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**Subject:** Castilleja School's Final Transportation Demand Management Plan; August 19, 2024 City Council Hearing, Agenda Item No. 13  
**Date:** Friday, August 16, 2024 1:02:27 PM  
**Attachments:** [image001.png](#)  
[2024 0816 M. Francois Letter to Mayor Stone.pdf](#)

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Good afternoon Mayor Stone and Members of the City Council,

Attached please find correspondence from Matt Francois on behalf of Castilleja School in regards to the above-referenced matter.

Please feel free to contact our office with any questions or concerns.

Thank you,

**Brooke Bennett**

Legal Assistant

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August 16, 2024

**VIA E-MAIL [City.Council@CityofPaloAlto.org]**

Honorable Mayor Greer Stone  
and Members of the City Council  
City of Palo Alto  
250 Hamilton Avenue  
Palo Alto, CA 94301

Re: Castilleja School's Final Transportation Demand Management Plan; August 19,  
2024 City Council Hearing, Agenda Item No. 13

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Dear Mayor Stone and Members of the City Council:

On behalf of Castilleja School (the "School"), we write in support of the Staff recommendation to approve the Final Transportation Demand Management Plan ("TDMP") for the Castilleja School Redevelopment Project (the "Project") as consistent with the conditions of approval imposed on the Project.

The sole duty of the City Council for its Agenda Item No. 13 is to ensure the School's TDMP incorporates all transportation demand management requirements into one document. The TDMP is fully compliant. This item should be approved on the consent calendar as there are no discretionary actions to be taken or policy questions to resolve.

As will be fully articulated in this letter, the suggestion by Staff in its report to the Council that School-side street parking can be counted in Project trip counts is based on a flawed and incorrect premise. Street parked vehicles have never been included in School trip counts for the simple and universally-accepted reason that it is impossible to discern whether a car parked in a public space is associated with the School or not. Instead, as reflected in the record and confirmed by W-Trans (the City's independent traffic consultant), driveway counters were (and continue to be) the sole basis for determining Project trip counts. Review of the TDMP does not give the City Council the power to add new requirements that were not previously included in the record. Should the Council nonetheless impose new requirements, its actions would amount to a gross abuse of discretion, exposing the City to legal liability and damages.

The School has worked diligently to ensure that it can continue to educate as many young women as allowed by complying with more than 100 conditions of approval imposed on the Project, including the TDMP which Staff described as "more robust than any other previously approved

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plan.”<sup>1</sup> The School has a proven track record of reducing trips by nearly 30 percent through implementing programs and measures similar to those included in the TDMP.

The City’s credibility is on the line. It cannot discriminate against the School by haphazardly changing approved Project conditions more than two years after the fact. It is not only unfair, it would be unjust and illegal. The School has the clear right to execute on its approvals so that it can educate more young women without prejudice or delay. Making a decision otherwise undermines the City’s credibility, sets a negative precedent for other projects/approvals, and subjects the City to significant legal risk.

## **1. Background**

On June 6, 2022, the City Council (on a 6-1 vote) approved the Project through its adoption of: (1) a Conditional Use Permit (“CUP”) Amendment, (2) a Parking Adjustment, (3) a Variance, (4) Architectural Review (“AR”), and (5) a Zoning Text Amendment. (*See* Record of Land Use Action No 2022-02 [the “RLUA”]). The Council’s approval of the Project was the culmination of more than 20 public hearings over the course of six years. And the Council action was based on detailed findings supported by substantial evidence in the record and made subject to compliance with more than 100 conditions of approval. All appeal periods and timelines for legal challenge of the Project (as approved and memorialized by the RLUA) have expired. On February 4, 2024, the City issued a Building Permit for the first phase of the Project to construct the underground parking garage.

As part of the Project approvals, the School is held to an average daily trip (“ADT”) standard of 1,198 trips and an AM peak trip standard of 383 trips. (Condition 22.a, 22.c.) The TDMP includes vehicle trip strategies to assist in complying with these trip thresholds and reduce vehicle trips to, and parking demand at, the School.

