

Castilleja School

Final Transportation Demand Management Plan

December 2, 2022

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Castilleja School

Final Transportation Demand Management Plan

1. Introduction.

Castilleja School is an independent school for girls in grades six through twelve, located in Palo Alto, California. Castilleja is the only non-sectarian all-girls middle and high school in the San Francisco Bay Area. It seeks to expand enrollment gradually as facilities are redeveloped for increased safety, sustainability, and programmatic space.

In connection with the School's Conditional Use Permit ("CUP"), an entitlement permit approved in the City of Palo Alto Record of Land Use Action, dated June 6, 2022 ("RLUA"), the School is held to an average daily trip (ADT) standard of less than 1,198 and an AM peak trip standard of less than 383, to avoid traffic impacts. This Transportation Demand Management Plan ("TDMP") includes vehicle trip strategies to assist in complying with these trip thresholds. In addition, successful TDM outcomes generally serve to reduce parking demand and minimize school-related disruptions and intrusions into the nearby residential neighborhoods.

As required by Conditional of Approval ("COA") 20, this TDMP "compiles all applicable transportation-related requirements of the Record of Land Use Action into a cohesive, well-organized and indexed document." The intent of the plan is to reduce vehicle trips to, and parking demand at, the school. This plan will also serve as a publicly available resource to inform interested residents of the School's transportation-related expectations and requirements. For reference purposes, attached as Appendix A is a matrix which provides all traffic and parking related COA's and Mitigation Measures.

Per COA 21, the TDMP incorporates various requirements from several source documents, summarized as follows:

- The School's transportation demand management plan on file with the City of Palo Alto;
- All applicable Mitigation Measures from the Certified Final EIR¹, particularly Mitigation Measures 4a and 7a;
- All applicable conditions included in this Record of Land Use Action;
- Applicable sections of the Palo Alto Municipal Code regarding TDM programs, monitoring, reporting and penalties; and

¹ Per COA 27, "to the extent that there is any inconsistency between [a] COA and Mitigation Measures, the more restrictive conditions shall govern." In most instances throughout this TDMP, the COA's are more stringent than the Mitigation Measures and will control.

- The TDM supplement submitted by the applicant and prepared by the transportation firm Nelson Nygaard, dated June 17, 2019, which includes updated monitoring report requirements and introduces new TDM strategies. (COA 21 e)

This TDMP summarizes the transportation performance measures and criteria set forth in the RLUA. In addition it will provide the implementation strategies to effectuate the intent of the TDMP, in order to ensure compliance. In the event the TDMP is inconsistent with the conditions of approval, mitigation measures or Council's motion approving the project, the latter shall prevail. **The specific sub-sections of the TDMP include the following:**

- Performance Standards
- Data Collection Methodology
- Reporting
- Required Mitigation Strategies
- Fees for City Monitoring
- Violations and Enforcement
- Future Oversight

Additionally, each academic year, the school intends to draft a TDM Operations Guide and Program Manual to ensure compliance with the TDMP. ***See Appendix B for the 2022-23 TDM Operations Guide and Program Manual.***

Castilleja is committed to implementing this TDMP in order to comply with the RLUA.

2. Performance Standards.

As required by the City Council in its June 6, 2022 motion, Castilleja School agrees to only use onsite and street parking along the perimeter of the school building for all parking. Castilleja can also utilize satellite parking. Castilleja School is responsible for no parking and no drop offs in unauthorized streets or areas and monitoring streets around the school for student parking and drop off compliance.

As mandated by COA 22, Castilleja School is held to the following trip performance standards:

- Average Daily Trips (ADT) Standard: The School's Average Daily Trips (ADT) shall not exceed 1198 trips. (COA 22 a)
- AM Peak Trips Standard: The School's AM Peak trips shall not exceed 383 trips. (COA 22 c)
- Per COA 24 b ii and 34c, exclusions to the to Performance Standards include:
 - Construction trips
 - Special and Major Events dates

- Non-school days
- Summer School shall be separately reported and not averaged with the academic year

3. Data Collection Methodology.

- The School shall install permanent vehicle counter devices at the entrance/exit of all drop off locations on campus, surface parking lots, and the subterranean garage to:
 - count the number of vehicle trips arriving to the campus and exiting each day (COA 22 e); and
 - calculate Average Daily Trip (ADT) and AM Peak Trip Counts (COA 22 b, 22 d).
- For both ADT and AM Peak Trip counts the following exclusions will apply: (COA 24 b ii and 34 c)
 - Construction trips
 - Special and Major Events dates
 - Non-school days
- ADT and AM Peak Trip Counts while summer school is in session will be reported separately and not averaged with the academic year (COA 24 b ii)
- The School shall install temporary vehicle counter devices in the public right of way at locations (Emerson, Bryant, and Kellogg) determined by the Director for each TDM monitoring report.
 - Data shall be collected for no less than seven consecutive days, determined by the Director, for each reporting period. (COA 22g) (COA 24 b iv) (COA 31)
 - The data collected by the counters shall be:
 - included in the TDM monitoring reports, and
 - used for ongoing monitoring and not to determine a violation of the CUP
 - The data collected from the temporary counter devices may inform future action regarding possible adjustments to the TDM plan. (COA 22 g)
 - After 15 years of monitoring, the Planning and Transportation Commission shall review whether this condition is still necessary. (COA 31)
- The School will preserve permanent vehicle counter data electronically for a period not less than three years. (COA 22 e)
- The vehicle counting devices shall be kept in working order. Malfunctioning devices shall be promptly fixed. (COA 22 e)

4. Reporting.

TDMP monitoring reports shall be prepared by the School and submitted to the Director of Planning and Development Services three times per academic year until:

- the school has reached maximum enrollment, or within 5 students below maximum enrollment, for two consecutive years, and
- has consistently met the average peak hour and average daily trip rate standards. (COA 23, MM 7a)

Until the school reaches the maximum enrollment and has consistently met the trip standards, the reports will be provided to the City according to the following schedule (COA 23 a):

Start of Monitoring Period	End of Monitoring Period	Due Date
July	October	December 15
November	February	April 15
March	June	August 15

Once the school reaches maximum enrollment for two consecutive years and has consistently met the trip standards, only two monitoring reports per academic year shall be required. (COA 23) The monitoring reports shall be provided to the City according to the following schedule (COA 23 b):

Start of Monitoring Period	End of Monitoring Period	Due Date
July	December	February 1
January	June	August 1

After 15 years of monitoring, the Planning and Transportation Commission shall review whether COA 23, summarized above, is still necessary.

