void and decimate the residential feel of the block.

5. Traffic/Transportation:

It is important that 24 hour/7 days a week car counts are conducted, not just "peak periods". Weekends and nights are very busy with school activities, far in excess of any comparable schools. We assume any traffic consultant will install automatic car counters and study total impact to the Single Family R1 neighborhood compared to surrounding streets.

6. Where can we see study of Staging Area of heavy construction equipment and mitigation plan for the 5+ years of construction for gas emissions, noise and traffic?

Please confirm back to me that these additional items will be included in the final NOP and Initial Study prior to the scoping meeting on February 8.

Thank you,

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

From: [French, Amy](#)
To: [Rob Levitsky](#)
Subject: Re: dudek castilleja report
Date: Tuesday, January 24, 2017 6:33:07 PM
Attachments: [image1.PNG](#)

Thank you for catching that. It is great to have such quick feedback on the IS. I have forwarded your comment to our consultant.

Sent from my iPhone

On Jan 24, 2017, at 6:10 PM, Rob Levitsky <roblevitsky@yahoo.com> wrote:

Amy

page 30 of the Dudek report says that

"the proposed project does not involve the demolition of housing and thus will not displace people or housing. Thus the project will have no impact"

<image1.PNG>

Sent from my iPhone

From: [French, Amy](#)
To: [Penny Ellson](#)
Cc: [Star-Lack, Sylvia](#)
Subject: Re: SCOPING MEETING Feb 8, 2017 Thursday City Hall: Re: Castilleja Girl's School Master Plan impact to the Embarcadero Corridor
Date: Tuesday, January 24, 2017 6:51:46 AM

The deadline is much later - 30 days from yesterday - but yes all comments at the CSTSC meeting will be forwarded to our consultant, and additional comments in writing can be submitted well after that date. I will make sure to cover that in the meeting

Sent from my iPad

On Jan 23, 2017, at 11:36 PM, Penny Ellson <pellson@pacbell.net> wrote:

To clarify. Comments from the 2/9 CSTSC meeting will be included in the scoping comments. Yes? Or should the site reps submit comments by the 2/8 deadline?

Penny

From: French, Amy [<mailto:Amy.French@CityofPaloAlto.org>]
Sent: Monday, January 23, 2017 4:57 PM
To: Penny Ellson
Subject: RE: SCOPING MEETING Feb 8, 2017 Thursday City Hall: Re: Castilleja Girl's School Master Plan impact to the Embarcadero Corridor

Thanks I just got it on my calendar, thanks to Sylvia. I had known about it before and agreed to come. But of course, having it on personal calendar is everything! Let me know if you have anything I should know (duration and what about a presentation I could give would be most helpful?)

From: Penny Ellson [<mailto:pellson@pacbell.net>]
Sent: Monday, January 23, 2017 4:55 PM
To: French, Amy; 'Kimberley Wong'
Cc: Safe Routes; Star-Lack, Sylvia
Subject: RE: SCOPING MEETING Feb 8, 2017 Thursday City Hall: Re: Castilleja Girl's School Master Plan impact to the Embarcadero Corridor

CSTSC meeting will be February 9, 10am-noon this month. Sylvia's team writes the agenda.

Best,

Penny

From: French, Amy [<mailto:Amy.French@CityofPaloAlto.org>]
Sent: Monday, January 23, 2017 4:48 PM
To: Penny Ellson; 'Kimberley Wong'
Cc: Safe Routes; Star-Lack, Sylvia
Subject: RE: SCOPING MEETING Feb 8, 2017 Thursday City Hall: Re: Castilleja Girl's School Master Plan impact to the Embarcadero Corridor

Hi Penny, thank you for responding to Kimberley. Please remind me what time the CSTSC meeting is, and where?

I've attached the Initial Study for the Castilleja School project that we uploaded to the City's website today. This will be discussed at the February 8 PTC scoping session, 6 pm.

When the PTC staff report has been reviewed and uploaded to the City's website, I will email this group the link to the staff report.

From: Penny Ellson [<mailto:pellson@pacbell.net>]

Sent: Monday, January 23, 2017 4:31 PM

To: 'Kimberley Wong'

Cc: Safe Routes; Star-Lack, Sylvia; French, Amy

Subject: RE: SCOPING MEETING Feb 8, 2017 Thursday City Hall: Re: Castilleja Girl's School Master Plan impact to the Embarcadero Corridor

Hi Kimberley,

Yes. I do remember meeting you. Thanks for your outreach and your interest in student safety.

I have notified Safe Routes to School Coordinators at affected school sites of the upcoming Castilleja meeting and I have forwarded project materials to them.

The Castilleja item is on our February 9 City School Traffic Safety Committee (CSTSC) agenda. I'm a member of this committee as I am a co-chair of the Palo Alto Council of PTA's Traffic Safety Committee, a democratic committee. I cannot unilaterally take a position for the PTA on a development project, nor can any other committee member. Our committee provides recommendations to staff. I don't know if any PTA site reps intend to weigh in at the 2/8 scoping meeting, but I have been told that comments given at the CSTSC meeting will be included in the scoping comments.

That said, the school site reps are aware of the issue, the Feb. 8 scoping session date, and your concerns. It is their responsibility to work with their site PTAs and decide how they wish to proceed. My job is to make sure they have information they need to inform their PTAs in advance of the CSTSC and the scoping session so that the site PTAs can take action as they see fit. I have done this.

Thank you very much for the update. I will share your note with the reps at the affected school sites today.

Best,

Penny

From: Kimberley Wong [<mailto:sheepgirl1@yahoo.com>]

Sent: Monday, January 23, 2017 3:56 PM

To: Penny Ellson

Cc: 'Safe Routes'; Sylvia.star-lack@cityofpaloalto.org

Subject: SCOPING MEETING Feb 8, 2017 Thursday City Hall: Re: Castilleja Girl's School Master Plan impact to the Embarcadero Corridor

Hi Penny,

I'm not sure if you remember talking to me at the swearing in meeting of the new city council members? I sent a note to Sylvia, but perhaps it got lost in the vacation mail over the holidays.

I just wanted to make sure that the safe routes committee is on top of the Scoping meeting for the Castilleja expansion project where public input is allowed on Feb 8, 2017, Thursday at 6pm. We want make sure your group weighs in on asking for an extensive study to evaluate the impacts of the rerouting of car traffic into an underground garage on Bryant street being that this is your concern and expertise. We need to see how this will impact bicycle safety and traffic flow especially during early morning commute hour on this already very busy corridor at Embarcadero and Bryant.

For your information, this updates are available on the City [website](#) for Castilleja.

And I've attached a plan for the garage and added traffic arrows so you can see the areas we are concerned with. I am not including Amy French given that we have already inundated her with many of our concerns regarding this project already.

<image001.gif>
Kimberley

From: Penny Ellson <pellson@pacbell.net>
To: 'Kimberley Wong' <sheepgirl1@yahoo.com>
Cc: 'Tina Peak' <tmpeak@yahoo.com>; 'Safe Routes' <SafeRoutes@CityofPaloAlto.org>;
"French, Amy" <Amy.French@CityofPaloAlto.org>
Sent: Tuesday, August 16, 2016 6:42 PM
Subject: RE: Castilleja Girl's School Master Plan impact to the Embarcadero Corridor of Palo Alto near PALY

Hi Kimberley ,

I am home now. Yesterday I touched base with city staff to understand where they are in the planning process and asked if it might be appropriate to bring this as an agenda item to the City School Traffic Safety Committee.

Here (pasted below) is the reply from the assigned planner Amy French and Safe Routes to School Coordinator Sylvia Star-Lack. Let's stay in touch about this. It sounds like this is the wrong moment to weigh in, but I agree it is important to follow this project. If you see further progress, please ping me. I try to keep an eye on these things, but we are tracking a lot of projects right now. We can help each other. An important moment to weigh in will be the scoping meeting mentioned below. Let's both watch for that notice.

Thanks for your interest in school commute safety.

Best,

Penny (Please read on.....)

(from Amy French)

This project will have an Environmental Impact Report process that will start with a scoping meeting. We will be preparing FAQs and hiring a consultant to prepare an EIR in the coming month, and we will also be updating the project description and webpage. After that, we can talk a bit more about timing with school commute task

force meeting.

From: Star-Lack, Sylvia
Sent: Tuesday, August 16, 2016 3:30 PM
To: Penny Ellson
Cc: French, Amy; Atkinson, Sue-Ellen
Subject: RE: Castilleja Girl's School Master Plan impact to the Embarcadero Corridor of Palo Alto near PALY

Hi Penny,

I forgot to tell you that I did speak with Amy French, the planner on this project. (I'm copying her on this as well.) She told me that this project does not have a complete application yet, so the project is on hold until the City receives a complete application. The project will get extra scrutiny with regard to turning movements and traffic because it is on the School Commute Corridors Network. Amy also let me know that sending this project to the CSTSC at this time will not be helpful. The project needs a complete application first.

Information about the project can be found here:

<https://palocalto.buildingeye.com/planning>

Enter the address: 1310 Bryant

Thanks for the phone call earlier!

-Sylvia

As a part-time employee for the City of Palo Alto , I look forward to responding to your email shortly. Thanks for your patience!

<image002.gif>

Sylvia Star-Lack | Coordinator, Safe Routes to School
Planning & Community Environment | Transportation Division
250 Hamilton Avenue | Palo Alto , CA 94301
T: 650.329.2156 | **E:** Sylvia.star-lack@cityofpaloalto.org

Please think of the environment before printing this email – Thank you!

Use Palo Alto 311 to report items you'd like the City to fix!! Download the [app](#) or click [here](#) to make a service request.

From: Kimberley Wong [<mailto:sheepgirl1@yahoo.com>]
Sent: Tuesday, August 09, 2016 3:41 PM
To: pellson@pacbell.net
Cc: Tina Peak
Subject: Castilleja Girl's School Master Plan impact to the Embarcadero Corridor of Palo Alto near PALY

Penny,

I was given your name and email by Tina Peak , my friend since our boys were in kindergarten at Addison together. And now they are both ready to head off to college this fall! Sigh!

Just wondering if you saw this article about the Aug 6 Daily Post article re: Castilleja's CUP application and "Master Plan"... Wondering if I could possibly talk to you about bike safety for the students of Palo Alto , especially for those using the Embarcadero corridor and its immediate surroundings near and around PALY.

To give you some background. Castilleja has submitted request to increase their CUP by 30% over a few years plus a master plan to build an underground garage which directs traffic from Westbound Embarcadero onto the campus via Bryant Street, through the garage and right turn only up and onto Emerson Street (which by the way is directs cars to front door!) and right back onto Eastbound Embarcadero. Not even mentioning the 168 trees that will be removed, or torn out to make way for this garage.

From my viewpoint, it will be a nightmare and a negative impact on the safety of students, bike, cars and pedestrians using the Embarcadero corridor to get to Paly, Town and Country, and to Stanford University . The other major intersection is Bryant and Embarcadero which many North Palo Alto students cross on the bike boulevard to Jordan Middle School .

Tina thought that you might have some thoughts on these issues and how might you approach the problem or who to contact about my concerns. Do you know of someone at Paly who is also involved in the safety of students traveling to and from the school?

I've provided the CUP and Master Plan application as well as a flyer for tomorrow's meeting at City Hall re: Embarcadero Corridor. Plans from Castilleja will definitely impact theirs in terms of traffic counts, traffic flows and accounting for many many more cars and traffic incidents involving bikes and cars on the road and intersections. If you have time to go, that may be of interest to you. Unfortunately I might have another meeting at that time.

I'd be happy to meet you some time to talk this over. My cell number is 650-906-6893. I live at 1260 Emerson Street , which appears on the August 6 issue of the Daily Post. My husband, Nelson Ng is the one quoted in this article.

Regards,
Kimberley Wong

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2016.0.7752 / Virus Database: 4633/12794 - Release Date: 08/11/16

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2016.0.7998 / Virus Database: 4749/13818 - Release Date: 01/23/17

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2016.0.7998 / Virus Database: 4749/13818 - Release Date: 01/23/17

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2016.0.7998 / Virus Database: 4749/13818 - Release Date: 01/23/17

From: [Jacqueline Taylor](#)
To: [Nanci Kauffman](#)
Cc: [Kathy Lavendecker](#); [Mary - SAVE OUR NEIGHBORHOOD](#); [Nelson Ng](#); [Kimberley Wong](#); [Andie Reed](#); [Neva Yarkin](#); [Rob Levitsky](#); [Steven M. Levitan](#); [Hank Sousa](#); [French, Amy](#); [Polina Levitan](#); [Michael Manneh](#)
Subject: Re: Meeting at Castilleja on 11/17/16
Date: Monday, January 23, 2017 5:33:50 PM

Dear Nanci

Thanks for your reply and suggestions.

Unfortunately, the kind of small group meeting you propose would not meet our needs at all. Of the neighborhood meetings you listed in your presentation on 11/17/16, over 2/3 were with a "small working group" of 4 neighbors who live right next to each other on Kellogg. Those neighbors, despite sincere efforts on their part, failed to represent the needs and concerns of the neighborhood (as you yourself acknowledged to me on 11/17). We think such meetings lack transparency and are ultimately counterproductive.

We would consider having a larger meeting of neighbors -- not the entire group of concerned neighbors immediately impacted by Castilleja's expansion plans -- but perhaps between 8 to 10 of us and including neighbors from different parts of the area most impacted by your plans. We do not wish simply to voice the concerns that you've already listened to and taken note of. As Nelson Ng has previously requested, we are interested primarily in what concessions or mitigation measures Castilleja is prepared to make. Amy French's letter of incomplete to you suggested some mitigation measures: lower enrollment, less construction, moving to another site. We therefore ask that for any meeting with neighbors you invite senior representative members of, or even the full, Board of Trustees of the school -- those empowered to make decisions concerning compromise, concessions and mitigation measures.

Such a meeting would need to take place in a neutral setting, such as a public conference room in Palo Alto (e.g., the library). We would not accept having Geoff Ball as a facilitator. If a facilitator seems advantageous, both the neighbors and Castilleja should hire and pay for a facilitator.

If Castilleja has no desire to consider compromise with or concessions to the neighbors, and plans to go ahead with plans for the new CUP and construction as stated in the June 2016 (incomplete) application, then there is little to be gained in our having a meeting at this time.

I hope this clarifies our stance, and thank you again for responding in writing to my initial message to you.

regards,

Jacqueline

On Monday, January 23, 2017 12:08 AM, Nanci Kauffman <nkauffman@castilleja.org> wrote:

Hi Jacqueline,

I am so glad to hear back from you. I would be happy to clarify what I have in mind for a meeting, but we would also like to hear from you about what would feel respectful and satisfying for you.

I understand that our use of the word "forum" felt misleading to those who expected more debate at the meeting, whereas we were using it to express that there would be a public forum for everyone to speak and be heard. In light of that miscommunication, I am proposing a smaller neighbor group meeting, so that there is more opportunity for discussion. Would that meet your needs and the needs of other neighbors who might join you? Our experience with other small neighbor groups would suggest that at least 4 neighbors but no more than 6 makes for the ideal group.

You mentioned in your email that you think I already have a good idea of neighbors' concerns. While I have listened carefully to every public comment, and I have read every letter, I have assumed that your disappointment with the format of the last meeting is an indication that you still have more feedback to share with us.

Geoff Ball has facilitated many of our small neighbor group meetings, so we may want to consider having him facilitate this one too. In that case, you could speak in advance with Geoff and let him know the format that works best for you.

Why don't you think it over and I will follow-up with you in a few days.

Thanks, Jacqueline. I appreciate the return email and I hope we can arrange a meeting.

Regards,
-nanci

On Sun, Jan 22, 2017 at 2:13 PM, Jacqueline Taylor <taylor_jacqueline@sbcglobal.net> wrote:

Hi Nanci

Thanks for your note sent earlier this month.

As I said in my original email, the concerned neighbors would like Castilleja representatives to communicate respectfully with us. Advertising your on campus November meeting as a "forum" for neighborhood discussion, and then running the meeting as a series of school presentations seriously misled neighbors. A forum suggests an open exchange of ideas and the setting of common goals. Your actual plan for the meeting did not include the advertised forum. I think you do have a good idea of neighbors' concerns as the neighbors likewise have a good idea of Castilleja's plans for expansion and enrollment increase.

We can make informed decisions on whether to accept your invitation to engage with Castilleja representatives only if you clearly set out in advance the meeting's format and objectives; this might include the extent to which you are willing to discuss compromise on the part of Castilleja and have a dialogue aimed at achieving it.

sincerely,
Jacqueline

On Sunday, January 15, 2017 6:02 PM, Nanci Kauffman <nkauffman@castilleja.org> wrote:

Hi Jacqueline,

Happy New Year. I'm following up on my offer made back in November to meet with you to hear more about the concerns you have regarding Castilleja's application for an enrollment increase and for permission to improve the campus. I know you were disappointed by the way we structured the last meeting, so I followed up to suggest we meet again. I didn't hear back, so at the time I assumed you weren't interested in further discussion.

Here we are in January, and I am writing to double check and to say that Kathy and I will be happy to meet anytime to discuss your concerns. Thanks, Jacqueline.

-Nanci

On Fri, Nov 18, 2016 at 8:08 PM, Nanci Kauffman <nkauffman@castilleja.org> wrote:

Thanks for your email, Jacqueline. I appreciate you giving us the opportunity to respond. Every single time we have a neighborhood meeting, I write to our parents to invite them. Typically, only a handful show up. Usually they come because they want the latest update, and they rarely say a word. In recent weeks, however, the door-to-door canvassing and the storefront petitioning, both organized by neighbors, have caused parents to feel it is time for them to engage. I suspect we will see ebbs and flows in their participation.

In light of your disappointment, would you like to get together with us for further discussion? Kathy and I are always willing to make ourselves available to individuals and to small groups, as we have done many times. The larger meetings are a great opportunity for those who have not been part of these smaller gatherings, and unlike at a smaller meeting, these larger meetings often include many first timers. We had meaningful discussions with them at each station.

Thank you for acknowledging the work we did to prepare. Please let me know which topics you'd like to discuss, and I will be sure to include the relevant participants in a meeting.

Regards,
Nanci

On Friday, November 18, 2016, Jacqueline Taylor <taylor_jacqueline@sbcglobal.net> wrote:

Dear Nancy and Kathy,

I write on behalf of myself and neighbors to thank you for hosting a meeting with neighbors last evening. It was evident you put a great deal of time and effort into preparing your presentation. At the same time, we request that in future you provide a more accurate description of the purpose of any announced meeting. We, the immediate neighbors of Castilleja, received postcard invites from the school advertising a "forum for neighborhood discussion." The greater part of the hour was taken up with your presentation, and we had no real forum for an exchange of ideas and meaningful dialogue.