The TDMP fully complies with the conditions of approval imposed on the Project, including Condition 20 specifying the contents of the TDMP and Condition 22 requiring that trips be counted by driveway counters. The average daily and AM peak trip thresholds imposed by Condition 22 to ensure “no net new trips” were based on driveway counts. (*See* August 14, 2024 Memorandum from Fehr & Peers, attached hereto as Exhibit A [including the actual driveway surveys conducted by W-Trans, the City’s traffic consultant for the Project, and an August 7, 2024 letter from W-Trans, confirming that *the trip thresholds were “based solely on driveway counts” and that “[v]ehicle activity along the public streets was not included . . .”*].)<sup>2</sup> The thresholds were established by driveway counts, and the TDMP measures Project trips by driveway counts in accordance with Condition 22.

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<sup>1</sup> (Staff Report for May 23, 2022 City Council hearing regarding Project, p. 9).

<sup>2</sup> Unless otherwise noted, emphasis in quotations is supplied and citations are omitted.

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Counting street parking as “trips” would artificially and improperly increase counts in a manner not supported by the facts or the law. Although it seems like a minor detail on the surface, the inclusion of parked cars in the trip count jeopardizes the School’s ability to meet the strict trip thresholds, thereby comprising its right to grow enrollment. Improving the School with modern buildings to serve additional, future women leaders was the entire reason that Castilleja agreed to undergo the extensive and expensive City process, culminating in the City Council’s June 2022 approval of the Project.

**2. The TDMP fully complies with Project Condition 20 and must be approved.**

Project Condition 20 requires that a final version of the TDMP incorporating all applicable transportation-related requirements be compiled into a “cohesive, well-organized and indexed document.” The intent of the TDMP is to reduce vehicle trips to, and parking demand at, the School for the purpose of minimizing School-related disruptions and intrusions into the nearby residential neighborhoods.

In its final adopted Motion to approve the Project (the “Motion”), the City Council directed that a Final TDMP be returned to the City Council for consideration. The Motion contained various items to be included in the TDMP, as follows: (1) a commitment to only use onsite and street parking along the perimeter of the School for School parking, (2) guidelines pertaining to satellite parking, (3) a general prohibition on juniors driving to school, (4) the School agreeing to monitor and enforce no parking/drop-offs in the neighborhood, (5) the School agreeing to be excluded from any possible future residential parking program, and (6) increasing the number of students within a 5 mile radius by a specified percentage prior to enrolling more than 450 students. All of these items are properly included in the TDMP.

In accordance with Condition 20 and the Motion, the TDMP “compiles all applicable transportation-related requirements of the Record of Land Use Action into a cohesive, well-organized and indexed document.” This is confirmed by the Staff Report:

The [Final TDMP] document identifies performance standards, data collection methodology and reporting requirements, mitigation strategies, fees for City monitoring, information on enforcement and addressing violations, and general oversight. Appendices to the TDMP include all other relevant parking and transportation-related conditions of approval from the RLUA and a TDMP operations guide and program manual that would be shared with enrolled students and their parents.

(Staff Report, p. 6.)

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Section 8 of the Motion authorized clarification to certain conditions. Those include (1) prohibiting use of pile drivers or exceptionally loud equipment during construction, (2) requiring the use of secant walls if groundwater is encountered during construction activities, and (3) requiring the use of non-audio safety measures for when cars exit the garage (avoiding buzzer/noise). ***Importantly, nothing in Section 8, nor any other part of the Motion, authorized clarification to any condition pertaining to the method of calculating Project trips.*** This is true even as Staff and multiple councilmembers expressed their understanding that trips would be counted solely by driveways counters. (Summary Minutes, May 23, 2023 City Council Meeting, pp. 7, 8, 18, 23; *see also* Staff Report for May 23, 2022 City Council hearing regarding Project, p. 9.)

The TDMP complies with Condition 20 and the Motion. As correctly stated by Staff in the Staff Report “this review does not present the City Council with an opportunity to add new requirements that were not previously included in the source documents.” (Staff Report, p. 6.)

**3. The Project trip thresholds were derived solely from driveway counts and did not include on-street parked vehicles.**

The ADT and AM peak trip thresholds imposed by Condition 22 were based on driveway counts. As explained in the attached memorandum from Robert Eckols, a Principal with Fehr & Peers, an expert transportation consulting firm (the “FP Memo”), the City’s independent traffic consultant (W-Trans) surveyed only the multiple driveways around the School to establish the Project trip generation thresholds. Based on review of the W-Trans raw survey data, Fehr & Peers concludes “the vehicle trips generated by the on-street parking were NOT included in the data collection or calculation of the school’s trip generation.” (FP Memo, p. 2.)

