11-Sep-19

Housing Incentive Program - zoning changes & waivers

Basic quwstion: Is this a good area for new high density housing?
Expect changes in requirements for this project will be applied to adjacent properties,
instead of 102 units, expect ~250 units after scaling for length along San Antonio Rd
Elementary School? Greendell ~3/8 miles with need to cross two busy streets, Route likely thru Greenhouse or by car
Middle School? JLS ~7/8 miles with need to cross two busy streets, Route likely thru Greenhouse or by car
Shopping? Specialty & Piazza within 1/4 to 1/2 mil but grocery & drug stores > 1 mi; likely travel by car
Dining? Limited choices within 1 mile mostly in MV
Parks & Recreation: 1/2 to 3/4 miles need to cross two busy streets
Bike travel on San Antonio seems hazardous
Transportation: limited bus service MV oriented
Result: Expect more traffic on San Antonio, Leghorn, Middlefield and Charlestown
Instead of denial, there should be a high priority mitigation plan
A piecemeal project-by-project approach is more likey to produce unsatisfactory than optimim results
Additional retail sales likely to be in MV given easier access
Housing/jobs imbalance; Jobs likely to be in MV given easier commute

General

Let's try to have a successful project. One where the residents have a good experience.
A good design is essential.
Roof top gardens could be very attractive, consider playground items, fountains, sun bathing, BBQ grill sites, etc
Recommend a eastery roof top view for sunrises, Mt Hamilton and July 4th fireworks. Westery for sunsets
Triple glazing for San Antonio Rd facing units
Sales or rentals?
AirBNB protective measures if sales
On-site staff? 24-7?
Staff office area & parking
All electric vs natural gas?
Space/clearance for UPS & Prime delivery
Space/clearance for moving vans (2/wk for 1 yr average occupancy & 102 units)
Sufficient space for trask & recycling; we have 140 units with 10/11 dumpsters for recycling
How are below market rate units distributed?
How are parking spaces allocated?
How many parking spaces allocated for handicapped?

From:	Cervantes, Yolanda
To:	Cervantes, Yolanda
Cc:	Planning Commission
Subject:	FW: 788 San Antonio PTC public comment
Date:	Wednesday, September 11, 2019 1:35:53 PM
Attachments:	Very clear that San Antonio is only Four Lanes..msg Auto making U-turn on San Antonio at Leghorn.msg Auto blocking intersection at Leghorn .msg Sheldon can this be shown tonight.msg

Forwarding

Yolanda M. Cervantes
Planning & Development Services
City of Palo Alto
Yolanda.cervantes@cityofpaloalto.org
650.329.2404

From: Sheldon Ah Sing <SAhsing@m-group.us>
Sent: Wednesday, September 11, 2019 1:32 PM
To: Cervantes, Yolanda <Yolanda.Cervantes@CityofPaloAlto.org>
Subject: 788 San Antonio PTC public comment

Hi Yolanda,

The attachments are from the public for tonight's meeting.


BIKE ROUTE
BEGIN
SPEED LIMIT 35
35
35
Hertz


SHARE
THE
ROAD
8FAZ154


Leghorn
CHANGERS


Leghorn

From: Hank Sousa
To: Planning Commission; Castilleja Expansion
Subject: Casti Camp
Date: Tuesday, September 10, 2019 10:43:10 AM

Hello Commissioners and city planning officials:

As I look through the current CUP there is only one mention of Castilleja's summer camp operation and that is about picking up campers. It is in the section under Conditions of Approval (#32). For eight Monday mornings during the summer a number of cars enter the ball field from Emerson, with the aid of traffic monitors, and drop off children. The parent drivers then park and enter the school for a period of time before departing. We neighbors wonder if the employee counts provided by the school take into account the summer workers. The DEIR states that full time, year-round employees number 109, while other publicly available sources quote the number as 139 or 284. This disparity leads us to a request that the whole summer camp operation be studied.

This additional traffic and activity needs to be taken into consideration as a neighborhood concern. Has this operation has ever been permitted by the city? It generates noise and traffic and it would be nice if we neighbors could have some summer quiet. What about eliminating the summer camp or restricting it to one session that is four weeks in duration? Then, close the gates for a month or so until the school begins to ramp up for school again. I don't think the traffic has been studied for the camp. The summer camps should be studied with respect to impacts to neighbors.

Thank You,
Hank Sousa
[redacted] Melville Ave.

From: Quigley, David
To: Planning Commission; Castilleja Expansion
Subject: Castilleja Expansion Plan
Date: Monday, September 9, 2019 5:18:54 PM

Commissioners & City Planning Officials:

As I review the DEIR, and the plans submitted to the city by Castilleja, I feel compelled to write you regarding several areas of impact to my home and the neighborhood. First of all, the noise levels that will be coming from the pool during swim and water polo events should be studied more thoroughly. Has the proposed below grade pool, with a sound wall, been studied by the architects? Please request that the final iteration of the DEIR study the proposed below grade pool plan (with sound amplification during events). What about the installation of a retractable pool cover? I've seen them in use at hotels, and I request that this option be studied as well.

The events held on the Circle appear to be overly loud to the group of neighbors facing the school on Emerson. Is it possible to limit these events? The 90 events the school is asking for should be dialed way back - ten or twenty during the school year should suffice.

