



# Architectural Review Board

## Staff Report (ID # 11193)

**Report Type:** Action Items **Meeting Date:** 8/20/2020

**Summary Title:** 1310 Bryant, 1235 and 1263 Emerson: Castilleja First ARB

**Title:** PUBLIC HEARING/ACTION ITEM 1310 Bryant Street, 1235 and 1263 Emerson Street [19PLN-00116]: Architectural Review of Castilleja School's Phased Campus Redevelopment Proposal for Site Modifications, Demolition, Construction of a Below Grade Parking Garage and a new Classroom Building, and Minor Alterations to one Facade of a Historic Inventory Category 3 Building on Campus. Redevelopment is Associated With a Request for Conditional Use Permit (CUP) Amendment and Variance for Gross Floor Area (GFA) Replacement. The Primary Project Also Includes Requests for a Tentative map With Exception and a Variance for Below-grade Setback Encroachment Into the Embarcadero Road Special Setback (the Alternate Project Does not Include These Requests). Zone District: R-1(10,000). Environmental Review: A Final Environmental Impact Report (EIR) was Published July 29, 2020. For More Information Contact Amy French, Chief Planning Official, at amy.french@cityofpaloalto.org

**From:** Jonathan Lait

### Recommendation

Staff recommends the Architectural Review Board (ARB):

1. Consider the Final Environmental Impact Report (EIR)<sup>1</sup> published July 29, 2020; particularly, sections focused on aesthetics and cultural resources,
2. Conduct a public hearing of the Architectural Review (AR) application (19PLN-00419) for phased redevelopment of Castilleja's campus, and

<sup>1</sup> Final EIR published July 29, 2020:

<https://www.cityofpaloalto.org/news/displaynews.asp?NewsID=4823&TargetID=319>

3. Continue the hearing to September 17<sup>th</sup>.

## Report

## Summary

The applicant, the Castilleja School Foundation (Castilleja), seeks to redevelop portions of its campus and increase the school's enrollment. Castilleja School is a private school providing education for girls from sixth grade through 12<sup>th</sup> grade. Founded in 1907 at 1121 Bryant Street, the school moved in 1910 to the 1310 Bryant Street campus. It is located within a single-family residential neighborhood zoned R-1(10,000).

This staff report:

- Supports the ARB's consideration of the Final EIR, published pursuant to the California Environmental Quality Act (CEQA);
- Supports review of campus redevelopment proposals (Project and Project Alternative plans) associated with the CUP request for annual enrollment increases up to a 540-student cap; and
- Clarifies the upcoming review process steps and purview of the ARB, HRB, and PTC for the Castilleja School project.

The ARB is scheduled to consider the Project over at least two meetings; August 20 and September 17, 2020. This first ARB discussion will include the EIR presentation and a presentation by the applicant. The applicant's presentation will include the Project plans and more recently submitted plans for a 'Disbursed Circulation/Reduced Garage Alternative'; this is referred to as the "Project Alternative."

The ARB's purview includes the physical changes to the campus, such as the site modifications, construction of a below grade parking garage and new classroom building. Staff asks for ARB comments regarding the Project and Project Alternative and requests a continuance of the public hearing to September 17, 2020. The September 17<sup>th</sup> staff report will include draft Architectural Review findings. Staff is now preparing these findings, as well as approval conditions tailored to the Project Alternative described in the Final EIR as the environmentally superior alternative.

The applicant also seeks a Conditional Use Permit (CUP) amendment (file 16PLN-00238) to increase its student enrollment cap. The enrollment would occur in stages alongside the phased campus redevelopment and would also include an enhanced Transportation Demand Management (TDM) program. The Planning and Transportation Commission (PTC) will consider the Final Environmental Impact Report (EIR), the CUP, and Variances on for gross floor area replacement and setback encroachment, and Tentative Map with Exceptions (17PLN-00234) August 26, 2020. Links to relevant documents are found on the City's Castilleja School Project webpages: ([https://www.cityofpaloalto.org/gov/topics/castilleja\\_school/default.asp](https://www.cityofpaloalto.org/gov/topics/castilleja_school/default.asp)).

### EIR Consideration and Project Objectives

The ARB is asked to consider the EIR prepared for this project. The ARB members received notice of the 2019 Draft EIR 60-day public comment period. The July 15, 2019 Draft EIR addressed the planning entitlement applications associated with the Project, and

- Noted the Applicant's eight project objectives;
- Identified the Project's 'significant and unavoidable' CEQA traffic impacts;
- Provided explanations and mitigation measures to address other impacts;
- Evaluated two on-site alternatives to the Project; and
- Discussed six other project alternatives, rejected from further analysis.

On July 30, 2020, ARB members were notified of the Final EIR publication. The Final EIR:

- (i) Provides Master Responses (MRs) and Individual Responses to Draft EIR public comments received during the 60-day review period that ended September 16, 2019;
- (ii) Revises the Draft EIR with additional analysis, clarifies project alternatives, and adds two alternatives (in Revised Chapter 13) discussed in the Final EIR Chapter 2 (MRs 4 and 5);
- (iii) Describes the Project's significant and unavoidable impact (SOI) under CEQA (the TIRE<sup>2</sup> Index increase on Emerson Street); the increase in daily traffic on Emerson Street between Melville Avenue and Embarcadero Road (Impact 7-1 in the Draft EIR); and
- (iv) Describes the Project Alternative's ability to avoid significant CEQA impacts, including the TIRE Index impact described above.

### Project Alternative

The Project Alternative is considered the 'environmentally superior alternative' to the Project; it changes the level of significance of CEQA impacts and would not require Council to adopt a 'Statement of Overriding Considerations' to approve it. The Project Alternative, submitted in 2020, would enable achievement of all Project objectives, while addressing several community concerns; removing the significant and unavoidable CEQA traffic impact of the Project; and enabling withdrawal of the Tentative Map application and Variance request for a below grade garage encroachment into the Embarcadero Road Special Setback.

If Council supports the Project Alternative, Council can:

- Certify the Final EIR by Resolution;
- Adopt the associated mitigation measures with a mitigation monitoring and reporting program; and
- Approve a Record of Land Use Action containing approval findings and conditions for the CUP, the Variance for floor area replacement, and Architectural Review.

## **Background**

### Applicant's Project Objectives

The Applicant's eight project objectives, as noted in the Draft and Final EIRs, are as follows:

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<sup>2</sup> TIRE = Traffic Intrusion into Residential Environments

1. Maintain a single integrated campus for the middle and upper school in the current location, while providing new structures that integrate state-of-the-art technology and teaching practices and retain flexibility to adapt to unanticipated changes.
2. Achieve better architectural compatibility with adjacent neighborhoods through a well-articulated building and improve site aesthetics and harmony with the surrounding neighborhoods through enhanced landscaping.
3. Increase enrollment to *540 students\** to allow more young women the unique opportunity to receive an all-girls education.
4. Increase on-site parking via an underground parking garage in order to reduce both parking visibility and surface parking spaces.
5. Improve vehicular, pedestrian, and bicycle access for students and staff through design efficiencies and a robust Transportation Demand Management Plan.
6. Ensure no increase in vehicle trips to and from the campus during AM and PM peak hours relative to recent (baseline) traffic volumes. Reduce the number of service deliveries and relocate deliveries within the campus and below grade, to decrease nuisance effects to neighbors.
7. Improve the campus's sustainability and energy efficiency by developing new facilities.
8. Phased development of the project to allow Castilleja School to continue to operate during construction and to reduce impacts on the neighborhood.

*\*Note:* Applicant request for a 540-student cap is associated with phased enrollment increases and special events limitations, alongside phased campus redevelopment over three years.