In confirming that the counts were based only on the driveways and not street parking, Kenny Jeong, Senior Engineer with W-Trans, wrote in an August 7, 2024 to Mr. Eckols:

To inform the traffic analysis and CEQA report that was prepared on behalf of the City of Palo Alto (as the CEQA lead agency), ***W-Trans oversaw the traffic data collection effort at Castilleja School. Among the activities conducted included a count of vehicle activity at multiple driveways serving the school. Vehicle activity along the public streets was not included with this counting exercise since these are public spaces that are not exclusively used by the school.*** These traffic counts occurred on January 25 and 26 in 2017 and served as the basis for identifying a trip rate unique to Castilleja School. ***As such, the trip rate was established to reflect the traffic that accesses the school, based solely on driveway counts at the school.***

Staff’s suggestion that street side parking could be included in the calculation of Project trips is based on the flawed and incorrect premise that street side parking was included in the original

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counts. (Staff Report, p. 5.) According to the City’s traffic consultant who conducted the counts, they were not.

In sum, the Project trip generation was based solely on driveway counts at the School. No counts were taken of the vehicle trips associated with the on-street parking. This is consistent with standard transportation engineering practice since the on-street parking is public parking and remains constant. Therefore, “monitoring driveway trips activity accurately captures the relative change in the peak arrival hour and daily trips, which can be compared to the trip caps in the CUP that require ‘no net new trips.’” (FP Memo, p. 6.)

**4. Since the trip thresholds were established by driveway counts, Condition 22 also requires that Project trips be measured by driveway counters.**

Condition 22 which specifies the “performance measures and requirements” to be incorporated into the TDMP plainly states that data from permanent driveway counters will be used to calculate ADT and AM Peak trips. For instance, Condition 22.b states: “**Data from permanent driveway counters placed at all entrance and exit driveways will be used to calculate ADT.**” Condition 22.d likewise states: “**Data from permanent driveway counters placed at all entrance and exit driveways will be used to calculate AM Peak Trips.**” This is consistent with Mitigation Measure 7a which reads: “***As part of the monitoring, Castilleja shall install traffic counting devices at each project site driveway and submit the raw data summary and analysis in the monitoring reports.***” The adopted Mitigation Monitoring & Reporting Program likewise states that “driveway counts” as included in the “monitoring reports” will be used to evaluate whether the ADT and AM peak hour trip thresholds are being met.

Condition 22.e goes on to provide: “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 existing each day.” The data collected by these devices shall be provided to the City upon request, in addition to the data provided with the TDMP monitoring reports pursuant to Condition 24. (Condition 22.e.) The School must preserve the count data for a period of not less than three years. (*Id.*) The counting devices shall be kept in working order and promptly fixed if malfunctioning. (*Id.*) The School shall provide real time driveway counter data to the City as directed by the Director. (*Id.*)

Condition 22.b and Condition 22.d both refer to Condition 24 “regarding the monitoring report for the ways ADT shall be calculated.”<sup>3</sup> Condition 24 elaborates on additional information that must be included in the monitoring reports related to driveway counts and other data. For instance, Condition 24.b.i states that the TDMP monitoring reports shall contain “driveway volume counts by 15-minute increments (raw counter data).” Condition 24.b.x requires that the reports

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<sup>3</sup> Nothing in this cross-reference refers to the calculation of AM peak hour trips.

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contain “the raw data from the driveway counting devices for the monitoring period.” Condition 24.d further requires that the reports describe the “installation, calibration methods, function and proposed maintenance of [the] permanent traffic counting devices.” Nothing in Condition 24 states that on-street parking adjacent to the School is to be used to calculate ADT or AM peak trips.<sup>4</sup>

While other information is to be included in the TDMP monitoring reports, driveway counts were the only method specified by the conditions to measure Project trip generation. This is why the counters have to be installed and kept in good working order and the raw data associated with the counters has to be preserved and provided to the City (including in real time, if requested).