My wife and I and our three daughters live across the street from the planned delivery ramp. Will full size motor coaches and large semi-truck delivery vans be permitted to drive up and down this ramp? Currently when large buses or delivery trucks drive to campus, a monitor comes out and blocks a portion of Emerson Street with cones. Have other alternatives been studied? What about using bob-tail (smaller) trucks that have had goods loaded into them at an off-site location? What about using smaller shuttles to pick up the girls and take them to a site more acceptable to be loaded onto large buses? It really does feel like a business park or industrial area when these large vehicles are around and, of course, it is really just a single family neighborhood. Please consider studying these alternatives as the neighbors are negatively impacted by these activities, which will only get worse with expansion.

Thank you for your consideration.

David Quigley
[redacted] Emerson Street
Palo Alto, CA 94301

From: Karen Ambrose Hickey
To: Planning Commission
Subject: Castilleja Plans
Date: Monday, September 2, 2019 4:55:23 PM

Commission Members,

I would like to provide input regarding the Castilleja School Project. I had a briefing from a friend who attended as I was dripping my graduated Paly student off at college.

The points I would like to make:
1) Impact on the Neighborhood and Environment
2) Other schools and business that addressed capacity demands within Palo Alto
3) Recommendation

Impact on the Neighborhood.
First and foremost, we all must remember that Castilleja was a boarding school so there was limited enrollment and obviously minimal traffic. Between 1994 and 1996, they phased out of being a boarding school and became a commuter school; this was due to declining enrollment. So, the intent of the school being within a very residential neighborhood was a very sound idea until 1996 when it became a commuter school. At that point, the need for student drop-off and pick-up began on a regular basis. With the creeping (and unlawful) growth of enrollment, the school has maximized it's space.

The proposal to create an underground parking facility, while taking out 75 trees, is clearly in the wrong direction for a world that is facing severe climate change. In addition to the impact on our air quality, the plan also severely impacts the safety of the Bryant Street bike route. As you are very aware, many students use this route as well as individuals like my husband who uses Bryant Street on a regular basis for bike transportation to and from work.

During the meeting, the question was posed about the water table. It appeared that there was not an answer to this question from the presenter. This, given the severe water shortage that we commonly have within California and earth quakes, seems to be a MAJOR concern.

It was articulated that there will be a traffic problem with the proposal. Cars will be traveling on Embarcadero, and likely their cars will be idling (again impacting air quality) as they await entrance to the Bryant Street entrance. It is a single treaded process with exit on Emerson. Students are expected to just jump out, kind of like a run by drop off as they gather their bags and school materials. Likely not going to happen.

You obviously have not been on Embarcadero at school drop off on a rainy day. With the overflow of Stanford traffic (and yes THEY also continue to build), the road is one big chokepoint. And if you listen to the Churchill closure proponents you have more traffic funneling in. Even running and bicycling on the sidewalk is more dangerous with cars looking for quicker cut throughs.

Other schools and business that addressed capacity demands within Palo Alto
Castilleja is not the first school to seek major expansion and many other private schools are supportive of what happens with Castilleja so they can do the same. I won't belabor these because others have.

However I went to a small Catholic GIRLS high school in a West LA neighborhood. We never grew our attendance or school site. Sports facilities are elsewhere. Students couldn't bring a car until senior year. The school still exists peacefully with the homeowners. No lies. No expansion. Still a high quality education for commuters. It's harder to get in as class sizes haven't grown.

Other examples are Harker and Keys. Even Pinewood has a facility away from the main campus.

The

Recommendation
The request from Castilleja to expand, and quite honestly ask the community to trust them given the years of disregard, is not reasonable at all and would become a slippery slope for other private institutions to emulate. I am a home owner, parent, and an educator. I believe 100% in education for ALL. We all make a difference and singling out girls is disrespectful, speaking from a woman's perspective.

The scenarios I propose are:
1) Castilleja, be like Harker and PAMF and find a new larger campus to expand the ever increasing demand (which is majority [>75%]outside of Palo Alto) to a new location. This will clearly be in the best interest of Castilleja long term. See how it has benefited Harker and PAMF. Both are consistently growing.

2) Castilleja create a second campus like was done by Keys School. The argument that they want the upper class students to mentor the middle school students is not valid. Of course we would LOVE that for our public schools but we know there are space restrictions. There are other methods to mentoring middle school students, all it takes is some planning and thinking outside the box.

I laugh at this. At my high school we had a Grade 1 to 8 next door and we did nothing with them. You might get a few interested in early childhood development but honestly why aren't they helping East PA?

3) No construction changes can be done on campus until after the number of students is at the agreed upon capacity limit. Castilleja must be capped at the designated enrollment and require shuttle service from designated location**s** to the

campus. A certain number of staff and student designated parking passes can be put in place with the Palo Alto Police Department involved in violations. This is what is done at Paly and Gunn high school. Local students can bike, even E-bike to school, however this will be a minority of students [< 25%]. The bulk of students [>75%] would be required to take the shuttle; this is beyond the shuttle that is currently provided from Caltrain. The school must be fined if they go beyond the enrollment limits; this is similar to what happened with Sand Hill Properties and the grocery market. If the law/rules are broken, fines must be enforced and get steeper until corrected.

It is a major lesson that needs to be taught to all students and overall people. Rules and laws are not meant to be broken and then just apologize and not make changes. It is really teaching poor values to the students and community. It leads to rules and laws being ignored and realize that money can pay to not obey - creating even more of a socio-economic divide. That is clearly not a community and world value I feel we want within Palo Alto.