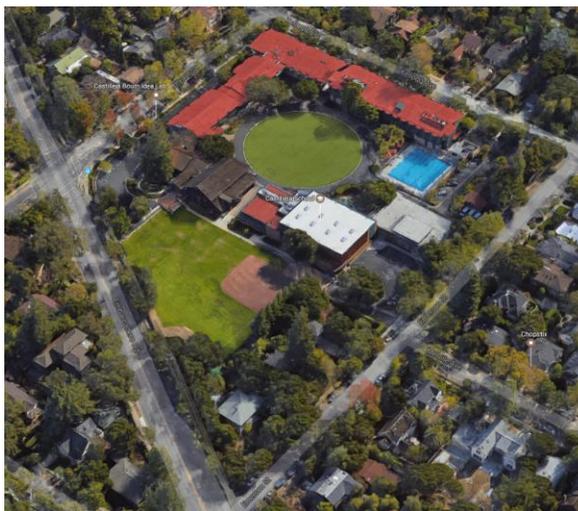
#### Project Information

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

#### Property Information

Address:	1310 Bryant Street, and 1235 and 1263 Emerson Street (project site) located within R-1 (10,000) Zone District) See Attachment A map
Neighborhood:	Seale Addition (located south of Embarcadero Rd west of Alma St)
Lot Dimensions & Area:	Project site is 286,783 square foot (s.f.) comprised of three parcels. <ul style="list-style-type: none"> <li>• 1310 Bryant (APN 124-12-034) frontages: 500' on Kellogg; 406.6' on Bryant; 429.4' on Embarcadero Rd; 430' on Emerson St</li> <li>• 1235 Emerson (APN 124-12-031) 75' wide by 100' deep, a rental housing unit on a 7,500 s.f. lot);</li> <li>• 1263 Emerson (APN 124-12-033) 105' wide by 100' deep, a 10,500 s.f. lot no longer used for housing).</li> </ul>
Housing Inventory Site:	No
Located w/in a Plume:	No
Protected/Heritage Trees:	Yes

Historic Resource(s):	Yes. Local historic inventory Category 3 resource. Other Castilleja buildings more than 45 years old are not on the inventory and are not eligible for the California Register of Historic Resources.
Existing Improvement(s):	One-, two- and three-story buildings; oldest building is circa 1910
Existing Land Use(s):	Private all-girls school and housing (Emerson address parcels)
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:	



Source: Google Maps

#### Land Use Designation & Applicable Plans/Guidelines

Zoning Designation:	R-1 (10,000), Single Family Residential with 10,000 sf min. lot size (enables replacement of school campus with 24 additional homes)
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 (Airport Influence Area):	Not Applicable
<u>Prior City Reviews &amp; Action</u>	
City Council:	Council informational EIR scoping report/summary of comments June 2017 <a href="http://cityofpaloalto.org/civicax/filebank/documents/58246">http://cityofpaloalto.org/civicax/filebank/documents/58246</a>
PTC:	PTC Scoping Session March 8, 2017 staff report: <a href="http://www.cityofpaloalto.org/civicax/filebank/documents/56245">http://www.cityofpaloalto.org/civicax/filebank/documents/56245</a>

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	PTC August 2019 Draft EIR hearing report <sup>3</sup> , excerpt minutes, <sup>4</sup> and video <sup>5</sup> links are provided in footnotes below.
HRB:	HRB September 12, 2019 Draft EIR hearing report <sup>6</sup> , excerpt minutes <sup>7</sup> and video <sup>8</sup> links are provided in footnotes below.
ARB:	None
Enforcement:	Case for exceedance of CUP 2000 cap: Enrollment reductions, TDM program monitoring <sup>9</sup> , penalty payment. Status: 430 students enrolled in 2019-20 school year; 426 students enrolled for 2020-21 school year. Enforcement agreement: TDM implementation; 2015 Embarcadero Road access study; 2016 CUP submittal/process while reducing enrollment annually, except City agreed to a pause in enrollment decrease for academic year 2017-18.

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## Project Description

The following applications will be presented to Council for consideration:

- **Architectural Review:** The ARB's recommendations on the Project and Project Alternative will be forwarded to the City Council for action on the Architectural Review application.
- **Conditional Use Permit (CUP) Amendment and GFA (FAR) Variance:** Palo Alto Municipal Code (PAMC) Chapter 18.77 establishes the process for evaluating a CUP amendment application and a Variance request. Variance and CUP applications are evaluated to specific findings. All findings must be made in the affirmative to approve these applications. The CUP phased enrollment increases are timed with phased campus modifications. The CUP includes an enhanced Transportation Demand Management (TDM) plan. The GFA (FAR) Variance is a request to replace above ground gross floor area (GFA) on the existing campus parcel, exceeding the Floor Area Ratio (FAR). The FAR, the ratio of the gross floor area to the lot area (campus parcel), is currently exceeded by existing building GFA. The GFA (FAR) Variance is requested for the Project Alternative, as well as for the project.
- **Encroachment Variance:** A second Variance is requested for the Project, but not the Project Alternative. The Project's subterranean garage would encroach into the Embarcadero Road special setback below grade; the Project Alternative's reduced garage would be located outside this setback.

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<sup>3</sup> PTC August 19, 2019 staff report <https://www.cityofpaloalto.org/civicax/filebank/documents/72895>

<sup>4</sup> PTC August 19, 2019 excerpt minutes <https://www.cityofpaloalto.org/civicax/filebank/documents/77794>

<sup>5</sup> PTC August 19, 2019 video <https://midpenmedia.org/planning-transportation-commission-63-8142019/>

<sup>6</sup> HRB September 12, 2019 staff report <https://www.cityofpaloalto.org/civicax/filebank/documents/73280>

<sup>7</sup> HRB September 12, 2019 excerpt minutes <https://www.cityofpaloalto.org/civicax/filebank/documents/77795>

<sup>8</sup> HRB September 12, 2019 video <https://midpenmedia.org/historic-resources-board-46-09122019/>

<sup>9</sup> Project webpage news updates: [https://www.cityofpaloalto.org/gov/topics/castilleja\\_school/archived\\_news\\_updates.asp](https://www.cityofpaloalto.org/gov/topics/castilleja_school/archived_news_updates.asp)

- **Tentative Map with Exception:** The Tentative Map with Exception is associated with the Project, but not required or requested with the Project Alternative. The request is to increase the campus size to add the two Emerson Street parcels, coupled with demolishing the two houses on these lots. The application (incomplete) includes an Exception request, because this R-1 (10,000) zoned Campus parcel exceeds the maximum allowable lot size of 19,999 sf.

The Final EIR provides descriptions of the Applicant's Project and Project Alternative, and other alternatives to the Project. The Project and Project Alternative both include:

- Demolishing five campus buildings (including the Leonard Ely Fine Arts Center fronting Emerson Street, classroom and campus center buildings along Bryant and Kellogg),
- Replacing campus gross floor area (GFA) on the campus parcel in a new academic building that also increases below-grade, non-GFA space,
- Constructing a subterranean garage accessed from the existing Bryant Street surface parking lot with a two-way access ramp with a one-way garage exit ramp; garage completion is associated with the phase 1 student enrollment increase.
- Providing a below grade pedestrian passage from the garage to campus buildings,
- Demolishing the at-grade pool and constructing a below-grade pool and pool sound wall,
- Providing for below-grade delivery and trash enclosures/waste pick-up with reconstruction of the Circle in the center of the campus, and
- Installing new landscaping and fences.

#### Project - Brief Summary

The Project is described fully in the Draft EIR<sup>10</sup> as updated in the Final EIR. In addition to the common elements listed above, the Project:

- Merges the two Castilleja-owned Emerson Street parcels (at 1235 and 1263 Emerson) with the campus parcel;
- Demolishes the Emerson homes to create open space and a large subterranean garage;
- Constructs a subterranean garage that:
  - Provides more than the required number of on-site parking spaces,
  - Extends beneath the Embarcadero Road special setback and beneath the two Emerson residential parcels, and
  - Receives all peak hour student drop offs; and
- Removes 31 trees, relocates 34 trees, and retains 99 trees in place; of these trees, seven of the trees to be removed and five of the trees to be relocated are protected trees, and three of the trees to be removed and one tree to be relocated are street trees.