As noted by Fehr & Peers, “the use of driveway counts is consistent with how trips have been monitored at the school since 2012.” (FP Memo, p. 5.) Using street parking for Project trip counts would not comport with the method by which trip thresholds were derived. It would be akin to comparing apples to oranges. Indeed, as noted by Fehr & Peers: “If the monitoring data collection methodology is changed to include on-street parking vehicle trips, the trip caps would need to be adjusted upward to align the trips caps with the new data to account for the existing on-street parking vehicle trips at the time the original counts were collected.”

**5. The City cannot legally amend the conditions of approval to require counting of on-street parking.**

Approval of TDMP does not give the City the opportunity to modify the conditions of approval related to trip count monitoring. Doing so would conflict with a myriad of well-founded legal principles and authorities.

**a. The plain terms of the Project conditions require using driveway counters to count trips.**

“To interpret . . . conditions of approval, [a reviewing court] look[s] first to the plain language of the conditions.” (*Martis Camp Community Assn. v. County of Placer* (2020) 53 Cal.App.5th 569, 591 [applying rules of statutory construction to conditions of approval citing *Moyer v. Workmen’s Comp. Appeals Bd.* (1973) 10 Cal.3d 222, 230 [“We are required to give effect to statutes according to the usual, ordinary import of the language employed in framing them.”].) “The Legislature’s chosen language is the most reliable indicator of intent because it is the language of the statute itself that has successfully braved the legislative gauntlet.” (*Lateef v. City of Madera* (2020) 45 Cal.App.4th 245, 253.)

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<sup>4</sup> While requiring that data from temporary vehicle counters placed in surrounding streets be included in the monitoring reports, the data is only to be “used for ongoing monitoring and not to determine a violation of [the CUP].” (Condition 22.g.)



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Further, it is well settled that an “agency must interpret the conditions it imposes in a reasonable manner, consistent with its intent at the time the condition was enacted.” (*Stone v. Board of Supervisors* (1988) 205 Cal.App.3d 927, 935; *see also Alford v. Pierno* (1972) 27 Cal.App.3d 682, 688 [“A statute should be interpreted so as to produce a result that is reasonable. If two constructions are possible, that which leads to the more reasonable result should be adopted.”].) Moreover, conditions have to be construed in accordance with its purpose and the legislative intent. (*See, e.g., Alford v. Pierno* (1972) 27 Cal.App.3d 682, 688 [“One of the cardinal rules of construction requires that words be given such interpretation as will promote rather than defeat the *general purpose and policy* of the law. . . . In construing a statute, the court should ascertain the intent of the Legislature so as to effectuate the purpose of the law.”].)

Courts “may not add to or alter [words of a statute] to accomplish a purpose that does not appear on the face of the statute or from its legislative history” and that “[w]ords may not be inserted in a statutory provision under the guise of interpretation.” (*Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1069 and *Kirkwood v. Bank of America National Trust & Savings Association* (1954) 42 Cal.2d 333, 341.)

The plain language of Condition 22 provides that “[d]ata from permanent driveway counters . . . will be used to calculate ADT” and “AM Peak Trips.” The manifest purpose of this provision was to ensure that the ADT and AM Peak Trips—also established by driveway counts—were not exceeded.

Neither Condition 22 nor any other condition authorizes the City to also monitor trips through adding consideration of School-side street parking. (*See, e.g., Keen v. City of Manhattan Beach* (2022) 77 Cal.App.5th 142, 148 [because a city ordinance permitting rental of residential properties was silent regarding the duration of the rentals, the city “cannot credibly insist its ordinances permit long-term residential rentals but have always banned short-term rentals. That interpretation makes no sense.”].) Doing so would impermissibly and unlawfully add words to the condition to accomplish a purpose that does not appear on its face or from the legislative history. (*Watsonville Pilots* and *Kirkwood*, both *supra* [further prohibiting a legislative body from adding words to a condition under the guise of interpretation].)

As noted by Staff, if the City’s intent were to include street parking in Project trip counts, it would have required a monitoring and tracking system. (Staff Report, p. 5 [“To track and monitor vehicles that are associated with the school, when they arrived, leave or are replaced with another vehicle requires an extensive amount of human resources either by Castilleja staff, hired consultants, or another approach that assumes a certain number [of] trips associated with on-street parking.”].) Yet, such a system was never discussed nor imposed as a condition of approval of the Project.