I hope that you take this request from Castilleja very seriously. It is the tip of the iceberg - the decision that is made will be the guideline for subsequent requests.

I believe in educating ALL children. Do what is right for the future of Palo Alto so it can remain the gem it once was. Why are you putting their needs before the kids of your own city?

Karen Hickey
Newell Road

Sent from Yahoo Mail on Android

From: Andie Reed
To: Historic Resources Board; Planning Commission; Castilleja Expansion
Subject: Architectural Historian
Date: Friday, September 6, 2019 2:10:36 PM
Attachments: Casti-KosturasHistoricalStudy.pdf

TO: Historic Resources Board, Meeting 9/12/2019 regarding DEIR for Castilleja expansion

Thank you for your hard work in consideration of this project.

In Chapter 6 – Cultural Resources, the Draft Environmental Impact Report correctly states, on page 6-15, that CEQA requires that "if a proposed project would result in an impact that might cause a substantial adverse change in the significance of a historical resource or its immediate surroundings, that needs to be studied".

However, the DEIR only studied the area of the school property as it exists today, and the two residential properties the school proposes to demolish and whose lots the school proposes to merge into the school, making the school ½ acre larger than it is currently. Many of the surrounding homes are over 100 years old, and the Lockey House (1263 Emerson, proposed to be demolished) is noted on the Palo Alto Primary Study II as "potentially eligible for CRHR". The proposed destruction of two homes in a short block of Emerson Street will have a devastating visual and character impact on that block and the surrounding area. Adding these two lots to the school commercializes what is currently a residential area. Dudek did not study the surrounding blocks.

A very important element of the **National Historic Preservation Act is Section 106**, in which the **Area of Potential Effects** need to be determined "and should take place early in the environmental review process". Section 106 describes that if this demolition falls into the required categories, further study of the effects is required:

1. what is the current land use and does it change? (currently the two R-1 lots are residential, it is proposed to change them to private school property)
2. does the destruction of the buildings change traffic patterns? (DEIR describes that an underground garage exit will replace these two houses, with hundreds of cars exiting daily)
3. what are the physical, visual, and atmospheric changes that effect the character of the geographic area surrounding the project? (DEIR agrees that it there will be a great degree of change, but proclaims that the changes are an improvement, based on no evidence and against all reason)

4. what is the nature and scale of the new construction in relation to the surrounding setting? (the proposal changes a residential block to a commercial underground garage exit on one side, with a lone house remaining on the block)

I attach herewith a report by William Kosturas, an architectual historian, for further explanation of the existing blocks surrounding the school. It is most effective to read it on-line, so you can see the photographs in color.

Thanks,
Andie Reed

--
Andie Reed CPA
[redacted] Melville Ave
Palo Alto, CA 94301
[redacted]

From: Pam McCroskey
To: Castilleja Expansion; Planning Commission
Subject: Castilleja School Planned Expansion
Date: Sunday, September 8, 2019 9:07:56 AM

Dear Sir/Madame:

I write regarding Castilleja's current proposed expansion plans. I reside at 1344 Emerson Street in Palo Alto. I oppose the expansion due to the significant and negative impacts the expansion will impose on my neighborhood. Above all I reject the proposal of an underground parking garage. However, I do support remodeling and repurposing, without a garage. I also highly endorse the concept of a split campus, given Castilleja's interest in increasing its student population to 540. I suspect that number will only grow higher.

The proposed garage exit on Emerson with a mandated right-turn exit onto Embarcadero will have potentially disastrous consequences. I routinely avoid taking a right turn at Emerson and Embarcadero as it is hazardous. It is only a matter of time before something terrible happens with all of the cars, bicyclists and pedestrians at Emerson and Embarcadero. There is a blind spot on the left when negotiating a right turn onto Embarcadero in addition to the danger of all of the cars coming from the underpass and from Melville. And my concerns are BEFORE the proposed 30% student enrollment increase.

Besides the issues of increased traffic dangers and congestion in the area due to the increase in student population, the sight of a concrete bunker will have a terrible aesthetic impact on our neighborhood. Why would anyone in our neighborhood want to look at that rather than housing and trees and shrubs? And please consider the four-plus years of construction imposed on the neighbors, with the associated noise, of trucks, tractors etc. loading and unloading, backup beeping, the dirt, dust, and general disruption for the neighborhood over a period of years.

Castilleja's twelve-plus year history of illegal enrollments and expansion plans have caused tremendous ill will. This neighborhood will have a lot to lose and nothing to gain.

Again, please discard the plans of an underground "bunker" garage. Additionally please consider the concept of a split campus. Castilleja has outgrown the six acres of land that it occupies.

Thank you.

Pam McCroskey
[redacted] Emerson Street,
Palo Alto, CA 94301

From: Nelson Ng
To: Planning Commission; Lait, Jonathan
Cc: Council, City
Subject: Castilleja"s DEIR Study for Emerson and Embarcadero- latest update
Date: Tuesday, September 10, 2019 9:14:11 AM
Attachments: Presentation1.pdf

Planning Director and Planning and Transportation Commission,

As part of the Transportation study for Castilleja's DEIR, I am requesting additional study to focus on the safety of the pedestrians and bicyclists using the sidewalk between Castilleja and Embarcadero at the intersection of Emerson and Embarcadero. Due to its close proximity to PALY and the Town and Country, pedestrians and bicyclists (**many of them are PALY students**) using the sidewalk to cross Emerson to go toward PALY.