Monitoring Report Requirements:

- Describe all monitoring report requirements, including TDM Plan goals and performance measure targets and data collected. (COA 24 a)
- A simplified, easy to read compliance review matrix (COA 24 q)
- The following **data and metrics**:
 - Driveway volume counts by 15-minute increments (COA 24 b i)
 - Average weekday AM peak trips and average weekday daily trips for the monitoring period, excluding construction trips, Special Event and Major Event dates and non-school days; summer school shall be separately reported and not averaged with the academic

- year. (COA 24 b ii)
- Total average daily weekday trips and AM weekday peak trips during the week that the campus frontage street segments are evaluated by the City (COA 24 b iii)
- The average daily weekday traffic volumes on the campus frontage City street segments (except Embarcadero) – raw data provided to the City according to the reporting schedule (COA 24 b iv)
- The dates and number of times the average weekday daily trips and/or AM weekday peak trips exceeded AM weekday peak and/or ADT exceedance threshold, including any special, limited circumstances such as trips during construction. (COA 24 b v)
- Rates of use of alternative transportation (% of mode split between bicycle, pedestrian, shuttles, etc.). (COA 24 b vi)
- Parking conditions (number of spaces within the garage used, number of spaces within surface lots used, extent (counts) of on-street parking adjacent to the school and in the expanded parking study area). (COA 24 b vii)
- Bicycle parking counts (supply and demand) and dates, times, & attendance of bicycle repair clinics. (COA 24 b viii)
- Student drop-off/pick-up location counts and percentages by driveway and target distribution percentages. (COA 24 b ix, COA 22 j)
- An electronically transmitted appendix to the report containing the raw data from the driveway counting devices for the monitoring period. (COA 24 b x)
- information on compliance with parking and drop-off requirements, including parking or drop-off in the surrounding neighborhood. (COA 24 f)
- Drop-off lane discharge rates, and the average and maximum lengths of ingress and egress queues in the four 15-minute increments prior to the first bell and the 15-minute increment following that bell. (MM 7a)
- The following **descriptions of methodology**:
 - How and where counts were conducted including any off-site data collected by an independent traffic engineering company. (COA 24 c)
 - Installation, calibration methods, function and proposed maintenance of permanent traffic counting devices. (COA 24 d)
 - How records of traffic counts are to be preserved electronically (COA 24 d)

- Frequency of posting of traffic count data to the School's website for accessibility to City officials and the public. (COA 24 d)
- Detailed explanation of the pick-up and drop-off process as well as target pick-up/drop-off distribution percentages. (COA 24 e)
- Provide a map of each parking study area, and description of methodology employed to capture off-campus parking. (COA 24 i)
- The following **descriptions of monitoring and safety operations**:
 - The number of daily (while school is in session) onsite traffic attendants (COA 24 g)
 - Use of traffic safety warning devices. (COA 24 h)
 - On and off campus Parking Management Strategies, Traffic Circulation Management Strategies and Event Traffic Procedures. (COA 24 j)
 - Traffic Monitor Staff are required to report any excessive vehicle queues, safety concerns, or other concerns or recommendations to improve safety and circulation to the administration. (MM 7a)
- The following **descriptions of TDM Strategies**
 - Identify scope and breadth of TDM measures utilized. (COA 24 k)
 - Other programs provided by the school. (COA 24 l)
- The following additional information:
 - The number of enrolled students for the period covered by the report. (COA 24 m)
 - List the dates of special events that occurred in the period covered by the report, including times, attendance, and parking/traffic management efforts and results. (COA 24 n)
 - Copies of mailings to families regarding the parking/traffic/pick-up/drop off policy, including traffic management for special events. (COA 24 o)
 - List of disciplinary consequences for students and parents who do not cooperate with the parking requirements. (COA 24 p)
 - Traffic Monitor Staff reports and Castilleja's response to each shall be summarized in the traffic monitoring reports. (MM 7a)
 - The School shall provide real time driveway counter data to the City, as directed by the Planning Director or the Office of Transportation. (COA 24 r)

Enrollment:

- Prior to March 1st each year, the school will provide the Director of Planning and Development Services a letter from an independent auditor attesting to the number of students enrolled at the school, at the time of the audit, for the academic year. (COA 5)
- Prior to exceeding an enrollment of 450 students a traffic consultant will provide verification that at least 40% (+/-2%) of its students reside within a 5 mile radius of the campus. (COA 4 c, 22) Such verification will respect the privacy of the students.

Major and Special Event Reporting:

- Castilleja will post on their website and report to the city all Major and special events annually. (COA 21 a)

5. Required Mitigation Strategies.

Transportation Mode Mitigations:

- Develop a comprehensive incentive program for faculty, staff, and students for carpooling and using alternative means of transportation. (COA 25 a xxi, 21 a). Each academic year, the school will publish a TDM Operations Guide and Program Manual with the specific incentives selected from the menu of mitigation strategies which will include programs for faculty, staff and students.
- Provide roundtrip shuttle service to Caltrain stations for students and employees, with no less than two round-trips to Caltrain station for each schedule. (COA 22 h)
- Communicate shuttle schedules to volunteers coming to campus for committee meetings. (COA 25 a xviii)
- Juniors are not allowed to drive to school, except that the School may make up to 5 exceptions at any given time. (COA 22 m)

Parking Mitigations:

- School-related parking exclusively on campus, at designated off-site lots, and on the School side of adjacent streets. (COA 22 k, 25 a vi)
- Develop guidelines for use of satellite parking. The school will use best efforts to secure satellite parking from year to year and if/when secured, the school will provide further details in the annually published TDM Operations Guide and Program Manual. For any satellite parking that is beyond walking distance, the school will provide shuttles. (COA 22 o)
- Castilleja to experiment with an assigned parking program with designated areas for certain types of parking (i.e. student, employee, visitor). (COA 25 a xiii)
- Designated Visitor Parking Zone in the Administration Building lot. (COA 25 a xiv)
 - When visitors check in at the Administration Building they will be

asked where they are parked and redirected to the visitor's zones if necessary. (COA 25 a xiv)

- Parking plans for School committee meetings which bring volunteers to the campus. (COA 25 a xviii)
- Castilleja School agrees to be excluded from any future residential parking permit program. (RPP) Program. (COA 22 k)

Operations Related Mitigations:

- At the beginning of *each semester*, Castilleja shall register all student cars, distribute I.D. tags, and review the traffic and parking policies with student drivers. (COA 25 a x)
- At the *beginning of every school year*, Castilleja shall set aside scheduled time for all faculty and staff to register their cars, receive an I.D. tag and review the traffic and parking policies. (COA 25 a ix)
- Traffic entering or exiting the project site driveways on Bryant Street shall be restricted to right-turns. (MM 7a)
- Routinely monitor and reassess drop-off/pick-up assignments to balance traffic flows. (COA 22 j)
 - If vehicle queues are causing spillover into the public right of way on Bryant Street, Castilleja will modify the drop-off procedures and TDM program to include greater staggering of bell schedules or other strategies that would decrease vehicle trips or otherwise spread out the number of peak hour vehicle trips accessing the underground garage. (MM 7a 15)
- Parking Monitoring.
 - Once per day, School personnel shall monitor parking onsite and on surrounding public streets. (COA 25 a v)(COA 25 a vi)
 - Offenders shall be instructed to move their car and where to park.(COA 25 a v) (COA 25 a vi)
 - Monitors are responsible for traffic control, enforcing no parking/drop-offs in unauthorized streets/areas, and monitoring of streets around school for student parking or drop-offs. (COA 22 l)
- Traffic Monitoring.
 - Provide traffic monitors during peak drop-off, pick-up and for some special events. (COA 25 a iv, 22 l)
 - Monitors to educate students and parents and enforce the circulation related conditions of approval to keep surrounding streets clear of congestion. (COA 25 a iv)
 - Traffic monitor responsibilities:
 - wear a highly visible safety vest. (COA25 a iv)
 - direct vehicle and pedestrian movements into, within, and exiting the garage. (MM 7a)
 - direct cars to maintain a constant flow of traffic to avoid queueing on public streets (COA 25 a ii)