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Further, the streets surrounding the School are public streets. It would be impossible to discern whether a car parked along the School frontage is associated with the School or not. While Castilleja is precluded from parking or dropping off students outside of designated areas, the public is not precluded from parking on the Castilleja side of the three public streets where parking is allowed. (Staff Report, p. 6.) And relying on unsupported and unfounded “assumptions rather than hard data,” as suggested by Staff, does not account for the fact that on-street parking can be used by multiple users multiple times per day. (Staff Report, p. 6.) In short, construing the conditions to include street parking as Project “trips” would produce an unreasonable result.

**b. The City must act in a manner consistent with the School’s vested rights.**

In California, “if a property owner has performed substantial work and incurred substantial liabilities in good faith reliance upon a permit issued by the government, he acquires a vested right.” (*Avco Community Developers, Inc. v. South Coast Regional Com.*, 17 Cal. 3d 785 (1976).) Furthermore, once a landowner has secured a vested right the government may not, by virtue of a change in zoning laws or land use designation, prohibit or modify the use by which the permittee relied on. (*Id.*; see also *City of West Hollywood v. Beverly Towers, Inc.*, 52 Cal.3d 1184, 1192 (1991) [subsequently enacted ordinance imposing new conditions on condominium conversion could not be enforced against property owners who had already obtained all discretionary permits to convert multi-family housing buildings to condominiums].)

The City must apply *existing* conditions to the Project, not invent new conditions or requirements or arbitrarily change the ones already imposed. As the California Court of Appeal famously admonished a city in a similar situation involving an application for a use permit: “**You cannot change the rules in the middle of the game.**” (*Woody’s Group, Inc. v. City of Newport Beach* (2015) 233 Cal. App. 4th 1012, 1016 [writ of mandate issued, ordering a city council to set aside its unlawful denial of a use permit application].) Similarly in *Security National Guaranty, Inc. v. California Coastal Commission* (2008) 159 Cal.App.4th 402, 419-420, 422-423, the Court of Appeal ruled that an administrative agency lacked jurisdiction to change existing land use laws or to create new laws affecting the use under appeal. In reaching this conclusion, the court reasoned that *the applicant “was entitled to have its development proposal judged by the standards in effect at the time of its application.”* (*Security National Guaranty, supra*, 159 Cal.App.4th at 422; see also *Citizens of Goleta Valley, supra*, 52 Cal.3d at 574 [California Supreme Court observes that requiring “a reexamination of basic land-use policy with every permit application would impose an unnecessary and wasteful burden on local governments.”].)

The School has vested rights to implement the Project in accordance with the RLUA. The conditions imposed on the RLUA specify that Project trips will be measured by driveway counters and specify no other method to count Project trips. The Project is approved and the School has relied on the approvals in expending millions of dollars to obtain necessary construction permits, including the Building Permit for the underground garage, issued by the City in February of this

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year. The School has obtained vested rights, which cannot legally be infringed upon by any subsequent modification or purported interpretation of the Project conditions.

**c. The City cannot legally modify the Project’s conditions.**

The City could only legally modify the conditions imposed on the Project approvals if it were to find the School in violation of the conditions of approval or being operated in a manner detrimental to the public health, safety, and welfare. (Palo Alto Municipal Code § 18.77.110.) Even then, the Director must provide the School notice, an opportunity to abate, and an opportunity to be heard. (*Id.*) The Director’s action on any such modification could be appealed, in which case the Planning & Transportation Commission would make a recommendation to the City Council for ultimate action.

It is well settled that any such action to modify or revoke an existing use permit infringes on a fundamental vested right and thus is subject to independent review by a court. (*Goat Hill Tavern v. City of Costa Mesa* (1992) 6 Cal.App.4th 1519, 1529 [observing that when rights are “sufficiently personal, vested and important to preclude its extinction by a nonjudicial body,” a trial court “must exercise its independent judgment on the evidence and find an abuse of discretion if the findings are not supported by the weight of the evidence.”]; *Malibu Mountains Recreation Area v. County of Los Angeles* (1998) 67 Cal.App.4th 359, 368 [court observes that “[a] CUP creates a property right which may not be revoked without constitutional rights of due process.”].)