Due to the high speed eastbound traffic exiting the Alma underpass toward Emerson as indicated in purple arrow in the picture below, the drivers that are making right turn from Emerson onto Embarcadero as indicated in blue arrow will have to focus on the eastbound traffic that often travels at a high speed of 30 to 40+ MPH. This gives the right turn drivers from Emerson very little time to notice pedestrians or bicyclists who sometimes ride at the last minute off the sidewalk to cross Emerson in front of cars turning right from Emerson to Embarcadero. Through the years, as a neighbor living within one block to this intersection, I have witnessed a number of near misses due to this situation. Therefore, it is very important for DUDEK to have an in-depth safety study for the pedestrians and bicyclists crossing Emerson with the expected significant traffic increase from Castilleja's proposed underground garage exit flow.

Sincerely

Nelson Ng
[redacted] Emerson Street

From: gogo heinrich
To: Castilleja Expansion; Planning Commission
Subject: Castilleja"s DEIR
Date: Thursday, September 5, 2019 6:11:35 PM
Attachments: Castilleja DEIR Comments.pdf
Castilleja Garage Opposition.pdf

Hello,
Attached are two documents regarding Castilleja's planned expansion project. One document addresses their Draft Environmental Impact Report, and the other document addresses the underground garage.
Thank you for the opportunity to provide comments. I look forward to your responses.
Best,
Gogo Heinrich, Architect
[redacted] Waverley Street
Palo Alto, CA 94301
[redacted]

From: slevy@ccsce.com
To: Planning Commission
Cc: Lait, Jonathan; Shikada, Ed; sahsing@m-groupl.us
Subject: Extending the HIP to Portions of San Antonio Road with HCD attachment
Date: Monday, September 9, 2019 1:07:40 PM
Attachments: Regional Housing Need Assessment101v8 (1).pptx

To the PTC members:

This note provides information and thoughts to the Planning Commission on the proposal to extend the Housing Incentive Program (HIP) to portions of San Antonio Road. I attach slides from a presentation last month by staff of the state Department of Housing and Community Development (HCD) with regard to the new methodology for determining regional housing needs assessments (RHNAs). Based on the new HCD information and the desire of the city to maximize local control while meeting its housing goals, I support the extension of the HIP to the proposed portions of San Antonio Road.

In response to the existing RHNA, Housing Element and Comprehensive Plan housing goals, the city council adopted a HIP covering downtown, Cal Ave and El Camino. The goal was to increase the incentives for housing development, recognizing the many barriers that are faced in Palo Alto and most cities, while doing so in a way that maximizes local control.

The new RHNA regional methodology (slide 8) includes major new state law requirements to mitigate overcrowding and the number of households who are cost-burdened measured by spending more than 30% of their income on housing. In the recent determination for Southern California, the new regional housing target was more than double the previous RHNA goal.

Since the Bay Area also has a high share of overcrowded and cost-burdened households, it is very likely that our RHNA goal will be much higher than the current one. It is also likely that Palo Alto's target will be higher (see the criteria on slide 9 and our current performance on slide 2).

It will be helpful for the PTC and council to explain to residents that the new higher targets are **not** the result of faster expected growth (they are not) but are the result of the goal to build more units so that fewer **existing residents will be subject to cost-burdens or overcrowding,** As before some of the housing need will relate to future growth but not more than currently.

How does this relate to the proposed San Antonio Road HIP? It seems very likely to me that sites along San Antonio Road will need to be added to the housing site inventory to come anywhere close to meeting the new RHNA requirements to identify sites (slides 9 and 11). These sites including the current proposed project could be a significant and needed addition to the city's sites identified for housing.

The extension of the HIP in this area is to me a reasonable next step to maximize local control given HCD's legal authority and new determination to act when cities take actions to block housing There was considerable discussion at the HCD presentation about the authority to intervene when HCD sees the case (see slide 10). The PTC and council are aware that HCD has warned Cupertino with regard to blocking the Vallco proposed housing and downzoning the site.

Moreover my understanding is that the current HIP has not yet produced a flurry of new housing proposals though there is one now before ARB referenced in the packet for San Antonio Road in the area covered by the proposed HIP extension.

The extension of the HIP will give the city an additional tool to meet our growing RHNA and Housing Element goals while preserving local project review. It will be a signal to HCD that Palo Alto is serious about meeting housing goals through local action. The same issues are also true when the PTC and council get to making decisions of the North Ventura Area Plan.

Stephen Levy

[redacted] Forest Avenue

Palo Alto

From: slevy@ccsce.com
To: Planning Commission
Cc: Lait, Jonathan; Shikada, Ed; sahsing@m-group.us
Subject: Extending the HIP to Portions of San Antonio Road
Date: Monday, September 9, 2019 1:02:03 PM

To the PTC members:

This note provides information and thoughts to the Planning Commission on the proposal to extend the Housing Incentive Program (HIP) to portions of San Antonio Road. I attach slides from a presentation last month by staff of the state Department of Housing and Community Development (HCD) with regard to the new methodology for determining regional housing needs assessments (RHNAs). Based on the new HCD information and the desire of the city to maximize local control while meeting its housing goals, I support the extension of the HIP to the proposed portions of San Antonio Road.

In response to the existing RHNA, Housing Element and Comprehensive Plan housing goals, the city council adopted a HIP covering downtown, Cal Ave and El Camino. The goal was to increase the incentives for housing development, recognizing the many barriers that are faced in Palo Alto and most cities, while doing so in a way that maximizes local control.