#### *Phases of Redevelopment*

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<sup>10</sup> Link to Draft EIR published July 15, 2019 with revisions in Final EIR published July 29, 2020: <https://www.cityofpaloalto.org/news/displaynews.asp?NewsID=4823&TargetID=319>

The first phase of the Project is the demolition of two houses and merging these parcels to construct the subterranean garage. The below grade garage would extend beneath the two residential parcels and beneath the Embarcadero Road special setback (subject to Council approval of a Variance). The Project's garage would:

- (1) increase on-site parking spaces beyond code requirement (taken together with surface spaces), and
- (2) modify campus circulation, re-routing drop-offs and pick-ups through the garage.

Following the first phase completion, the enrollment level would increase annually, up to 490 students. Additional construction phases would be associated with requested student enrollment caps of 520 and 540 students, as follows:

- **Phase 2 relocates the pool and increases enrollment to a maximum of 520 students; and**
- **Phase 3 relocates deliveries and waste pick-ups further from the street and below grade, reduces food service deliveries by 10%, and implements a sustainability plan; and**
- **Phase 4 demolishes campus buildings, replaces removed GFA with the academic building GFA, and increases enrollment to a maximum of 540 students.**

#### Project Alternative - Brief Summary

Final EIR describes the Project Alternative. The Project Alternative responds to and addresses several community concerns, while continuing to achieve the Project Objectives, proposed enrollment cap, and the number and frequency of special events.

Compared to the original Project, the Project Alternative:

- Reconfigures the subterranean garage footprint, reduces the overall size of the garage, and moves the underground structure outside the Embarcadero Road setback;
- Retains two residential structures on Emerson Street and the row of six redwood trees at the western edge of Spieker Field;
- Distributes school traffic to three drop-off/pick-up locations around the campus (retaining the Kellogg Avenue drop off driveway);
- Removes the right-turn only restriction for vehicles exiting the garage, avoiding the Project's TIRE Index impact on Emerson Street, subject to mitigations that would avoid creating any new TIRE Index impacts.
- Provides on-site parking spaces meeting the code-required spaces;
- Reduces the size of the Academic Building at the ground floor level by 754 square feet (offset by increasing the building's below-grade level by 800 square feet);
- Includes site modifications; namely, reconstruction of the existing loop driveway on Kellogg Avenue, in generally the same location; and
- Retains 21 more trees than the original project.

#### *Construction Phases of Project Alternative*

The first phase of construction of the Project Alternative would include completion of the reduced subterranean garage and landscaping. Once concluded, this would enable an increase

of enrollment up to 490 students through an annual increase of 27 students. The subsequent phases for the Project Alternative are the same as the subsequent phases for the Project.

#### Enhanced Transportation Demand Management (TDM) and Traffic Increase

The Project and Project Alternative rely on an enhanced TDM program to address an increase in daily vehicle trips to campus and maintain existing peak hour trips. The enhanced TDM plan would supplement the school's existing TDM program. The Draft EIR included a Mitigation Measure (MM 7a) requiring Castilleja to implement TDM measures sufficient to reduce the daily trip rate to 2.4 trips per student. The measure is to reduce the number of vehicles accessing the proposed garage for drop-off and pick-up, thus reducing the projected maximum queues. The TDM plan and Mitigation Measure 7a allow some increase in total daily traffic trips but set a limit on the number of peak hour trips and the daily trip rate per student. Attachment B provides a brief summary on traffic (baseline, TDM, CEQA impacts and Council policies).

#### Historic Resources Board Review

Both the Project and Project Alternative propose minor modifications to the Gunn Administration Building, a Historic Inventory Category 3 resource on campus. The Draft EIR found Castilleja's Emerson houses ineligible for listing on the California Register of Historic Registers. In September 2019, the HRB considered the Draft EIR and viewed potential changes to the Category 3 resource. Related content is provided in the Discussion report section.

#### PTC Review

The ARB's review of the Project and Project Alternative designs will inform PTC review. The proposed Academic building is the physical manifestation of the requested gross floor area (GFA) replacement/FAR Variance. The ARB's review of and comments on this design will help preparation of both AR and Variance findings. The ARB's review of the garage design and related site modifications for the Project Alternative will also help focus the PTC's Variance discussion.

In addition, the PTC will recommend Council action on the CUP requesting enrollment increases and will discuss the proposal for special events. The existing CUP recognizes five major events held each year plus additional events with between 50 and 100 guests. The PTC will consider the CUP's proposal for limits on campus events of between 50 and 100 people.

In August 2019, the PTC conducted a meeting to receive public comments on the Draft EIR. Links to the staff report<sup>11</sup> and minutes<sup>12</sup> are provided in the footnotes for this page. Written comments to the PTC<sup>13</sup> are also provided in the footnotes below.

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<sup>11</sup> PTC August 2019 staff report <https://www.cityofpaloalto.org/civicax/filebank/documents/72897>

<sup>12</sup> PTC meeting minutes <https://www.cityofpaloalto.org/civicax/filebank/documents/74495>

<sup>13</sup> Comments to PTC in August 14, 2019 packet <https://www.cityofpaloalto.org/civicax/filebank/documents/72753>

## Discussion

This report section assists the ARB and members of the public, focusing the discussion on seven topics:

1. Architectural Review (AR) Findings - provides the general AR findings and a brief note about Finding #1.
2. Request for Phased Development Construction - provides the language of PAMC 18.76.020 (g) for ARB and Council consideration of the request.
3. Final EIR' is to assist the ARB navigate the EIR - including master responses to comments relevant to the ARB's purview, and project alternatives.
4. Circulation and Parking Design - relates to AR Findings #2 and #4.
5. Compatibility of Building Design and EIR Aesthetics Section - relates to AR Findings #2D, #3, and #6.
6. Views, Trees, Landscaping, Fences, Lighting and Historic Preservation - relates to AR Findings #2B, #3 and #5.
7. Other Considerations - briefly discusses the retention and/or loss of the Emerson Street homes, sustainability and stormwater, and construction dust emissions.

### 1. Architectural Review Findings

The ARB reviews development projects with respect to the Architectural Review (AR) Findings set forth in Palo Alto Municipal Code (PAMC) Chapter 18.76, Section 18.76.020, item (d).

The Project Alternative plans will be evaluated with respect to the six AR findings below. Note, however, that not all AR Findings are applicable to the project. For instance, the R-1 districts do not have Context Based Design Criteria (which is cited in general AR finding #2c).

The ARB may wish to comment on the project with respect to AR findings at this time – especially, to flag any AR findings staff should pay special attention to when crafting draft AR findings. As noted earlier, the September 17<sup>th</sup> report will include tailored, draft AR findings for ARB input.

*PAMC 18.76.020 (d) Findings:* Neither the Director, nor the City Council on appeal, shall grant architectural review approval, unless it is found that each of the following applicable findings is met:

- (1) The design is consistent with applicable provisions of the Palo Alto Comprehensive Plan, Zoning Code, coordinated area plans (including compatibility requirements), and any relevant design guides.
- (2) The project has a unified and coherent design, that:
  - (A) Creates an internal sense of order and desirable environment for occupants, visitors, and the general community,
  - (B) Preserves, respects and integrates existing natural features that contribute positively to the site and the historic character including historic resources of the area when relevant,

- (C) Is consistent with the context-based design criteria of the applicable zone district,
  - (D) Provides harmonious transitions in scale, mass and character to adjacent land uses and land use designations,
  - (E) Enhances living conditions on the site (if it includes residential uses) and in adjacent residential areas.
- (3) The design is of high aesthetic quality, using high quality, integrated materials and appropriate construction techniques, and incorporating textures, colors, and other details that are compatible with and enhance the surrounding area.
- (4) The design is functional, allowing for ease and safety of pedestrian and bicycle traffic and providing for elements that support the building's necessary operations (e.g. convenient vehicle access to property and utilities, appropriate arrangement and amount of open space and integrated signage, if applicable, etc.).
- (5) The landscape design complements and enhances the building design and its surroundings, is appropriate to the site's functions, and utilizes to the extent practical, regional indigenous drought resistant plant material capable of providing desirable habitat that can be appropriately maintained.
- (6) The project incorporates design principles that achieve sustainability in areas related to energy efficiency, water conservation, building materials, landscaping, and site planning.

