



# CASTILLEJA SCHOOL

Planning and  
Transportation  
Commission

OCTOBER 28, 2020 PTC

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



## RECENT HEARING OUTCOMES

- **PTC 9/9:** 4-1-2 vote recommended EIR sufficiency and continued hearing to enable preparation of CUP and Variance findings and conditions
- **HRB 9/24:** HRB received applicant presentation, supported EIR revisions and historic preservation finding, and formed a subcommittee to review final details
- **ARB 10/1:** ARB noted the changes helped and asked for more changes before the next hearing – scheduled November 5<sup>th</sup>

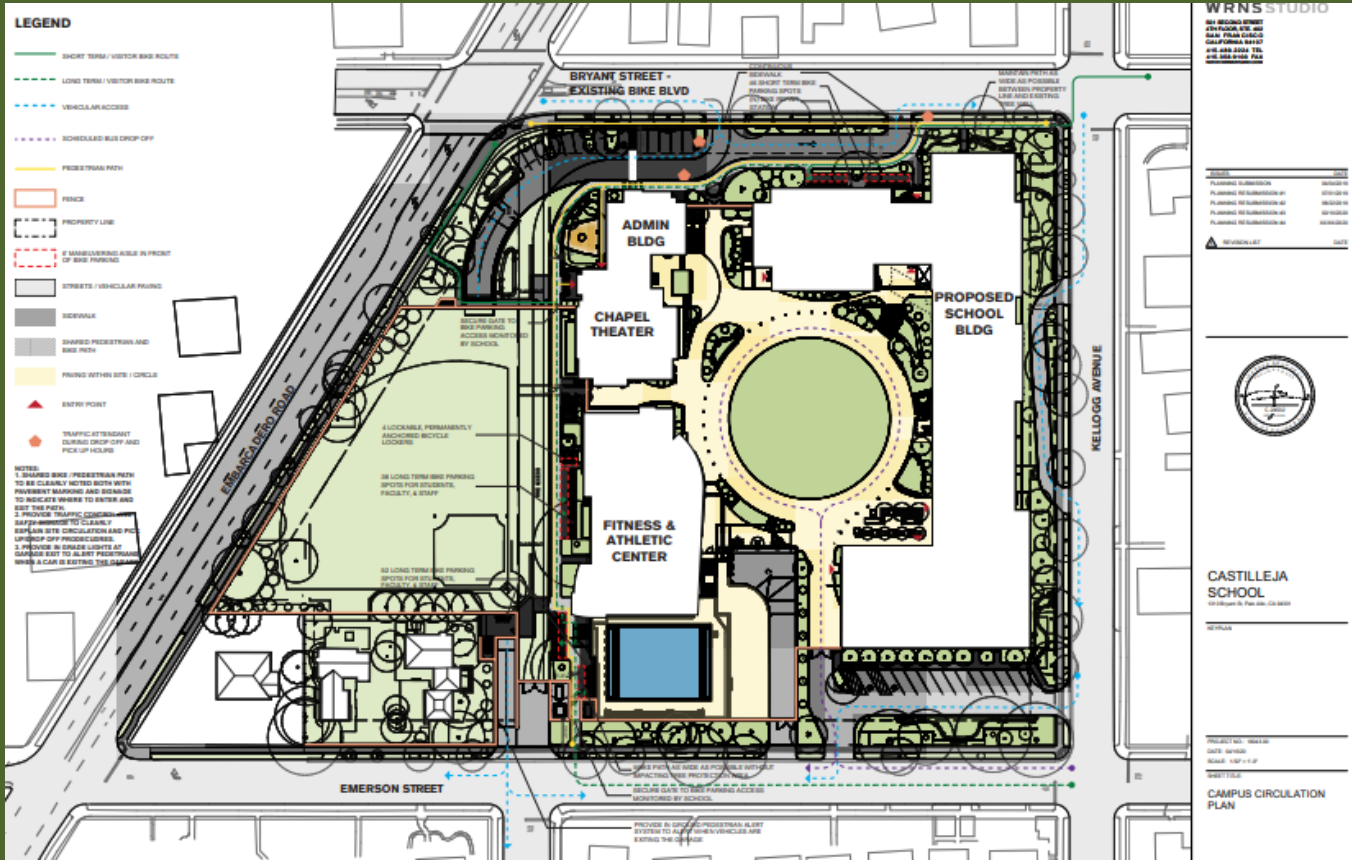


## TODAY'S PTC HEARING

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1. Staff presentation
  - Conformed Plans (changes after 9/9 PTC, 10/1 ARB)
  - CUP Findings (based on meeting conditions)
  - Variance Findings (replacement GFA lower: 81,942 sf)
  - Conditions (response to PTC direction 9/9)
2. Applicant presentation
3. PTC clarifying questions
4. Public Testimony
5. PTC direction on Findings/COAs for Variance and CUP
  - Approval/Modifications/Continue to later date hearing, or
  - Alternative, Denial

# EIR PROJECT ALTERNATIVE #4 MOVING FORWARD



**6.17 acre campus parcel = 268,765 sf**



# ACADEMIC BUILDING REDESIGN: ARB PROCESS



KELLOGG AVE PERSPECTIVE VIEW - WITHOUT TREES



KELLOGG AVE PERSPECTIVE VIEW - WITH TREES

October 28, 2020

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# KELLOGG AVENUE: BEFORE-AFTER IMAGES

Existing



Proposed



# STUDENT DROP-OFF DRIVEWAY ENTRANCES

**KELLOGG AVENUE DROP OFF**



KELLOGG ENTRANCE VIEW

**BRYANT STREET DROP OFF**



BRYANT STREET ENTRANCE VIEW