- instructed parents to move out of the driveway if their daughter is not at the pick-up location and others are waiting. (COA 25 a xx, MM 7a)
 - report any excessive vehicle queues, safety concerns, or other concerns or recommendations to improve safety and circulation to the administration. (MM 7a)
- Other.
 - The School's adjacent Emerson Street residential properties shall not be used for any School related purpose, including but not limited to, additional parking, deliveries or student pick-up or drop-off. (COA 13)
 - The School will coordinate with the Director of Planning and Development Services and the Chief Transportation Official to identify a traffic safety warning device to be used at the garage exit that will not generate excessive noise audible at neighboring residential properties to the greatest extent feasible. (COA 12 c)
 - Following the construction of the Academic Building, all deliveries and bus pick-ups and drop-offs shall be accomplished within designated pick-up/drop-off areas on campus. (COA 10)

Communication & Education Mitigations:

- Continuous education of staff, students, and families regarding the importance of an efficient and safe student drop-off operation to prevent excessive queuing in the garage. (MM 7a, COA 19)
- The School shall update its transportation and parking handbook/portal and distribute it annually to the parents of enrolled students in advance of the upcoming academic year. The handbook must contain all of the requirements in COA 25 a including the following information: (COA 25, 19)
 - Updated parking/traffic/pick-up/drop-off policy. (COA 25 a)
 - Parents shall be instructed not to double-park on street nor drop-off or pick up students in undesignated areas. (COA 25 a i)
 - Except for exiting the parking garage onto Emerson, parents shall be instructed not to make left turns in or out of driveways at peak times. Signs shall be posted to indicate these turning rules (COA 25 a iii)
 - Castilleja students and parents shall be instructed to park exclusively either on campus, at designated off-site lots made available for School use, or on the School side of adjacent streets where parking is permitted. (COA 25 a vi)
 - Disciplinary consequences for students and parents who do not cooperate with the parking requirements. (COA 25 a vii)
- The Parent/Student Handbook shall be incorporated into the Castilleja School long range planning efforts and made part of the Board Policies and Procedures Manual. (COA 25)
- There must be a bi-annual communication to parents reminding them of the

- importance/purpose of the School's TDM strategies. (COA 21 a)
- Castilleja shall continue its major transportation campaign with families to emphasize carpools and use of Castilleja buses and shuttles, Caltrain and other alternative means of transportation. Every Castilleja family shall receive information promoting carpooling and providing information to facilitate car/vanpooling in their immediate geographic area. (COA 25 a xii)
- Regular newsletters to parents will include a TDM section with any relevant updates to the TDM Policy or event parking requirements. (COA 25 a & MM 7a)
- Committee Meetings (COA 25 a xviii):
 - At the beginning of School committee meetings, a reminder of parking policies shall be announced to all attendees.
 - Anyone not following the policy shall be requested to move their car.
 - When meeting notices are sent to committee members, a parking reminder and shuttle schedule shall be included.
- Provide bicycle safety education for students, parents, and staff to encourage students and staff to ride bicycles to and from school (MM 7a 16)
- Host school-wide bicycle encouragement events (such as competitions, incentives, and other fun events) to support biking, walking, carpooling, and transit use. (MM 7a 17, Nyguard June 17, 2019)
- The transportation demand management program monitoring reports will be posted to the School's website. (COA 16 d)
- The School will have a dedicated phone number and email address to be answered by someone affiliated with the School who will immediately respond to complaints regarding noise, special events, athletic competitions, traffic and parking or other neighborhood disturbances. (COA 17)
 - Communication regarding this phone number, email address, and a link to these COA's, will be sent to all property owners and tenants within 600 feet of the School at the start of each academic year. (COA 17)

Summer Camp Mitigations:

- Drop-off and pick-up shall be conducted on-site. (COA 25 a xix)
- Castilleja personnel shall facilitate getting campers into vehicles and ensure all policies are followed. (COA 25 a xix)
- Castilleja shall give all summer camp families written instructions for a drop-off/pick-up procedure at the beginning of each camp session. (COA 25 a xix).
- Director of Summer Camp responsible for enforcing policies with parents. (COA 25 a xix)

Major and Special Event Parking Mitigation Measures: (COA 6 j)

Castilleja will adhere to the following parking mitigation measures for our Major and Special Events.

Major Event Mitigation (500+ guests per COA 6)

- Provide appropriate parking and shuttle service to CalTrain. (COA 25 a xvii)
- The CalTrain shuttle schedule and parking plan shall be included with other event information and shared with potential attendees. (COA 22 I, 25 a xvi, a xvii)
- For certain events as needed, make every effort to arrange off-site parking with nearby parking lots and provide shuttle service to the parking locations. The availability of these lots is dependent on events and cooperation from lot owners. (COA 25 a xvii)
- Maximize on-site parking and use tandem parking and assisted or valet parking whenever feasible. (COA 25 a xvi)
- Provide traffic monitors and direct as much traffic as possible onto the school site, using tandem parking, and assisted or valet parking, allowing students to use all lots after hours, using the day-time loading zones for parking, and utilizing all resources to minimize impact to street parking. (COA 25 a xvii)
- Use traffic monitors to make sure that all vehicles park legally and safely when parking on the street. (COA 25 a xvi)

Special Event Mitigation (51-500 guests per COA 6)

- Special Event provisions in TDM plan shall apply to special events (COA 22 i)
- Provide roundtrip shuttle service for all special events to encourage attendees to use transit or a park and ride service. (COA 22 i)
- The CalTrain shuttle pick-up/drop-off locations and schedule, and parking plan shall be included with other event information and shared with potential attendees. (COA 22 i)
- Use Spieker Field for overflow parking as needed. (COA 25 a xi)
- A parking plan must be identified and listed on the event list provided to the City and posted to the website. (COA 6 i)

Per MM 4a Castilleja will follow parking mitigation measures related to major and special events per the following table: (COA 6 h, i)

Time of Day	No of Guests	Parking Plan	Monitors **	Shuttle Service
Instructional Hours*	50-80	X		
Instructional Hours	>80	X	X	X

Outside Instructional Hours	>160	X	X	X
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*Instructional hours= 7:00 a.m. - 6:00 p.m.

** Seven traffic monitors required for all events with more than 75 guests.

- Castilleja will continue to refine its calendaring process to plan school functions so special events with more than 100 attendees coming to campus do not fall on consecutive nights or weekends. (COA 25 a xv).