*a. AR Finding #1: Consistency with Comprehensive Plan and Zoning Code*

AR Finding #1 is to compare the project with Zoning Code development standards and Comprehensive Plan policies. The content and analysis of the project with respect to these land use documents is found in the EIR. The Zoning Code enables the Applicant's requests for CUP and Variances; therefore, AR Finding #1 will reference CUP and Variance findings in the draft Record of Land Use Action (RLUA) for Council action.

*b. RLUA*

A Record of Land Use Action (RLUA) citing applicable AR Findings will be prepared for the ARB's meeting scheduled on September 17, 2020. Similarly, the RLUA prepared for the Planning and Transportation Commission's second staff report will contain draft CUP and Variance findings. Not all AR Findings are applicable to the project; thus, the RLUA will cite AR Finding #2c as not applicable to the decision.

## **2. Request for Phased Development Construction**

*a. Three Years Construction*

The ARB may wish to comment on the Applicant's proposed three-year campus redevelopment plan, included in the Draft EIR project description. Phased developments up to five years are allowed via Phased Architectural Review approval. Ultimately, the Council will consider the Applicant's request for phased development after reviewing and certifying the Final EIR.

The PAMC Chapter 18.76 section 18.76.020, Architectural Review, item (g) enables approval of phased development projects, as follows:

*PAMC 18.76.020 (g) Phased Projects and Enforcement of Approval Conditions*

An application for a phased project may be submitted and a specific development schedule may be considered and approved. In no event, however, shall such a development schedule exceed five years from the original date of approval. Approved project plans and conditions of approval imposed through the architectural review process shall be enforceable as approved unless the application is revised or withdrawn in accordance with this title.

*b. Modular Classrooms*

The ARB may wish to comment on or request additional information regarding the modular classroom proposal. During the three-year construction time frame, the Applicant would install modular classrooms temporarily on Spieker Field to enable continuation of educational programs. The design of the modular buildings is not detailed in the Project plans, but the EIR includes some description.

**3. Final EIR**

The ARB is requested to consider the Final EIR as it reviews and provides comments on the Architectural Review application. Final EIR Introduction (Chapter 1) orients the reader. The revised Draft EIR/Final EIR include responses to comments on the Draft EIR, via individual Responses to Comments (Chapter 3) and Master Responses (Chapter 2).

*a. Chapter 2 - Master Responses*

There are 13 Master Response (MR) sections. Master responses related to Architectural Review topics are underlined below and include:

- Alternatives and Circulation (MRs 1, 3, 4, 5, 11, and 12),
- Compatibility of building design (MRs 4 and 6), and
- Views, trees and landscaping/character (MRs 6, 7, and 8).

1. *MR1, Project Description:* garage circulation slight change, construction period/closure of Embarcadero, Embarcadero during operation, bike/pedestrian circulation.
2. *MR2, CUP:* past violations (code compliance issue rather than a CEQA issue); baseline is conditions at the time the Notice of Preparation (NOP) was issued, current CUP terms and requirements, enforcement mechanisms, reporting for non-traffic issues.
3. *MR3, Construction:* traffic, noise, air quality.
4. *MR4, Disbursed Circulation/Reduced Garage Alternative:* description, impacts.
5. *MR5, Project Alternatives:* split campus, relocate, no garage, reduced enrollment, retain/replace housing, disbursed drop-off/pick-up.
6. *MR 6 Land Use and Planning Impacts:* building style, compatibility, external effects (traffic, noise) compatibility - special events, character of residential block, loss of housing in face of housing demand citywide, FAR including garage rules.
7. *MR7 Tree Impacts and Mitigation:* tree loss and mitigation.

8. *MR8 Aesthetics: tree loss, Embarcadero as scenic corridor, views of garage exit.*
9. *MR9 Historical Resources: Dudek methodology/conclusions, Lockey house, historic district*
10. *MR10 Vehicle Transportation: Stanford Hospital, Stanford GUP, Signalization Kingsley, Churchill Closure, Surface Circulation - including Embarcadero issues, TDM - existing and proposed, effectiveness*
11. *MR11 Bicycle and Pedestrian Safety: accident history, traffic impacts on bike boulevard, proposed circulation routes*
12. *MR12 Garage Circulation: intended circulation, staff management, wheel stop time, queueing, emergency response*
13. *MR13 Noise: pool, special events, heavy trucks and buses*

*b. Alternatives*

Staff recommend the ARB focus discussion on the Project Alternative as the environmentally superior alternative. Final EIR Chapter 2, Master Response 5, Project Alternatives provides further discussion of several alternatives and reasons for not carrying some alternatives forward in the EIR, or for providing further analysis.

Some example alternatives are:

- The alternative for Castilleja to create a second campus and the reasons for not carrying it forward for further evaluation in the EIR.
- A 'no garage' alternative, initially considered but rejected from further analysis in the Draft EIR; this was looked at further in responses to comments (see Draft EIR Chapter 13, Alternatives, and Final EIR Chapter 2, Master Response 5).
- An alternative requiring Castilleja to relocate, additional discussion and reasons for not carrying it forward for further evaluation in the EIR.

**4. Circulation and Parking Design (AR Findings #2 and #4)**

*AR Findings #2 and #4*

- *AR Finding #2 (E)* is to ensure a unified and coherent design that enhances living conditions on the site (if it includes residential uses) and in adjacent residential areas.
- *AR Finding #4*, in part, is to ensure a functional design allowing for ease and safety of pedestrian and bicycle traffic. *AR Finding #4* is also to ensure elements are provided to support the building's necessary operations. These include convenient vehicle access to property and utilities, appropriate arrangement and amount of open space and integrated signage.

*a. Bicycle and Pedestrian Circulation On-Campus*

The ARB may review the bicycle and pedestrian circulation on the site as it relates to AR Finding #4. The Master Response, Bicycle and Pedestrian Safety (MR11), responds to comments regarding bicycle safety given traffic volumes on local streets and potential conflicts with vehicles at the project site frontages. The Project and Project Alternative differ with respect to curb cuts onto rights of way:

- The Project would reduce driveway curb cuts, which would improve bicycle safety.
- The Project Alternative would retain the two curb cuts on Kellogg Avenue.

Other proposed project features would have no impact on bike and pedestrian safety around the site. However, the ARB may wish to discuss bicycle circulation on site and adjacent frontages (Bryant, Emerson, Kellogg, Embarcadero) and pedestrian circulation, especially relating to below grade garage drop-offs and pick-ups.

*b. Garage Circulation - Vehicle Access and Queues*

The ARB can consider the site plans with respect to vehicle access and the functionality of the garage design and surface parking lots to remain. The garage's two underground lanes will accommodate passenger vehicles and emergency response vehicles. That is, if one lane is blocked, emergency access would be maintained with the second lane. If both lanes are blocked at the Bryant entry, emergency vehicles would enter from the Emerson Street side.

Some members of the public have expressed concerns about drop off queues spilling out onto local streets. The garage entrance queues are not expected to extend onto Bryant Street or Embarcadero Road (see Draft EIR pages 7-32 through 7-34 discussion). The Final EIR amended Mitigation Measure 7a to require monitoring and adjustment of the TDM plan, to ensure this does not occur. Master Response 12, Garage Circulation, and Response to Comment C27.4-1 provide additional discussion of queues at the garage entrance.