# BRYANT STREET IMAGES: TREES OFF/ON



BRYANT STREET PERSPECTIVE VIEW - WITHOUT TREES



BRYANT STREET PERSPECTIVE VIEW - WITH TREES



# EMERSON STREET IMAGES: TREES OFF/ON



EMERSON STREET PERSPECTIVE VIEW - WITHOUT TREES



EMERSON STREET PERSPECTIVE VIEW - WITH TREES

## OTHER BEFORE-AFTER IMAGES

Existing  
View Bryant/  
Kellogg



Proposed

Existing  
View Emerson



# **PTC: VARIANCE AND CUP FINDINGS**

packet pages 25-29

## **Special Circumstances for GFA replacement Variance**

- Private school space needs
- Campus size (268,765 sf); in R-1 10k 8k-12k is the norm
- Maximum FAR disproportionately constrains campus - extreme disparity (FAR formula)

Strict application of FAR would deprive the School of privileges enjoyed by others and deprive the School of its longstanding historic and permitted use of its property

# VARIANCE FINDINGS

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## Variance Findings 2 and 3:

- Plans comply with height, setbacks, coverage, open space, parking requirements
- Site coverage is proposed at 27% where 35% coverage is allowed by code
- Proposed FAR is 0.42:1 where existing FAR is 0.43:1
- Comprehensive Plan Policies are noted in EIR table 4-1

## Variance Finding 4:

### Replacement floor area:

- Seismically safe, visually compatible building
- Increased open space and sustainability measures
- Slightly reduces above-grade floor area (2k+ sf) and modernizes facilities
- Bus drop-off and pick-ups on site, loading, delivery, trash functions move below grade
- Mature trees preserved/replaced to retain/enhance canopy; replacement prioritized
- Creates compatible site landscaping and fencing to fit into the neighborhood