A number of Castilleja parents who are not immediate neighbors were also in attendance. When queried they

told us that they did not receive your postcard invite, but rather an email message from either Mary Spicer or Nancy Tuck. The presence of these more distant neighbors c(who have numerous opportunities to meet with you) further diluted any attempt at meaningful dialogue with more immediate neighbors with real concerns about the impact of increased enrollment and significant campus construction.

We do not know whether Nancy Tuck and Mary Spicer were acting at your request in emailing the more distant neighbors, or whether Castilleja approved the content of their email messages. But in any case this was an ill-chosen strategy. Your advertisement to us of a "forum for neighborhood discussion" may not have been disingenuous, but it undermines the credibility of Castilleja's assertions (e.g., in the supporting materials for your CUP application) that you have reached out to the immediate neighbors affected by your future plans in an effort to achieve a solution for more harmonious coexistence between the school and this neighborhood.

Full disclosure of whether a meeting is a presentation or a forum, or something else, will allow us to make an informed decision about whether to allocate our valuable time in attending. Thank you.

Jacqueline Taylor

--

Nanci Kauffman
Head of School
Castilleja School
1310 Bryant Street, Palo Alto CA 94301
[650-470-7718](tel:650-470-7718)
Twitter: @nancikauffman

WOMEN LEARNING | WOMEN LEADING

For an appointment, contact Kathy Burch <kburch@castilleja.org> or [650-470-7702](tel:650-470-7702)

--

Nanci Kauffman
Head of School
Castilleja School
1310 Bryant Street, Palo Alto CA 94301
[650-470-7718](tel:650-470-7718)
Twitter: @nancikauffman

WOMEN LEARNING | WOMEN LEADING

For an appointment, contact Kathy Burch <kburch@castilleja.org> or [650-470-7702](tel:650-470-7702)

--

Nanci Kauffman
Head of School
Castilleja School
1310 Bryant Street, Palo Alto CA 94301
[650-470-7718](tel:650-470-7718)
Twitter: @nancikauffman

WOMEN LEARNING | WOMEN LEADING

For an appointment, contact Kathy Burch <kburch@castilleja.org> or [650-470-7702](tel:650-470-7702)

From: French, Amy
To: ["Rob Levitsky"](#)
Cc: [Passmore, Walter](#); [Dockter, Dave](#)
Subject: RE: castilleja EIR scoping meeting
Date: Monday, January 23, 2017 2:25:00 PM

Rob, have informed our Urban Forestry staff about the scoping meeting, and have forwarded the Initial Study to them. You may have already reviewed the Initial Study uploaded today to the Castilleja webpage the city maintains (the IS, item 5 in the list of 'city staff and consultant documents', is viewable via a link on page two – click on the link).

I have noted to Urban Forestry that they are welcome to attend the meeting, or they may choose to provide comments on the IS via response to my email that alerted them to the Initial Study. Note that regarding the question: **Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?** the initial study states: The project would require removal of trees regulated under the City's Tree Ordinance. The project's impact on tree resources is potentially significant and will be analyzed in the project EIR.

Please note that our CEQA consultant will attend the meeting, as will I. The meeting will be recorded and Urban Forestry staff can review the proceedings via mid-pen media center video recording the day after; so they will be able to hear your input about what the EIR should study with respect to trees and potential tree removals. I will send the link of the recording to them the following day, if they are not planning to attend the scoping session.

From: Rob Levitsky [mailto:roblevitsky@yahoo.com]
Sent: Monday, January 23, 2017 12:44 PM
To: Passmore, Walter; Dockter, Dave
Cc: French, Amy; Rob Levitsky
Subject: castilleja EIR scoping meeting

Walter,Dave

there is an EIR scoping meeting set for
6pm on Feb 8 2017 for the castilleja proposal.

i assume that the planning/EIR consultants have requested that Urban
Forrestry attend this important scoping
meeting, since 168 or more trees, many
of them protected Oaks and Redwoods,
are in danger if this project is allowed
to go forward in its current design

thanks
rob levitsky

A scoping meeting in a public hearing with the Planning and Transportation Commission has been tentatively scheduled for February 8, 2017, at 6 pm. The City's consultant is preparing a draft initial study that will identify potential impacts in several topic areas. Early in the new year, staff will post additional information about the scoping session goals, as well as target dates for publication of reports for public review prior to the scoping session.

http://www.cityofpaloalto.org/gov/topics/castilleja_school/default.asp

Sent from my iPhone

From: [French, Amy](#)
To: [Al Kenrick](#)
Subject: Re: Project at 1310 Bryant / Castilleja.
Date: Friday, December 23, 2016 9:23:39 AM

Hello I am out of office but want to make sure you are aware you can sign up to get emails from the city about this project - perhaps you are already signed up for that?

In any case, we are targeting February 8, 2016 for a scoping session in a public hearing at the Planning and Transportation Commission. I encourage you to attend or review the documents that will be published prior to that meeting. The consultant contract for preparation of an Environmental Impact Report includes a traffic consultant to perform various traffic studies beyond what the applicant provided with the application. The studies will be described in the documents released prior to the upcoming scoping session.

Sent from my iPad

> On Dec 22, 2016, at 4:33 PM, Al Kenrick <al.kenrick@gmail.com> wrote:

>

>

> Ms French,

> I am a neighbor of this project and live at 134 Melville. In general I am very concerned about the project as I think the School has outgrown its footprint and it's historic lack of compliance with enrollment requirements casts great doubts about their ability/willingness to comply with representations of future enrollment connected with this project.

>

> Additionally, I am very concerned about additional traffic along the Embarcadero and Alma corridors.

>

> How does the projected project map impact the traffic on Melville between Emerson and Alma ? I'm very concerned that the exit of the proposed garage will flood Melville street for those cars exiting toward Alma. The Melville to Alma left turn is very dangerous and additional traffic is a real hazard.

>

> What kind of traffic studies is the City going to do to evaluate the impact of the project ?

>

> These are the primary concerns I have as a nearby resident.

>

> Thank you.

>

> Al Kenrick

> 134 Melville Ave.

>

>

From: [Levitan, Steven M.](#)
To: [French, Amy](#)
Subject: Castilleja groundwater analysis
Date: Friday, December 16, 2016 11:25:28 AM

Hi Amy,

Regarding the attached notice, why did the city ask Castilleja to conduct this groundwater analysis and report? Does it have to do with the new CUP application, or is it for another reason? I am surprised because I had thought the new CUP application had been rejected as incomplete, and not yet re-filed, and I did not expect any further environmental or other analyses to be requested or conducted until a complete application was on file.

Thanks,
Steve Levitan

About Hogan Lovells

Hogan Lovells is an international legal practice that includes Hogan Lovells US LLP and Hogan Lovells International LLP. For more information, see www.hoganlovells.com.

CONFIDENTIALITY. This email and any attachments are confidential, except where the email states it can be disclosed; it may also be privileged. If received in error, please do not disclose the contents to anyone, but notify the sender by return email and delete this email (and any attachments) from your system.

From: French, Amy
To: ["Kitty Price"](#)
Subject: RE: Concern about Castilleja expansion
Date: Monday, November 28, 2016 10:00:00 AM

That is okay. I appreciate your concerns about traffic. That is another part of the EIR effort; the City is retaining a traffic consultant to prepare analysis and they would consider existing and proposed conditions related to Embarcadero and other roadways.

From: Kitty Price [mailto:kitty.price@att.net]
Sent: Monday, November 28, 2016 9:49 AM
To: French, Amy
Subject: Re: Concern about Castilleja expansion

Sorry for not putting my comments all together, but another area of concern is regarding traffic backing up on Embarcadero due to cars entering Castilleja's parking garage. Any backup on Embarcadero would be ridiculous particularly given that I read recently that it is designated as a higher speed road.

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

From: [French, Amy](#)
To: [Kitty Price](#)
Sent: Monday, November 28, 2016 9:27 AM
Subject: RE: Concern about Castilleja expansion

Thank you for your comments. I am not familiar with the Pinewood School history, as the school is not located in Palo Alto. I do know a gym for the school is located in Palo Alto.
FYI we anticipate being able to begin environmental review of the proposed expansion this week. The Environmental Impact Report would include possible alternatives to the proposed expansion at the site.

From: Kitty Price [mailto:kitty.price@att.net]
Sent: Sunday, November 27, 2016 5:26 PM
To: French, Amy
Subject: Concern about Castilleja expansion

Hello Amy,
I live one block from Castilleja and feel strongly that the proposed expansion would impose an undue burden on the neighborhood and that Castilleja should be told to expand to a second site just like Pinewood School has done. The fact that they have a mentoring tradition from their upper school to their lower school is not sufficient reason to force the entire neighborhood to suffer under their very large expansion here. Upper school students can communicate with lower school students without being on a single campus.

Sincerely,
Kitty Price
1445 Bryant St

From: jamespoppy@comcast.net
To: [French, Amy](#); [City Mgr](#)
Subject: Castilleja's "Neighborhood Forum"
Date: Sunday, November 20, 2016 10:16:07 AM

Hello Ms. French and Mr. Keene,
I have lived on the 100 block of Melville for nearly 40 years and I feel very threatened by the Castilleja project to urbanize our neighborhood.

Castilleja held what was billed as a neighborhood forum on the 17th, but then invited a room full of non-neighbor parents to speak out in favor of the school. The neighbors who spoke were 100% in favor of Castilleja's mission to educate young women. That is not the issue. The project is out of scale with the neighborhood and will negatively impact our quality of life, not to mention property values.

I hope you will keep Castilleja accountable for their statements and actions during this process. It is clear they do not intend to listen to neighbors.

Regards,
Jim Poppy

From: marysylvester@comcast.net
To: [French, Amy](#)
Cc: [Nelson Ng](#); [Kimberley Wong](#); [Jacqueline Taylor](#); [Hank Sousa](#); [Poppy, Jim](#); [Rob Levitsky](#); [Neva Yarkin](#); [Polina Levitan](#); [Steven M. Levitan](#); [Diane Rolfe](#); [William Powar](#); [Paula Powar](#)
Subject: Re: November 17th Castilleja Meeting at 7:00pm
Date: Thursday, November 17, 2016 11:45:06 PM

Good evening, Amy!

Given the number of speakers at the Castilleja meeting tonight, the meeting had to be extended and the time was limited to 2-minutes per speaker. It was not a productive meeting or a good use of anyone's time as Castilleja parents came to sing the school's praises and the neighbors came to "discuss" and comment on the project, which we had been told was the purpose of the forum. Meaningful discussion did not take place nor was there an attempt to stimulate it by the school or its facilitator.

I appreciate your clarification about your role as to Castilleja's community outreach meetings and we won't expect to see you as a matter of course. City representation at tonight's meeting was requested only because of the school's efforts to generate attendance and speakers from the greater Castilleja community causing neighbor concern about not having sufficient time to make our issues and questions known.

Unfortunately, that concern was realized when a number of neighbors chose to leave the meeting at the designated conclusion time of 8:00, believing the meeting was purely a Castilleja public relations effort to promote itself before the City and media, a message that had gone out to parents this morning via email correspondence.

I am interested in your email from tonight that you refer to "Castilleja's mandate to have the meetings," and neighbors went tonight thinking it was a required meeting, either because of the school's use permit or submission of the Master Plan. Can you please clarify, was the meeting tonight required or not, and why? I believe 2 meetings are required each year by Castilleja's CUP, is that correct? Is the school required to have public meetings now that they have submitted the Master Plan? Are there any rules or guidelines that govern the content of what can take place at these meetings?

Appreciatively,
Mary

From: "Amy French" <Amy.French@CityofPaloAlto.org>
To: "MARYSYLVESTER" <marysylvester@comcast.net>
Cc: "Nelson Ng" <lofujai@gmail.com>, "Kimberley Wong" <sheepgirl1@yahoo.com>, "Jacqueline Taylor" <taylor_jacqueline@sbcglobal.net>, "Hank Sousa" <thomashenrysousa@gmail.com>, "Jim Poppy" <jamespoppy@comcast.net>, "Rob Levitsky" <roblevitsky@yahoo.com>, "Neva Yarkin" <nevayarkin@gmail.com>, "Polina Levitan" <polinalevitan@yahoo.com>, "Steven M. Levitan" <steve.levitan@hoganlovells.com>, "Diane Rolfe" <onedianerolfe@comcast.net>,

"William Powar" <wkpowar@sbcglobal.net>, "Paula Powar" <pkpowar@mac.com>

Sent: Thursday, November 17, 2016 6:19:40 PM

Subject: RE: November 17th Castilleja Meeting at 7:00pm

Unfortunately, I am not able to attend tonight's meeting. I have other plans that I had made before, and I have a few work deadlines as well. The speaker rules for applicant-hosted meetings are not mandated by the City. And actually, the city allows anybody to speak at public hearings, they do not have to be immediate neighbors of the project.

It is not my role to moderate Castilleja's community outreach meetings. It is Castilleja's mandate to have the meetings, and to invite City staff (me). I have no obligation to attend the meeting (I would if I could, and will if I can). I attended the tree meeting, and I have met with groups of neighbors here at City Hall.

As you may be aware, anybody can appeal a Conditional Use Permit or Major Architectural Review, which are among the application processes the Castilleja project is subject to. Appeals of two story, single family home applications are limited to immediate neighbors.

In the case of this project, as I have stated, the Planning and Transportation Commission will be holding a scoping hearing for environmental review. We are looking toward early 2017; there is some consultant work to be done in advance of the hearing. And council will be involved because of the EIR that is anticipated.

At the upcoming public meetings in the Council Chambers for this project, the chair of the committee (and Mayor, for Council) can allow 3 minutes per speaker (or less if there are many speakers). I do not yet have dates for the meetings.

From: marysylvester@comcast.net [mailto:marysylvester@comcast.net]

Sent: Thursday, November 17, 2016 4:05 PM

To: French, Amy

Cc: Nelson Ng; Kimberley Wong; Jacqueline Taylor; Hank Sousa; Poppy, Jim; Rob Levitsky; Neva Yarkin; Polina Levitan; Steven M. Levitan; Diane Rolfe; William Powar; Paula Powar

Subject: Re: November 17th Castilleja Meeting at 7:00pm

Hello Amy!

I'm following up on yesterday's email to you about a City representative attending tonight's meeting at Castilleja. Another confidential email has gone out today by a Castilleja parent and neighbor encouraging attendance at tonight's meeting by Castilleja parents. I don't know where all the individuals listed as cc(s) reside but I know one lives on Ramona and Addison and another lives on Churchill and Bryant, neither affected by the proposed construction.

Perhaps for future mandated meetings pursuant to the school's conditional use permit, the City can play a role in defining who must be allowed an opportunity to speak. Priority needs to be given to "immediate" neighbors of the school, maybe within 1-2 blocks of the school, before others outside the neighborhood are allowed to speak.

Thank you for consideration of this request!

Mary Sylvester
135 Melville Avenue
Palo Alto, CA.

From: "MARYSYLVESTER" <marysylvester@comcast.net>

To: "Amy French" <amy.french@cityofpaloalto.org>

Sent: Wednesday, November 16, 2016 7:53:09 PM

Subject: November 17th Castilleja Meeting at 7:00pm

Hi Amy!

I'm just checking in to see if you'll be attending tomorrow night's meeting at Castilleja?

I can imagine how busy you are, the last thing you need is one more night meeting.

There's concern in the neighborhood though that Castilleja may have invited parents to tomorrow night's meeting who may not be immediate neighbors of the school and will use available Q &A time expressing their support for the school's Master Plan and denying neighbors adequate time to speak.

Will there be any City monitoring of the meeting tomorrow night so as to ensure fairness and avoid a biased presentation of the "neighbor's" concerns to the City and community-at-large?

Appreciatively,
Mary Sylvester

From: French, Amy
To: ["Tom Shannon"](#)
Subject: RE: Castilleja School Application
Date: Thursday, October 20, 2016 11:03:00 AM

Correct, still incomplete. I seriously doubt the application will be deemed complete by the end of the year. Good question about utilities, I do not have answers at this time, but could forward your email to Utilities and see what they have to say about that. You could also bring this concept up at the scoping meeting, I am hoping to have at end of November. Stay tuned for that.

From: Tom Shannon [mailto:tshannon2@cs.com]
Sent: Thursday, October 20, 2016 10:50 AM
To: French, Amy
Subject: Castilleja School Application

Hi Amy,

Couple of quick questions on Castilleja's application:

The City's website states that the application is "under review." Assume that means that it is still incomplete? How will we know when the City deems the application complete? Do you feel the application will be "complete" before the end of the year?

Utilities: Will Castilleja be required to underground the electrical, telephone and cable lines surrounding the school on Bryant, Kellogg and Emerson Streets? All these utilities are in easements on the school's side of the street.

Thanks,
Tom Shannon
408-230-7095

From: [Nelson Ng](#)
To: [Gitelman, Hillary](#)
Cc: marysylvester@comcast.net; [Keene, James](#); [French, Amy](#); [Mullen, Jarrett](#)
Subject: Re: Copy of Your Review Comments for Castilleja Notice of Incompletion
Date: Wednesday, August 31, 2016 4:17:39 PM

Ms Gitelman,

Thanks very much for your quick reply. I hope after reading through the materials that I submitted in the previous message, you have a better understanding on the magnitude of the direct negative impact to my family and our neighborhoods. The concerned neighbors of Castilleja are working very hard together to protect our quality of life.

It is great to hear that an EIR will be required. Thanks for the brief overview of the long review process that we will be embarking on together. Can you please let me know when we be able to get a detailed timeline with specified milestones for this public review process? I will communicate it to the concerned neighbors. I understand you and the city staffs are very busy. With more publicly available information in a timely manner, it will help to reduce the amount email overhead to you and your team as this case with Mr. Mullen. We recognize the city staff time is valuable and we also want to have more effective use our tax dollars. By the way, as I mentioned to Ms French, I hope all these staff hours are being charged to Castilleja. I will follow up with Ms. French in separate email to get the transportation-related comments and to make sure it will be published along with the Notice of Incomplete in the Palo Alto City Planning website at <http://www.cityofpaloalto.org/news/displaynews.asp?NewsID=3625&TargetID=319>. In addition, we would like to be part of the process for the TIA given traffic is such a big impact to the neighborhood.

Another example of having timely public information is important. I just learned yesterday that Castilleja is performing "trenching" to study the root system of the impacted trees. There was no prior notice of such activity. So we don't know if this activity was approved by the City. Our concerned neighbor Mr. Rob Levisky only found out when he was looking over his yard. Since then he read through the "Tree Preservation and Management Regulations" of Palo Alto Municipal Code and learned "trenching" is explicitly outlawed. So we are not sure if/why the city is allowing this to happen. Given this is a public process now, if this is an City approved activity or any other activities in the future, shouldn't it be communicated all all concerned citizen of Palo Alto. Don't you agree? Mr. Levisky and I will be following up in a separate email with Mr Dave Dockter and Ms French to understand if proper permit was issued for this activity and how to ensure Castilleja will maintain their trees in the meantime.