6. Fees for City Monitoring.

Before the start of each academic year and upon receipt of an invoice from the City, , the School shall fund the City's installation of temporary vehicle traffic counter devices t. (COA 31)

In addition, within 30 days of receipt of an invoice from the City:

- Castilleja will deposit \$15,000 with the City of Palo Alto to cover all City costs associated with periodic review of the school's compliance with these conditions of approval.
- The deposit amount shall be replenished within 30 days after receiving notice from the City that the deposit balance is \$5,000 or less. (COA 30)

7. Violations and Enforcement.

As more specifically outlined in COA 28, a violation of any term of the RLUA is a violation of the Palo Alto Municipal Code and the City has the right to initiate civil and/or criminal enforcement and/or abatement proceedings, or after notice and public hearing, revoke the approvals set forth in the RLUA or alter the COA's/mitigation measures. In addition, in the event of a violation, the City may take appropriate enforcement actions, including but not limited to the imposition of administrative financial penalties. (COA 28)

The City may require Castilleja to suspend enrollment increases or reduce maximum enrollment if it finds the school in violation of any conditions of approval, including but not limited to the approved transportation demand management plan, anticipated student drop off distribution, or environmental mitigation measures, subject to the following criteria (COA 29)

After the initial notice of violations	Castilleja has 45 days to take corrective action and demonstrate compliance to avoid a suspension in enrollment
Any determination to reduce or suspend increases in enrollment from the Director of Planning and Development Services	Must be made within 60 days of the initial notice
An appeal to a determination to reduce or suspend increases in enrollment	May be appealed in writing within 14 days and would be subject to applicable fees
A final determination* to suspend increases to or reduce enrollment made after the start of the academic year and prior to March 1	Shall apply to the next academic year regardless of whether the School has remedied any violations that were the cause of the suspended enrollment.
Violations of ADT and AM Peak Trip thresholds	May also be enforced according to Mitigation measure 7a and COA 4 (Enrollment) and COA 34 (summarized below)

**The term final determination used in this context includes the time to process an appeal, if filed.*

Between CUP approval and attainment of enrollment of 535 students (5 students below maximum enrollment of 540 students), for 2 consecutive years, any violation of the AM Peak or ADT thresholds will be subject to the following schedule: (COA 34 a)

Violation	Consequence
1st report showing Average AM Peak (383) or ADT (1198) thresholds exceeded	Add an additional TDM measure as determined by Castilleja
2nd consecutive report showing Average AM Peak (383) or ADT (1198) threshold exceeded	Add an additional TDM measure as determined by the Director of Planning and Development Services in consultation with the Chief Transportation Official and Castilleja

3rd consecutive (and for each consecutive violation thereafter) report showing Average AM Peak (383) or ADT (1198) threshold exceeded	Reduce enrollment by at least 5 students or more as reasonably determined necessary by the Director of Planning and Development Services in consultation with Chief Transportation Official to ensure attainment in the next admissions cycle
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Following attainment of the maximum enrollment or within 5 students below maximum enrollment, for two consecutive years, violation of the average AM Peak or ADT thresholds provided in Condition #22 shall be subject to the following schedule: (COA 34 b)

Violation	Consequence
1st report showing Average AM Peak (383) or ADT (1198) thresholds exceeded	Additional TDM measures shall be required as determined by the Director of Planning and Development Services in consultation with the Chief Transportation Official.
2nd consecutive report showing Average AM Peak (383) or ADT (1198) threshold exceeded	Additional TDM measures shall be required as determined by the Director of Planning and Development Services in consultation with the Chief Transportation Official.
3rd consecutive (and for each consecutive violation thereafter) report showing Average AM Peak (383) or ADT (1198) threshold exceeded	Reduce enrollment by at least five (5) students or more as reasonably determined necessary by the Director of Planning and Development Services in consultation with Chief Transportation Official to ensure attainment in the next admission cycle.
If one report in a calendar year (February or August) showing average AM Peak (383) or ADT (1198) threshold exceeded and one or two reports in the next calendar year showing an exceedance of the same thresholds	Implement more intensive TDM measures as determined by the Director of Planning and Development Services in consultation with the Chief Transportation Official.
If one report in a calendar year (February or August) showing average AM Peak (383) or ADT (1198) threshold exceeded and three consecutive reports in the next two calendar	Reduce enrollment by up to 5% in the next admission cycle or by up to 10% over the next two admission cycles combined as reasonably determined by

years (February, August, February) showing an exceedance of the same thresholds	the Director of Planning and Development Services in consultation with Chief Transportation Official to ensure attainment of the AM Peak Hour and ADT standards
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Restoration of Student Enrollment. (COA 34 b v)

To restore student enrollment:

- Castilleja must demonstrate compliance with AM Peak and ADT thresholds for three consecutive reporting periods.
- Upon successful compliance, the Director of Planning and Development Services will determine the restoration schedule.
- The increase in enrollment shall not exceed the lesser of 25 students or the total number of reduced student enrollment.
- Following the restoration of enrollment, Castilleja's enrollment increases can continue with 25 students per year.

Driveway Device Counter Maintenance.

- A device that is out of order or provides inaccurate data for more than 10 consecutive days shall be considered a violation of condition COA 22 e. (COA 22 e)

If Castilleja is in violation of trip rate standards, it may implement some or all of the following measures sufficient to attain the peak hour and trip rate standards. (MM 7a)

- Late afternoon shuttle departures
- Off-site drop-off/pick-up area
- Expanded carpool/trip planning program
- Additional off-site parking
- Parking/Carpool Incentives program for employees
- Alternative transportation information
- Bike tune-up day and on-site repair stations
- Guaranteed Ride Home Program
- On-Site car or bike sharing program
- Provide transit passes
- Mandatory ridesharing

8. Oversight.

Planning and Transportation Commission Oversight.

After 15 years of monitoring:

- The Planning and Transportation Commission will review whether temporary vehicle devices in the public right of way are still necessary. (COA 31)

- The Planning and Transportation Commission will review whether the TDM Monitoring report is still necessary. (COA 23)

Director of Planning and Development Oversight.

- After implementation of the TDMP, the Director of Planning and Development Services may, based on empirical data or other information that would reasonably impact the effectiveness of the TDMP, determine that one or more of the TDM strategies has become infeasible or ineffective. Upon such determination, the School shall propose an alternative measure(s) in consultation with the Director to achieve the intended performance of the replaced strategy or strategies. (COA 25)
- From time to time, the City may require supplemental traffic counts or studies to be funded by the School to assess and possibly redistribute student drop-off/pick-up to further limit impacts on surrounding streets. (COA 26)

Neighborhood Committee Requirements & Oversight. (COA 33)

- The City Council shall appoint a 3-person Neighborhood Committee that shall have advisory responsibility to review TDM reports and TDM plan performance.
- The Neighborhood Committee will convene within 30 days of submission of a TDM report and as needed to review other issues within its purview.
- The Neighborhood Committee will provide any recommendations to the planning and Development Services Director within 14 days of meeting.
 - If the Committee is unable to convene or provide a recommendation within the timelines above, the Planning and Development Services Director may act without the recommendations of the Committee.
 - Meetings of the Neighborhood Committee shall be subject to the Brown Act.
- The Neighborhood Committee members shall live within 500 feet of the school and serve two year terms.