# CUP FINDINGS

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## CUP Finding #1

- Private school located here since 1910 (50 years before R1 CUP requirement for schools)
- Campus modifications/operations subject to CUPs issued 1960s and beyond
- 8+ years TDM monitoring demonstrated reduced AM peak trips - 28% of the trips
- Enforcement in 2013, 2017 led to gradual enrollment reduction, decreased impacts
- No change in campus parcel size, no increase in nonconformity/maximum lot size
- Replacement building meets 30' R-1 Zone height limit (existing building is 34'8" tall)
- Demolishes non-historic buildings and proposes more compatible buildings than existing
- Expands usable (habitable) basement, slightly reduces (by 2k+) existing GFA

# CUP FINDINGS

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## Parking

- reduces at-grade parking on-street and off-street, addresses 'spill-over' parking
- existing campus does not meet private school parking requirement; proposed: 104 non-tandem spaces - two 13-space lots, 78 non-residential underground garage spaces
- adds convenient bicycle parking spaces – spaces increase from 102 to 140

## Landscaping/sustainability

- adds pedestrian scale fencing, gates, paths of ingress and egress, site improvements
- sustainability: rooftop photovoltaics, energy efficiency, water-use efficiency, EV charging stations, LEED building to meet current building and seismic codes

## Traffic

- does not increase peak hour trips (Enhanced TDM program + mitigation measures)
- adds only 114 net new daily trips (after implementation of Mitigation Measure 7a)
- traffic to be conducted in an orderly and safe manner; consequences for noncompliance

# CUP FINDINGS

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## COAs and MMRP are designed to:

- Preserve nearby resources with preservation/protection plan
- Limit tree removals/relocations, survival measures for replaced and relocated trees
- Monitor, enforce TDM to ensure less than significant impacts to traffic, vehicle circulation, queuing due to student drop offs, school activities and events
- Mitigate construction and pool noise, limits school hours and the number, frequency, and type of events, and enforce ongoing performance standards and the TDM program
- Designate point of contact for all complaints, providing events and construction information, traffic data and reports on the School website, funds for a 3rd party consultant to help City evaluate, monitor, and enforce compliance;
- Require School to troubleshoot issues, handle complaints in a timely manner, coordinate

# CUP FINDINGS

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CUP Finding #2: The proposed use will be located and conducted in a manner in accord with the Palo Alto Comprehensive Plan and the purposes of the Zoning Ordinance:

- Private School Use - existing, Conditionally Permitted use in R-1 Zone
- Comprehensive Plan policy conformance
- EIR Mitigation Measures improve existing TDM measures with performance monitoring and enforcement and impose clear special event restrictions
- Conditions of approval related to the CUP provide additional clarity for operations



# CONSIDERATION OF CONDITIONS

The draft conditions of CUP approval address topic areas:

1. Enrollment
  2. Special Events
  3. Operations and Community Engagement
  4. Monitoring and Enforcement
  5. Temporary Campus
  6. TDM program
  7. Construction
  8. Pool Noise
- Draft conditions are a framework to help facilitate the Commission's deliberation
  - MMRP/COA work in tandem, carry the same weight and enforcement
  - Staff requests specific PTC direction/feedback

# 1. ENROLLMENT

## Features:

- **540 student cap**, phased enrollment increases tied to construction milestones
- **Initially maintain enrollment at existing 426 students level** at CUP amendment
- **After underground garage**, up to 490 students via annual 25-27 student increases
- **After academic building**, up to 540 students via annual 25-27 student increases

## Some community members seek to have City:

- **Continue to reduce enrollment to 415 students**
- **Not allow enrollment increases until after construction completes**

# ENROLLMENT

## Enrollment Conditions are 4, 5, 16 and 29:

- **Conditions require ongoing compliance** with the conditions of approval and mitigation measures
- **Includes process to suspend enrollment increases** if documented violations not cured
- **PTC may direct changes** after considering applicant's request/comments, providing guidance on:
  - enrollment ceiling and timing
  - whether phased increases should be allowed
  - when enrollment increases would begin

## Consider TDM program:

- Increasing enrollment results in more trips, need for more parking
- At current 426 student level the School meets the AM Peak target
- School requests no increases until garage completes
- New TDM program imposes greater criteria to help reduce net new vehicle trips