Again, thanks very much for your help and speedy reply. I am looking forward to the information so the concerned neighbors of Castilleja can be more informed on the Castilleja expansion activities.

Looking forward to further discussions with you in the future.

Regards

Nelson

Please excuse my iPhone for any typos

On Aug 31, 2016, at 8:19 AM, Gitelman, Hillary <Hillary.Gitelman@CityofPaloAlto.org> wrote:

Nelson:

Thanks for reaching out. We are at the beginning of a long process to review Castilleja's application. That process will include "scoping" and preparation of a full environmental impact report (EIR).

There will be multiple opportunities for you to articulate your concerns, starting with the EIR "scoping" phase, when we will provide an initial description of the proposal and request oral and written comments on the issues and alternatives requiring analysis in the EIR. This phase should begin later this fall and would be a good time for us to connect and make sure that we understand your perspective and that you have the information you need to provide meaningful comments.

Amy is our designated project manager for this project, and she can facilitate a meeting. Also, she can let you know what transportation-related comments we have provided to the applicant. I believe we will be requiring our EIR consultant to contract with a qualified traffic engineering firm to prepare a Transportation Impact Analysis (TIA), the scope of which can be informed by the comments we receive during the EIR scoping process.

Regards,

Hillary

<image001.jpg>

Hillary Gitelman | Planning Director | P&CE Department
250 Hamilton Avenue | Palo Alto, CA 94301
T: 650.329.2321 | E: hillary.gitelman@cityofpaloalto.org

Please think of the environment before printing this email – Thank you!

From: Nelson Ng [<mailto:lofujai@ymail.com>]
Sent: Wednesday, August 31, 2016 7:49 AM
To: Gitelman, Hillary
Cc: marysylvester@comcast.net; Keene, James; French, Amy; Mullen, Jarrett
Subject: Re: Copy of Your Review Comments for Castilleja Notice of Incompletion

Dear Ms Gitelman,

How are you doing? It was nice meeting you on March 2nd in the Planning Department to discuss the Castilleja traffic issue.

Shortly after returning from summer vacation, I learned from the City Planning Department website that Castilleja' CUP application is proposing to have an underground garage exit pointing directly at my front door. I immediately wrote an [email to Ms. Amy French](#) explaining my objection to the Castilleja expansion plan. On August 4th, a group of concerned Castilleja neighbors Ms Mary Sylvester, Mr. Michael Manneh, my wife Ms Kimberley Wong and I met with Ms French. She explained to us that the City replied to Castilleja with the [Notice of Incomplete](#) on July 30th. However, she is still waiting for Mr. Jarrett Mullen's feedback for the Transportation section of the notice.

Since then Ms. French has been helpfully and promptly replying to our inquiries via emails and providing us with requested public documentations relating to the CUP application. I continued to check for Mr Mullen's Transportation input via email on August 10th, 14th and 15th as included below without any success.

Last Thursday was Castilleja's first day of school. Please see the [2 min traffic video](#) showing a continuous line of stop and go traffic wrapping around Emerson to Kellogg to Bryant. The neighbors are very concerned with the additional traffic brought to our neighborhood and the city by Castilleja's 70%+ of non Palo Alto student body. Therefore, we would like to meet with you and your team to learn how we can work together to protect the quality of life for our neighborhood and Palo Alto City as a whole.

Please let me know when you will be available to meet and we are looking forward to discussing with you soon.

Thanks

Nelson

----- Forwarded Message -----

From: Nelson Ng <lofujai@ymail.com>

To: "French, Amy" <Amy.French@CityofPaloAlto.org>; "Mullen, Jarrett" <Jarrett.Mullen@CityofPaloAlto.org>

Cc: "marysylvester@comcast.net" <marysylvester@comcast.net>; Michael Manneh <michael.manneh@gmail.com>; Kimberley Wong <sheepgirl1@yahoo.com>

Sent: Wednesday, August 10, 2016 11:39 PM

Subject: Re: Follow up for Aug 4th 2016 meeting

Amy,

It was nice seeing you in the Planning & Transportation Commission meeting tonight. Sorry that we didn't have a chance to talk as I had to leave for other engagement. I would like to check back on the status for the rest of the documents that we requested last Thursday. Also did you receive the city approval letter for Castilleja 2016-2017 enrollment to stay above 415? If not, should we contact Jim Keene directly since he signed a similar letter for the previous year?

Jarrett,

Can you please forward me a copy of your review comments for the Transportation item for the Notice of Incomplete? Also can you please let me know what is necessary for a neighborhood to request for a PA traffic camera as shown below?

Thanks

Nelson

----- Forwarded Message -----

From: Nelson Ng <lofujai@ymail.com>

To: "French, Amy" <Amy.French@CityofPaloAlto.org>; Jarrett Mullen <jarrett.mullen@cityofpaloalto.org>

Cc: "marysylvester@comcast.net" <marysylvester@comcast.net>; Michael Manneh <michael.manneh@gmail.com>; Kimberley Wong <sheepgirl1@yahoo.com>

Sent: Sunday, August 14, 2016 8:33 PM

Subject: Re: Follow up for Aug 4th 2016 meeting

Amy,

Again. Thanks very much for all the documents that you and the team provided. Did you receive Jarrett's comment for the Transportation item of the Notice of Incomplete? If so, can you please forward it?

Jarrett,

If you have not forwarded your comments for the Transportation item of the Notice of Incomplete to Amy, can you please forward it to us as well?

Thanks very much and have a nice day

Nelson

----- Forwarded Message -----

From: Nelson Ng <lofujai@ymail.com>

To: "marysylvester@comcast.net" <marysylvester@comcast.net>; Amy French <Amy.French@CityofPaloAlto.org>

Cc: Jarrett Mullen <Jarrett.Mullen@CityofPaloAlto.org>; Michael Manneh <michael.manneh@gmail.com>; Kimberley Wong <sheepgirl1@yahoo.com>

Sent: Monday, August 15, 2016 9:49 PM
Subject: Re: Follow up for Aug 4th 2016 meeting

Amy,

Thanks very much for your explanation on Castilleja's violation extension for 2016-2017. We will contact Mr. Jim Keene to see how we can inject public review/input to this process to avoid continuing this indefinite extension.

Thanks for the explanation of item 1 & 2 below and we will monitor it through Building eye. As for #3, I understand that you don't publish the email to public. I am just wondering beside you and other City of PA personnel are they being shared with Castilleja?

Thanks for letting us know that you are still waiting for the comment on Transportation Item. We will check back in a week.

Thanks

Nelson

From: "marysylvester@comcast.net" <marysylvester@comcast.net>
To: Jarrett Mullen <jarrett.mullen@cityofpaloalto.org>
Cc: James Keene <james.keene@cityofpaloalto.org>; Hillary Gitelman <Hillary.Gitelman@cityofpaloalto.org>; Amy French <amy.french@cityofpaloalto.org>; Nelson Ng <lofujai@ymail.com>
Sent: Monday, August 22, 2016 10:06 AM
Subject: Copy of Your Review Comments for Castilleja Notice of Incompletion

Good morning, Mr. Mullen!

I have been an immediate neighbor to Castilleja School for 39 years. Over that period of time there has been an increasing number of problems caused by the school to the surrounding neighborhood, and none more so than traffic and parking problems.

I know you have been involved with the review of the school's 2016 CUP application as well as their accompanying Master Plan. Neighbors of the school are requesting your review comments for the transportation item of the Notice of Incompletion. While we know that City staff have very busy calendars without the addition of Castilleja's large and complex project, our community believes your comments are important to our understanding of the City's position as to neighborhood traffic in our area and consequently how to move our concerns forward to a larger audience.

I believe you have been contacted several times this month about your comments by my friend and long time neighbor, Mr Nelson Ng, who lives directly across from the school on Emerson Street.

The neighborhood is also interested in how to secure elevated traffic cameras on the Castilleja perimeter, particularly at Emerson and Embarcadero for a more thorough understanding of the implications of Castilleja's plans on an already congested and dangerous thoroughfare.

The traffic camera behind Gunn High School is an example of what we are interested in. Can you assist us with this matter?

Please forward as your earliest convenience, the requested materials to either myself and/or Mr. Nelson Ng lofujai@gmail.com.

Appreciatively,
Mary Sylvester

From: marysyvester@comcast.net
To: [Mullen, Jarrett](#)
Cc: [Keene, James](#); [Gitelman, Hillary](#); [French, Amy](#); [Nelson Ng](#)
Subject: Copy of Your Review Comments for Castilleja Notice of Incompletion
Date: Monday, August 22, 2016 10:07:00 AM

Good morning, Mr. Mullen!

I have been an immediate neighbor to Castilleja School for 39 years. Over that period of time there has been an increasing number of problems caused by the school to the surrounding neighborhood, and none more so than traffic and parking problems.

I know you have been involved with the review of the school's 2016 CUP application as well as their accompanying Master Plan. Neighbors of the school are requesting your review comments for the transportation item of the Notice of Incompletion. While we know that City staff have very busy calendars without the addition of Castilleja's large and complex project, our community believes your comments are important to our understanding of the City's position as to neighborhood traffic in our area and consequently how to move our concerns forward to a larger audience. I believe you have been contacted several times this month about your comments by my friend and long time neighbor, Mr Nelson Ng, who lives directly across from the school on Emerson Street.

The neighborhood is also interested in how to secure elevated traffic cameras on the Castilleja perimeter, particularly at Emerson and Embarcadero for a more thorough understanding of the implications of Castilleja's plans on an already congested and dangerous thoroughfare. The traffic camera behind Gunn High School is an example of what we are interested in. Can you assist us with this matter?

Please forward as your earliest convenience, the requested materials to either myself and/or Mr. Nelson Ng lofujai@gmail.com.

Appreciatively,
Mary Sylvester

From: French, Amy
To: ["Tom Shannon"](#)
Cc: carlab@cb-pr.com; akcooper@pacbell.net; mcleod.bruce@gmail.com
Subject: RE: Castilleja Notice of Incomplete
Date: Thursday, August 04, 2016 9:48:00 AM

1. The immediate next steps and notifications include:
 - a. A walk through of the site by staff who have not yet provided written comments to me. Looking at August 15th currently. Several other staff members walked the site last week.
 - b. I am preparing a scope of work for a consultant to prepare a Historic Resource Evaluation, Peer review of transportation submittal, and draft Initial Study of potential environmental impacts (and following CEQA documents).
 - c. The applicant is considering revisions to the conceptual site plan. Staff had commented on potential impacts given the basement footprint and exit ramp locations, with respect to existing trees and a potential historic resource. Any revised plan set would be posted on the site once received. I can alert you when any plans are received.
 - d. When the applicant submits the Architectural Review application, that 'Acella' entry will upload to the 'building eye' site. I can send you a link to that site; we would also replace the verbiage on the site postings to reflect that application, so you would see that happen.
2. The applicant told me the City Manager had approved continuation at current level for the school year that begins August 22. I am looking for that letter now and will respond more thoroughly to your questions via separate email this week.
3. The CUP is associated with a Master Plan as proposed. We identified the need for environmental review (and deposit of full amount to cover consultant cost) and submittal of an Architectural Review (AR) application to continue our review of the project. I don't believe these application components will be separated from the CUP, though you are correct that the code says they are. The CUP and AR process will include Planning and Transportation Commission review (our code says PTC reviews CUP upon a request for hearing – this is not an 'appeal' and has no fee attached) and ARB review of the master plan concept and first phase project (below-grade parking/circulation and tree/house demolition proposal) followed by Council review, all associated with a CEQA document that would be published after preparation for a 30-day (minimum) public comment period.

From: Tom Shannon [<mailto:tshannon2@cs.com>]
Sent: Thursday, August 04, 2016 9:17 AM
To: French, Amy
Cc: carlab@cb-pr.com; akcooper@pacbell.net; mcleod.bruce@gmail.com
Subject: Re: Castilleja Notice of Incomplete

Hi Amy,
Thanks for forwarding the NOI. A couple of questions have come up with neighbors:

1. Could you tell us what the immediate next steps are and how we will be notified about them. What

might happen over the next 3 months? I assume we are somewhat in a holding pattern until Castilleja responds to the NOI. However, the NOI stipulates several submittals. How can we find out when those documents and fees have been submitted by Castilleja to the city? Will they appear on the website?

2. The NOI states that Castilleja's enrollment of 438 was approved by the City for the year 2015 - 16. Neighbors are concerned about this issue because Castilleja continues to be in violation of the current CUP which stipulates a maximum enrollment of 415 students not 438 students. We know Castilleja will not have an amended CUP for school year 2016 - 17. Does that mean they get to continue to be in violation of their CUP for 2016 -17 or will they be required to reduce enrollment to what is stipulated in the current CUP? Many neighbors have voiced that they City is not enforcing the current CUP. Please advise us as to how this will be handled for the 2016-17 school year? Where does the City get the authority to override an existing CUP for now what has turned into 4 years since the over enrollment infraction first surfaced in 2013. Shouldn't the school be required to comply with the current CUP at some point?

3. Typically CUP Amendments are first heard by a zoning administrator and can then be appealed to the Council. Will that be the process for Castilleja's Amendment? How do we separate the Master Development Plan process from the CUP Amendment application process?

Thanks,
Tom Shannon

P.S. Please do a "Reply-All" to the addresses noted in this email. The three other persons are all members of the small neighborhood working group: Carla Befera, Bruce McLeod and Alan Cooper.

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

From: French, Amy <Amy.French@CityofPaloAlto.org>
To: Tom Shannon <tshannon2@cs.com>
Sent: Wed, Aug 3, 2016 11:41 am
Subject: RE: Castilleja Notice of Incomplete

[Here you go.](#)

From: Tom Shannon [<mailto:tshannon2@cs.com>]
Sent: Wednesday, August 03, 2016 11:37 AM
To: French, Amy
Subject: Castilleja Notice of Incomplete

Hi Amy,

Robin alerted me via email yesterday that you would be back in your office today. Can you email me a copy of the Notice of Incomplete that you issued last week on Castilleja's application? Or, should I come in person to City Hall to pick up a copy. It would be helpful in answering neighbors' questions. Many neighbors are asking our representative group how the City responded to the application.

Thanks,
Tom

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

From: Ellner, Robin <Robin.Ellner@CityofPaloAlto.org>
To: Tom Shannon <tshannon2@cs.com>

Sent: Tue, Aug 2, 2016 8:18 am
Subject: RE: Castilleja Notice of Incomplete

Good morning Tom,

I do not have a copy of the notice. Amy is scheduled to be back in the office tomorrow.

Robin

Robin Ellner | Administrative Associate III | P&CE Department
250 Hamilton Avenue | Palo Alto, CA 94301
T: 650.329.2603 | E: robin.ellner@cityofpaloalto.org

Please think of the environment before printing this email – Thank you!

From: Tom Shannon [<mailto:tshannon2@cs.com>]
Sent: Monday, August 01, 2016 4:24 PM
To: Ellner, Robin
Subject: Fwd: Castilleja Notice of Incomplete

Hi Robin,

Amy's email directed me to you. Can you send me a copy of the Notice of Incomplete that Amy sent out to Castilleja last week.

Thanks,
Tom Shannon
408-230-7095

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

From: Tom Shannon <tshannon2@cs.com>
To: Amy.French <Amy.French@CityofPaloAlto.org>
Sent: Mon, Aug 1, 2016 3:58 pm
Subject: Castilleja Notice of Incomplete

Hi Amy,

Could you email me a copy of the Notice of Incomplete that you issued last week on Castilleja's application?

Thanks,

Tom Shannon
408-230-7095

From: [Gee Gee Williams](#)
To: [French, Amy](#)
Subject: Expansion of Castilleja School
Date: Monday, July 11, 2016 3:59:56 PM

Dear Amy French,

I live at 340 Churchill Avenue and am opposed expanding Castilleja School students. We are not upset that we share the neighborhood with them but I am mindful of their presents and expanding it 102 more students a day does not feel good. Adding 27 more students a year means more traffic. All you have to do is go out on Alma Street in the morning and cope with the traffic and the school will see that this area does not need more cars, buses, trains or bikes.

Thank you for representing my opinion. I am not opposed to good education and think Castilleja is a model but more people in this neighborhood is not welcomed. Have they considered other locations for their expansion?

Gee Gee Williams
650-324-1140
manageablecare@gmail.com

From: [John Stucky](#)
To: [French, Amy](#)
Subject: Castilleja School Development project
Date: Monday, July 11, 2016 11:19:29 AM

Dear Ms. French---

As a neighbor of the Castilleja School, living directly across the street on Bryant, I am writing to give the school my full support. I strongly believe that Castilleja's mission to teach young women of the Bay area how to think and develop as well as contribute to society is among the noblest and most necessary of goals. I applaud their mission.

I do understand that some of my neighbors have had specific issues with traffic in our area due to Castilleja's presence. The thought of a larger student body may seem even more threatening. However, from my experience Castilleja has given an immense and conscientious effort to develop ways to alleviate or lessen the effect of increased traffic. I have been extremely impressed.

Considering these efforts, which I am sure will continue, I do not view the growth of Castilleja's student body as a threat. Considering their mission I can only support this growth as Castilleja continues to help in the development of strong, willing and well educated young women. Their students are an invaluable asset to our society.

Regards,

John Stucky, MA, MLIS

司馬章 / ジョン スタッキ

Library Director

C. Laan Chun Library

Asian Art Museum

200 Larkin Street

San Francisco, California 94102-4734

Phone: 415-581-3692

Email: jstucky@asianart.org

Website: <http://www.asianart.org/collections/library>

Library catalog: <http://opac.libraryworld.com/opac/signin?libraryname=C%20LAAN%20CHUN%20LIBRARY>.

前事之不忘後事之師也。 司馬遷 --史記

Those who don't forget the past will be masters of the future. --- Sima Qian – Records of the Grand Historian.



CELEBRATING 50 YEARS
1966-2016

From: [Ed Williams](#)
To: [French, Amy](#)
Subject: Castilleja Conditional Use Perit
Date: Sunday, July 10, 2016 2:19:44 PM

Dear Amy French,

I own and live at 340 Churchill Ave. just two blocks from Castilleja School and I strongly oppose an amendment to their Conditional Use Permit. They are a commercial facility in a residential zone and if they limit their enrollment to 415 students, I believe they could coexist peacefully in this neighborhood. Otherwise, the opposition to Castilleja expansion plans will continue to receive increasing opposition.

Thank you for your attention to this letter.