The School is not in violation of the conditions of approval or being operated in a manner detrimental to the public health, safety, and welfare. Thus, the City has no basis to attempt to modify the Project conditions to require counting of street parking as “trips.” If the City were to nonetheless do so, its actions would be subject to non-deferential review by a court.

**d. Adding street parking to Project trip counts would lack a nexus to the Project and would be unsupported by substantial evidence in the record.**

As previously acknowledged by Staff, Castilleja has a successful track record of actually reducing vehicle trips by nearly 30 percent between 2012 and 2019.<sup>5</sup> In connection with the Project, Castilleja will implement an even more robust TDMP that ties student enrollment increases to current trip generation rates (no net new trips). As shown by the comprehensive Environmental Impact Report (“EIR”) by the City’s expert environmental consultants, all significant environmental impacts of the approved Project were reduced to a less than significant

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<sup>5</sup> (See, e.g., March 30, 2022 Staff Report to PTC, p. 63 [“Over nine years of fall and spring TDM program monitoring, Castilleja has demonstrated the School is capable of reducing peak hour trips and maintaining these reductions. Since the monitoring began in 2012, Castilleja has achieved a reduction of 28% of the trips in the morning peak hour.”].)

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level. This includes traffic impacts to Emerson Street (between Melville Avenue and Embarcadero Road) which the EIR found would be mitigated to a less than significant level by Mitigation Measure 7a which allowed adherence to even higher trips than allowed by Project conditions and monitoring of those trips by “traffic counting devices at each project site driveway . . .” For instance, while Mitigation Measure 7a caps trips at 1,296 ADT and 440 AM peak hour trips, Condition 22 caps trips at 1,198 ADT and 383 AM peak hour trips to ensure “no net new trips.”

The baseline trips were based on driveway counts. The Project trips are likewise measured by driveway counts per Condition 22. Modifying the Project trip calculation would lack a nexus to the specified condition of ensuring no net new trips. (*See, e.g., Anza Parking Corp. v. City of Burlingame* (1987) 195 Cal.App.3d 855, 861 [Court of Appeal observes that “[n]o local governmental body . . . may condition the issuance of any use permit for any purpose not reasonably related to the use of the property for which the use permit is requested.”] and *Liberty v. California Coastal Commission* (1980) 113 Cal.App.3d 491, 502-504 [condition requiring restaurant owner to provide parking for visitors and non-customer beach goers and other commercial uses was struck down as unreasonable and unfair].)

Likewise, there is no evidence, let alone substantial evidence, that modifying the calculation of Project trips to add street parking is necessary to ensure “no net new trips” or to address any significant environmental impact. The EIR and resulting studies prepared by the City’s expert environmental consultants provide substantial and unrefuted evidence to the contrary—that the Project as proposed will not result in significant traffic impacts and will achieve the no net new trip standard. Substantial evidence is defined as evidence of “ponderable legal significance . . . reasonable in nature, credible, and of solid value.” (*Lucas Valley Homeowners Assn. v. County of Marin* (1991) 233 Cal.App.3d 130, 142.) Substantial evidence includes “fact, a reasonable assumption predicted upon fact, or expert opinion supported by fact.” (Public Resources Code § 21080(e).) Substantial evidence does not include “argument, speculation, unsubstantiated opinion or narrative, [or] evidence that is clearly inaccurate or erroneous . . .” (*Id.*)

Mitigation Measure 7a requires trip generation monitoring by driveway counters. That adopted mitigation measure cannot legally be modified without re-opening CEQA review. (*Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 359 [agency must have “legitimate reasons” supported by substantial evidence for modifying adopted mitigation measures]; *Lincoln Place Tenants Assn. v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1509 [previously adopted mitigation measures cannot be modified or deleted without a showing that it is infeasible to implement them as shown in a supplemental EIR supported by substantial evidence].) The City has not and cannot make the requisite findings supported by substantial evidence to modify Mitigation Measure 7a. Thus, any attempt by the City to modify this measure would be invalid and unenforceable. (*Napa Citizens, supra*, 91 Cal.App.4th at 359.)