*c. Parking Design – Tandem Spaces*

The ARB may wish to discuss the proposals for tandem parking spaces. The existing campus staff surface lot currently includes six tandem spaces, located in the staff parking lot on the corner of Emerson and Kellogg. These six spaces do not count toward the existing spaces existing on campus. The Project and Project Alternative garage plans include tandem car parking spaces as well; the deeper space of the tandem pair is not counted toward the required parking spaces for a private school.

- The Project plans show 131 parking spaces; of these, 121 non-EVSE parking spaces, with 95 below grade parking spaces and 26 surface lot spaces, plus ten EVSE parking spaces. Of the ten pair of tandem car spaces (20 parking spaces), the deeper ten spaces of the tandem pair are not counted toward meeting required parking spaces. That is because they cannot be accessed without coordination among the school staff. These ten deeper spaces are not required per the demand based on analysis; however, the City could enable their use for staff or event overflow parking associated with the CUP. Without the ten deeper spaces, the 131 spaces represent an increase of 49 car spaces over the existing 82 spaces on campus.
- The Project Alternative plans show 104 on-site parking spaces, 78 below grade and 26 above grade. These numbers do not include the five deeper car spaces of five tandem pairs. The Project, the deep spaces are not counted toward meeting required parking. Without the deeper tandem spaces, the 104 spaces represent an increase of 22 spaces over the existing 82 spaces. The City could enable their use with the CUP.

*d. Circulation - Construction Traffic*

Related to the request for phased construction, the ARB may wish to discuss issues related to proposed phases. The EIR contains analysis and measures to address issues that may arise during the four anticipated phases of construction. The issues addressed are:

- construction traffic volumes,
- traffic management,
- potential noise disruption to students during construction,
- impacts of construction traffic on bicycle safety,
- construction encroachment into the public right-of-way that requires temporary lane closures, and
- construction dust emissions.

References:

- Final EIR Chapter 2 MR describes anticipated construction phasing and schedule presented in Draft EIR Chapter 3,
- Revised Draft EIR Chapters 3 and 7 demonstrate that construction would not adversely affect traffic conditions in the vicinity, and
- The Bicycle and Pedestrian Safety responses (MR 11) address impacts of construction traffic on bicycle safety.

*e. Vehicular Circulation – Visibility at Embarcadero Curve*

The ARB may wish to consider the safety and visibility issues related to the Project's proposal for traffic exiting the garage. The Project's drop-off traffic would exit onto Emerson and turn right to access Embarcadero, which has a speed limit of 25 miles per hour. The curve in Embarcadero Road, approximately 150 feet west of Emerson Street, can obscure views of oncoming vehicles. The EIR notes that 150 feet of distance will meet the stopping sight distance requirements for Embarcadero Road. The EIR also notes the gaps in Embarcadero Road traffic would allow for right turns from Emerson Street.

References:

- Master Response 10, Vehicle Transportation, notes the updated TIS (Appendix E) includes an analysis of existing traffic flows on eastbound Embarcadero Road between Kingsley Avenue and Bryant Street that found traffic moves at an average speed of 29 to 30 miles per hour during the AM, School PM, and PM peak hours.
- The TIS and Draft EIR Table 7-6 identify the Emerson/Embarcadero intersection operates at acceptable levels of service and that the project would not cause the level of service to degrade.
- The EIR notes that while there would be some congestion from vehicles waiting to turn right onto Embarcadero Road, this approach to the intersection would continue to operate consistent with City policy and standards.

## **5. Compatibility of Building Design and EIR Aesthetics Section (AR Findings #2(D), #3, and #6)**

### *AR Findings #2(D), #3 and #6*

- *AR Finding #2(D)* is to ensure harmonious transitions in scale, mass and character to adjacent land uses and land use designations.
- *AR Finding #3* is to ensure buildings will have high aesthetic quality, use high quality, integrated materials and appropriate construction techniques, and incorporate textures, colors, and other details that are compatible with and enhance the surrounding area.
- *AR Finding #6* is to ensure the project incorporates design principles that achieve sustainability in areas related to energy efficiency, water conservation, building materials, landscaping, and site planning.

#### *a. Aesthetics*

The ARB may wish to review this chapter and responses to comments on the Draft EIR regarding aesthetics. The building materials, along with the landscaping design and fencing details, reflect materials and designs present in this residential setting. The EIR Aesthetics section (Chapter 5) analyzes the proposed site plan, buildings, and landscaping. The Aesthetics section notes that the campus' compatibility with neighboring residences would be improved compared to the existing conditions and that proposed architectural features, fencing and walls will reduce the institutional character of the site.

#### *b. Academic Building*

The ARB's attention on the Academic Building and garage and other aesthetic considerations is appreciated. The Applicant's goal for the new Academic Building is to attain LEED Platinum standard; this includes a deconstruction approach in compliance with Castilleja School's proposed Sustainability Road Map. The proposed building would be slightly smaller in scale and massing than the existing buildings along Kellogg and Bryant.

The new building would comply with the R-1 zone height limit and incorporate more horizontal and vertical articulation than the existing buildings. The design includes large roof overhangs with exposed wood beams, trellised patios, and outdoor covered areas, and use of exterior materials that occur in the neighborhood.

The ARB may wish to review Draft EIR pages 5-11 through 5-13 and MR 8, Aesthetics, pertaining to building design, including articulation, materials, and colors. In Draft EIR comments, some community members characterized the design as too modern and industrial, with a mix of siding materials that would not harmonize with the neighborhood. But as one commenter notes, "compatible does not mean matching; the Comprehensive Plan defines compatible as "capable of existing together without significant conflict or ill effects"."

Master Response (MR) 8 conveys that the proposed Academic Building would be slightly smaller in scale and mass than the existing buildings and Response to C3-15 notes:

*"the Academic building is proposed to consist of two wings, with the library wing oriented along Bryant Street and having a footprint of 8,237 square feet and the*

*classroom wing oriented along Kellogg Avenue with a footprint of 33,036 square feet. In contrast, the average size of a Walmart Supercenter (which offers both merchandise and groceries and is typically open 24-hours per day) is 179,000 square feet while the original big-box Walmart store is now called a Discount Store (which typically do not offer groceries and are open for 14 or 15 hours per day) and has an average size of 105,000 square feet (247wallst.com 2014). The above grade portion of the proposed Academic building would be smaller than a typical Walmart.”*

The requested Variance to replace existing gross floor area (GFA) lies within the PTC’s purview and findings. The Project and Project Alternative require Council approval for reconstruction. A comparison of the Project and Project Alternative GFA, as in the Final EIR, is excerpted below.

Feature	Project	Project Alternative
Demo GFA and above grade GFA	90,593 sf to be demolished (6,021 sf from two Emerson houses plus 84,572 sf on campus) replaced by above grade new construction (84,124 sf)	New above grade construction (84,170 sf) is less than the existing above grade construction to be demolished (84,572 sf) on campus; 800 sf below grade is to be repurposed.
Academic Building GFA	33,060 sf on the first floor and 31,082 sf second floors, plus 3,713 sf GFA below-grade GFA (because there is no interior building space above it at the ground level, as per Municipal Code Section 18.12.040).	32,683 sf on the first floor and 30,705 sf on second floor, plus 4,513 sf of below-grade GFA (because there is no interior building space above it at the ground level).
Campus size	Tentative Map to merge campus parcel with two parcels = 286,783 sf	Campus parcel size remains 268,783. Two house parcels remain, 7,500 sf and 10,500 sf

### c. Garage Exit

The ARB is requested to consider the aesthetics of the garage exit. The EIR Aesthetics chapter discusses the underground garage. Several members of the public expressed concern as to the garage’s size and compatibility with the surrounding context. The EIR Aesthetics chapter discusses the underground garage. Neighbors have expressed specific concerns about the garage exit at Emerson Street.