Edgar M. Williams
650-324-1140
ewilliams340@comcast.net

From: [Levitan, Steven M.](#)
To: [Mullen, Jarrett](#)
Cc: [Mello, Joshua](#); [French, Amy](#); [Gitelman, Hillary](#); akcooper@pacbell.net; lofujai@ymail.com
Subject: RE: Castilleja School Follow-Up
Date: Wednesday, March 16, 2016 11:07:44 AM
Attachments: [Castilleja neighbor statement 3.12.16.pdf](#)

Dear All,

Please see the attached Summary Statement prepared by a group of Castilleja's neighbors. I thought this might be useful to understand our positions.

Best regards,
Steve

From: Mullen, Jarrett [mailto:Jarrett.Mullen@CityofPaloAlto.org]
Sent: Thursday, March 03, 2016 11:34 AM
To: Levitan, Steven M.; akcooper@pacbell.net; lofujai@ymail.com
Cc: Mello, Joshua; French, Amy
Subject: Castilleja School Follow-Up

Hi Steve, Nelson, and Alan,

Thanks for meeting with Josh, Hillary, Amy, and I yesterday morning to discuss Castilleja School and share your concerns. Below are a summary of the three preliminary drop-off alternatives Josh shared at the beginning of the meeting and attached is a copy of the transportation demand management (TDM) report I have available.

Please note the alternatives are by no means final or represent the only configurations open to evaluation. The alternatives would typically be implemented as a condition of an approved amendment to the conditional use permit (CUP) or other planning entitlement process.

Alternative 1 Embarcadero Road Access & Widening: Castilleja would have direct access from Embarcadero Road maintaining four through lanes on Embarcadero. This would require widening of Embarcadero between Emerson and Bryant to add a left turn lane.

Alternative 2 Embarcadero Road Access Without Widening: Castilleja would have direct access from Embarcadero Road with one eastbound lane on Embarcadero Road to avoid widening. Essentially, the existing one lane configuration within the Embarcadero Road/Alma underpass would extend to Bryant Street.

Alternative 3 Emerson & Bryant Access Without Widening: Provide motor vehicle access from Emerson and Bryant to/through the school site, but configured to minimize travel along Bryant or Emerson. Site driveways would be as far north as possible on both Emerson and Bryant streets to

limit school traffic circulation to the site access points. Conversion of Embarcadero Road from four through lanes to three through lanes with a left turn lane.

If you have any specific transportation-related questions, please do not hesitate to contact me directly. Amy can assist with any questions you may have about the CUP submittal process/schedule and enforcement activities.

Best regards,



Jarrett Mullen | Associate Transportation Planner
Planning & Community Environment – Transportation
250 Hamilton Avenue | Palo Alto, CA 94301
D: 650.329.2218 E: jarrett.mullen@cityofpaloalto.org

Please think of the environment before printing this email – Thank you.

About Hogan Lovells

Hogan Lovells is an international legal practice that includes Hogan Lovells US LLP and Hogan Lovells International LLP. For more information, see www.hoganlovells.com.

CONFIDENTIALITY. This email and any attachments are confidential, except where the email states it can be disclosed; it may also be privileged. If received in error, please do not disclose the contents to anyone, but notify the sender by return email and delete this email (and any attachments) from your system.

Proposed Castilleja School Expansion of 125 Students
Summary Statement Prepared by Neighbors

Situation: Castilleja recently announced a proposal to increase enrollment to 540 students – 125 more than the current CUP max of 415 students, amounting to a 30% increase, the largest ever proposed.

While we appreciate Castilleja's mission to deliver a top notch education to young women, we feel the City should deny approval of an enrollment increase beyond the current cap of 415 for the following reasons:

1. **Traffic congestion, on-street parking, safety** – Castilleja juniors, seniors, staff, visiting parents, sports participants, test-takers, lecture attendees, etc. drive to school and park on neighborhood streets not just 5 days, but 7 days a week, with events occurring mornings, afternoons, evenings, weekends and throughout the summer. 73% of Castilleja's enrollment comes from outside Palo Alto, so the majority of this traffic is externally generated. The neighborhood bears all the impact of this private enterprise's traffic, busses, parking, deliveries, events – and is now facing spillover parking from those in downtown/Professorville seeking parking outside the permit zone. These streets are corridors for local residents walking to local public schools (Addison, Paly, Walter Hayes, Jordan), as well as a major bike boulevard. Neighbors hear brakes squeal and horns honked every day, and feel the situation has become unsafe for local children and adults.
2. **Comparison** – Other private schools in Palo Alto are held to stricter standards. The CUP for Stratford Garland, operating on 10 acres, allows a max of 482 students (48 students/acre), hours are 8am–4pm, evening activities are NOT permitted, street parking is not allowed, etc. Palo Alto High School is approx 64 students/acre. ***Castilleja is currently at 73 students/acre, no limit on evening/weekend events. It is seeking to increase to 90 students/acre.***
3. **City's prior directive** - 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 saw this as a conclusive decision. They did not realize this directive would be ignored by Castilleja, starting in 2001, and go unenforced by the City.
4. **Palo Alto Municipal Code and Comprehensive Plan:** Castilleja's use no longer satisfies the City's definition of an R-1 conditional use. Per the PAMC, a CUP will "not be detrimental to the public health, safety, general welfare, or convenience (in the vicinity)" and it 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."
5. **Continuous Violation** - Castilleja has exceeded the existing CUP enrollment cap of 415 for the last 16 years, and to this day continues in violation with its current 438 students. At \$42,000 tuition per student, the school has collected some \$20 million in revenue from over-enrollment in the past 16 years. The school ignored many other current CUP requirements - until it sought another amended CUP. Neighbors have had no viable enforcement leverage. Neighbors have no confidence that future CUP conditions will be met, nor that conditions can be sustained or improved with 125 additional students being delivered to this small section of Palo Alto.

If the school needs to expand to meet demands, we suggest that, like many others, it consider dividing into two appropriately-sized campuses. Many thanks for your time and attention to this matter.

– Neighbors of Castilleja

3/11/16



Nelson Ng's Public Records Request of January 25, 2017; Response due February 4, 2017

Request: All documents related to Castilleja CUP/Master Plan application and communications between the City and Castilleja. Please see attached file for the list of 25 items:

1. Any and all documents in the City's possession and referencing "Design Enhancement Exception (DEE)" that are specifically related to the above-entitled project. **PCE**
2. Development Review Committee notes from the date that the application was submitted to the City to today's date and that relate in any way to the above-entitled proposed project. **PCE**
3. Architectural Review Board notes from the date that the application was submitted to the City to today's date and that relate in any way to the above-entitled proposed project. **PCE**
4. City of Palo Alto's contract or other written agreement with Dudek related to the above-entitled project. **ASD/PCE**
5. Any and all documents in the possession of the City that include those requested by Urban Forestry and those from Urban Forestry to planner Amy French and regarding the above-entitled project. **PCE/PWD**
6. Any and all documents in the possession of the City, including, but not limited to: consultant reports related to removal and relocation of trees on the Castilleja campus, replacement of trees, and alternatives to tree removal and tree relocation. **PCE/PWD**
7. Any site plans that relate in any way to the above-entitled project. **PCE/DSD**
8. Each and every document, consultant report, consultant letter, site plan, architectural plan, and other type of plan requested by the City in Amy French's letter of July 27, 2016 in which she describes the project application for the above-entitled project as "incomplete." **PCE**
9. A copy of any soil study, geo-tech study, arborist study in the possession of the City and related in any way to Castilleja School and obtained by the City at any time during the last 20 years. **PCE/DSD/PWD/FD**
10. Any and all forms of oral, written and electronic communications including voice mail between anyone representing Castilleja School and anyone in the City of Palo Alto Planning Department between January 1, 2010 and today's date. **PCE**

STAN SHORE

242 Kellogg Avenue
Palo Alto, Calif. 94301
Tele 650-326-3310 Fax 650 321-4955
StanShore@ihot.com

January 26, 2017

Katherine Waugh
DUDEK
853 Lincoln Way, Suite 208
Auburn, CA 95603

Subject: "Castilleja School Conditional Use Permit and Master Plan Initial Study"

Dear Ms. Katherine Waugh,
I am a resident of Palo Alto who has been reading the Castilleja Master Plan Initial Study, January 2017. There are two significant errors and there may be others. I am focused on the section 3.13a, b and c. Page 30 of your report.

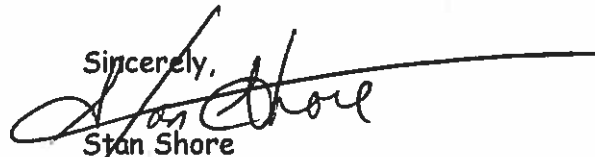
Section 3.13a

"The proposed project would increase the school's student capacity and is expected to require a slight increase in school staff." Nancy Kauffman (representing Castilleja) in a public announcement told the community, "there would NOT be a single increase in school staff". Meaning no additional teachers or additional staff whether it is an employee or additional contracted services. Her public statement should be included in your report.

Section 3.13b and 3.13c

See enclosed two photos of the two single-family homes at 1235 Emerson Street and 1263 Emerson Street. Both parcels are in a R1 zone. Castilleja is requesting that both homes be demolished. Palo Alto has a severe housing shortage. The Palo Alto community will fight against any action that further reduces the residential housing inventory. Furthermore, a significant portion of the neighborhood is opposed to Castilleja gobbling up more land in our residential neighborhood.

Sincerely,



Stan Shore

c.c. Amy French, Chief Planning Official and Palo Alto City Council

Encl. two photos

Stan Shore

650-326-3310

StanShore@ihot.com

memo

January 30, 2017

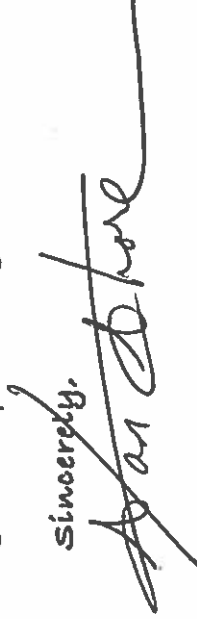
Hi Amy,

You may or may not know, that Castilleja owns another home across the street from 1235 Emerson Street. Neighbors are concerned that Castilleja will slowly gobble up the community.

Neighbors believe the proposed demolition of the two homes (photos enclosed) should go through the normal rezoning process. Allowing Castilleja to use the variance process to demolish the two homes sets a precedent that in the future Castilleja could acquire other residential homes, in the neighborhood, and then demolish them.

1235 and 1263 Emerson Street are zoned R1. Neighbors believe these two homes should remain as homes. Any change should go through the formal R1 zoning process. Neighbors do not want Castilleja to gobble up the neighborhood.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Shore", with a long horizontal line extending from the end of the name.

11. Any and all forms of oral, written and electronic communications including voice mail between anyone representing Castilleja School and anyone in the City of Palo Alto Planning Commission between January 1, 2010 and today's date. **PCE**

12. Any and all forms of oral, written and electronic communications including voice mail between anyone representing Castilleja School and anyone in the City of Palo Alto City Council Members between January 1, 2010 and today's date. **CLK**

13. Any consultant reports, Historic Resource Evaluations, letters from architectural historians, letters from anyone representing Castilleja, regarding the houses that are proposed to be demolished as part of the above-entitled project. **PCE**

14. Studies regarding mitigation measures and alternatives: smaller project; lower enrollment; off-site growth; additional site for school. **PCE?**

15. Any and all communications between the City and anyone representing Castilleja regarding recommendations for environmental mitigations for the above-entitled project? **PCE/CMO?**

16. Any and all documents regarding Castilleja's compliance and non-compliance with any of its use permits between January 1, 2014 and today's date. **PCE**

17. Any documents in which Castilleja has in any way modified its application for permits related to the above-entitled project. **PCE/DSD**

18. Any correspondence, notes, emails, and other documents which reference discussions between anyone representing Castilleja and Amy French about changes to the application for the above-entitled project. **PCE/DSD?**

19. Any and all consultant reports regarding noise, geology, biological resources, traffic and that deal with the Castilleja School and are dated between 2000 and today's date.

PCE/DSD/PWD/FD

20. Any interoffice memos, emails, letters, and notes between any City department and Amy French regarding the above-entitled project. **PCE**

21. Any interoffice memos, emails, letters, and notes between any public agency and Amy French regarding the above-entitled project. **PCE**

22. Any interoffice memos, emails, letters, and notes between the Palo Alto City Attorney and Amy French regarding the above-entitled project. **ATT/PCE**

Response: Attorney-amy emails are protected by attorney client privilege.

23. Any and all emails, memos, letters, and notes reflecting communications between the EIR preparer and Amy French related to the above-entitled project. **PCE**

24. Any and all written communications from the City Departments handling Utilities, Fire, Building and Public Works supplied to Castilleja and related to the above-entitled project, except the following, which we received on Jan 12, 2016: **UTL/FD/DSD/PWD**

a. 8/1/16 Utilities Electric Engin memo,

b. 7/26/16 Utilities Water-Gas-Wastewater Engin memo

c. 8/16/16 Public Works Engin memo

25. Any documents in the City's possession, reflecting the location of easements on the Castilleja School property and dated at any time up to and including today's date. **PCE**

City of Palo Alto
Development of Planning and Community Environment

California Environmental Quality Act

***REVISED* NOTICE OF PREPARATION**

This Notice of Preparation has been revised to extend the public comment period and to clarify that the project has been determined to have potential environmental impacts in the resource area of aesthetics. No changes in the proposed project have been made.

TO: Responsible and Trustee Agencies, Organizations, and Interested Parties

FROM: City of Palo Alto

250 Hamilton Avenue

Palo Alto, California 94301

Contact: Amy French, Chief Planning Official

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Castilleja School Conditional Use Permit Amendment, Master Plan, Parcel Map with Exception and a Variance to allow the pedestrian access and vehicle ramp into the subterranean garage to encroach into the Embarcadero Road special setback and the Emerson Street side setback, and some subterranean parking to encroach into the Embarcadero Road and side setbacks.

AGENCIES: The City of Palo Alto requests that public agencies provide comments regarding the scope and content of the EIR as it relates to an agency's statutory responsibilities in connection with the proposed project in accordance with California Code of Regulations, Title 14, Section 15082(b).

ORGANIZATIONS AND INTERESTED PARTIES: The City of Palo Alto requests comments and concerns from organizations and interested parties regarding the environmental effects associated with construction and operation of the proposed project.

PROJECT TITLE: Castilleja School

PROJECT LOCATION: 1310 Bryant Street and 1235 and 1263 Emerson Street, Palo Alto, CA 94301. Project site is 286,783 sf comprised of three parcels: (1) APN 124-12-034 (1310 Bryant, school site), (2) APN 124-12-031 (1235 Emerson, "Emerson House" aka 'Lockey/Alumnae House', 75' on Emerson St), and (3) APN 124-12-033 (1263 Emerson, "Head's House", 105' on Emerson St).

PROJECT DESCRIPTION: Castilleja School is an all-girls private school in Palo Alto that has been operating since 1907. Currently, the school serves grades 6 through 12. The school's facilities include an administrative building, a maintenance facility, a chapel theater, classrooms, a gymnasium, pool, above ground parking areas, athletic fields, and a dining hall. The project proposal is to demolish two homes on adjacent Castilleja-owned parcels (at 1235 and 1263 Bryant) and merge the two parcels into the Castilleja campus parcel via Parcel Map with Exception, and demolish four existing buildings and replace them with a single building. The applicant seeks to expand enrollment and redevelop the existing campus in three construction phases:

1. Construct a below-grade parking structure under the merged parcels to accommodate 130 vehicles, re-route drop-off and pick-up through the garage, and increase enrollment to a maximum of 490 students;
2. Relocate the existing pool, complete bikeway station on Bryant Street Bicycle Boulevard, and increase enrollment to a maximum of 520 students; and
3. Relocate deliveries and waste pick-ups further from the street and below grade, reduce number of food service deliveries by 10%, implement sustainability plan, and increase enrollment to a maximum of 540 students.

In order to accomplish the proposed project, Castilleja School Foundation has submitted an application to amend the school's existing Conditional Use Permit and an Architectural Review application. Including future phase construction of a new campus building, the project would result in an increase in the total building square footage within the campus by 26,700 square feet, all of which would be below grade - above grade the square footage would remain the same. The applicant also proposes to increase the number of off-street parking spaces from 73 to 170. Of these, 130 would be below ground and 40 of which would be in surface parking lots. This would reduce the number of above ground spaces by 33 spaces. The amount of open space would also increase by 6,182 square feet. Finally, the project includes a Transportation Demand Management Plan to offset transportation impacts and a proposal for no net new automobile trips, as well as a Sustainability Program. Additional project details and figures are provided in the Initial Study, which is available for review at the City of Palo Alto website for this project: http://www.cityofpaloalto.org/gov/topics/castilleja_school.asp

POTENTIAL ENVIRONMENTAL EFFECTS: As documented in the Initial Study, the following areas of potentially significant environmental impact will be analyzed in the Draft EIR: Aesthetics, Air Quality (project construction only), Biological Resources (trees and migratory birds), Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Land Use and Planning, Noise, Traffic, and Tribal Cultural Resources. Potential cumulative impacts and

potential for growth inducement will be addressed; alternatives, including the No Project Alternative, will be evaluated.

SCOPING MEETING: The City of Palo Alto will hold a scoping meeting as part of the Planning and Transportation Commission's regularly scheduled meeting on February 8, 2017. The meeting will start at 6:00 p.m. and will be held at the City of Palo Alto Council Chambers, located in City Hall at 250 E. Hamilton Avenue. The meeting agenda will be posted to the City's website: <http://www.cityofpaloalto.org/gov/boards/ptc/default.asp>. Interested parties are welcome to attend and present environmental information or concerns that you believe should be addressed in the EIR.

This NOP and Initial Study as well as future CEQA documents for this project will be available for review at the City's website for this project:

http://www.cityofpaloalto.org/gov/topics/castilleja_school.asp

If you require additional project information, please contact Amy French, Chief Planning Official, at amy.french@cityofpaloalto.org

PUBLIC REVIEW PERIOD: This NOP is available for public review and comment pursuant to California Code of Regulations, Title 14, Section 15082(b), for 30 days. The comment period for the NOP begins January 23, 2017 and ends on March 15, 2017. The City has extended the public comment period beyond the 30-days mandated by state law.