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**e. Modifying conditions to add street parking to Project trip counts would infringe on the School's constitutionally protected rights.**

There is no requirement that the School include street parking in its Project trip counts. It does not appear that the City has imposed such a condition on any other comparable use either. Thus, imposition of any such condition on Castilleja would not only infringe on the fundamental right to education but also raise concerns of arbitrary/irrational and unequal treatment.

In *Arnel Development Co. v. City of Costa Mesa* (1981) 126 Cal.App.3d 330, 337, the Court of Appeal ruled that enactment of an ordinance downzoning certain property was arbitrary and discriminatory where enacted without considering appropriate planning or land use criteria and for the sole and specific purpose of defeating a single development proposal.<sup>6</sup> (*See also Del Monte Dunes, Ltd. v. City of Monterey* (9th Cir. 1990) 920 F.2d 1496, 1508 [federal court finds local agency's land use decision, motivated by "political pressure from neighbors" instead of legitimate regulatory concerns, to support a substantive due process claim].)

"[A] deliberate, irrational discrimination, even if it is against one person (or other entity) rather than a group, is actionable under the equal protection clause." (*World Outreach Conference Center v. City of Chicago* (7th Cir. 2009) 591 F.3d 531, 538.) Recognizing the fact that Castilleja is an all-girls school, such unequal treatment could implicate heightened scrutiny by a reviewing court. (*City of Cleburne v. Cleburne Living Center* (1985) 473 U.S. 432, 440-441 ["Legislative classifications based on gender also call for a heightened standard of review. . . . A gender classification fails unless it is substantially related to a sufficiently important governmental interest."]; *Academy of Our Lady of Peace v. San Diego* 2012 U.S. Dist. LEXIS 191020 [court denied city's summary judgment motion as to equal protection claim filed by an all-girls school in connection with the city's denial of permits to modernize its campus, reasoning the school had produced sufficient evidence demonstrating that the city had intentionally treated the school differently than other similarly situated property owners].)<sup>7</sup>

Subjecting the School to different or more burdensome requirements than imposed on similarly situated property owners would deprive Castilleja of its constitutionally protected rights to due process and equal protection under the law. Such apparently arbitrary and discriminatory unconstitutional treatment would unnecessarily expose the City to the risk of litigation, and a potential award of damages and attorneys' fees.

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<sup>6</sup> The *Arnel* court noted that the ordinance was "not rationally related to the general regional public welfare, but, at best, to conserving the interests of the adjoining property owners and residents of the immediate area." (126 Cal.App.3d at 337.)

<sup>7</sup> Government Code Section 65008 also prohibits any zoning or planning action by a local government that denies any individual or group the enjoyment of residence, landownership, or any other land use because of, among other factors, their gender.

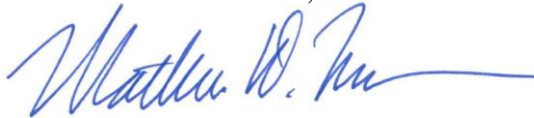
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The City has conferred final discretionary approvals on the School's Project. As such, the Project cannot now be made subject to further public review or have new or expanded conditions imposed on it based on the need for subsequent ministerial Project approvals, such as approval of the TDMP. The TDMP fully complies with the Project conditions and thus must be approved.

Thank you for your consideration of our client's views on this important matter. Please feel free to contact me (at 650-798-5669) or my co-counsel Mindie Romanowsky (at 650-324-9300, ext. 1150) should you have any questions regarding the contents of this letter.

RUTAN & TUCKER, LLP



Matthew D. Francois

MDF:bb

cc: Kathy Layendecker, Head of School, Castilleja  
Mindie Romanowsky, co-counsel, Jorgensen, Siegel, McClure, & Flegel  
Jonathan Lait, Planning Director  
Molly Stump, City Attorney  
Robert Eckols, Fehr & Peers  
Kenny Jeong, W-Trans

# EXHIBIT A



# Memorandum

Date: August 14, 2024

To: Mindie S. Romanowsky Jorgenson, Siegel, McClure & Flegel, LLP  
Matthew Francois, Rutan and Tucker

From: Robert Eckols, Principal

**Subject: Trip Monitoring for Castilleja School Perimeter Parking**

*SJ24-2276*

Fehr & Peers has provided Castilleja School with transportation planning & engineering services since the spring of 2012 when we began to monitor morning peak hour vehicle trip activity at the school's driveways. In June, 2022 Castilleja was approved for a new Conditional Use Permit (CUP) which prescribes that if/when the school increases enrollment, it is limited 383 vehicle trips during the morning peak arrival hour and 1,198 average daily trips (ADT), to be measured with driveway counts. Since then, Fehr & Peers has monitored Castilleja School trip activity (i.e., AM Peak Trips and Average Daily Trips) in accordance with the Conditions set forth in the CUP.