## 2. SPECIAL EVENTS

- **School proposes 90 special events annually:**
  - Five major events include enrolled students, parents/guardians; some may exceed 500 guests
  - 50 other events range in size from 100 to 500 guests (31 events have up to 200 guests, 11 events have up to 300 guests, 6 events have up to 400 guests)
  - Remaining events are less than 100, but more than 50 guests (35 events have up to 100 guests)
- **Area residents are concerned** about the size and frequency of events
- **School took measures** to minimize impacts, but still an area of contention
- **City and School disagree** as to how many events current CUP allows (letter)
  - School assertion: CUP allows an unlimited number of events with more than 100 attendees, not including defined major events
  - City staff's perspective: CUP intended to limit size/number of events at the school
- **EIR considered impact of events** on neighborhood; mitigation measure #4a requires a parking plan depending on when the event occurs and its size
- **CUP must clearly establish regulations** for events that allow the school to achieve its academic interests while minimizing impacts to area residents



## SPECIAL EVENTS CONDITION #6

### Condition #6:

- imposes time of day restrictions with half of the events ending prior to 6pm and many more ending by 8pm
- notes the major events, student performances and school dances are the only events that may extend to 10pm
- requires fewer events take place on Saturdays than in the past and no Sunday events
- requires half of the events (35) to have fewer than 100 guests
- includes athletic competitions (4) in the event total
- restricts the number of events to 70 - a 20%+ reduction
- Events less than 50 guests are not regulated

Note: All special events will be subject to School's updated TDM plan, including provisions for shuttle service, to further mitigate potential impacts

Note 2: 74 events per academic year is more in line with School programming needs so further reductions will begin to impact the school's academic and social interests

PTC may consider allowing 74 special events per academic year, or some other allowance

## **SPECIAL EVENTS – PTC CONSIDERATIONS**

- For many years, School relied upon a certain number of events on campus
- Prior to filing CUP application, School held more than 100+ events a year
- Events number reduced over the years
- Drastic changes to number and frequency would disrupt School's interests
- 90 events over roughly 185 school year days is considerable
- Some area residents seek ten special events per academic year
- Garage and site circulation improvements will help mitigate impacts but not reduce the number of neighborhood trips

### 3. OPERATIONS AND COMMUNITY ENGAGEMENT

- Included in the draft conditions are several restrictions that pertain to the overall operation of a school in a residential neighborhood
- Some of these conditions address noise, lighting and hours of operation, summer school activity and use of the fields
- Some conditions are carry-overs from prior approvals
- Several conditions set expectations for how the school will engage its neighbors and respond to complaints. The conditions require:
  - posting monitoring reports and other information
  - establishing a dedicated contact phone number
  - continuing a prior condition for regular community meetings