RESPONSES AND COMMENTS: Please indicate a contact person for your agency and send your responses and comments to:

Amy French, Chief Planning Official
City of Palo Alto PCE Department
250 Hamilton Avenue
Palo Alto, California 94301
(650) 329-2336
amy.french@cityofpaloalto.org

French, Amy

From: Stan Shore <stanshore@ihot.com>
Sent: Wednesday, February 01, 2017 10:12 AM
To: French, Amy
Subject: LAST EMAIL: Bldgs should blend with neighborhood; Set Backs, Height requirements ; Scoping Meeting

Good morning Amy,

This is my last email to Planning and Transportation Commission. As I will be speaking at the February 8 meeting, I need to know: How much time will I be allowed to speak? Do I sign in to speak, similar to what happens at a City Council meeting? Will this email and my previous email been read by the commission? Should I bring copies of my emails to distribute to the Commissioners?

Below comments deal with new construction, building height requirements and building set back requirements for Castilleja.

1. This is a residential neighborhood, look and feel of all new buildings should conform with the character of a residential neighborhood. New Castilleja building should be low key and blend in with the surrounding residential neighborhood. New buildings should NOT be a giant monument to Castilleja. To keep the character of this residential neighborhood, Castilleja needs to reduce building heights and increase building setbacks.

2. New Castilleja building should NOT exceed average height of all residential homes surrounding Castilleja. I estimate average height of surrounding homes is twenty-two (22) feet. City staff should calculate average height of all homes, on opposite side, of Castilleja. Then notify homeowners of the average height of the surrounding homes. A condition to any CUP approval would be that all new Castilleja construction cannot exceed the average height of the residential homes surrounding Castilleja.

3. To keep the character of this residential neighborhood any new constructed building fronting: Emerson street, Kellogg Ave, Bryant street and Embarcadero Rd, should be set back a minimum of seventy-five (75) feet from the paved road. This 75 foot set back means that there will be no gates, fences, patios or street level parking between the paved street and the foundation of any new building. The 75 foot set back, on all four streets, would soften the mass and scale of this project located in a quiet R1 residential neighborhood.

4. The 75 foot set back would be filled in with appropriate landscaping to compliment the single family homes on the opposite of the street.

5. Planning and Transportation Commission, should be aware, that this massive construction project is in a quiet R1 residential area and operating under a Conditional Use Permit. Because the school is in a residential area the mass and scale of all new buildings should conform with the character and size of all surrounding residential homes. Proposed mass and scale of the Castilleja project is over whelming. The project, as proposed, does NOT blend in with the surrounding R1 residential homes. The project screams out, "LOOK AT ME". Old Palo Alto and Professorville is not a place for a gigantic, in your face, commercial structures.

I am 100% opposed to the mass and scale of this project.

Amy, thank you for your time.

Sincerely,

Stan Shore

Kellogg Ave., Palo Alto

From: [Adrienne Lee](#)
To: [Scharff, Gregory \(internal\)](#)
Subject: Castilleja School Underground parking, tree removal and expansion
Date: Saturday, February 04, 2017 10:36:12 AM

Hello Palo Alto City Leaders,

Please help Kimberly Wong and Nelson Ng maintain a more peaceful existent next to Castilleja School. The current off-site parking required is best for all of palo alto neighbors. Regarding traffic and commercialization of neighborhoods, I am writing to you as a resident and business owner of a professional optometric practice with employees. I hope that you would help to maintain reduced traffic, encourage shuttle, bus, carpooling, public transportation use and centralization of commercial activity. Our Embarcadero Road commute is harrowing in the morning. Please do not make it more crowded and hazardous for our kids walking and biking to school by allowing Castilleja and other private schools (with majority non locals attending) which adds traffic from 101 and alma to the surface streets. We have been almost killed 10 times by people rushing around in the past 8 years. A possible solution to Castilleja's need to increase enrollment: require that they admit majority locals into their school if they insist upon exceeding their permitted enrollment number. Local kids would most likely bike to to school! My employees to carpool and take the bus. They would rather live in town and bike to work but housing is unavailable. Please do your best to encourage more dense housing and affordability. I would not preclude in law unit permit expansion while requiring mandatory driveway parking use.

Regards,

Adrienne Lee
50 Morton Way
home 650-856-2785
cell 408-887-4491
work 650-326-1649

From: [Mamelok_yahoo](#)
To: [Planning Commission](#)
Subject: Castilleja Expansion
Date: Saturday, February 04, 2017 1:42:50 PM

Dear Planning Commission,

I think that Castilleja is a fine school but it has very limited benefit to Palo Alto per se. Traffic around the school, despite their good faith efforts, is very bad. This will get worse if the number of students enrolled at their current campus increases. A large construction project will disrupt a residential neighborhood for a number of years. I urge you not to approve their application for expansion. It was bad enough that Casti increased enrollment secretly, in violation of their Use Permit. They should be denied the ability to expand on the current site.

Sincerely,

Richard D. Mamelok, MD
364 Churchill Avenue
Palo Alto, CA
94301-3601

Tel: +1 650 853 1445
Mobile: +1 650 924 0347
mamelok@pacbell.net

This email (including any attachments) may contain material that is confidential and privileged and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: [Annie Yamashita](#)
To: [Scharff, Gregory \(internal\)](#); [Kniss, Liz \(internal\)](#); [DuBois, Tom](#); [Kou, Lydia](#); [Fine, Adrian](#); [Holman, Karen](#); [Wolbach, Cory](#); [Tanaka, Greg](#); [Planning Commission](#)
Cc: [yamashita shinichi](#)
Subject: Letters regarding Castilleja's expansion
Date: Monday, February 06, 2017 4:28:38 PM
Attachments: [170206 - Signed 3 letters to The City Of PA regarding Castilleja.pdf](#)

Dear Palo Alto Council Members,

Attached, please read and accept our letter on the above subject.
Thank you for taking your time to read it.

Best regards,
Robert & Annie Yamashita
305 Kellogg Ave.,
Palo Alto, CA 94301

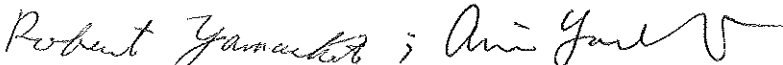
February 05, 2017

Dear Palo Alto City Council,

I am a neighbor living in Palo Alto. I have noticed that gridlock on Embarcadero going towards Paly, Stanford or Town and Country in the morning that begins at Bryant has gotten much worse over the past 2 years. It can only get even worse if Castilleja is allowed to expand their school, reroute traffic onto the Bike Boulevard at Bryant (also known as a "Safety Corridor") and force all the cars to the underground and back up to the eastbound traffic on Embarcadero. The traffic jams will be exponentially worse during the 5+ years of construction that they are planning when construction vehicles will be piling into the area while residents, staff, students and bicycle commuters will need to converge, causing many safety concerns.

I oppose the Master Plan that Castilleja proposes. It is a small school in a residential neighborhood and needs to remain small to keep to the confines of the small plot of land on which it sits. It should not be allowed to build an underground garage that will bring in more cars. Build a garage and cars will come! Palo Alto does not need more cars or traffic that will endanger the commute of children and residents in this community through this increasingly congested corridor.

Thanks very much,


Robert Yamashita & Annie Yamashita
305 Kellogg Avenue
Palo Alto, CA 94301

February 05, 2017

Dear City Council,

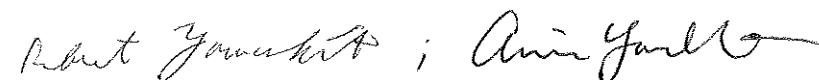
“Build it and they will come”... Recently written by Jen Nowell on the Friday Dec 30 2016 Daily Post regarding building a new downtown Palo Alto parking garage.

In the case with building a garage for Castilleja, more parking means more cars. That cannot be disputed. Adding more vehicles during peak traffic times on Embarcadero will further solidify the gridlock in and out of Stanford, around Paly and Town & Country. 70+% of the students of Castilleja come from outside of Palo Alto. Adding 30% more students will further increase incoming traffic.

There are many precedents in the Bay Area for private schools re-locating, increasing shuttle services or adding satellite locations in order to expand. Castilleja was originally designed for 100 students (before cars and traffic and removing the dormitories). Having 415 students is too many for this small 6-acre plot of land. They are currently overenrolled (for the last 15 years) at 438 students.

The R1 neighborhood cannot support an increase in enrollment without drastically deteriorating the quality of residential life we all appreciate in Palo Alto. We ask the City to enforce the permit for 415 students and not allow an underground parking garage.

Thank you,


Robert Yamashita & Annie Yamashita
305 Kellogg Avenue,
Palo Alto, CA 94301

February 05, 2017

Dear Palo Alto City Council,

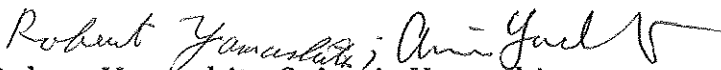
I am a resident of Palo Alto who has enjoyed living in this great walkable city to fantastic schools, community centers, libraries, art centers and town centers. It is troubling that walking has become unpleasant, not only along Alma, University and Embarcadero but also along the side streets that have experienced more cut through traffic.

I am troubled by the fact that our roads, neighborhoods and downtown areas are being inundated with daytime workers and traffic that grows our population by many fold during the day. Since our traffic has gotten worse, getting across town in the usual 10 minutes is a very difficult feat and construction of large buildings is bringing even more people to our cities and spilling over into our previously quiet neighborhoods.

We cannot let special interest groups that serve less than 25% of our local community to dictate what happens in our neighborhoods that affect 100% of the local community. Projects such as Castilleja School's will further degrade traffic flow, cause environmental pollution of natural hazards and noise, and destroy classic homes and the accompanying mature canopy that Palo Alto prides itself in preserving.

Please give careful consideration on the impact to our neighborhood and stop the slow deterioration of our quality of life in Palo Alto.

Best regards,


Robert Yamashita & Annie Yamashita
305 Kellogg Avenue
Palo Alto, CA 94301

From: jamespoppy@comcast.net
To: [Planning Commission](#)
Subject: Castilleja project does not make sense for Palo Alto
Date: Monday, February 06, 2017 4:54:52 PM

Hello PTC Members,

I have lived at 135 Melville Ave for 39 years and have been a patient neighbor of Castilleja. They are a great institution, but their proposed expansion project has no business in a R1 neighborhood!

The increased traffic along Embarcadero will solidify the gridlock on that important road for all of Palo Alto and Stanford.

The impact on the neighborhood would be irrevocable. A massive underground garage emptying hundreds of cars onto neighborhood streets? That is not in keeping with the aesthetics of an R1 neighborhood. Not to mention the safety issues. The corner of Emerson and Embarcadero is already a blind turn and very dangerous for pedestrians. Cars exiting the garage would be backed up, causing them to find alternative routes through the neighborhood, when Paly is also in session.

Castilleja wants to hold 90 events with as many as 700 people. That is not in keeping with an R1 neighborhood, and no other private schools in the area are allowed nearly that many events under the condition of their CUP.

Demolition of the Lockey House and an additional single family home will change the character of that block forever.

A minimum of 6 years of construction is more than a neighborhood should have to endure. The environmental impact of all of this needs to be studied in a full EIR.

Castilleja pays no taxes. They have not acted in good faith and should not be rewarded for 15 years of code violations.

NO TO THE EXPANSION!!!!

Regards,
James C Poppy

From: [Jessica Radomski](#)
To: [Planning Commission](#)
Subject: Support for Castilleja School's CUP
Date: Monday, February 06, 2017 5:32:39 PM

Good Evening,

My name is Jessica Radomski and I am currently an employee of Castilleja School. I am writing today to let you know that I support Castilleja and hope you approve their upcoming CUP. A new CUP will allow Castilleja to admit and educate more qualified young girls.

Thank you for your time!

--

Jessica Radomski
Database Manager
Castilleja School
650-470-7744

From: [Michelle Cale](#)
To: [Planning Commission](#)
Subject: Castilleja School: support for the Master Plan proposal
Date: Monday, February 06, 2017 5:45:51 PM

Dear Planning Commission:

I am writing in support of Castilleja School's proposed Conditional Use Permit. My family has been resident in Palo Alto since 2001. My two daughters are current Castilleja students (in 9th and 12th grades). Castilleja's Master Plan is creative in the solutions it offers for both the school and the neighborhood, redirecting traffic, reducing on-street parking, improving the facility, and overall reducing the environmental impact of the institution. Even with the enrollment expansion, the school will still be a small one, especially compared to the nearby Palo Alto High School which has four times the enrollment and a smaller parking lot since its recent building expansion.

Over the past couple of years, the school has made great efforts to control and educate the school population on neighbor-friendly parking and car use. The proposal to build an underground garage at the school is an excellent solution to the "parking problem" perceived by a few of the school's neighbors. Hopefully the neighborhood will see that and be in support of it. There will, obviously, be some short term disturbance, as there is for any building project (and Palo Alto is hardly short of construction in residential areas!) but there will be a great gain for both the neighborhood and the students, as a small expansion of the school population, as envisaged by the CUP, will allow a greater range of courses to be offered in the high school grades.

I think it is tremendously important that the Bay Area has high quality options for girls' education. Castilleja provides one of the few opportunities in Northern California for girls to attend an all-girls school, and it is a school that is consistently rated among the best in the state. That makes it a jewel in Palo Alto's crown. Indeed, Castilleja School is a main reason we still live here in Palo Alto despite the high cost of living generally! It has been demonstrated that girls fare better in STEM education in an all-girl environment. I am pleased to say that my elder daughter - who is the captain of Castilleja's robotics team - will probably be studying Mechanical Engineering at the University of Oxford in the UK in the Fall. A lot of her success and opportunity to succeed in a traditionally "male" subject is down to the quality of the education she has received at Castilleja.

The successful implementation of the Castilleja Master Plan will not directly benefit my family or my daughters but, as a Palo Alto resident and a strong believer in high quality education for girls, I believe the city should support this proposal for the benefit of future generations of young women in our community.

Best wishes -
Michelle Cale
1555 Edgewood Drive
Palo Alto, CA 94303

--

Michelle Cale

From: [Douglas Kerr](#)
To: [Planning Commission](#)
Subject: Castilleja School
Date: Tuesday, February 07, 2017 7:53:04 AM

Dear City Planning,

I write in support of Castilleja's expansion. I value girls' education and see the school as doing important and necessary work. I have lived on Churchill Ave for over 10 years and find the school to be a respectful neighbor, especially with the changes they have implemented over the last 2-3 years. To be honest, the traffic and inconvenience added is negligible, and I am dumbfounded as to why people are complaining. Being on Churchill, we see ten times the traffic-- foot, bike, car-- because of Paly, but I am happy to say that both schools contribute to a thriving community. It is only the safety issues on Churchill that I believe warrant any real attention and concern.

Sincerely,
Douglas Kerr
241 Churchill Ave

From: [Planning Commission](#)
To: [Nelson Ng](#)
Bcc: [French, Amy](#); [Lait, Jonathan](#)
Subject: RE: Continuance for the Castilleja project
Date: Thursday, February 09, 2017 9:35:00 AM

Hello Mr. Ng,

At last night's PTC meeting, the Commission continued the Castilleja item to March 8, 2017.

Regards,

Yolanda

Yolanda M. Cervantes
Planning & Community Environment
City of Palo Alto
Yolanda.cervantes@cityofpaloalto.org
650.329.2404

From: Nelson Ng [<mailto:lofujai@ymail.com>]
Sent: Wednesday, February 08, 2017 5:41 PM
To: Planning Commission
Subject: Continuance for the Castilleja project

Dear Planning and Transportation Commissioners,

I understand the PTC public hearing for Castilleja project is rescheduled from tonight to March 8th. Can you please confirm that there is a continuance for the Castilleja project.

Thanks

Nelson

French, Amy

From: Gitelman, Hillary
Sent: Wednesday, March 01, 2017 7:50 AM
To: French, Amy
Subject: FW: Castilleja
Attachments: letter from Lana and Michael Borbas CUP.docx

For your file. HG



Hillary Gitelman | Planning Director | P&CE Department
250 Hamilton Avenue | Palo Alto, CA 94301
T: 650.329.2321 | E: hillary.gitelman@cityofpaloalto.org

CITY OF
**PALO
ALTO**

Please think of the environment before printing this email – Thank you!

From: Lana Borbas [<mailto:lanaborbas@sbcglobal.net>]
Sent: Tuesday, February 28, 2017 9:00 PM
To: Gitelman, Hillary
Subject: Castilleja

Hello Ms. Gitelman,

Attached please find my letter regarding Castilleja's Conditional Use Permit application. Also please know that the fact that our daughter attends one of the finest schools in the country is so important to our family and to our daughters future.

My husband works in Palo Alto and he commutes our daughter to and from school and we also carpool with another girl occasionally as well. Please allow Castilleja to expand this school so that more girls can attend this phenomenal school.

Warmest Regards
Lana Borbas
(daughter of a 10th grader)

Hillary E. Gitelman
Director of Planning & Community Environment
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA, 94301

Dear Ms. Gitelman,

I am writing to share my support for Castilleja School's amendment to its Conditional Use Permit application filed last year. Castilleja has shown itself to be a conscientious neighbor and has taken steps to meaningfully reduce its on-street traffic and parking, consumption of water, natural gas, electricity, and its overall carbon footprint. I believe the proposed scope of study as described in city filings is appropriate. I hope the Planning Department and the City of Palo Alto will consider the merits of the proposal without an undue delay so the school is able to continue its proud tradition of educating the next generation of female leadership while maintaining good relations with its neighbors and the greater Palo Alto community.

The Master Plan and CUP application include new measures that will continue Castilleja's efforts to lessen impacts to neighbors and keep the best interests of the Palo Alto community in focus.

The proposed measures include:

- A commitment to preventing traffic increases even with additional students by extending its carpool, shuttle, and busing programs.
- A determination to keep cars off neighborhood streets through the construction of an underground garage for parking and all student pick-ups and drop-offs.
- A new community-accessible park along Emerson Street, drought tolerant plantings, and a new tree canopy that meets or exceeds current conditions.
- A concerted effort to reduce noise by relocating the pool below-grade, and limiting hours of operation and frequency of school events.

These are measurable actions that show Castilleja's commitment to long-term accountability and a desire to be a good neighbor. I am proud to show my support for Castilleja School because it continues to be a responsible community member while maintaining its role as a leading educator of young women.

Sincerely,

Michael and Lana Borbas
4391 Calle de Farrar
San Jose, CA 95118

French, Amy

From: Gitelman, Hillary
Sent: Wednesday, March 01, 2017 7:49 AM
To: French, Amy
Subject: FW: Girls' Education

For your file. H



Hillary Gitelman | Planning Director | P&CE Department
250 Hamilton Avenue | Palo Alto, CA 94301
T: 650.329.2321 | E: hillary.gitelman@cityofpaloalto.org

CITY OF
**PALO
ALTO**

Please think of the environment before printing this email – Thank you!