The new RHNA regional methodology (slide 8) includes major new state law requirements to mitigate overcrowding and the number of households who are cost-burdened measured by spending more than 30% of their income on housing. In the recent determination for Southern California, the new regional housing target was more than double the previous RHNA goal.

Since the Bay Area also has a high share of overcrowded and cost-burdened households, it is very likely that our RHNA goal will be much higher than the current one. It is also likely that Palo Alto's target will be higher (see the criteria on slide 9 and our current performance on slide 2).

It will be helpful for the PTC and council to explain to residents that the new higher targets are **not** the result of faster expected growth (they are not) but are the result of the goal to build more units so that fewer **existing residents will be subject to cost-burdens or overcrowding,** As before some of the housing need will relate to future growth but not more than currently.

How does this relate to the proposed San Antonio Road HIP? It seems very likely to me that sites along San Antonio Road will need to be added to the housing site inventory to come anywhere close to meeting the new RHNA requirements to identify sites (slides 9 and 11). These sites including the current proposed project could be a significant and needed addition to the city's sites identified for housing.

The extension of the HIP in this area is to me a reasonable next step to maximize local control given HCD's legal authority and new determination to act when cities take actions to block housing There was considerable discussion at the HCD presentation about the authority to intervene when HCD sees the case (see slide 10). The PTC and council are aware that HCD has warned Cupertino with regard to blocking the Vallco proposed housing and downzoning the site.

Moreover my understanding is that the current HIP has not yet produced a flurry of new housing proposals though there is one now before ARB referenced in the packet for San

Antonio Road in the area covered by the proposed HIP extension.

The extension of the HIP will give the city an additional tool to meet our growing RHNA and Housing Element goals while preserving local project review. It will be a signal to HCD that Palo Alto is serious about meeting housing goals through local action. The same issues are also true when the PTC and council get to making decisions of the North Ventura Area Plan.

Stephen Levy

[redacted] Forest Avenue

Palo Alto

From:	Jeanne Fleming
To:	French, Amy
Cc:	Council, City; Clerk, City; Lait, Jonathan; Shikada, Ed; Architectural Review Board; Planning Commission; UAC; board@pausd.org
Subject:	Please provide update on Wireless
Date:	Friday, September 6, 2019 5:53:53 PM

Dear Ms. French,

On behalf of United Neighbors, I am writing to ask you what, if anything, has occurred with respect to small cell node wireless installations in Palo Alto since July 17th, 2019, when Rebecca Atkinson provided an update at my request. (We also know separately, from your email of August 27th, 2019, that cell towers are scheduled to be installed in Midtown later this month). Please consider this a formal request.

To be clear, I am asking for information about application submissions, application resubmissions, application reviews, application approvals, permits issued, compliance reports submitted by permittees and everything and anything else related to small cell node wireless facilities that are not already in operation.

Thank you for your help. Since the City Manager decided to shut down the Wireless Hot Topics page in April, residents have no other way, realistically, of determining what is happening with respect to these controversial 150-and-counting proposed installations.

I will be checking in with you weekly.

Please let me know if you have questions.

Sincerely,

Jeanne Fleming

Jeanne Fleming, PhD
JFleming@Metricus.net
650-325-5151

From: Nelson Ng
To: Planning Commission; Lait, Jonathan
Cc: Council, City
Subject: Re: Comment on traffic study for Castilleja DEIR
Date: Tuesday, September 10, 2019 9:22:11 AM
Attachments: PTCTraffic_Aug14_2019.pdf

Planning Director and Planning and Transportation Commission,

I am attaching the slides from my presentation during the August 14th PTC hearing for the Castilleja Expansion DEIR.

Sincerely

Nelson Ng

On Saturday, August 17, 2019, 04:18:32 PM PDT, Nelson Ng <lofujai@ymail.com> wrote:

Planning Director and Planning and Transportation Commission,

I notice that I omitted "weekend" in the following bullet point for item #3 below

- The days that Castilleja have evening and weekday events

This bullet point should be "The days that Castilleja have evening and weekday **and weekend** events"

Regards

Nelson

On Tuesday, August 13, 2019, 05:41:25 PM PDT, Nelson Ng <lofujai@ymail.com> wrote:

To the Planning Director and Planning and Transportation Commission,

My name is Nelson Ng. I live at 1260 Emerson Street directly across from the 1263 Emerson Street known as the Lockey House that is owned by Castilleja School.

I found that the DEIR published for Castilleja's Expansion is incomplete and the basis for analysis is fatally flawed. The baseline traffic study was based on only three days – January 26, 2017; May 16, 2017 and April 10, 2019. These days were mid-week and the data was based on Castilleja's self survey and vehicle counts. To provide a more accurate understanding of

the project and its impacts, what should be evaluated in the traffic study for Castilleja's proposed project are:

- Current traffic counts for the full neighborhood (including nearby Palo Alto High School) for a full week while Castilleja and Palo Alto High is in session. The traffic count should include vehicles, pedestrians, bicyclists, etc. This traffic count should be signed off by a Castilleja official certifying that the count is accurate. Bicyclists, both adult commuters and school children make up the majority of traffic on the Bryant street bike boulevard and should be included.

- Traffic should be counted (car and bike/pedestrians/other) for the full neighborhood for a full week while

    - Castilleja and Palo Alto High are in session.