Castilleja Oversight for the Transportation Demand Management Plan. (COA 25 a viii)

- Oversight for the Transportation Demand Management Plan shall be the responsibility of the Head of School
- Other staff may be assigned responsibilities regarding the daily operations and enforcement of the plan.
- At the beginning of each year Castilleja will provide the neighbors and the City with a list of individual contacts with emails and phone numbers of the staff members assigned this

responsibility. (COA 17)

- A log will be kept of all communication and expressed concerns which are received and the School staff will review the log for trends and respond to remedy any problems.
- Neighbors who feel their concern was not properly responded to, can contact the number the School publishes for complaints.

Appendix A:

Transportation and Parking Related COA's and Mitigation Measures

Transportation Demand Management Plan	Condition of Approval (COA) or Mitigation Measure (MM)		
Introduction	COA 20, 21	COA 21 e	COA 27
Performance Standards			
ADT and AM Peak Standards	COA 22 a, c		
Exclusions	COA 24 b ii	COA 34 c	
Data Collection Methodology			
Permanent Vehicle Counter Devices	COA 22 b, d, e		
Summer School Trip Counts	COA 24 b ii		
Temporary Vehicle Counter Devices	COA 22 g	COA 31	COA 24 b iv
Preservation of Permanent Vehicle Counter Data	COA 22 e		
Maintenance of Vehicle Counting Devices	COA 22 e		
TDM Reporting			
Monitoring Periods and Deadlines	COA 23 a,b		
Reporting Requirements	COA 24 a,b, f, g, q	MM 7a	COA 22 j
Methodology	COA 24 c - f	COA 24 i	
Monitoring and Safety Operations	COA 24 g, h, j	MM 7a	
TDM Strategies	COA 24 k, l		
Additional TDM Reporting Requirements	COA 24 m - p, r	MM 7a	
Reporting Enrollment	COA 22 n	COA 4 c	COA 5
Special Event Reporting	COA 21 a		
Required Mitigation Strategies			
Comprehensive Incentive Program	COA 25 a xxi	COA 21 a	
Roundtrip Caltrain Shuttle Service	COA 22 h		
Committee Meetings Parking	COA 25 a xviii		
Juniors Driving to Campus	COA 22 m		
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Daily Parking Monitoring	COA 25 a v, vi	COA 22 l	MM 7a
Limited Turning	MM 7a	COA 25 a iv	

All Deliveries and Buses at Designated Areas on Campus	COA 10		
Parking Monitor Responsibilities	COA 25 a v, vi	COE 25 a i,xx	MM 7a, COA 22 I
Traffic Monitor Responsibilities	MM 7a, COA 22 I	COA 25 a ii-iv, vi	COA 25 a xx
Use of Adjacent Housing Properties	COA 13		
Safety Warning Device	COA 12 c		
Communications and Education			
Parking and Traffic Rules	COA 25 a i-iii	MM 7a	COA 25 a vi, vii
Schoolwide Bicycle Encouragement Events	MM 7a - 16, 17		
Student Parent/Guardian Handbook	COA 25, 25 a	COA 19	
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Summer Camp			
Summer Camp Parking	COA 25 a xix		
Fees for City Monitoring			
Fees for City Monitoring	COA 30	COA 31	
Violations and Enforcement			
Violations and Enforcement	COA 28	COA 29	COA 34 a, b
Restoration of Enrollment	COA 34 b v		
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Oversight			
Planning and Transportation Commission	COA 31	COA 23	
Director of Planning and Development Services	COA 25	COA 26	
Neighborhood Committee	COA 33		
Castilleja School	COA 25 a viii	COA 17	COA 25

Appendix B:

Castilleja School 2022-23 TDM Operations Guide & Program Manual

Castilleja School

2022-23

Transportation Demand Management Operations Guide & Program Manual

An annual consolidation of Castilleja School TDM mitigation practices & requirements



TDM CONDITIONS OF APPROVAL and MM REQUIREMENTS

This Castilleja 2022-23 Transportation Demand Management (TDM) Operations Guide and Program Manual (“Operations Guide”) enumerates all aspects of the School’s TDM program for the 2022-23 school year. This Operations Guide was developed in the context of the City of Palo Record of Land Use Action (“RLUA”) dated June 8, 2022 and the Final TDM Plan required by the Conditions of Approval and the Mitigation Measures. *[Note: A reference summary of TDM related Conditions of Approval (COA’s) and the Mitigation Measures is provided in Table A, attached to this Operation Guide].*

OVERVIEW OF TDM PROGRAMS & OPERATIONS MANAGEMENT

This Operations Guide provides an overview of the planned mitigation strategies for the 2022-23 academic year to achieve our AM peak trip threshold of 383 trips and our Average Daily Trip (ADT) threshold of 1198. It contains appropriate measures and elements consistent with other Palo Alto, Santa Clara County, and regional commute programs, as well as the required COA’s and Mitigation Measures required by the RLUA. The goal is that by implementing the strategies listed in this Operations Guide, Castilleja will successfully reduce trip counts and impact to the neighborhood.

The Operations Guide is categorized in the following sections:

- I. Modes of Transportation
- II. Communication and Education
- III. Traffic and Parking Management
- IV. School Operations
- V. Monitoring and Reporting

Modes of Transportation

CARPOOLING

Castilleja actively encourages carpooling for employees, students, and parents/guardians. For employees, we offer cash incentives to those who commute with two or more in a car not in the same family. For students and parents/guardians we have programs in place to support the matching of families. In addition, Castilleja offers carpoolers in electric vehicles priority in using chargers in the employee parking lot.

- **Student Carpool Facilitation:** Castilleja's student carpool matching efforts include a parent representative who contacts households that live near an active carpool or live near other homes to help foster a carpool arrangement between these families. Parents looking for a carpool match can fill out the online form located on our website. A member of our parent community uses the survey results to help facilitate carpool matching.
- **Carpool Facilitator Parties:** Castilleja will organize small, informal carpool matching parties in neighborhoods where a high concentration of families live at the start of every school year.
- **Employee Carpool Facilitation:** Castilleja has a spreadsheet for employees on the Employee Transportation Portal for employees wishing to find a carpool partner.

WALKING AND BIKING

Castilleja actively encourages walking and biking to school for both students and employees that live within a 2-mile radius of campus. For employees we offer a cash incentive for walking or biking to school. For employees and students, we provide on-site bike repair equipment and conduct bike safety and maintenance clinics.

- **Bicycle and Pedestrian Connections:** Bicycling and walking are an alternative to the private automobile. They are also zero-emission modes of transport and, therefore, every trip converted from a car to a bike or walk helps our air quality. Castilleja supports and encourages biking and walking programs. Our new campus will incorporate bicycle lanes and paths to promote bike commuting and walking.