From: Jennie [<mailto:jenniecho@yahoo.com>]
Sent: Tuesday, February 28, 2017 10:13 PM
To: Gitelman, Hillary
Subject: Girls' Education

Hillary E. Gitelman
Director of Planning & Community Environment City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA, 94301

Dear Hillary,

I am writing to share my support for Castilleja School's amendment to its Conditional Use Permit application filed last year. Castilleja has shown itself to be a conscientious neighbor and has taken steps to meaningfully reduce its on-street traffic and parking, consumption of water, natural gas, electricity, and its overall carbon footprint. I believe the proposed scope of study as described in city filings is appropriate. I hope the Planning Department and the City of Palo Alto will consider the merits of the proposal without an undue delay so the school is able to continue its proud tradition of educating the next generation of female leadership while maintaining good relations with its neighbors and the greater Palo Alto community.

The Master Plan and CUP application include new measures that will continue Castilleja's efforts to lessen impacts to neighbors and keep the best interests of the Palo Alto community in focus.

The proposed measures include:

- A commitment to preventing traffic increases even with additional students by extending its carpool, shuttle, and busing programs.

- A determination to keep cars off neighborhood streets through the construction of an underground garage for parking and all student pick-ups and drop-offs.
- A new community-accessible park along Emerson Street, drought tolerant plantings, and a new tree canopy that meets or exceeds current conditions.
- A concerted effort to reduce noise by relocating the pool below-grade, and limiting hours of operation and frequency of school events.

These are measurable actions that show Castilleja's commitment to long-term accountability and a desire to be a good neighbor. I am proud to show my support for Castilleja School because it continues to be a responsible community member while maintaining its role as a leading educator of young women.

Sincerely,
Jennie Cho

Sent from my iPhone

French, Amy

From: Gitelman, Hillary
Sent: Wednesday, March 01, 2017 7:48 AM
To: French, Amy
Subject: FW: I support Castilleja
Attachments: City Council letter about Castilleja.pdf; I support Castilleja.pdf

For your file... I will send these to you as they come in. Hillary



Hillary Gitelman | Planning Director | P&CE Department
250 Hamilton Avenue | Palo Alto, CA 94301
T: 650.329.2321 | E: hillary.gitelman@cityofpaloalto.org

CITY OF
**PALO
ALTO**

Please think of the environment before printing this email – Thank you!

From: Susie Pickett [<mailto:susie.pickett@gmail.com>]
Sent: Tuesday, February 28, 2017 11:11 PM
To: Gitelman, Hillary
Subject: I support Castilleja

Dear Hillary,

The attached letters--one addressed to you and one a copy of the letter I'm sending to the Palo Alto City Council--express my support of Castilleja's increased CUP and renovation.

I hope you will consider the voices of community members who support all schools in Palo Alto, as well as parents of students who benefit from Castilleja's focus on Women Learning, Women Leading.

All my best,
Susie Pickett
Palo Alto resident and Castilleja Parent, '18

Mayor Greg Scharff's Office
City of Palo Alto, Office of the City Clerk
250 Hamilton Ave.
Palo Alto, CA 94301
February 17, 2017

Dear Mr. Scharff, City Council Members, and neighbors of Castilleja,

I have been curious about how Paly impacts the traffic around Old Palo Alto, so I decided to see for myself on a day when PAUSD has a holiday (Presidents Day Weekend). This morning I drove by Castilleja School at 7:50 a.m. (ostensibly crunch time in the neighborhood, as school starts at 8:00). The neighborhood was quiet, several cars were at each school drop off, and neighborhood traffic was light. Mind you, it was raining, so you would assume that more people would be dropping their walkers and bikers at school; however, this was not the case.

I would posit that Paly, a public high school just blocks away, which has no Conditional Use Permit (CUP) and a current enrollment of 2000 according to the school's website is the main driver of traffic in the neighborhood. As I neared the school this morning, to my dismay, I saw red "Stop Castilleja Expansion" signs on a number of lawns surrounding the school.

The buzz around Castilleja has been very negative. I heard from a neighbor that when their family was looking at schools in the neighborhood in the 70s, the realtor told them that Castilleja was a boarding school. At its height, there were no more than 60 boarders at the school.

I have also heard that neighbors would like Castilleja to move to another location because construction would impact the neighborhood for 5 years. Aside from the fact that land is scarce and dear in the Bay area (and that the school is a landmark close to Stanford and has been at this location for over 100 years), anyone who purchased the land would likely raze the school and the location would still be under construction for a lengthy period of time.

As I sit at my home, which is across the street from a Palo Alto Elementary School, traffic is heaviest at drop-off and pick-up and people park on "my" side of the street at various times during the school day. I can hear the bell schedule and often recess, and if the principal makes announcements, I can hear that, too. The point is, that I moved into my neighborhood knowing that there is a school, that there are busy times and quiet times. I also hear the train at night and the concerts emanating from Shoreline amphitheater; but we live in the Bay area, and it is a vibrant, growing community.

Castilleja has really taken the time and effort to reduce traffic flow, and from my point of view as a recent direct neighbor of the school, Castilleja's impact is minimal in comparison to the neighboring school of 2,000. In addition to the train (and logjams at railroad crossings), the Stanford game day traffic (where the neighborhood becomes a satellite parking area) and the general increase in traffic from the recent explosion of growth in the area, Castilleja is a small part of this confluence.

As Castilleja moves forward with its sorely needed renovation (not expansion) and hopes to allow more students to benefit from this amazing school, please take this note into consideration as neighbors raise their voices in opposition to this Bay area treasure.

Yours sincerely,
Susie Pickett,
Palo Alto Resident

Hillary E. Gitelman
Director of Planning & Community Environment
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA, 94301

Dear Hillary,

I am writing to share my support for Castilleja School's amendment to its Conditional Use Permit application filed last year. Castilleja has shown itself to be a conscientious neighbor and has taken steps to meaningfully reduce its on-street traffic and parking, consumption of water, natural gas, electricity, and its overall carbon footprint. I believe the proposed scope of study as described in city filings is appropriate. I hope the Planning Department and the City of Palo Alto will consider the merits of the proposal without an undue delay so the school is able to continue its proud tradition of educating the next generation of female leadership while maintaining good relations with its neighbors and the greater Palo Alto community.

The Master Plan and CUP application include new measures that will continue Castilleja's efforts to lessen impacts to neighbors and keep the best interests of the Palo Alto community in focus. The proposed measures include:

- A commitment to preventing traffic increases even with additional students by extending its carpool, shuttle, and busing programs.
- A determination to keep cars off neighborhood streets through the construction of an underground garage for parking and all student pick-ups and drop-offs.
- A new community-accessible park along Emerson Street, drought tolerant plantings, and a new tree canopy that meets or exceeds current conditions.
- A concerted effort to reduce noise by relocating the pool below-grade, and limiting hours of operation and frequency of school events.

These are measurable actions that show Castilleja's commitment to long-term accountability and a desire to be a good neighbor. I am proud to show my support for Castilleja School because it continues to be a responsible community member while maintaining its role as a leading educator of young women.

Sincerely,

Susie Pickett
Palo Alto resident and Castilleja parent, '18

French, Amy

From: Dana Fenwick <dana_fenwick@yahoo.com>
Sent: Tuesday, February 28, 2017 6:42 PM
To: Gitelman, Hillary
Subject: Support for Castilleja School's Amendment to its Conditional Use Permit Application

Hillary E. Gitelman
Director of Planning & Community Environment City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA, 94301

Dear Hillary,

I am writing to share my support for Castilleja School's amendment to its Conditional Use Permit application filed last year. Castilleja has shown itself to be a conscientious neighbor and has taken steps to meaningfully reduce its on-street traffic and parking, consumption of water, natural gas, electricity, and its overall carbon footprint. I believe the proposed scope of study as described in city filings is appropriate. I hope the Planning Department and the City of Palo Alto will consider the merits of the proposal without an undue delay so the school is able to continue its proud tradition of educating the next generation of female leadership while maintaining good relations with its neighbors and the greater Palo Alto community.

The Master Plan and CUP application include new measures that will continue Castilleja's efforts to lessen impacts to neighbors and keep the best interests of the Palo Alto community in focus.

The proposed measures include:

- A commitment to preventing traffic increases even with additional students by extending its carpool, shuttle, and busing programs.
- A determination to keep cars off neighborhood streets through the construction of an underground garage for parking and all student pick-ups and drop-offs.
- A new community-accessible park along Emerson Street, drought tolerant plantings, and a new tree canopy that meets or exceeds current conditions.
- A concerted effort to reduce noise by relocating the pool below-grade, and limiting hours of operation and frequency of school events.

These are measurable actions that show Castilleja's commitment to long-term accountability and a desire to be a good neighbor. I am proud to show my support for Castilleja School because it continues to be a responsible community member while maintaining its role as a leading educator of young women.

Sincerely,
Dana Fenwick, 1975 Bryant Street

French, Amy

From: Lani Takano <lanit@me.com>
Sent: Tuesday, February 28, 2017 6:22 PM
To: Gitelman, Hillary
Subject: We support Castilleja!

Hillary E. Gitelman
Director of Planning & Community Environment City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA, 94301

Dear Hillary,

I am writing to share my support for Castilleja School's amendment to its Conditional Use Permit application filed last year. Castilleja has shown itself to be a conscientious neighbor and has taken steps to meaningfully reduce its on-street traffic and parking, consumption of water, natural gas, electricity, and its overall carbon footprint. I believe the proposed scope of study as described in city filings is appropriate. I hope the Planning Department and the City of Palo Alto will consider the merits of the proposal without an undue delay so the school is able to continue its proud tradition of educating the next generation of female leadership while maintaining good relations with its neighbors and the greater Palo Alto community.

The Master Plan and CUP application include new measures that will continue Castilleja's efforts to lessen impacts to neighbors and keep the best interests of the Palo Alto community in focus.

The proposed measures include:

- A commitment to preventing traffic increases even with additional students by extending its carpool, shuttle, and busing programs.
- A determination to keep cars off neighborhood streets through the construction of an underground garage for parking and all student pick-ups and drop-offs.
- A new community-accessible park along Emerson Street, drought tolerant plantings, and a new tree canopy that meets or exceeds current conditions.
- A concerted effort to reduce noise by relocating the pool below-grade, and limiting hours of operation and frequency of school events.

These are measurable actions that show Castilleja's commitment to long-term accountability and a desire to be a good neighbor. The school has been at this location for over 100 years! I am proud to show my support for Castilleja School because it continues to be a responsible community member while maintaining its role as a leading educator of young women.

Thank you,
Lani Takano

French, Amy

From: PolinaLevitan@YAHOO <PolinaLevitan@YAHOO.com>
Sent: Tuesday, February 28, 2017 2:36 PM
To: French, Amy
Cc: Nelson
Subject: Castilleja

Not even 2-4 parking guards in yellow vests at every corner stationed around Castilleja for this morning event, nor, "NO Castilleja Parking" signs placed by Castilleja's facilities department in front of resident's homes, and neither nearly 200 PNQLnow.org posters around the neighborhood, deterred Castilleja guests from parking on 100 block Kellogg and taking up two parking spaces in most cases. NOT OK.

160 Kellogg 2/28/17 10 am (2 parking spaces)

French, Amy

From: Palo Alto Public Records Center <paloaltoca@mycusthelp.net>
Sent: Tuesday, February 28, 2017 11:13 AM
To: wross@lawross.com
Subject: Public Records Request :: W000697-022417
Attachments: PRR_W000697-022417_Staff_Response.pdf; S17166751
_Dudek_Castilleja_School_Contract_RS.pdf; C14153013_Fully_Executed_.pdf;
149976PLAN_RFP_CONTRACT_PLANNING_.pdf; Dudek_Emails_1-25-17_through_
2-27-17.pdf

--- Please respond above this line ---



02/28/2017

RE: PUBLIC RECORDS REQUEST of February 24, 2017, Reference # W000697-022417

Dear William,

I am writing in response to your requests for documents under the California Public Records Act (Govt. Code § 6250 et seq.) received by the City on 2/24/2017.

Your request mentioned 1. Documents setting forth the Request for Proposal ("RFP") to which the environmental consulting firm, Dudek and Associates, ("Dudek") responded for preparing environmental analysis under the California Environmental Quality Act ("CEQA") in the City; 2. The RFP to which Dudek responded to prepare the Castilleja School Conditional Use Permit and Master Plan Initial Study; 3. The consultant contract or contracts executed by Dudek with respect to Items numbered 1 and 2 above; 4. The number of environmental analyses prepared by Dudek for the City in the last five years with the name of the project associated with the environmental analysis; 5. For the projects for which Dudek performed an environmental analysis, the number where Dudek concluded that there was a potential impact on the environment associated with the cumulative traffic impacts of the respective project; and, 6. Any instructions from Planning Staff, City Council Members or Planning and Transportation Commission Members to Dudek concerning the environmental analysis for the Castilleja School Conditional Use Permit and Master Plan Initial Study, other than may be contained in the revised Notice of Preparation, dated February 2017, SCH 201701502.

The City has reviewed its files and has located responsive records to your request. Please log in to the Records Center at the following [link](#) to retrieve the appropriate response.

If you have any questions, or wish to discuss this further, please contact me.

Sincerely,

Yolanda Cervantes
Administrative Assistant
Planning and Community Environment



French, Amy

From: Benato, Cynthia@DTSC <Cynthia.Benato@dtsc.ca.gov>
Sent: Tuesday, February 28, 2017 10:54 AM
To: French, Amy
Cc: State.clearinghouse@opr.ca.gov; Itaylor@cde.ca.gov; JGordon@cde.ca.gov; Buttle, Jackie@DTSC; Salcedo, Jose@DTSC; Duke, Bud@DTSC
Subject: City of Palo Alto Castilleja School NOP for draft EIR_DTSC Responsible Agency Review Comment letter
Attachments: City of Palo Alto - Castilleja School NOP for draft EIR (2017012052)_DTSC Comments.pdf

Good Morning.

Please see the attached, signed DTSC Letter of Review of the Notice of Preparation of Draft Environmental Impact Report for the subject site. The original will be mailed to the addressee via U.S. mail. If you have any questions please contact Project Manager, Harold (Bud) Duke, PG at (916) 255-3695 or via email at Bud.Duke@dtsc.ca.gov.

Sincerely,

*Cynthia Benato
Office Technician
Department of Toxic Substances Control
S.S.F.L. and Northern California Schools Unit
(916)255-6521
cynthia.benato@dtsc.ca.gov*

French, Amy

From: French, Amy
Sent: Tuesday, February 28, 2017 7:04 AM
To: Rob Levitsky
Cc: Dockter, Dave; Passmore, Walter
Subject: Re: new Casti Tree map

Rob, the tree plan has not yet been submitted; that is why it is not shown on the city's website for this project. It would seem that Castilleja is only using this in their neighbor communication efforts at this time - it is not yet an 'official' submittal and I assume it is subject to revisions following conversations and prior to submittal for the city's analysis. I did see the tree drawing because I was copied on Nanci's email.

I do not have any plans for garage revisions. They have not been submitted. There are no other submitted project drawings or charts in my possession that are not on the website. If the applicant prepares and submits other renderings, elevations, or charts to update the application, I will post them - and those signed up to receive emails when postings in the webpage will receive an email. Item 26 under 'applicant submittal items' on the website are recently submitted renderings. I concur with you that accurate drawings are needed. The original master plan set, available on the website as item 1, shows the extent of the underground garage.

There are no decisions being made at this time regarding this project. The project applications are still incomplete. There will be no actions, no formal hearings with the HRB or ARB regarding the contemplated demolition of buildings, conceptual master plan or garage design, and no CUP hearing until actual environmental impacts and project issues are compiled and published. The project itself will be discussed in public hearings after further submittals and further study, after the scoping meeting and receipt of public comments regarding what have been identified as potential impacts to be studied the EIR will study. The draft EIR cannot be prepared until the studies are finished and the applicant completes the application by submitting additional items.

Sent from my iPad

> On Feb 27, 2017, at 9:05 PM, Rob Levitsky <roblevitsky@yahoo.com> wrote:

>

> Amy

>

> I spoke to the palo alto city council on Feb 6 2017 about the proposed large scale removal of trees associated with the Castilleja expansion plans. The very next morning, Feb 7 2017, i received an email from Nanci Kaufman with the following tree map, showing less trees marked for removal.

>

> [cid:1738282c-0e85-453a-b090-85136a2d67cd@namprd09.prod.outlook.com]

>

>

> I do not see this tree map on the City of palo alto website for the Castilleja proposal. It should be in the section under "Trees"

>

> Could you please comment as to why its not on the website. Have you not received this drawing? If not, shall i consider it a bogus drawing?

> If the tree map is correct, then it changes the capacity of the proposed underground garage. Do you have the updated drawings for the underground garage?

>

> Its ridiculous to think anyone can make reasoned decisions about approving such an underground structure without accurate drawings.

>

> Are there other drawings and charts for the Castilleja proposal in your possession that you have not posted on the website? If so, why not?

>

> i would also like to comment that the "Renderings of project from Emerson street" watercolor is utter nonsense.

> [\[cid:3cc7773c-2209-4e82-9d67-fce41503dd37@namprd09.prod.outlook.com\]](mailto:cid:3cc7773c-2209-4e82-9d67-fce41503dd37@namprd09.prod.outlook.com)

>

> Please post an elevation of the project from Emerson street, and an elevation from Bryant street, and show the 20 foot setback violations caused by the driveways.

>

>

> rob levitsky

> 1200 Emerson street

>

>

>

>

>

>

>

>

>

> Sent from my iPhone

> <image1.PNG>

> <image2.JPG>

French, Amy

From: Gitelman, Hillary
Sent: Monday, February 27, 2017 6:04 PM
To: French, Amy
Subject: FW: Proposed Castilleja Expansion

Comments for your file



Hillary Gitelman | Planning Director | P&CE Department
250 Hamilton Avenue | Palo Alto, CA 94301
T: 650.329.2321 | E: hillary.gitelman@cityofpaloalto.org

**CITY OF
PALO
ALTO**

Please think of the environment before printing this email – Thank you!

From: Meimei Pan [<mailto:meimeipan@gmail.com>]
Sent: Monday, February 27, 2017 4:18 PM
To: Council, City
Subject: Proposed Castilleja Expansion

Feb. 27, 2017

Dear Palo Alto City Council Members,

Many others have written to you regarding the expansion of Castilleja. Our major concern is their commercial parking garage for 130 spaces. The entrance of the garage on Embarcadero onto Bryant and exiting onto Emerson/Embarcadero will create a major traffic jam. In its present configuration, we have waited quite awhile to make that turn, and oncoming traffic (at full speed) makes that turn already difficult. If you think about it, all those parents dropping off their children at 8:00 am and picking up at 3:00. Embarcadero will come to a stand-still at 8:00 am.

Do we really want to add to the already congested Embarcadero? As a resident of Whitman Ct., an alley half a block north of Embarcadero, we already experience the current congestion on Embarcadero at Bryant and Waverley Sts, especially during early morning and mid to late afternoons.