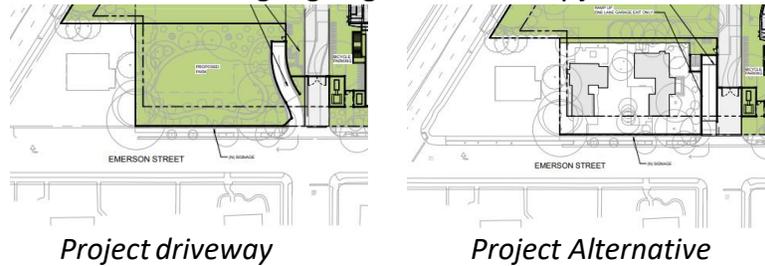
The garage entrance would be located internal to the site and views of it would be filtered by landscaping. The garage exit would be set back 80 feet from Emerson Street, with trees and landscaping on either side of the garage exit ramp. Draft EIR images (figures) illustrate this.

Draft EIR Figures 5-2 and 5-3 provide photographs of the existing visual conditions along Emerson Street.

Draft EIR Figures 5-4 and 5-6 show the proposed gate at the parking garage exit ramp would be placed at the below-grade end of the ramp, immediately at the exit to the garage structure.

The renderings and photo-simulated images show only the top of the gate would be visible from Emerson Street for the Project. The below excerpted plan clips show differences between the Project and Alternative:

- The *Project's* garage exit driveway would be curvilinear leading to the street frontage,
- The *Project Alternative's* straight garage exit driveway just across from Melville Avenue.



The ARB's comments on the visibility/screening of vehicular egress gate and ramps for the Project and Project Alternative would be helpful to the review. The *Project's* curved driveway, fencing and landscaping are shown below in photographic simulation of the garage exit viewed from Melville. The simulation shows the brick wall, landscaping, and curve in the ramp would help the garage exit blend into the Castilleja campus, preventing visibility of the garage exit gate.



*Project Alternative's* straight-in driveway, fencing and landscaping, shown on figure 13-4 (clip below) viewed from Melville Avenue. The simulation shows that since the Project Alternative's driveway is not curved, the retaining wall, fence and exit gate would be more visible from Melville than the Project's exit gate.



**6. Views, Trees, Landscaping, Fences, Lighting, Historic Preservation (AR Findings # 2(B), #3, #5)**

*AR Findings #2B, 3 and 5*

- AR Finding #2(B) is to ensure the project preserves, respects and integrates existing natural features that contribute positively to the site and the historic character, including historic resources of the area when relevant,
- *AR Finding #3* is to ensure the design is of high aesthetic quality, using high quality, integrated materials and appropriate construction techniques, and incorporating textures, colors, and other details that are compatible with and enhance the surrounding area.
- *AR Finding #5* is to ensure the landscape design complements and enhances the building design and its surroundings, is appropriate to the site's functions, and utilizes to the extent practical, regional indigenous drought resistant plant material capable of providing desirable habitat that can be appropriately maintained.

*a. Tree Removals and Views*

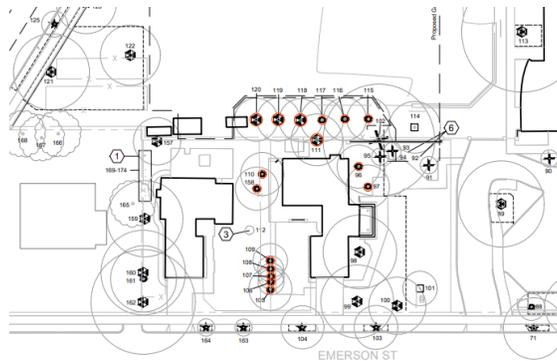
The ARB's purview includes review of proposed landscaping and views of the site from off-site vantage points, and this includes existing trees on the site. The Project removes 31 trees and relocates 34 trees. The Project would change the views of the site from each frontage, with changes in tree locations and canopy. However, following Project construction, the landscaping within and around the perimeter of the site would be similar to the existing landscaping on the project site. Analysis is found in Final EIR Master Response 8, which notes the visual impacts due to tree removal and construction impacts were evaluated in Impact 5-1 in Draft EIR Chapter 5, Aesthetics. The Project Alternative involves 21 fewer tree removals.

*b. Tree Canopy Increase*

The ARB purview includes review of replacement trees. The proposed tree replacement planting is shown on Sheet L.2.1 of the Project site plans. The plans for both the Project and Project Alternative provide for a replacement of tree canopy within the project site and an increase in the number of trees on site. The goal is a net increase in canopy, in the long term. The landscape plan (see Updated Figure 3-11 Final EIR) for the *Project* shows:

- Several trees are proposed to be planted in the landscaped open space between Spieker Field and Emerson Street, and
- Several trees are proposed to be planted in the northwestern corner of Spieker Field.

The Project Alternative plans indicate retention of the Redwoods next to the Lockey House, as shown and discussed on the following report page.



c. *Embarcadero Views*

The ARB may wish to discuss the anticipated views of the Project and Project Alternative from off site, including views from Embarcadero Road. The EIR included detailed discussion as to how the views of the site from each frontage would change as a result of the Project. This analysis identified changes in tree locations and canopy as well as proposed building demolition, landscaping, fencing, and building design. Views of the Project from Embarcadero Road, given the Project's removal of Redwoods, were a key community concern.

The Draft EIR concludes that the Project would not substantially change visual characteristics of the site as viewed from Embarcadero Road. A photographic simulation of views from Embarcadero Road is included in the Final EIR (Figure 5-6), showing the *Project's* trees would provide similar visual resources as the existing Redwoods. Although the trees would be in different locations than the existing row of Redwood trees, they would be visible from the road which would preserve the general quality and character of existing views from Embarcadero Road. As shown in the above image, the *Project Alternative* would include preservation of the Redwoods adjacent to Castilleja's two Emerson houses; these Redwoods are visible from Embarcadero Road.

d. *Tree Preservation and Management Regulations and Mitigation Measure 4b*

The ARB and community may wish to discuss the City's regulations for tree preservation and removals. As noted in the Final EIR/responses to comments, the proposed tree removal and relocations are permitted under the City's Tree Preservation and Management Regulations. Tree removals and relocations are subject to Mitigation Measure 4b, which was updated in the Final EIR. The Final EIR responses noted that the Tree Preservation and Management Regulations encourage preservation but also expressly allow for removal of protected trees.

The classification of "designated" trees provides flexibility to interpret appropriate protection for particular trees or projects. For this project, staff deemed it appropriate to designate more trees, to allay neighbor concerns. The mitigation measure exceeds minimum protection requirements for trees and with conditions of approval and code requirements, staff anticipates a very high level of compliance.

*e. Landscaping and Fences*

The ARB's purview includes review of the landscape architectural design, theme, cohesiveness, and use of native plant materials. The ARB may wish to discuss the campus circle modifications in plans for the Project and Project Alternative. The functionality of the circle will be modified, with changes in access from buildings and proposal for vehicle access. The ARB may also wish to comment on the landscaping and fences proposed in the campus design with respect to the campus' relationship to neighborhood setting and context.

In addition to five types of fences, which appear to be compatible with the campus and neighborhood context, a concrete and cedar plank sound wall is proposed to be located 20 feet from Emerson Street right of way, to buffer the pool noise. The "Fence Section @ Pool" on Draft EIR Figure 5-5 shows the wall would have a height of six feet in relation to the sidewalk on Emerson Street. The wall above six feet, angled towards the interior of the pool area, would not be perceived as excessive when viewed from the sidewalk or street. Vegetation is proposed in the 20-foot wide buffer between the wall and property line.

*f. Lighting Design*

Lighting plans associated with construction phases 3 and 4 are shown on Project plan sheets LTB 100-104. Luminaire styles proposed for the site construction in Phases 3 and 4 are shown on plan sheet LTB.003. The plans show lighting fixtures would include:

- bollards and ground-level fixtures along walkways and near building entrances,
- building-mounted lighting around building perimeters and at entrances,
- ground-level lighting in bicycle parking areas,
- wall mounted lighting on steps and planter walls,
- upward-directed spot lighting only to highlight specimen trees.