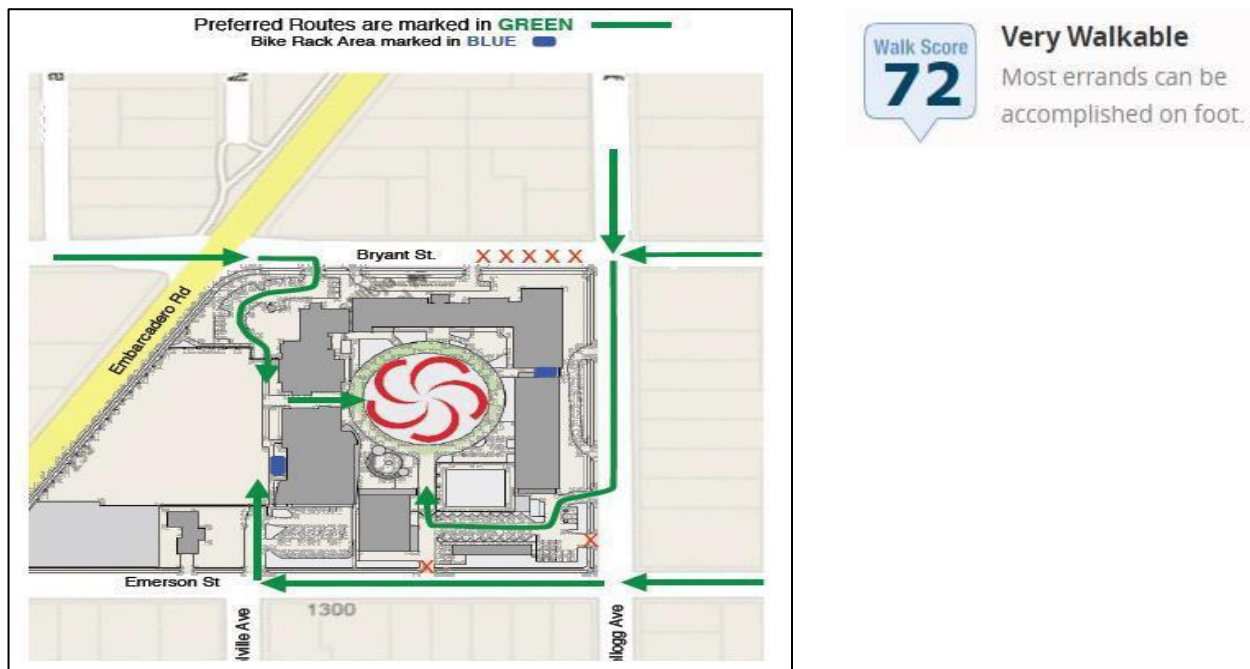


• **Bicycle Parking:** Castilleja provides more than 100 secure bicycle facilities which is currently more than enough bike parking for all of our students and employees who wish to commute to Castilleja by bicycle. For our campus remodel Castilleja plans to install 140 Class II secure bicycle parking facilities for bicycle commuters. Castilleja counts bicycle parking daily. As the demand for bicycle facilities expands, Castilleja will add more racks to accommodate the growing number of bicycle commuters.

- **Bicycle Repair Fix It Station:** Castilleja has a bicycle Fix-it station in the maintenance office. The bike Fix-it station includes an air compressor and a bike repair kit. We have staff that will assist any students or employees that need help with maintaining their bike.
- **Bicycle Tune Up Day:** Castilleja hosts two free events during the school year with a local bicycle shop or mobile service to provide free bicycle mini-tune-up or maintenance checks for all students, faculty, and staff. Tune-up events help promote the Bike-to-School Days campaign.
- **Bicycle Safety Education:** Castilleja hosts a bicycle safety education class taught by staff or a local bicycle advocacy organization twice per year. The bike safety workshop will review bike riding basics, family biking tips, and general bike mechanics.
- **On-Campus Bikeshare:** Castilleja currently has two school-owned bicycles for employees to use for lunchtime recreation or daytime errands.

- **Walking or Biking to Campus Guidelines:** Castilleja provides safe route mapping for biking and walking to school to students and employees. According to WalkScore.com, Castilleja rates a 72 out of 100 as a "very walkable" location. Shown below are guidelines for walking or biking to campus.

BIKING AND WALKING SAFE ROUTES MAP



TRANSIT, VAN, AND SHUTTLES.

- **Free School Bus and Van Service:** Castilleja offers free school bus and van service from Burlingame, San Mateo, Woodside, Portola Valley, the Los Altos region, East Palo Alto, and Menlo Park. This free service is available to students and employees. The school bus routes are listed on the Castilleja transportation resource portal, Castilleja.org/transportation-portal.
- **Caltrain Shuttle Van:** Castilleja operates three to four last-mile van pick-up services for students and employees traveling to and from school via Caltrain. The van picks students and employees up at the Palo Alto University Avenue Caltrain Station in the morning and provides return service to the station after school. The Caltrain shuttle schedule can be found on our transportation portal Castilleja.org/transportation-portal.

- **Student Parent/Guardian Incentive Program:** We currently offer our school bus/van and shuttle services free of charge to our students and employees. We will continue to monitor our current routes and look for opportunities to add routes as needed.

Communication and Education

CASTILLEJA TDM RESOURCE PORTAL WEBPAGE

- **Castilleja Commuter Resource Webpage (Portal):** Castilleja maintains web pages containing transportation resources and policy information for parents/guardians, students, and employees. Traffic reduction is a priority for the school. All school community members must abide by the school's TDM plan, posted on the Employee, and Parent/Guardian portals. The portals include instructions regarding all parking, car registration, and traffic circulation guidelines and the expectations that students, parents, and employees make every effort to reduce their transportation impact.
- **Employee Portal TDM Webpage:** Our employee transportation and parking TDM webpage contains some of the following information:
 - Parking requirements for employees who bring a car to campus
 - Information about our loaner bicycles
 - TDM pledge and trip reduction policy
 - Describes our 2022/23 employee incentive program
 - Links to: Bus/Van/Shuttle Schedules and Vehicle Registration
- **Parent/Guardian Portal Transportation Webpage:** Our parent/guardian transportation portal page contains some of the following information:
 - Traffic and trip reduction policy
 - Parking guidelines
 - Who can drive to campus (Seniors only)
 - Our van/bus shuttle program and links to the schedule
 - Link to our vehicle registration form

STUDENT PARENT TDM COMMUNICATIONS

- **Student TDM Communications:** At the start of each semester Castilleja will remind Seniors that they must register all cars that will be driven to campus and review the traffic and parking policies.

- **Student Parent/Guardian School TDM Communications:** Castilleja sends out letters, emails, flyers, and our weekly newsletter communications to inform students and parents/guardians of the following:
 - Upcoming commuter fairs
 - Commuter policies
 - Transportation & free bus/shuttle services
 - Parking updates and information
 - Annual survey's
 - School traffic TDM requirements
 - Alternative options to consider such as biking, walking, carpooling or using the free bus/shuttle service
- **Student Parent Traffic Reduction Policy:** At the start of each school year and the second semester families receive communication about the importance of limiting the school's traffic impact on the surrounding neighborhood through transportation marketing materials, the handbook, and our TDM Transportation portal page. All students and parents are encouraged to carpool, ride Caltrain, and use the school's buses and shuttles. Students who live near campus are encouraged to walk or ride a bike to school.
- **Student Parent Handbook TDM Information:** At the start of each school year students and parents/guardians are provided a handbook with our traffic rules and consequences for non-compliance. All students and parents/guardians are required to sign a form attesting that they have received and read the handbook.

CASTILLEJA NEWS TRANSPORTATION SECTION NEWSLETTER

- **Castilleja's Weekly Newsletter:** CastiNews is Castilleja's weekly newsletter and includes information about events, parking, and traffic minimization. CastiNews goes to all students, parents/guardians and employees and includes a transportation and parking section. This section is used to provide traffic and parking updates for special events or any general updates as needed.