If Castilleja goes back to the CUP of 415 then no parking garage will be needed.

Castilleja has overgrown its location. If they want to expand they should split the junior high or high school to another location. All the other private schools have split the elementary school from junior high/high school.

Palo Alto already has enough traffic and adding this garage will definitely expand the problem.

Our two daughters attended Castilleja School so we understand the appeal of making its education available to more students; however, this could be argued for any level of enrollment. We know for a fact, that the current campus barely accommodates the current level of enrollment. A split campus makes more sense if you want to expand the school. The concept of scaled neighborhoods is important, not to mention the strict rules about preserving certain trees to which we residents are bound. The deliberate ignoring of limits previously agreed to by the school and Council, appears illogical and may I say, rather insensitive, to us residents who try to be good citizens preserving quality of life for everyone?

Sincerely,

Raehua Meimei Pan and Lynn Jacobson

334 Whitman Ct.

Palo Alto, CA 94301

French, Amy

From: amy french <amyfrenchsings@yahoo.com>
Sent: Sunday, February 26, 2017 1:09 PM
To: French, Amy
Subject: Fwd: Meeting with Castilleja

Sent from my iPhone

Begin forwarded message:

From: Jacqueline Taylor <taylor_jacqueline@sbcglobal.net>
Date: February 26, 2017 at 12:30:30 PM PST
To: Nanci Kauffman <nkauffman@castilleja.org>
Cc: Kathy Layendecker <klayendecker@castilleja.org>, cc: Mary☺ - SAVE OUR NEIGHBORHOOD <marysylvester@comcast.net>, Kimberley Wong <sheepgirl1@yahoo.com>, Nelson Ng <lofujai@ymail.com>, Hank Sousa <thomashenrysousa@gmail.com>, Neva Yarkin <nevayarkin@gmail.com>, Rob Levitsky <roblevitsky@yahoo.com>, Andie Reed <andiezreed@gmail.com>, Michael Manneh <michael.manneh@gmail.com>, "French, Amy" <Amy.French@cityofpaloalto.org>
Subject: Re: Meeting with Castilleja
Reply-To: Jacqueline Taylor <taylor_jacqueline@sbcglobal.net>

Dear Nanci,

Thank you for your emails of Feb 7 and Feb 16 regarding a meeting and your description of compromises on the part of Castilleja.

Meeting and Scheduling:

We are disappointed that you do not find it appropriate to call a meeting of the entire Board. While you may think it helpful for us to meet with those Board members most familiar with the proposed project, we think all members, especially those who are unfamiliar with it, should know the extent of the opposition to the proposed project by the neighbors most immediately impacted. Please let us know if an opportunity for meeting with the full Board becomes available, and we can provide a preliminary agenda.

Please note that we are aware in the past you have used meetings with neighbors to give the misguided impression that we, the neighbors in the vicinity of Castilleja, have had significant input into your plans. For 3 years you met with a small group of our neighbors, and they have a very different impression of those meetings than what you repeatedly describe in your public correspondence. They were, in fact, as shocked and dismayed as any of us when you presented Castilleja's expansion plans on June 30, 2016.

Your Nov 2016 "public forum" consisted of 45 minutes of promotional displays expounding the highlights of the school, followed by a series of 2 minute statements by both immediately impacted neighbors and parents who do not reside in the immediate vicinity. Note that the language of the 2000 CUP requires Castilleja to have a twice yearly meeting for the express purpose of a public dialogue with neighbors about their issues.

Compromises:

Since this email communication is part of the public record, we would like to set the record straight that the items you list under "Compromises" are actually basic requirements for Castilleja to continue to operate in this Single Family Neighborhood as defined in the year 2000 Conditional User Permit (CUP) <http://www.cityofpaloalto.org/civicax/filebank/documents/53961> as clearly stated below.

"The proposed use, at the proposed location, will 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".

Please let us know if you envision room for substantive compromise on your part on items such as the proposed increased enrollment, the underground garage, or the extended construction spanning a number of years.

We are not now, nor have we ever been, opposed to Castilleja School. However, it is imperative that the school take into consideration the residents who live here 24/7 and wish to have quiet enjoyment of our homes (per the Palo Alto Zoning Ordinance for R1 neighborhoods as described in Title 18 of the municipal code).

Thank you for your time,

Jacqueline Taylor and Andie Reed
on behalf of
PNQLnow.org

On Tuesday, February 7, 2017 10:36 AM, Nanci Kauffman <nkauffman@castilleja.org> wrote:

Dear Jacqueline,

In response to your most recent email
about a meeting with Castilleja leadership
, I have some information to share and also some additional questions:

- **Meeting:**

The full Board of Trustees meets only a few times per year and their agendas are quite formal and

always full. I can certainly

arrange for a small number of trustees to attend a neighbor meeting, just as we have done with other small groups of neighbors. We would ensure that those in attendance would be the trustees most familiar with the project.

- **Scheduling:** Please let me know what time of day works best. For example, does the group prefer an early evening time or

an early morning time?

Is there a preferred day of the week?

Once I have a bit more guidance from you, then I can poll trustees and offer you a handful of dates from which to choose. My understanding is that based on the date, you will secure the location and the

appropriate

facilitator.

- **Compromises:** Throughout the past 5 years, in neighbor meetings both small and large, we were told by neighbors time and again that the most significant impacts Castilleja imposed on neighbors were:
 - pick-up and drop-off traffic
 - parking
 - delivery trucks
 - garbage trucks
 - buses
 - evening and weekend events
 - noise

The plan we submitted on June 30, 2016 took several years to develop and includes significant changes and compromises to address in a comprehensive way, each and every one of these concerns

listed.

By moving parking, drop-offs, buses and trucks underground, we will dramatically decrease traffic and parking impacts to below what was required in our 2000 CUP. We propose more limits to our evening and weekend events, and we propose a time curfew on events. We even propose consequences for any violations which binds both current and future administrations.

Given the attention we have given to these matters, we would benefit from hearing your group's perspective on further compromise. Until now, we understood that your group is 100% opposed to the project, so we actually do need to hear about what further concerns you have that we haven't addressed.

Thank you for working with us to schedule a meeting and for providing us with some guidance as to the topics you would like us to address in our meeting.

Regards,
-Nanci

PS Attached
is
the actual rendering
s
that depict

the exit from the garage we have proposed
, along with a rendering of the proposed park area

. As you can see, if approved, the plans will dramatically improve the aesthetics of the neighborhood. Also attached is our new Tree Plan, which portrays that all but a handful of trees will be retained. Most of those that are indicated for relocation will be moved towards the campus perimeter to enhance the neighborhood.

--

Nanci Kauffman
Head of School
Castilleja School
1310 Bryant Street, Palo Alto CA 94301
650-470-7718
Twitter: @nancikauffman

WOMEN LEARNING I WOMEN LEADING

For an appointment, contact Kathy Burch <kburch@castilleja.org> or 650-470-7702

French, Amy

From: Cervantes, Yolanda
Sent: Friday, February 24, 2017 7:42 AM
To: French, Amy
Subject: RE: Invitation to lunch with Nanci Kauffman

Yes, the invitation has been forwarded to the PTC.

Yolanda M. Cervantes
Planning & Community Environment
City of Palo Alto
Yolanda.cervantes@cityofpaloalto.org
650.329.2404

From: French, Amy
Sent: Thursday, February 23, 2017 6:27 PM
To: Cervantes, Yolanda
Subject: Fwd: Invitation to lunch with Nanci Kauffman

FYI though I assume you see all emails addressed to "planning commission"

Sent from my iPhone

Begin forwarded message:

From: Nelson Ng <lofujai@ymail.com>
Date: February 23, 2017 at 12:11:20 PM PST
To: Amy French <amy.french@cityofpaloalto.org>
Cc: Kimberley Wong <sheepgirl1@yahoo.com>, Hillary Gitelman
<hillary.gitelman@cityofpaloalto.org>, James Keene
<james.keene@cityofpaloalto.org>, "Planning.Commission@CityofPaloAlto.org"
<Planning.Commission@CityofPaloAlto.org>
Subject: Fw: Invitation to lunch with Nanci Kauffman
Reply-To: Nelson Ng <lofujai@ymail.com>

Amy,

Per our February 6th email exchange, thanks for asking the PTC support staff to include our July 25th 2016 email exchange into the PTC public hearing document package. <http://www.cityofpaloalto.org/civicax/filebank/documents/55782>

While Castilleja continues to make claims that they have been working with the neighbors on the Master Plan as the following statement in page 5 of their Master Plan Narrative, most of the immediate neighbors didn't have any detail of the Master Plan until the June 22nd 2016 neighborhood meeting or after the plan was submitted on June 30th 2016.

"Castilleja has worked extensively with its neighbors to develop a Master Plan that balances numerous and often-competing objectives."

I would like to submit the following email thread as an example which contains notes from my first meeting with Ms. Kauffman on August 11th 2016 as part of the public documents for the project. As one of the most impacted immediate neighbors by the underground garage, I had to find out from the the City website after Castilleja filed their master plan. If the plan is approved, they will demolish the single family home in front of my house and replace it with a garage exit that will direct hundreds of cars an hour to my front door. During that meeting with Ms. Kauffman, I clearly voiced my opposition to the project and offered many alternatives to this plan. However, to date I still see Castilleja is pushing their original plan full speed ahead without taking in any input while Ms. Kauffman continues to claim that all neighbors will have ample opportunity to provide input to the plan.

Thanks

Nelson

----- Forwarded Message -----

From: Nelson Ng <lofujai@ymail.com>

To: Nanci Kauffman <nkauffman@castilleja.org>

Cc: "klayendecker@castilleja.org" <klayendecker@castilleja.org>; Kimberley Wong <sheepgirl1@yahoo.com>

Sent: Monday, August 15, 2016 10:18 PM

Subject: Re: Invitation to lunch with Nanci Kauffman

Nanci,

Thanks for the reply. We will relay this message to our concerned neighbors. We will all be looking forward to the updates based on our input. Meanwhile we will continue our efforts to protect our quality of life.

Regards

Nelson

From: Nanci Kauffman <nkauffman@castilleja.org>

To: Nelson Ng <lofujai@ymail.com>

Cc: "klayendecker@castilleja.org" <klayendecker@castilleja.org>; Kimberley Wong <sheepgirl1@yahoo.com>

Sent: Monday, August 15, 2016 11:11 AM

Subject: Re: Invitation to lunch with Nanci Kauffman

Dear Nelson and Kimberley,

Thank you both for taking the time to meet with us. We appreciated the opportunity to hear your concerns and we will reflect on all of them as we continue to develop our plans for Castilleja's future. Please stay tuned for more updates.

Regards,
-Nanci

On Fri, Aug 12, 2016 at 11:31 PM, Nelson Ng <lofujai@ymail.com> wrote:

Nanci and Kathy,

Thanks for meeting with Kimberley and me yesterday to discuss our input for Castilleja on ways to co-exist with the neighbors. Here is the summary of our discussion.

While Kimberley and I appreciate the opportunity of this face-to-face meeting, this does not change the fact that we were never briefed on the current plan prior to its submission. We had to learn about the direct negative impact to our house from the City website. We learned that the two houses across from us would be demolished and replaced with an underground garage driveway funneling traffic of 440 trips per peak hour to our front door and living room. Thanks to Nanci for clarifying the 440 trips means 220 cars minus the cars that will be parked and exited as a later time.

Because we stated that we adamantly oppose the current master plan and CUP application in our previous email, I appreciated that Kathy limited the overview of the plan to the barrier at Emerson & Embarcadero and beautification of the grounds above the underground garage exit.

As a way to frame the context of our input, I restated the following known facts

- Castilleja is located in a Single Family R1 Neighborhood
- Castilleja is operating under the Conditional User Permit that is granted in 2000 with a maximum of 415 student enrollment
- Castilleja has violated the enrollment limit for over 10 years

The following is our input:

Non Starter

- o Building an underground garage
- o An exit ramp for the underground garage pointing at our home
- o Remove/Move 168 trees especially the 120 ft Redwood and the Oak trees in 1235 and 1262 Emerson
- o Demolishing the 1235 and 1262 Emerson
- o Discussion of any plan without prior traffic study that measures the true impact of Castilleja traffic to the neighbors' quality of life and an agreed acceptable impact target by the neighbors.
- o Multi year constructions to disrupt and reduce our quality of life.
- The guiding principle to design any plan is to allow Castilleja and the neighbors to co-exist in harmony while protecting the quality of life for the neighbors and Palo Alto residents as a whole. Any proposal must have a clear description of the benefit to the neighborhood and Palo Alto City as a whole, to benefit the Palo Alto Community and stay within the confines of the R-1 zoning of the neighborhood
- Palo Alto traffic is reaching gridlock level. Though neighbors in the past were hoping a garage will address the off street parking issue, most of us who have met in the neighborhood meeting have realized that this will not solve the problem. Traffic is getting worse and the garage will just invite more traffic to the neighborhood and the City. If your goal is as you mentioned to reduce traffic in the neighborhood, then you should not need a

garage. You should redirect the budget for the underground garage toward solutions including the following to reduce traffic to Palo Alto

- o remote garage or lot
- o more shuttles and from remote garage or lot
- o bike/walk
- o train/bus
- Current traffic study is widely inadequate by just manually counting car for one hour during school dropoff in Castilleja campus in the morning. We need to have accurate comprehensive traffic study that covers 24x7 traffic around the neighborhood with and without Castilleja in session for the following. Set up traffic cameras such as the case by Gunn High, count many days over an extensive period of time in various weather conditions, automate the counting of cars for surrounding neighborhood.
 - o Regular class session
 - o Summer class session
 - o Weekday events
 - o Weekend events
- Castilleja presents the result of the traffic study to the neighbors and work with the neighbors to define a concrete acceptable target of the traffic impact to the neighborhood.
- Safety: Need to collaborate with the Commission of Traffic Safety, other schools, Penny Ellson of the PA Bicycle Advisory Committee as well as those working on the plans for the Embarcadero corridor near Paly and Town & Country. They all need to be aware of the master plan of Castilleja and drastically change of flow of traffic and dedicating one east bound lane off Embarcadero at the Kingsley, Emerson, Embarcadero junction to outflowing Emerson traffic.
- We need much better transparency of the discussion regarding the plan to avoid a repeat of not notifying impacted neighbors as in our case. This was not an acceptable approach to build a collaborative plan.
 - o Date of Castilleja/Neighborhood meeting should be communicated at least 1 month ahead via email and Castilleja website
 - o All materials to be presented in the Castilleja/Neighborhood meeting should be viewable via Castilleja website 2 week prior the meeting
 - o All meeting note of the Castilleja/Neighborhood meeting should be viewable via Castilleja website 1 week after the meeting
 - o All submission of documents by Castilleja to the City and communication from the City to Castilleja related the the current CUP application and existing CUP should be made available in the Castilleja website
- Suggestions to welcome more feedback from the neighbors:
 - o Provide several options of plans to present to the community before submission. Print out huge copies and allow them to view the various options just like at the Embarcadero corridor meetings. Have neighbors write on the plans for their immediate input. This should be followed up to make sure that Castilleja has made changes and "heard" the neighbors' requests.
 - o This will reduce the amount of iterations to the submitted plans and increase transparency between Castilleja and the neighbors
 - o Explore large lots to park cars offsite and shuttle students in. Explore another site to have a satellite school, near 101 just as Keyes school did.

We are looking forward to see how your actions will bring back a good quality of life to our Single Family Neighborhood.

Nelson & Kimberley

French, Amy

From: Jo Ann Mandinach <joann@needtoknow.com>
Sent: Wednesday, February 15, 2017 11:39 AM
To: French, Amy
Cc: Council, City
Subject: I'm totally opposed to Casti's Expansion. Embarcadero's enough of a mess

Hello,

I'm totally opposed to the proposed expansion of Castilleja School. Embarcadero's already over-crowded and will only get worse with the Stanford's proposed expansion.

Backed up turning traffic on Embaradero and El Camino now eliminates one through lane and is hazardous as cars play demolition derby when they try to get out of lanes going nowhere.

With all the construction on San Antonio, 101, gridlocked Middlefield etc., it's getting impossible to go anywhere or to cross El Camino.

ENOUGH.

Most sincerely,
Jo Ann Mandinach

Jo Ann Mandinach
Need To Know Info Solutions
<http://www.needtoknow.com>
650 329-8655 or cell 650 269-0650
Palo Alto, CA 94301

French, Amy

From: Andie Reed <andiezreed@gmail.com>
Sent: Tuesday, February 14, 2017 3:14 PM
To: French, Amy
Cc: Gitelman, Hillary; Cervantes, Yolanda
Subject: Re: Responses to your email Friday evening regarding Castilleja School

Thanks, Amy, that was very helpful.

Andie

On Tue, Feb 14, 2017 at 3:00 PM, French, Amy <Amy.French@cityofpaloalto.org> wrote:

I'm glad we were able to have a phone conversation today so I could provide clarification regarding the difficulties of email conversations and further discuss your questions.

From: Andie Reed [mailto:andiezreed@gmail.com]
Sent: Tuesday, February 14, 2017 7:39 AM
To: French, Amy
Cc: Gitelman, Hillary; Cervantes, Yolanda
Subject: Re: Responses to your email Friday evening regarding Castilleja School

Hi Amy,

Thanks for getting back to me.

I have read all the material you point me to in your response yesterday. I still have unanswered questions, as described in my email of Friday. Are you going to follow-up with answers on another email, or are you indicating I need to call you to get answers?

Thanks,

Andie

On Mon, Feb 13, 2017 at 3:03 PM, French, Amy <Amy.French@cityofpaloalto.org> wrote:

The Planning and Transportation Commission (PTC) scoping meeting, now scheduled for March 8, 2017, is for the purpose of taking public and Commissioner comments; no action is requested and no recommendations regarding the project will be made. A link to the PTC report is found on the City's website for the Castilleja project (viewable here: http://www.cityofpaloalto.org/gov/topics/castilleja_school.asp). The March 8, 2017 PTC meeting will be captured on video and uploaded following the meeting at this link <http://midpenmedia.org/category/government/city-of-palo-alto/boards-and-commissions/planning-and-transportation-commission/>.

The EIR process generally takes 9-12 months, and it is possible that a draft EIR could be published for public review this summer. The Final EIR schedule will depend on public comments received. Separate from the EIR process, the ARB, HRB, PTC and City Council will have opportunities to review the project. The ARB process is codified in Palo Alto Municipal Code Chapter 18.77, Section 18.77.070: [http://library.amlegal.com/nxt/gateway.dll/California/paloalto_ca/paloaltomunicipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:paloalto_ca](http://library.amlegal.com/nxt/gateway.dll/California/paloalto_ca/paloaltomunicipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:paloalto_ca)).