    - Castilleja is **not** in session while Palo Alto High is in session.

    - Palo Alto High School is **not** in session while Castilleja is in session

- All intersections within a half-mile to a mile radius, especially those with traffic signals need to be included. Critical intersections missing are: Embarcadero/Waverley; Embarcadero/Pedestrian crossing at Palo Alto High School; and Embarcadero Road/Town & Country/Palo Alto High School Driveways.

In addition, the traffic study needs to address the construction traffic for the three-five years of construction. The information in the report puts the responsibility on the future contractor for construction routes, construction staging, and construction parking. The volume of vehicles and the duration of the project warrant that a complete study, recommendations, and mitigations for this work be presented in the EIR instead.

The traffic study also needs to include proposed projects such as the CalTrain rail crossing project, the City of Palo Alto's modifications to Embarcadero Road for bicyclists, etc.

From this baseline, the traffic report should be rewritten/resubmitted for review.

1. The following 3 Alternatives are listed in the DEIR:

    1: Staying with 415 students and no construction

    2: 73% enrollment increase to 506 students and demolish two Single Family Home to build an underground garage

    3: 73% enrollment increase to 506 students and demolish one Single Family Home to build an underground garage

This DEIR is incomplete because the Chapter 7 Transportation section did not analyze impact of any enrollment increase option **without** an underground garage. This report focuses on how to make the garage achievable by various means to mitigate the three **Significant but Unavoidable** impacts. Instead, it should study other alternatives that allows for a moderate enrollment increase (20% to 30%) **without** an underground garage to address the traffic impacts such as satellite parking areas and splitting the campus to provide a truly unbiased solutions for the community.

I am requesting this DEIR to provide the current impact of Castilleja comparing to other streets listed to be included in item 3 below and to study the impact of an alternative without an underground garage but using satellite parking for all students being driven in with school shuttles running between the satellite parking lot and the campus.

2. In page 7-12,

> The peak hour is determined based on the actual traffic volume data; it is defined by the City and Caltrans guidance as the 60-minute period during which the highest traffic volumes were observed. The peak period for morning commute traffic is from 7:00 AM to 9:00AM; … The school afternoon peak period occurs between 2:00 PM and 4:00 PM … The evening peak period, between 4:00 PM and 6:00 PM, …

The commute traffic has increased significantly in recent years. The peak period has expanded. Therefore, the peak period study should be expanded to the following:

- morning commute traffic 7:00AM to 10:00AM
- evening commute traffic to 4:00pm to 7:30PM.

3. The following is stated in page 7-13,

> At the time of the existing conditions traffic counts in January 2017, enrollment at Castilleja School was 438 students. Site-specific trip generation rates for the AM, School PM, and PM peak hours were developed based on driveway counts and adjusted based on results from a student travel pattern survey. It is estimated that the school site currently generates 352 vehicle trips during the AM peak hour, 274 vehicle trips during the School PM peak hour, and 176 vehicle trips during the PM peak hour,

Site specific trip generation rates based on driveway counts and adjusted based on results from a student travel pattern survey is problematic and will not yield accurate results. Students are routinely dropped off one to two blocks away from the campus. For example, Castilleja students are routinely dropped off at the cul-de-sac on Melville

between Bryant and Waverley. Those traffic counts are not included in Castilleja's count of cars entering their parking lot. Student travel pattern survey is conjecture at best.

During the March 2017 scoping letter input for the DEIR, I suggested the following study criteria to establish a baseline. The data should be compared with traffic of "what is allowable" for the Single Family R-1 neighborhood and not the existing condition. This determines the TRUE impact of Castilleja traffic to its surrounding neighborhood. Some surrounding neighbors have observed a 90% traffic reduction on days when Castilleja is not in session while Palo Alto schools are still in session. Therefore, the study must measure traffic impact with and without Castilleja in session. In addition, missing from the study are the impacts of a hundred of Castilleja school events per school year including evening and weekend events and the two summer camp sessions per year. The following are a list of items the Traffic study must include

- Castilleja in session while Palo Alto school in session
- Castilleja school is out on holiday with no activities while Palo Alto school in session
- Palo Alto school holiday while Castilleja school in session
- The days that Castilleja have evening and weekday events
- During the summer, with and without Castilleja Summer School in session.

All studies should be done on a weekly basis of 24x7 period and not just one day in week to avoid missing significant traffic pattern changes for different days of the week. Please see item #6 for the complete set of streets and intersections to be studied.

4. Projects such as Grade Separation at Churchill and Alma, Stanford GUP expansion and bike lane on Embarcadero Road will have major traffic impacts to this neighborhood. This study must include the cumulative impact of Castilleja expansion along with these projects. This study should show the impact of Castilleja expansion with the additional impact from each project.

5. The 3 to 5 years construction for this expansion project must be studied. We need to understand what is the feasible for this neighborhood to handle with increase in traffic created by the construction related machinery and staging.

6. A number of streets and intersections that were submitted to be studied as part of the March 2017 EIR Scoping comment are omitted in the DEIR study listed in page 7-5 to 7-7. Please see attached update to Figure 7-1 and Figure 7-2. Please include them into the study for the final EIR.

7. In Page 7-30, Table 7-10 shows the following Daily Trips count for different number of enrolled student scenarios. This yields 2.74 Daily Trips per student for all 4 scenarios.