Traffic and Parking Management

PARKING RESTRICTIONS

- **Restrict Student Driving and Parking on Campus:** Juniors are prohibited from driving and parking on or around campus however 5 exceptions to this rule are allowed at any given time for students that have extenuating circumstances.
- **Campus Parking:** Students, parents/guardians, visitors and employees are informed that they may only park on campus, in the schools remote lots, and on the school side of the street around campus.
- **Designated Student and Employee Parking Program:** The school has created dedicated student parking in the senior lot and employee parking in the Kellogg/Emmerson lot. In addition, Castilleja has reserved EV Parking for employees that carpool and drive an Electric Vehicle. All visitors to campus are instructed to use the Admin Lot.
- **Visitor Parking Lot:** The area in front of the Administration Building has been designated as the visitor parking zone. All visitors to campus are instructed to use this parking lot.

OFF-CAMPUS PARKING

- **Remote Parking Facilities:** Castilleja currently leases 25 parking spaces at First Presbyterian Church for use by employees allowing them to park and walk to campus. Castilleja also currently leases 15 parking spaces at University AME Zion Church for students and employees. There is a shuttle that runs between the church and the school in the morning and multiple times in the afternoon.
- **Rules for parking at the off-campus lots:**

First Presbyterian Church

- ❖ Parking is allowed 6:30 a.m. - 6:00 p.m.
- ❖ No moving your car to campus during the school day
- ❖ Be respectful of the neighborhood: Keep quite when returning to your car.

AME Zion Church

- ❖ Parking is allowed 6:00 a.m. – 8:00 p.m.
- ❖ Sign up the day before to schedule shuttle service
- ❖ Be respectful of the neighborhood: Keep quiet when returning to your car or waiting for the shuttle.

SPECIAL EVENT PARKING MANAGEMENT

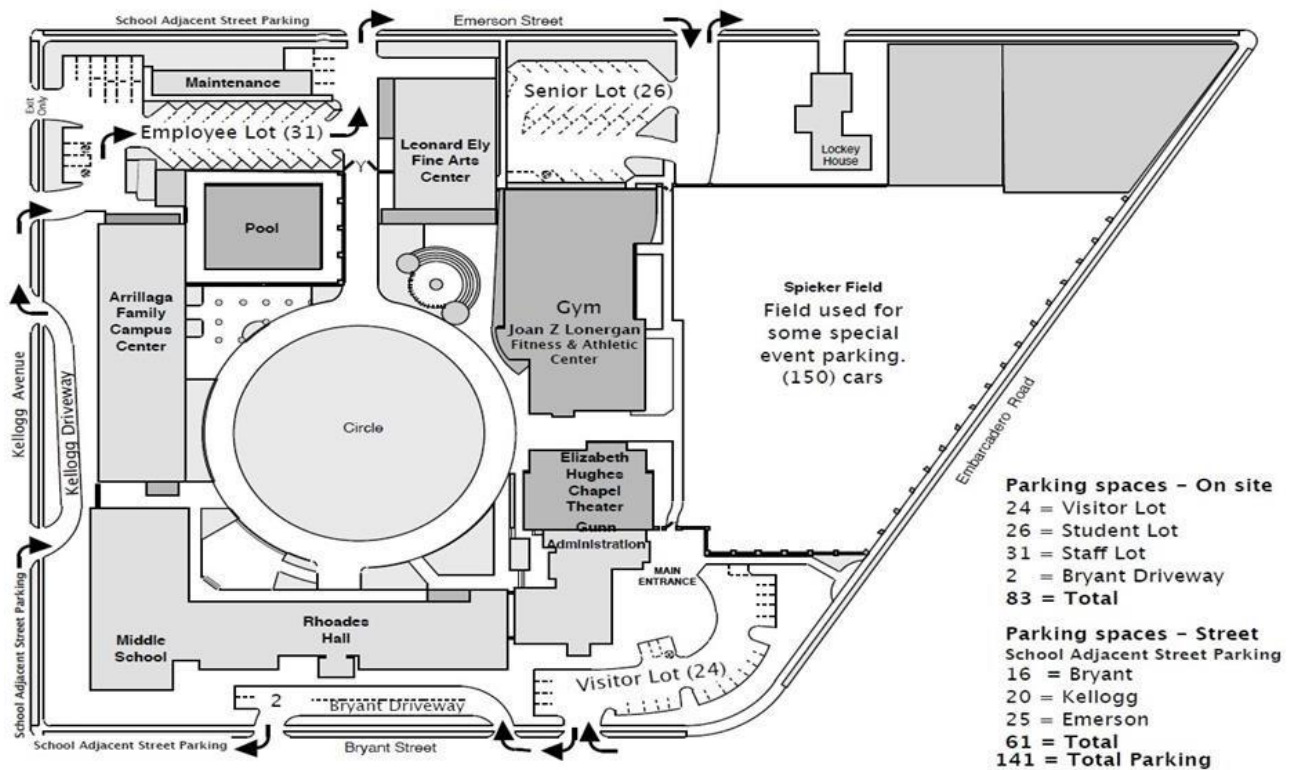
- **Special Event Parking and Traffic Management:** Castilleja will review the parking and traffic requirements for each special event included in our special event list provided to the City at the start of the school year.

Castilleja will implement our special event parking management mitigation measures (listed below) for events that fall into the following categories,

1. Major Events
2. Special Events taking place 8:30 a.m. - 2:30 p.m., with greater than 100 guests
3. Special Event taking place outside of instructional hours with greater than 160 guests

- **Special Event Parking Mitigation Measures:**
 - ✓ Provide traffic monitors to make sure that all vehicles park legally and safely.
 - ✓ Provide shuttles to Caltrain and publish the shuttle schedule in Casti News.
 - ✓ Make every effort to arrange off-site parking with nearby parking lots and provide shuttle service to and from the parking locations. The availability of these off-site parking locations will be communicated to attendees via Casti News Transportation section.
 - ✓ Use the athletic field for overflow parking when needed.

A nighttime and weekend supervisor lives in housing near the school to supervise traffic and parking during evening and weekend events. The employee is also on call should an unforeseen disruption occur. Below is an event parking map.



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- **Parking for School Committee Meetings:** For school committee meetings Castilleja will coordinate a parking plan and shuttle schedule. The parking plan and shuttle schedule will be communicated included in committee member communications. At the start of these meetings leaders will be instructed to remind guests of our parking policies and ask guests that are not parked in an approved location to move their cars.

SUMMER CAMP PARKING AND TRAFFIC MANAGEMENT

- **Summer Camp Parking Mitigation Measures:** Summer camp drop-off and pick-up will be conducted on campus. Camp employees will facilitate getting campers into vehicles and ensure all parking/traffic policies are being followed. It will be the responsibility of the Director of Summer Camp to enforce the policies with parents.