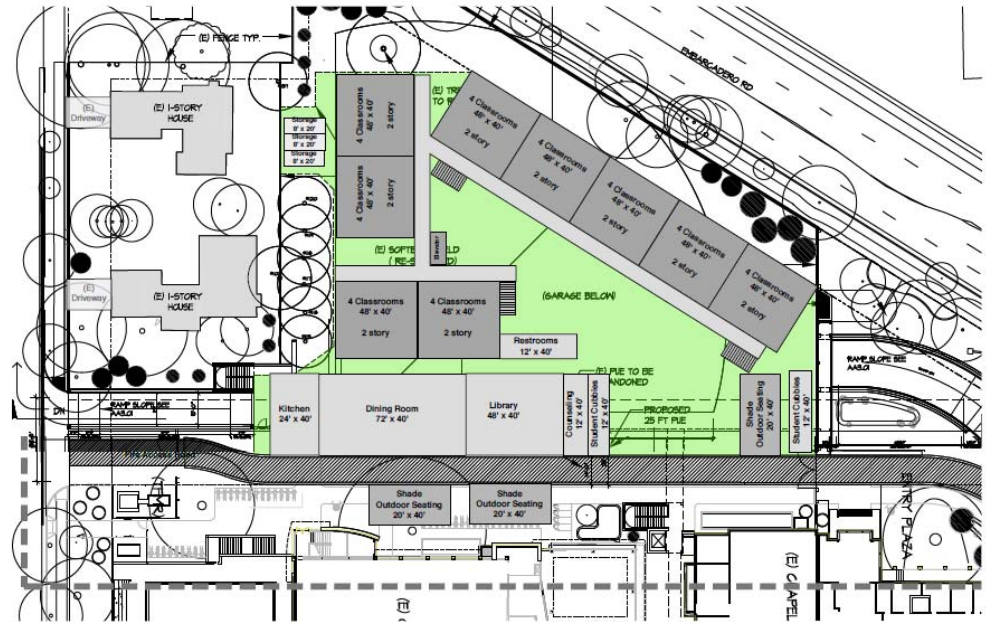
## 4. MONITORING AND ENFORCEMENT

- Ongoing monitoring, reporting and enforcement - requested by community members (skeptical and frustrated with over-enrollment, City enforcement)
- Several conditions address these concerns:
  - Draft conditions of approval #31 and #33 are to recover staff time required to enforce and monitor the CUP; this covers the review of the School's performance related to traffic mitigation measure 7a, and events mitigation measure 4a
  - Oversight will include:
    - School communications to the neighborhood regarding events
    - Ensuring enrollment increases do not exceed stated annual increments or overall maximum
    - Monitoring traffic standards, and enforcement of consequences if the School fails to comply
    - Failure to meet ADT and AM peak performance standards require more efficient or additional trip reduction measures
    - Student enrollment reductions begin after 3 consecutive reporting periods of missed targets



## 5. TEMPORARY CAMPUS

- Draft Condition #11 addresses removal of temporary campus - School is unable to increase enrollment (past 490) until the temporary campus is removed
- PTC can suggest wording changes or additional conditions related to the dismantling and uses of the temporary campus - it is one of the requested components of the CUP application



Temporary Campus Layout Relates to Alternative #4

## 6. TDM - SUMMARY

- At 415 student cap, the School was restricted to an AM peak count of 511 trips; due to its current, aggressive TDM program, the School has reduced AM peak trips to below 400 trips even with the unauthorized increase in student enrollment
- **Enhanced TDM Program builds on current TDM program and required EIR MMs:**
  - Performance metrics - fewer trips per day, fewer AM peak trips
  - Requires targets for average daily trip (ADT) and average AM peak hour to be calculated from typical, non-special event, school days
- **School must install permanent vehicle counter devices** at entrance and exit driveways, track daily trip totals and monitor peak trips
- For one week each (initially three) reporting period, the City will monitor traffic on the streets adjacent to the school that have driveways (Bryant, Kellogg, Emerson)
- School will need to achieve better performance from its existing TDM measures or employ additional trip reduction measures as it increases enrollment over time
- Combined TDM plan with its performance metrics, draft conditions, and EIR mitigation measures should minimize impacts associated with increased student enrollment
- Conditions of approval require students, faculty and staff to use campus pickup/drop off locations and parking lots; some will park on street immediately adjacent to school and some may do neither

# TDM – COMPLIANCE AND REPORTING

- TDM plan's composition per draft COAs is among the most comprehensive programs the City has previously considered
- Program includes rigorous reporting schedule and requirements, meaningful penalties for non-compliance, and conditions that require funding to support ongoing enforcement and compliance reviews
- Data collection/monitoring reports will be posted online and available to the public

## REPORTING SCHEDULE

<u>Item</u>	<u>Frequency</u>	<u>Until</u>
Driveway Counter Data	Monthly	In perpetuity
TDM Reports	3 times/year	2 years max. enrollment & all targets met
TDM Reports	2 times/year	In perpetuity