You may reach me by phone at (650)329-2336).

From: Andie Reed [<mailto:andiezreed@gmail.com>]

Sent: Friday, February 10, 2017 6:54 PM

To: French, Amy

Cc: Gitelman, Hillary; Scharff, Gregory (Internal); Kniss, Liz (Internal); Filseth, Eric (Internal); DuBois, Tom; Fine, Adrian; Kou, Lydia; Holman, Karen; Tanaka, Greg; cory.wolback@cityofpaloalto.org; Keene, James; Planning Commission

Subject: Castilleja School

Amy French

Chief Planning Official

City of Palo Alto

Dear Amy,

I am writing in response to the information that was received by members of our group at Friday's Traffic and Safety meeting.

We have a few questions that we would appreciate your clearing up for us.

Please respond to the following questions, formatted for your easy reference:

1. We understand that the EIR scoping meeting hearing will be Mar 8 before the PTC, and the deadline for written comments will be Mar 15.

a. Will the City staff recommend action on all comments, written and oral, that are proposed outside of the Dudek Initial Study as well as the Dudek IS?

b. Will we see the results of City staff's deliberations on all comments, written and oral?

c. Will the Planning and Transportation Commission make recommendations that we can access?

d. Do the PTC comments ultimately get sent to the City Council for consideration?

2. When Mary Sylvester and I met with you on Jan 12, I believe you stated that the actual EIR would take 6 months to one year to complete. This conflicts with your public remarks that it could be done by June. When you say the draft EIR may be done by June, does that mean it has already begun and has been ongoing?

b. Please provide us a timeline that accurately represents how the EIR process will unfold.

c. Please confirm that there will be public input on the draft EIR, and when that can be expected to occur.

d. When the public has input into the draft EIR, when do we see if our comments have been included, that is, can we find out what has been accepted prior to the final EIR report? ____

3. Has this project gone before the Architectural Review Board yet? At what point will there be public input into the ARB report prior to its being completed? Please explain how the ARB process works and the timeline.

4. We appreciate that you are responsible for doing presentations about the Castilleja project in public settings. However, it does not seem consistent with your duties as representing all of the citizens that you do not explain that there are many pitfalls to this project, many detrimental impacts to the neighbors, and there is growing pushback from

the neighborhood. We, the neighbors, need to be represented as well as the applicant. This project is not being built on an industrial site, it is being built in an R-1 zoned residential neighborhood. Please either:

a. let us know a few days in advance any time you are doing this presentation so we can also do our presentation, or

b. provide both sides of the impact this project will have on traffic, safety, noise, and loss of residents rights to quiet enjoyment of their homes.

5. Please explain the connection between the CUP enrollment maximum of 540 that is being applied for and the Master Plan application for the expansion of the school. These are two very different applications; if one is not accepted, the other becomes at least partially moot. The way these applications are linked, it appears the school is being fast-tracked towards the end they desire without any consideration that the benefits all accrue to the school and detriments all to the residents. We would appreciate your describing how combining these two elements benefits the residents in any way.

6. As we discussed on Jan 12, you mentioned that you would add our link www.PNQLnow.org to the CPA/Castilleja website, under "Public Comments and Neighbor Submissions". What has happened with that idea?

Thank you for your attention to this matter.

We look forward to your responses.

PNQLnow.org

Andie Reed

Nelson Ng

Kimberley Wong

Hank Sousa

Mary Sylvester

Jim Poppy

Neva Yarkin

Rob Levitsky

Jackie Taylor

--

Andie Reed CPA
160 Melville Ave

Palo Alto, CA 94301
530-401-3809 ph

--

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

French, Amy

From: Castilleja Expansion
Sent: Wednesday, February 08, 2017 4:49 PM
To: 'Christina Ablaza'
Cc: French, Amy; kwaugh@dudek.com
Subject: RE: comment on proposed Castilleja expansion

Thank you for your comments. I am copying our consultant.

From: Christina Ablaza [<mailto:christinaablaza@hotmail.com>]
Sent: Tuesday, February 07, 2017 9:36 AM
To: Castilleja Expansion
Subject: comment on proposed Castilleja expansion

Dear Ms. French,

While I acknowledge that expanded parking capacity would be helpful to the immediate neighbors of Castilleja, I'm fearful of the negative impact any construction will have on Embarcadero traffic. As you know, morning and afternoon traffic is already quite difficult for Paly students and parents, as well as those of us who work at Stanford (and have children attending Paly).

Because Castilleja is a private school, and I'm not sure how many Palo Alto residents attend, I do not find any expansion to be of benefit to city residents, and I will greatly resent any disruption to my or my children's commute. Castilleja has exceeded their enrollment limit, so how or why can we trust that they will abide by any limits put in place with an expansion approval, and how would they enforce limits on the numbers of cars dropping students off in the morning? If Castilleja would like to expand, they can find space in another location in the area so that Palo Alto residents are not negatively impacted.

I'm also concerned about any trees that might be cut down, as I read that the tree that they've already removed was not as unhealthy as the arborist they hired had determined. I will not support the removal of more trees on the property.

Sincerely,
Christina Ablaza
551 Tennyson Ave.

French, Amy

From: Yoriko Kishimoto <ykishimoto@earthlink.net>
Sent: Monday, February 06, 2017 10:31 PM
To: French, Amy
Cc: Cervantes, Yolanda
Subject: Re: Scoping for proposed Castilleja expansion

Thanks Amy and hello Yolanda- thanks for doing that and let me know if you have any questions! Yoriko

Sent from my iPhone

On Feb 6, 2017, at 3:31 PM, Castilleja Expansion <Castilleja.Expansion@CityofPaloAlto.org> wrote:

Hello Yoriko, Amy French here. I have forwarded your comments to our consultant. Also copying PTC support staff as we are preparing after packet emails to put at places.

From: Yoriko Kishimoto [<mailto:ykishimoto@earthlink.net>]
Sent: Sunday, February 05, 2017 10:06 AM
To: Castilleja Expansion
Subject: Scoping for proposed Castilleja expansion

These are brief comments re: proposed Castilleja School Expansion.

First, I note that the school is a result of a conditional use permit in an R-1 neighborhood. According to our Municipal Code, 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." (Muni code 18.12.010)

Further, "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;

(2) Be located and conducted in a manner in accord with the Palo Alto Comprehensive Plan and the purposes of this title (Zoning)." (Muni code 18.76.010)

These are the standards which must be used.

For purposes of scoping:

1. I saw the proposed Transportation Impact Analysis (TIA) scope and it proposes to use "existing" traffic as the baseline vs. a standard for R-1 neighborhoods and it proposes to gather data and do analysis for some "peak hour". I remember there has been a city custom/policy to use "what is allowable" under existing zoning vs. "existing traffic". That came up when I was on the council when people thought it was unfair to use existing (low) traffic when the building

happened to be empty. Instead, the city used a calculation based on what traffic there would be if the building was in use. I disagreed then, but the reverse would seem applicable here to be consistent. The baseline should be an average R-1 neighborhood. Please clarify baseline assumption - it seems any CUP should meet standards to keep impacts appropriate for R-1 zoning.

2. Peak hour analysis is appropriate to measure impact on commuters, but there are many events and vendor traffic at Castilleja all day which have an impact on the neighbors. Data gathered should capture these.

3. I live on the Embarcadero Road side, which is already heavily impacted by traffic and has already undergone some analysis. I would be interested in the impact on bicyclists and pedestrians since this is a residential arterial key to bike/ped traffic to Palo High School, Stanford University, Duveneck, Town and Country and many other community bike destinations. This block is one block away from the recent study and policy decision made about Embarcadero between Emerson and El Camino to improve bike safety and overall design, and of course adjacent to the important bike boulevard. Please improve bike safety and access, not worsen it! I was glad to see the proposal to eventually have a "bike station" on Bryant.

4. I support the deep concerns of Nelson Ng and Kimberley Wong who live on Emerson and have a commercial garage exit aimed at their house! It's shocking that any applicant would even propose this configuration. This alone is simply unacceptable. Besides the issues of noise and glare, they are concerned about the negative fengshui which I know is not usually included in environmental analysis.

5. Finally, I am concerned about the proposed encroachment into the residential neighborhood and its long term, cumulative impact by tearing down good houses on R-1 zoning and converting them to commercial use. Castilleja is a high quality school (our daughters went there for middle school) but it is up to the city to allocate zoning between residential and commercial uses. Especially when we have such a housing crisis, any conversion from houses to commercial use should be taken seriously.

All for now - thank you for your consideration,

Yoriko Kishimoto
251 Embarcadero Rd
Palo Alto, CA 94301

French, Amy

From: Nelson Ng <lofujai@ymail.com>
Sent: Monday, February 06, 2017 9:04 AM
To: French, Amy
Cc: Kimberley Wong
Subject: Re: Email missing from PTC public hearing document

Amy,
Great. Thanks for the quick reply.

Nelson

Please excuse my iPhone for any typos

On Feb 6, 2017, at 8:58 AM, French, Amy <Amy.French@CityofPaloAlto.org> wrote:

I have asked the PTC support staff to forward this email to the PTC members and put at places as well.

From: Nelson Ng [<mailto:lofujai@ymail.com>]
Sent: Monday, February 06, 2017 5:54 AM
To: French, Amy
Cc: Kimberley Wong
Subject: Email missing from PTC public hearing document

Amy,
I am unable to find the following email to be included in the following documents for the PTC public hearing. Can you please check and include it if it is not in there already?

<http://www.cityofpaloalto.org/civicax/filebank/documents/55782>

Thanks

Nelson

From: Nelson Ng <lofujai@ymail.com>
To: "amy.french@cityofpaloalto.org" <amy.french@cityofpaloalto.org>
Cc: Kimberley Wong <sheepgirl1@yahoo.com>
Sent: Monday, July 25, 2016 6:43 AM
Subject: Castilleja CUP Application

Ms Amy French,

My family and I have been living at 1260 Emerson Street for the past 20 years. We have tried our best to co-exist with Castilleja in our Single Family neighborhood. During that time, we endured the traffic from the daily school sessions, weeknight and weekend events and the disruption from construction noise, dirt and traffic from the multiyear project to rebuild their gym. Although I am supportive of Castilleja's mission to grow the next generation of female leaders, there is a

limit. Castilleja's latest CUP submission has pushed beyond that limit. Despite a lot of neighborhood feedback of the ongoing negative traffic impact and our outrage of their 15+ years violation of the Year 2000 CUP for 415 student limit, Castilleja submitted a new CUP application with the following:

1. A 30%+ jump in enrollment from Year 200 CUP of 415 students to 540 students. *(The "Note of Proposed Development Project" indicates from 438 students. It should be corrected to 415, the approved number from the current active CUP from the Year 2000)*
2. A 5+ year project to basically rebuilding the entire campus with an expansion of 18,000 square feet of land by demolishing two adjacent single family homes

Although in the CUP application Castilleja repeatedly try to paint a picture that the plan was a result of working with the neighbors, I was only able to learn from the City of Palo Alto website containing information of the CUP application that my home will have major direct negative impact from the proposal. I am very surprised that I was never consulted nor informed by Castilleja prior to filing the CUP application that the plan to demolish 1263 Emerson would result in an exit of the proposed underground garage that will take all the outflow traffic from the garage directly toward my front door and living room. This will have direct and significant negative impact to my family's quality of life and the property value of our home.

Palo Alto traffic is already reaching gridlock level during commute hours. Castilleja has done nothing to reduce traffic impact by requiring any significant percentage of their 75% non Palo Alto student body to be shuttled in. Instead they are asking for increased enrollment and to build a new parking lot to support the extra students commuting from outside of Palo Alto.

In order to protect the quality of life for our neighborhood and the City of Palo Alto as a whole, I respectfully request the Palo Alto City Planning Department to do the following

1. Reject the latest CUP application filed by Castilleja and immediately enforce the existing CUP that was approved by the City on November 2000 to require Castilleja to rollback to 415 students.
2. Require Castilleja to perform a traffic study that accurately reflects the true impact of 415 students to the Single Family Neighborhood in Old Palo Alto. The study should be done by a reputable 3rd Party Traffic study company with the study managed by Palo Alto City Planning Department. The study should include but not be limited to the following:
 - 24x7 traffic study that covers different periods (rainy vs dry seasons) of the year to show the additional traffic for same period with and without Castilleja in session for:
 - Regular school session
 - Summer school session
 - Weekday evening events
 - Weekend events
 - The study should cover not just the immediate 1 block radius but at least 3-4 block radius of the Castilleja campus that can show the true impact of the school traffic

Present the findings from the above study to the neighbors to seek the agreement from the neighbors for an acceptable impact of the school to the neighborhood as baseline and develop plans to reach that goal. If the goal cannot be met, further enrollment reduction might be necessary.

3. Find an alternative site for parking and busing students into the campus or finding an alternate campus to house part of the student body. (for eg, considering the Foothill college is vacating the Cubberley campus and it would be a great opportunity to explore)

Until the above actions are taken with satisfactory result from the neighborhood, the city should not consider any enrollment increase from Castilleja.

Given the severity of the possible impact to my quality of life and my property, I would also like to request a face to face meeting with you to discuss this. Please let me know if you are available to meet this Tuesday, Wednesday or Friday.

Regards

Nelson Ng



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Edmund G. Brown Jr.
Governor

February 28, 2017

Ms. Amy French
Chief Planning Official
City of Palo Alto
250 Hamilton Avenue, 5th Floor
Palo Alto, California 94301

REVIEW OF NOTICE OF PREPARATION OF DRAFT ENVIRONMENTAL IMPACT
REPORT FOR THE CASTILLEJA SCHOOL CONDITIONAL, 1310 BRIANT STREET
AND 1235 AND 1263 EMERSON STREETS, PALO ALTO, SANTA CLARA COUNTY
(SCH #2017012052)

Dear Ms. French:

The Northern California Schools Unit of the Department of Toxic Substances Control (DTSC) has reviewed the Notice of Preparation (NOP) for the Castilleja School Conditional Use Permit Amendment and Master Plan draft Environmental Impact Report (EIR) proposed by the City of Palo Alto (City). The due date to submit comments was February 24, 2017.

As reported in the NOP, the Castilleja School Foundation (CSF) is requesting an amendment Permit from the City for their existing Conditional Use Permit, a Parcel Map to consolidate the three parcels on which the Castilleja School campus is located into a single parcel, Architectural Review, and approval of a master plan. Construction of proposed physical improvements would occur in three phases. These include demolishing two residential structures, constructing a below-grade parking structure, relocating the existing pool, completing a bikeway station, relocating service deliveries to the parking structure, and demolishing four classroom buildings and replacing them with a single building.

Based on a review of the NOP, DTSC would like to provide the following comments:

1. If the CSF plans to use State funds for the Project, then the CSF shall comply with the requirements of California Education Code, sections 17210, 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268. If the CSF is not using State funds for the project, or is otherwise specifically exempted under

section 17268, DTSC recommends that CSF continue to investigate and clean up the site under County oversight and in concurrence with all applicable DTSC guidance documents.

A local education agency may also voluntarily request California Department of Education (CDE) site/plan approval for locally funded site acquisitions and new construction projects. In these cases CDE will require DTSC review and approval prior to its final approval, except when exempt under section 17268.

2. Because the Project is school site related, DTSC recommends that an environmental review, such as a Phase I Environmental Site Assessment and/or Preliminary Endangerment Assessment, be conducted to determine whether there has been or may have been a release or threatened release of a hazardous material, or whether a naturally occurring hazardous material is present based on reasonably available information about the property and the area in its vicinity. Such an environmental review should generally be conducted as part of the California Environmental Quality Act (CEQA) process. Also, such an environmental review is recommended for compliance with the requirements of California Education Code, section 17268(a) or 17213(a). If the CSF elects to proceed to conduct an environmental assessment for the site under DTSC oversight, it should enter into a Voluntary Cleanup Agreement with DTSC to oversee the preparation of the environmental assessment.
3. The presence of existing, older or former structures may result in potential environmental concerns due to lead from lead-based paint and/or organochlorine pesticides from termiticide applications and polychlorinated biphenyls (PCBs) from electrical transformers, light ballast or window caulking or glazing. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006"*, and in accordance with the recommendations provided in the United States Environmental Protection Agency's website *"PCBs in Caulk in Older Buildings"* (<http://www.epa.gov/pcbsincaulk/index.htm>).
4. If the site was previously used for agricultural purposes, pesticides (such as DDT, DDE, and toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the *"Interim Guidance for Sampling Agricultural Soils"*

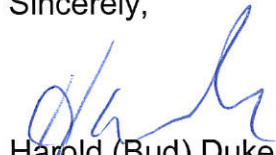
(Third Revision)", dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.

5. The Site appears to be located within 10-miles of a geological unit potentially containing naturally occurring asbestos (NOA). Pursuant to DTSC's *"Interim Guidance – Naturally Occurring Asbestos at School Sites"*, revised September 24, 2004, further action should be considered and conducted to determine whether a naturally occurring hazardous material (i.e., NOA) is present, based on reasonably available information about the Site and the areas in its vicinity.
6. If a response action is required based on the results of the above investigations, and/or other information, the EIR will require an analysis of the potential public health and environmental impacts associated with any proposed response action, pursuant to requirements of the CEQA (Pub. Resources Code, Division 13, section 21000 et seq.), and its implementing Guidelines (California Code of Regulations, Title 14, section 15000 et seq.), prior to approval or adoption of an EIR for the project. A discussion of the mitigation and/or removal actions, if necessary, and associated cumulative impacts to the project properties and the surrounding environment, should be included in the EIR. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to the project properties and the surrounding environment, are not available for inclusion in the EIR, then an Addendum or Supplement to the EIR may be required.

DTSC is also administering the Revolving Loan Fund (RLF) Program which provides revolving loans to investigate and clean up hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

For additional information on DTSC's Schools process or RLF Program, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (916) 255-3695, or via email at bud.duke@dtsc.ca.gov.

Sincerely,



Harold (Bud) Duke
Senior Engineering Geologist
Northern California Schools Unit
Brownfields and Environmental Restoration Program

cc: (see next page)

Ms. Amy French
February 28, 2017
Page 4

cc: (via email)

State Clearinghouse (State.clearinghouse@opr.ca.gov)
Office of Planning and Research

Lesley Taylor (LTaylor@cde.ca.gov)
Department of Education – Sacramento, CA

John Gordon (JGordon@cde.ca.gov)
Department of Education – Sacramento, CA

Jackie Buttle (Jackie.Buttle@dtsc.ca.gov)
DTSC CEQA Tracking Center – Sacramento, CA

Jose Salcedo (Jose.Salcedo@dtsc.ca.gov)
DTSC Schools Unit – Sacramento, CA