The EIR Mitigation Measure 5a requires a lighting plan that:

- identifies the specific light fixtures to be used and their proposed locations and the expected light levels within the property and at the property boundaries,
- demonstrate compliance with the criteria identified in Palo Alto Municipal Code Section 18.23.030. This includes requirements such as spillover reduction; use of high-pressure sodium and metal halide as permitted light sources; lighting limits of 0.5 foot-candle, as measured at the abutting residential property line; designing interior lighting to minimize nighttime glow; using low intensity lighting for building exteriors, parking areas, and pedestrian ways; and directing pedestrian and security lighting downward.

Note that a 0.5 foot-candle is the amount of light generated by 1 candle at a distance of 1 foot. Light levels at the project site perimeter would be 0.5 foot-candle or less; thus, the project would not create substantial light spillover to adjacent public right-of-way or private property.

*g. Historic Preservation - HRB Review of EIR and Historic Resources*

The Project and Project Alternative propose minor modifications to the Gunn Administration Building, a Historic Inventory Category 3 resource on campus. In September 2019, the HRB reviewed concepts for modifying this building after it is separated from the non-historic building to be demolished. At the meeting, the HRB also considered the Draft EIR. The Draft EIR found Castilleja's Emerson Street houses ineligible for listing on the California Register of Historic Registers.

The HRB briefly discussed the older of the two Castilleja-owned houses on Emerson Street. The HRB focused on potential impacts to cultural resources. One HRB member questioned whether retention of the Emerson houses was a project alternative. Regarding the Gunn Administration Building's modifications, the HRB requested to see the final design considerations. The HRB also requested additional information regarding the Lockey House evaluation and historic district consideration (noting this is not the applicant's responsibility).

*h. HRB Meeting 2019 Public Comments*

In September 2019, many of the eight public speakers (including the Castilleja applicant team, and speakers on behalf of Castilleja) also submitted individual written comments on the Draft EIR. The Final EIR addresses individual and meeting comments. Commenters' concerns included:

- Demolition of Castilleja's two Emerson Street homes and removal of the six redwood trees next to the Emerson Street homes, to create the subterranean garage and landscaped open area,
- Interest in retention of the Lockey House,
- Aesthetics concerns/block character degradation, given the Emerson garage exit,
- Interest in neighborhood historic homes and context for the home at 1215 Emerson,
- Bike boulevard concern,
- Liquefaction concern for historic buildings, due to the geologic report, and
- Construction noise.

Commenters also expressed support during the HRB meeting, noting:

- The design would be compatible, given the proposed use of materials complimenting the campus' historic building, and similar scale and massing as the existing building,
- The value in separating the Gunn Building from the attached building, and
- The new gates, fencing, and landscaping were appreciated.

*i. Proposed Modifications to Gunn Administration Building*

Plan sheet AB.303 shows the proposed façade treatment for the building wall to be exposed following demolition of the attached non-historic building. The facade on the right side of the below image would be the façade to receive architectural treatment that is necessary for safety and to meet the Secretary of the Interior's Standards (SOIS). Exposed sections of the wall would be covered with stucco on the first floor and wood shingles on the second

floor, consistent with the existing building materials and finishes. New doors would be installed on the first and second floors and new exterior stairs would be constructed to provide access to the second floor.



### 5 EAST ELEVATION GUNN BUILDING 1/16" = 1'-0"

#### j. Referral to HRB/AR Finding #2(B)

Per PAMC 16.49, the ARB is not required to refer to the HRB proposals for alterations to 'contributing' resources – i.e., resources not identified as 'significant' unless they are within the Downtown area or a historic district. The Category 3 Gunn Building/Chapel is technically not a 'significant' structure by definition set forth in PAMC 16.49. A "Contributing building" is:

*"a good local example of architectural styles and which relate to the character of a neighborhood grouping in scale, materials, proportion or other factors. A contributing building may have had extensive or permanent changes made to the original design, such as inappropriate additions, extensive removal of architectural details, or wooden facades resurfaced in asbestos or stucco."*

Referral to the HRB enables review of the final design for the Gunn Family Administration Building. Removal of the attached building and SOIS compliant modifications could improve the building's historic integrity. An HRB hearing September 10, 2020 would enable staff to refine draft wording regarding treatment of the historic resource for AR finding #2(B) for the ARB's consideration on September 17.

## 7. Other Considerations

The ARB discussion may include comments on Project and Project Alternative plans relating to:

### a. Emerson Street Houses

Emerson Street's existing character/Proposals for home demolition and retention:

- *Project's* demolition of two houses would be a noticeable change in visual conditions along the Emerson frontage. The Project includes a 0.33-acre landscaped open space area above a garage, instead of the two houses; open space is part of residential character; however, housing unit loss is a concern.
- *Alternative Project's* retention of two Emerson houses and adjacent redwoods is likely to be viewed more favorably by the community.

*b. Sustainability, including stormwater considerations*

- Many community members are concerned about garage construction, including groundwater concerns. The garage floor would be approximately eight feet above the highest anticipated groundwater level, as reported in the Geotechnical Investigation.
- The below-grade garage and all project site features have been designed to incorporate standard stormwater quality requirements. This includes routing all runoff to water quality treatment facilities, such as bioswales, flow-through planters, and sand/oil separators in drain inlets, as shown in the project site plans provided in Appendix B.
- There would not be any untreated runoff from any developed portions of the project site, including the garage.

*c. Construction over a three-year period and dust emissions*

- Concerns regarding three years of construction include dust emissions. A mitigation measure requires all areas to be paved and building pads to be completed as soon as possible (Mitigation Measure 9a) and use of seeding or soil binders to minimize dust emissions from portions of the site that have been disturbed.
- The measure requires materials stockpiles to be covered on days when they are not accessed, including any day on which construction does not occur.

## **Notification, Outreach & Comments**

Notice of the Final EIR publication and ARB meeting was published in the *Palo Alto Daily Post* on July 28, 2020. The City's webpage provides an announcement of the meeting. Staff mailed postcards on July 28, 2020, announcing the Final EIR publication and August hearings. Staff emailed notices to Council, PTC, ARB, and HRB.

The Applicant provided information about the multiple outreach meetings Castilleja 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](http://www.cityofpaloalto.org/gov/topics/castilleja_school.asp). Additional outreach meetings took place after the application was submitted. Staff met with neighbors separately and shared neighbor comments with the applicant. The neighbors presented concerns to Council in early 2016; the neighbors' comments are linked to the City's project website.

Staff attended one meeting Castilleja School held in October 2016 on campus in advance of the removal of an on-site Redwood Tree. 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>.

Many public comments on the project were collected and shared in reports to the HRB, PTC and Council 2017-2019. Comments on the IS and scope of the Draft EIR received were forwarded to the City's consultant for consideration during preparation of the Draft EIR.

With website posts alerting the community to news updates, comments were received after the late Spring 2018 completion of the CUP application, late Spring 2019 Architectural Review application submittal, and ARB application completion in March 2020. Just prior to packet preparation, staff received an email showing a neighbor's suggestions for another alternative; it is attached to this report (Attachment D).

## Next Steps

The Council is required to certify the Final EIR and take actions on all requested planning applications. The PTC will be tasked to provide recommendations on the project; reviews by the PTC will occur over at least two public hearings. On August 26, 2020, the PTC will receive presentations on the Final EIR, CUP and Gross Floor Area (GFA) Variance, applicable to both the Project and Project Alternative. The PTC, with its purview over land use and transportation, will also have an opportunity to make comments regarding the Tentative Map and Variance for encroachment associated with the primary Project (but not associated with the Project Alternative). The PTC will be invited to discuss the proposed enhanced Transportation Demand Management (TDM) program, potential approval conditions, and compliance related to the requested CUP.

As noted, staff has a placeholder September 10, 2020 for the HRB to review the modifications to the Category 3 resource on campus. Staff will return to the ARB September 17, 2020, with draft Architectural Review findings for the ARB's consideration. At that time, the applicant will be able to present any modifications to the Project Alternative plans in response to the ARB's comments.