Condition	# of Students	Daily Trips
Existing CUP	415	1,135
2017 Enrollment	438	1,198
2018 Enrollment	434	1,187
Proposed Project	540	1,477

In page 7-19, it stated "The existing ADT was determined based on 24-hour machine counts conducted in January 2017 and September/October 2018". Is the Daily Trips number for 2018 Enrollment Condition measured from Sept/Oct 2018 study or just calculated using the rate for 2017 Enrollment. If it is measured, please explain how the rates 2017 and 2018 are exactly the same? If it is calculated, please provide the actual measured daily trip.

8. In Table 7-4 of page 7-14, the following is car trips exiting the garage

   - AM Peak(7am to 9am): 199 *(This works out to be 18.1sec per car)*
   - School Peak PM(2pm to 4pm): 187 *(This works out to be 19.3sec per car)*
   - PM Peak(4pm to 6pm): 124 *(This works out to be 29sec per car)*

   In table 7-12 of page 7-40, it estimates the following Delay time with this project at Emerson right turn onto Embarcadero

   - AM Peak(7am to 9am): 24.7 sec *(145.7 cars/hr)*
   - School Peak PM(2pm to 4pm): 24 sec *(150 cars/hr)*
   - PM Peak(4pm to 6pm): 20.1 sec *(179 cars/hr)*

   Majority of the morning drop-off traffic and afternoon pickup traffic will not be evenly spread out during the 60 minutes period. Most traffic will appear within the 15 minutes before and after the bell. Therefore, the study should provide a the study of the same traffic volume of within a 30 minutes window to calculate how many cars will back up through the proposed garage onto Embarcadero from Bryant entrance due to the delay of cars making a right turn from Emerson onto Embarcadero.

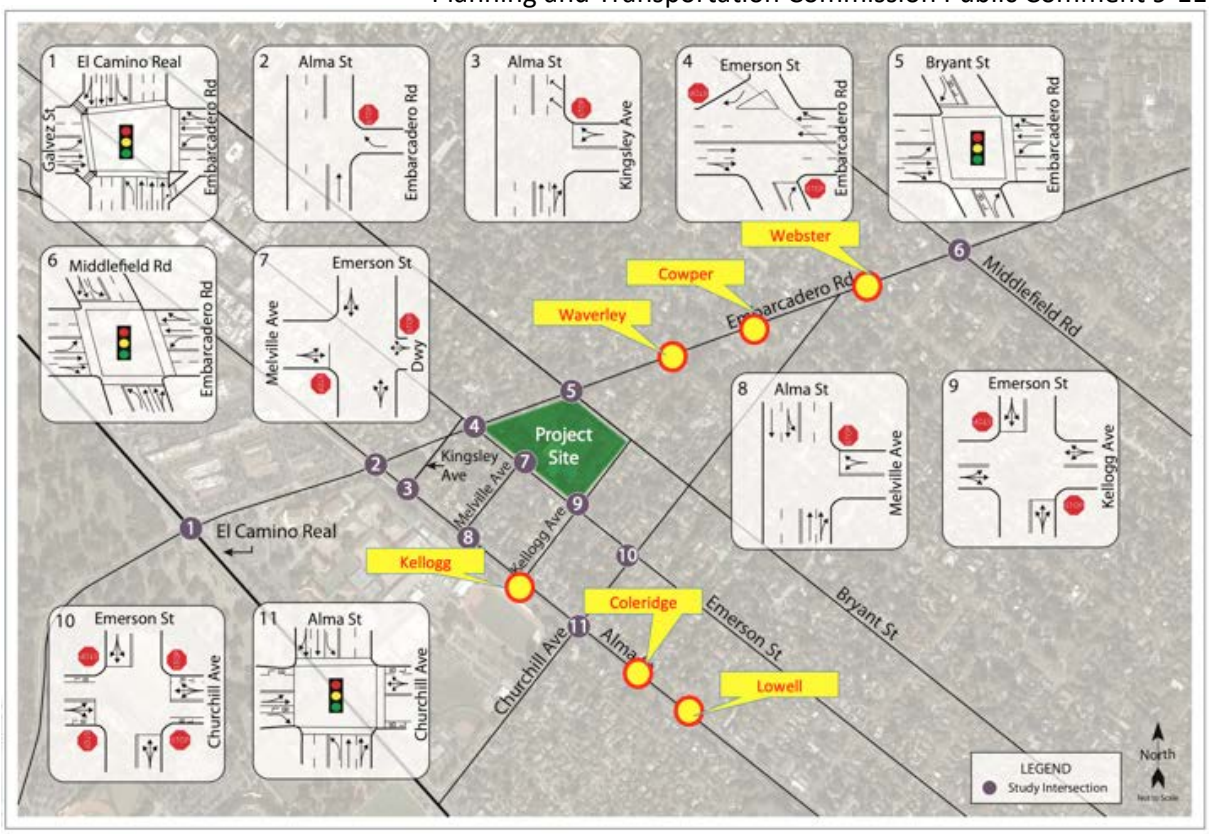
9. The following claim regarding Castilleja expansion impact on bike safety is on page 7-29.

   > The project includes a reduction in total curb cut driveways from eleven driveways … to six driveways …

The reduction in driveway curb cuts will improve bicycle safety.