## TDM - MONITORING REPORTS

- Will use multiple metrics to understand School transportation trends
- For ADT and AM peak hour metrics, two calculation methods required:
  - Sample weekly average metric based on 3 highest typical days in one week
  - Average all typical weekdays in four (4) or six (6) month reporting period
  - *If data shows trips exceeds either metric, violation of targets deemed to have occurred*
- Each period may reveal up to four potential violations when assessing compliance
- Traffic engineering practice approach: potential to dilute non-excluded data sets
  - Days with a high ADT may not trigger violation if averaged over long reporting period with several other data sets
  - Community may consider financial penalty in City fee schedule insufficient as a deterrent
- COAs provide for fees and other mechanisms as a sufficient deterrent for violating the conditional use permit, including suspension of enrollment and modification of the conditional use permit, among other options

# TDM PROGRAM – ALTERNATIVES

- Full enrollment @ a 1,296 daily trip target reflects 2.4 trips per student - this is lower than existing EIR-reported rate of 2.74 trips per student
- PTC may consider two alternatives for ADT performance metrics:
  - (1) Impose more aggressive metric: Starting ADT of 1,137 (prorated target for 415 students, reflecting previously allowed enrollment cap). This lower ADT:
    - reflects possible baseline conditions at the previously allowed enrollment limit
    - requires more aggressive trip reduction strategies to mitigate additional trips generated by exceeding the cap
    - is based on insufficient empirical data to conclude lower ADT target is achievable
  - (2) Impose less aggressive metric for initial reporting years: ADT at 1,296:
    - to provide overall ceiling to measure against year over year as enrollment increases
    - would not likely require greater trip reduction strategies until maximum enrollment
- PTC may consider ADT and AM peak numbers over shorter period (eg every two weeks/month)
  - Data collection at same interval, two or three times a year
  - This approach may result in greater accountability for high ADT or AM peak counts, if they occur, that might otherwise have been averaged out in a larger data set

## 7. CONSTRUCTION

- During construction (three years), City proposes a ‘stay’ of enforcement of the ADT and AM peak trip performance metrics (accurately monitoring trips associated with academic functions challenging)
- City would continue to collect data; this information will be included in the monitoring reports
- At 3 years after BP issuance, School would be subject to the ADT and AM peak trip thresholds
- AR conditions: Construction logistics, demolition, Public Works, Utilities, Public Art, Urban Forestry
- MMRP contains many construction-related mitigation measures, with timing and performance evaluation criteria for these measures
  - MM 8b and 9a address construction noise and emissions
  - MM 12a requires compliance with/implementation of geotech recommendations
  - MM HAZ-1 addresses demolition of hazardous materials
  - MM BIO-1 and 2 address construction with respect to bird nesting and bat roosts
  - MM 4b addresses tree protection related to demolition and construction
  - MM6a and MM6b address historic resource protection during construction and crew training on cultural resources at each construction phase



## 8. POOL NOISE

- Mitigation measures 8a and 8b address noise, and the MMRP includes notes on timing and compliance
- Condition of approval #12 addresses noise, including:
  - emergencies related
  - a requirement School obtain a noise exception permit for amplified sound equipment use

## NEXT HEARINGS

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- **10/28: PTC Hearing to discuss findings and conditions**
- **11/5: ARB Hearing, review revisions, findings, conditions**
- **11/18: Next PTC date for additional discussion as needed**