## Environmental Review

The PTC held a scoping meeting on March 8, 2017. The Draft EIR 60-Day Comment Period ran July 15, 2019 through September 13, 2019. The Draft EIR process enabled many public comments including in the first public DEIR hearing with the PTC on August 14, 2019. The HRB held a public hearing September 12, 2019, also during the public comment period. Process history prior to the DEIR hearings is captured in those reports. Public comments on the DEIR are indexed here: <https://www.cityofpaloalto.org/civicax/filebank/documents/73834>. The Final Environmental Impact Report (EIR) was published July 29 and 30, 2020.

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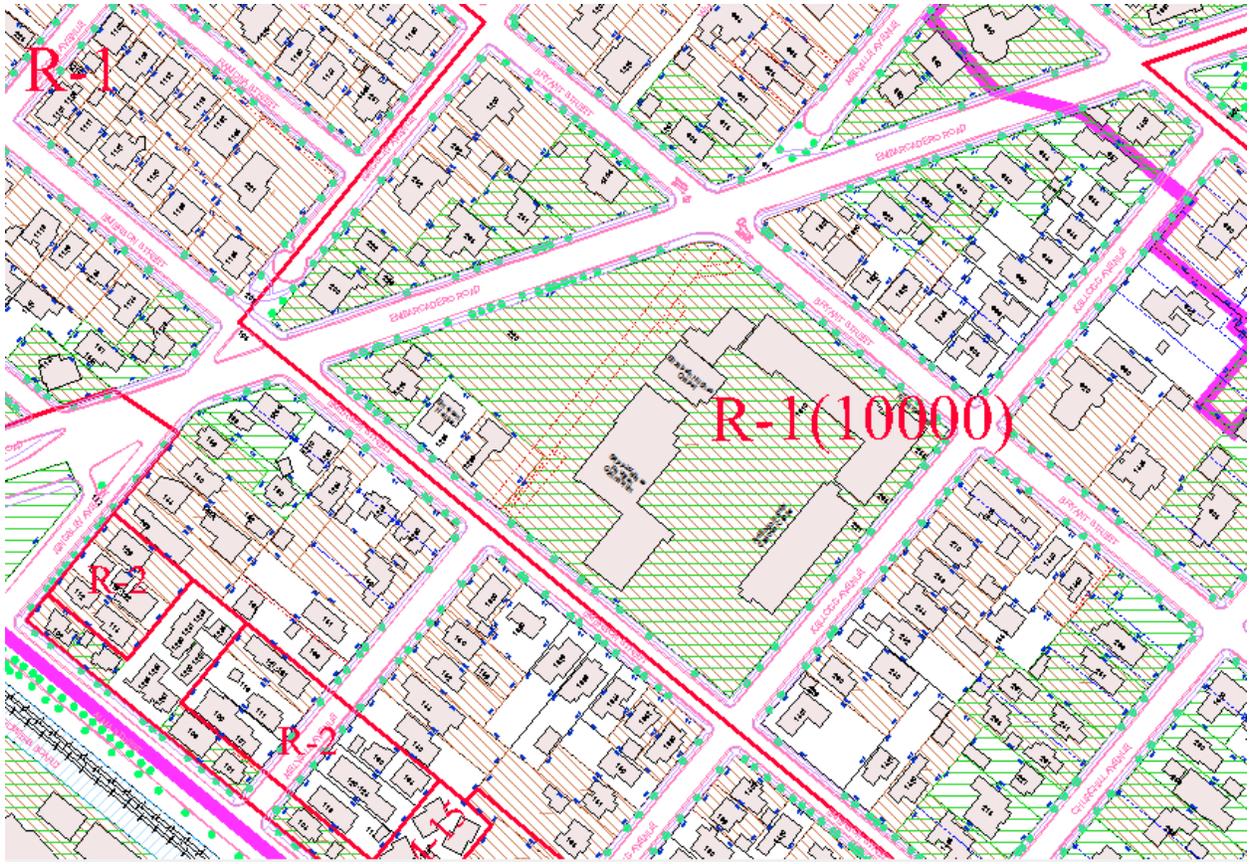
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**Attachments:**

- Attachment A: Location Map (DOCX)
- Attachment D: Comments Received After Final EIR (PDF)
- Attachment C: Links to Plans and Final EIR (DOCX)



Location Map – Castilleja School

**August 4, 2020**

**Alternative plan to Castilleja’s proposed plan:**

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

**Plan Benefits - Immediate:**

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

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

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

**Implementation Plan:**

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

***Castilleja:***

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

***City:***

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

August 4, 2020

**Plan Benefits – Long term:**

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

**Added Bonuses:**

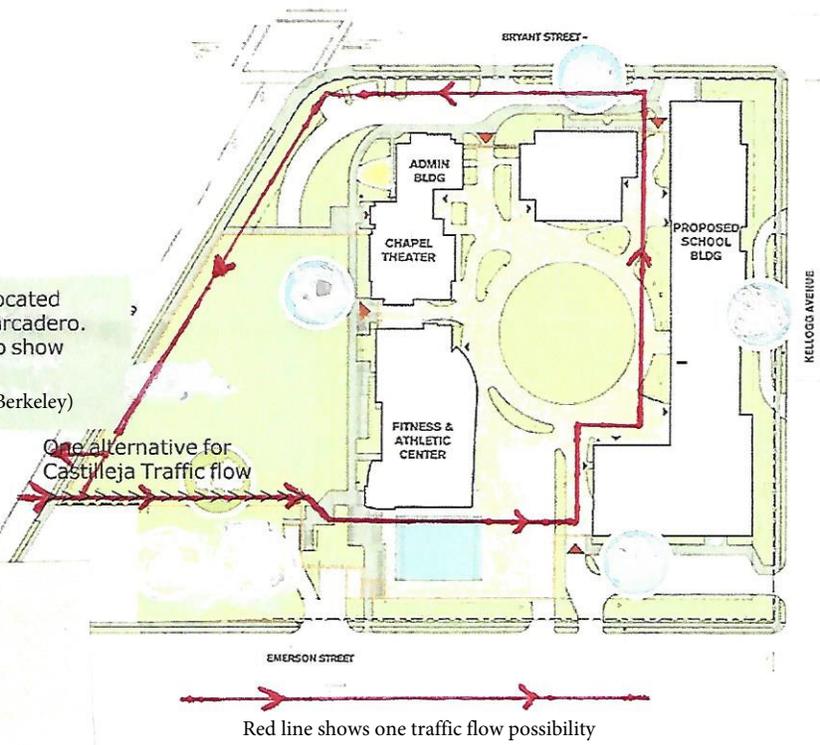
1. **Bike safety improved for Palo Alto HS students:** If the Alma bicycle crossing is moved from Churchill Ave. to Kellogg Avenue with high speed rail, then this Kellogg underpass/interchange would dramatically improve bicycle safety, if there is no Castilleja traffic on Kellogg Ave.
2. **Future Castilleja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

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

Tom Shannon - 256 Kellogg Ave.  
 Alan Cooper - 270 Kellogg Ave.  
 Carla Befera - 1404 Bryant St.  
 Bruce McLeod - 1404 Bryant St.

### Castilleja Alternative Proposal "Castilleja Gate" July 2020

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



Sather Gate at UC Berkeley

## Attachment C

### **Environmental Impact Report, and Project and Project Alternative Plans**

Project plans, Alternative Project plans and other documents including the Final EIR are viewable online at [www.cityofpaloalto.org/castilleja](http://www.cityofpaloalto.org/castilleja)

Project plans are also viewable online as follows:

1. Go to: <https://paloalto.buildingeye.com/planning>
2. Search for "1310 Bryant Street" and open record by clicking on the green dot
3. Review the record details and open the "more details" option
4. Use the "Records Info" drop down menu and select "Attachments"
5. Open the attachment named "project plans"