However, I am unable to find any traffic study data and analysis in the report to substantiate this claim that significant traffic increases to the Bryant Street Bike Boulevard by combining all incoming Castilleja traffic entering the proposed garage by making a left turn from Embarcadero onto Bryant Street and then a right turn from Bryant to enter the garage will not put Bike Boulevard users at risk. Bryant Street Bike Safety Boulevard is one of the most used commute routes by PAUSD students biking to school. Castilleja auto traffic will be competing with the PAUSD students and other adult commuters for the right of way to use this busy section of the Bike Boulevard during the commute hour. This study must include data and analysis on the potential risk increase to PAUSD students and other bicyclists due to significant traffic increase during student commute hour. The study should include all previous traffic accidents including bicyclists and use the data to project the potential of increase accidents by the increased traffic. Please refer to item 8, on the volume of Castilleja traffic should not be averaged on a 60 minutes basis but rather concentrating on the 15 minutes before and after the school session bell time.

The study should also include scenarios when cars are backed onto Bryant and Embarcadero from the garage per study of item #8, the increase risk to the bicyclists when cars are blocking the intersection of Bryant and Embarcadero or abandoning entering the garage and competing with bicyclists to travel south on Bryant Street.

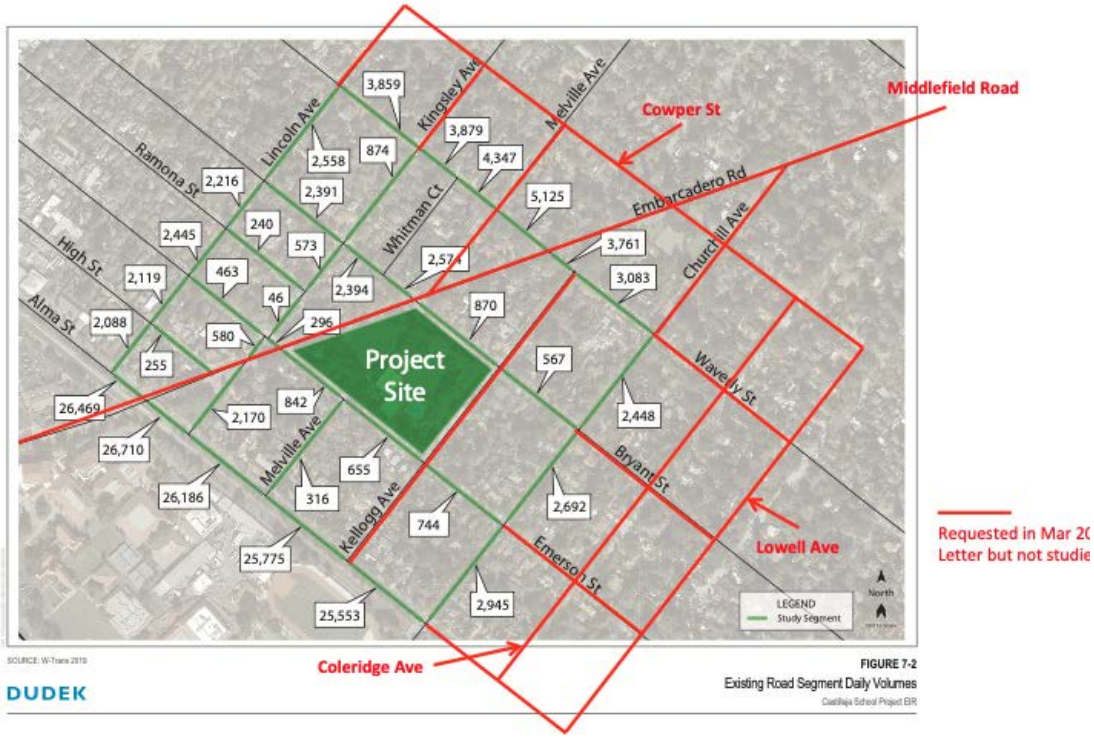


SOURCE: W-Trans 2019

DUDEK

Intersections requested in March 2017 Scoping Letter but not studied in DEIR

FIGURE 7-1
Transportation Study Area
Castilleja School Project EIR



Waverley Street from:

- Churchill Ave to Coleridge

- Coleridge to Lowell

Bryant Street from:

- Churchill to Coleridge

- Coleridge to Lowell

Emerson Street from:

- Churchill to Coleridge

- Coleridge to Lowell

Churchill Avenue from:

- Embarcadero to Cowper

- Cowper to Waverley

Alma Street from

- Churchill to Coleridge

- Coleridge to Lowell

Lincoln Avenue from:

- Cowper to Waverley

Kingsley Avenue from:

- Cowper to Waverley

Melville Avenue from

- Cowper to Waverley

- Waverley to Embarcadero (cul-de-sac)

Embarcadero Road from

- Middlefield to Bryon

- Bryon to Webster

- Webster to Tasso

- Tasso to Cowper

- Cowper to Waverley

- Waverley to Bryant

- Bryant to Emerson

- Emerson to El Camino

Kellogg Avenue from:

- Alma to Emerson

- Emerson to Bryant

- Bryant to Waverley

Coleridge Avenue from:

- Alma to Emerson

- Emerson to Bryant

- Bryant to Waverley

- Waverley to Cowper

Lowell Avenue from:

- Alma to Emerson

- Emerson to Bryant

- Bryant to Waverley

- Waverley to Cowper

Cowper Street from

- Lincoln to Kingsley

- Kingsley to Melville

- Melville to Kellogg

- Kellogg to Embarcadero

- Embarcadero to Churchill

- Churchill to Coleridge

- Coleridge to Lowell

Sincerely

Nelson Ng