CITY OF  
**PALO  
ALTO**

**AMY FRENCH**

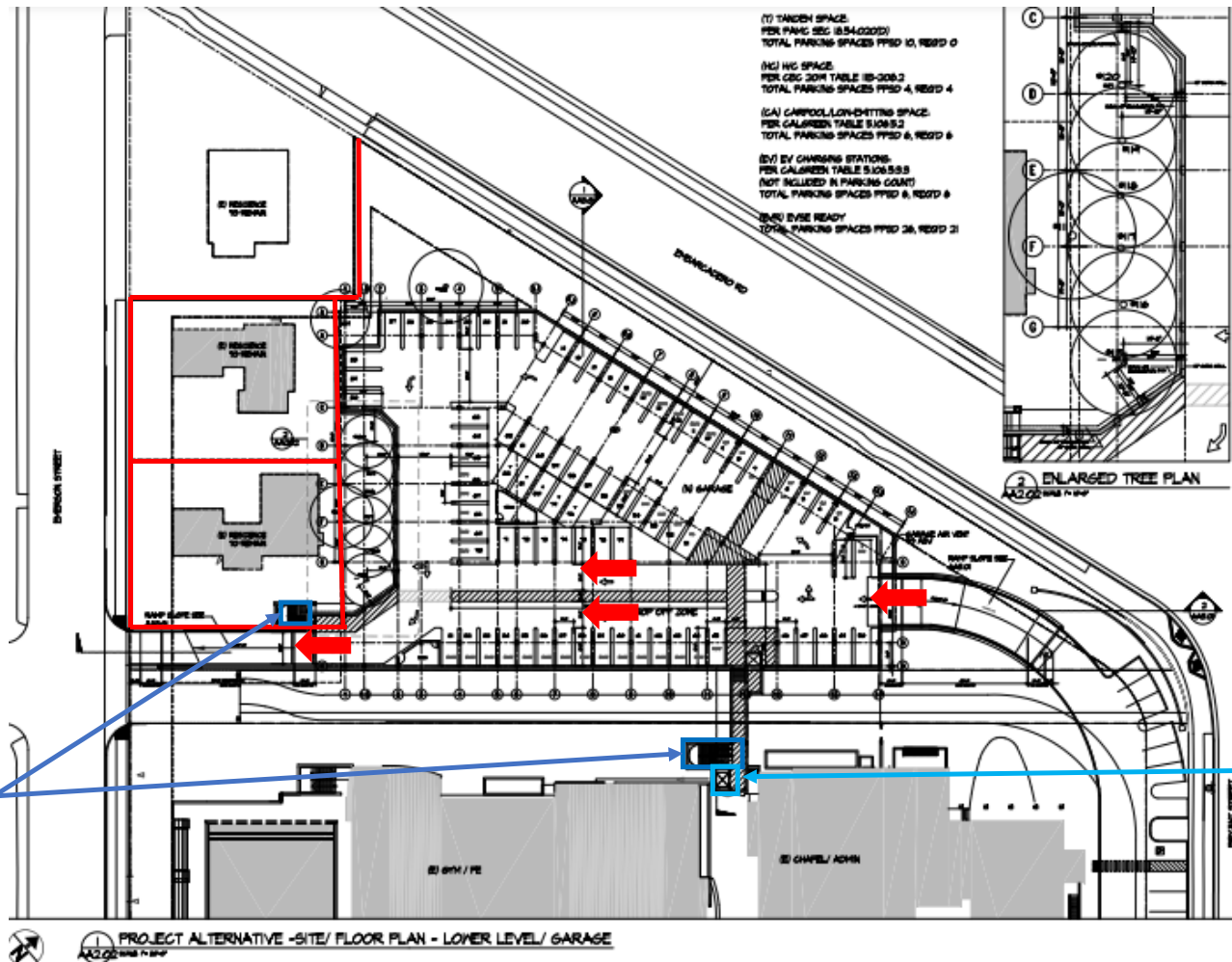
*Chief Planning Official*

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# NON-RESIDENTIAL BELOW-GRADE GARAGE

No change to existing SFR parcel lines

Two staircases to access the Garage:  
@Lockey parcel  
@gym/tunnel



## One-way circulation

Note: 1998 code added prohibition of basement garages for R1 homes due to safety concern regarding ramps vs pedestrians  
**18.12.060 item (d)**

Elevator to campus from tunnel