TRAFFIC RULES, ENFORCEMENT, MONITORING AND MANAGEMENT

- **Daily Traffic Management:** Castilleja uses school employees and security guards to help enforce all of our traffic rules. Castilleja traffic monitors will be identified by wearing a highly visible safety vest. During peak traffic times in the morning and afternoon Castilleja uses a total of eight attendants to enforce the following rules and safety measures:

- Right turn only rule into and out of campus driveways and parking lots
 - Make sure cars do not back up on Kellogg, Bryant, Emerson or Embarcadero
 - No double parking in the neighborhood
 - No drop-off/pick-up of students outside of approved drop-off locations
 - No blocking the neighbor driveways at any time.
 - Maintain traffic flow in driveways. Drivers are directed to circle the block and return if their student is not at the pick-up location.
 - Monitor the exit onto Bryant street to assure that the bike route is kept safe upon exiting.
- **Traffic Monitor Training:** At the beginning of the school year school traffic monitors are trained on the above procedures as well as being instructed to report any excessive vehicle queues, safety concerns, or other concerns or recommendations to improve safety and circulation.
- **Daily Onsite and Surrounding Public Street Parking Oversight:** At least once per day traffic attendants will monitor parking onsite and on surrounding public streets. Any offenders are notified to move their car and added to our violation list for follow up if necessary.
- **Student Drop-off and Pick Up Distribution:** Castilleja has multiple drop-off and pick up locations. Morning drop-offs and afternoon pick-ups are positioned in separate locations depending on grade level, carpool, and multi grade level families. Families who carpool use the priority loading area in the Employee Lot located by the pool. Castilleja attempts to distribute a portion of users at drop-off/pick-up areas (43% Bryant St, 30% Kellogg Ave, and 27% Bryant St. onto Emerson St.) to manage peak-hour traffic more efficiently. Castilleja will routinely monitor and reassess the drop-off/pick-up assignments to balance traffic flow and mitigate any back up onto the surrounding streets.

School Operations

Transportation Coordinators: Castilleja has designated two staff members to support the school's transportation facilities and programs. One staff person has a primary responsibility to oversee and manage transportation programs for the school. A second staff member aids and supports the transportation coordinator.

Vehicle Registration and Permitting: Vehicle registration and permitting are required for all students, parents/guardians, and employees. The Transportation Portal, under the Vehicle Registration link, completes the registration process. Upon registration a parking sticker is issued which must be affixed to the lower right-hand corner of the car's windshield.

EMPLOYEE TDM POLICY

- **Start of School Year Employee TDM Communication:** At the start of each school year Castilleja sets aside time for employees to register their cars, receive their I.D. tags and review the traffic and parking policies.
- **Employee TDM Handbook:** At the beginning of each school year, all Castilleja employees receive an Employee Policy Handbook. The handbook contains a section that describes the TDM rules employees are expected to follow to comply with the TDM related COA's and Mitigation Measures. All employees are encouraged to walk, ride a bike, carpool, take the train, or use the various Castilleja shuttles to campus and abide by all transportation demand programs outlined in the Transportation Section of our Employee Portal and Employee Handbook.
- **Employee TDM Reduction Pledge – Mandatory Participation:** For the 2022-23 school year we are asking all employees to commit to doing one of the following, at least four times a week:
 1. Commute by means other than a car (walk, bike, take the train, or use Castilleja van/bus transportation)
 2. Carpool with two or more non-family members
 3. Park in one of the remote parking lots

Employees who cannot fulfill one of the options above at least four days a week, are required to sign up to help with traffic duty on days when they need to park on campus.

- **Employee TDM Commitment Survey:** All employees are sent a survey at the beginning of the school year and asked to identify which of the above options they plan to commit to. When employees check-in to our school's computer system each morning they are asked a survey question regarding their mode of transportation for that day. We use this information to monitor TDM compliance and to calculate incentives for using alternative forms of transportation.
- **New Employee TDM Orientation Packet:** As new employees arrive at Castilleja, they are supplied with a TDM Orientation Packet. This packet covers commuting to campus, preferred transport modes, commuting by car limitations, TDM monitoring and participation, and the importance of the TDM Requirements.
- **Employee Transit Benefits:** Employees can elect Commuter Transit benefits. Castilleja will provide employees up to \$92.50 per pay period (maximum of \$185 a month) towards their commute costs when they use public transportation to commute to and from Castilleja at least 4 days a week. Funds will be issued directly to a debit card

by our administrator, HRPro and spending deemed to be commuter funds would be limited to the purchase of a Clipper Card, or SamTrans or BART passes or transit parking.

- **Employee Incentive Program:** Castilleja actively encourages carpooling and alternative means of transportation to school. Employees earn \$2.50 for each day they bike, walk, park remotely, carpool, or take public transportation. Employees must record their daily mode of transportation via the VisitU app. We use this data to calculate our TDM incentives and for TDM Plan Reporting.
- **Employee TDM Expense Reimbursement:** Employees are eligible for a \$50 annual employee reimbursement to defray the cost of their TDM compliance. The reimbursement covers bike tires, inner tubes, rain boots, helmets, bike gear, bike tune-ups, transit costs, walking shoes, or fuel costs for carpool or vanpools.

Monitoring and Reporting

- **Permanent Vehicle Counter Devices:** Castilleja installed permanent vehicle counter devices at the entrances and exits of drop-off locations, surface parking lots, and garages. Castilleja will monitor the number of vehicle trips to and from campus during the peak morning hours.
- **Temporary Vehicle Counter Devices:** From time to time, Castilleja will install temporary vehicle counter devices in the public right of way at locations determined by the City Planning Director.
- **Annual Student Travel Mode Assessment Transportation Survey:** Annually, Castilleja will conduct an online survey of students and parents to understand better commute patterns and programs that might encourage them not to drive alone to campus. The findings of each survey will help inform the selection of strategies that may have the most significant impact on reducing future vehicle trips to campus and parking demand. The academic year-end Castilleja TDM Monitoring Report will include the annual student (parent and employee) travel mode survey data.
- **City Costs Associated with Annual Compliance Review:** Castilleja will deposit \$15,000 with the city to cover all city costs associated with the annual review of the school's compliance report.
- **Monitoring Report:** Compiled TDM and travel data will generate a descriptive monitoring report for the City, according to the below chart. However, only the academic year-end monitoring report will include the annual student, parent, and employee commuter survey and mode-use survey data.

Appendix A:

Transportation and Parking Related COA's and Mitigation Measures

Transportation Demand Management Plan	Condition of Approval (COA) or Mitigation Measure (MM)		
Introduction	COA 20, 21	COA 21 e	COA 27
Performance Standards			
ADT and AM Peak Standards	COA 22 a, c		
Exclusions	COA 24 b ii	COA 34 c	
Data Collection Methodology			
Permanent Vehicle Counter Devices	COA 22 b, d, e		
Summer School Trip Counts	COA 24 b ii		
Temporary Vehicle Counter Devices	COA 22 g	COA 31	COA 24 b iv
Preservation of Permanent Vehicle Counter Data	COA 22 e		
Maintenance of Vehicle Counting Devices	COA 22 e		
TDM Reporting			
Monitoring Periods and Deadlines	COA 23 a,b		
Reporting Requirements	COA 24 a,b, f, g, q	MM 7a	COA 22 j
Methodology	COA 24 c - f	COA 24 i	
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