Recently, a question has arisen as to whether, in addition to driveway counts for trip monitoring, on-street public parallel parking along the three frontages of the school property should be included in trip counts. In order to determine the legitimacy and efficacy of including public on-street parking to the on-going driveway monitoring as a means to measure Castilleja's compliance with the trip cap thresholds set forth in the CUP (i.e. no new net trips), several factors must be considered, including:

1. Underlying Data Used to Establish Trip Caps;
2. The Conditional Use Permit- Conditions of Approval;
3. On-Street Parking Vehicle Trips Data Collection Methodology; and
4. On-Street Parking was a Background Condition; Monitoring Driveway Trips Captures the Relative Change in Peak Arrival and Daily Trips.



## Underlying Data Use to Establish Trip Caps

In connection with Castilleja's master plan and CUP application, a traffic impact analysis (TIA) was prepared by the City of Palo Alto's transportation consultant W-Trans. It is industry practice to use trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual. These rates are generic rates based on empirical surveys throughout the United States. However, ITE recommends that the best way to estimate trip generation is by surveying a similar type of use. Since the school was already in operation, a survey was conducted by W-Trans at the school to capture the existing trip generation. The surveyed trip generation rates for the school were used in the traffic impact analysis and, ultimately, to establish the peak hour and daily trip caps included in Condition of Approval 22, summarized below.

The methodology used to collect the existing trip generation data is described in the Transportation Impact Analysis (TIA) on Page 18 as follows: *"Thus, to calculate the school's trip generation rate, a survey was conducted at the school during a typical non-holiday period in January, 2017."* There was no further explanation of the study methodology provided in the text of the TIA and the raw count data was not presented in the TIA appendices. Thus, to further understand data collection methodology, Fehr & Peers requested the count data from W-Trans that was used to establish the morning peak hour and daily trip caps. The W-Trans raw survey count data is included with this memo as **Attachment A**.

Based on the raw data, there were 12 surveyors stationed (see **Figure 1**) at the 11 driveways (locations 2 – 12) and loading areas that serve vehicles, bicycles, and pedestrians, and one bicycle/pedestrian entrance on Embarcadero Road (location 1). The surveyors recorded the number of vehicles, pedestrians, and bicyclists entering and exiting the campus every 15-minutes between 6:00 AM and 7:00 PM.

Based on Fehr & Peers' review of the W-Trans raw survey data, the vehicle trips generated by the on-street parking were NOT included in the data collection or calculation of the school's trip generation. The City's traffic consultant, W-Trans, has also verified that the on-street parking was not included in the calculation of the school's trip generation. A letter from W-Trans to Fehr & Peers regarding the data collection methodology they used to establish the existing trips generated by the school in 2017 is included as **Attachment B**. Because the Castilleja trip caps were established using driveway counts, the conditions of approval specifically require placement of permanent driveway counters to verify compliance with the trip established peak hour and daily trips caps.

The trip caps developed by City staff using the trip generation data described in the TIA did not include on-street parking vehicle trips. If the monitoring data collection methodology is changed to include on-street parking vehicle trips, the trip caps would need to be adjusted upward to align



the trips caps with the new data to account for the existing on-street parking vehicle trips at the time the original counts were collected.

### Conditional Use Permit – Conditions of Approval

In accordance with the survey findings in the TIA , the City adopted Conditions of Approval 22 b, d, and e , which set forth the only mechanisms (i.e., permanent driveway counters) in the CUP to account for vehicle trips, as follows:



Figure 1: Castilleja School Access/Egress Points, Palo Alto, CA

Source: W-Trans Consultants

*"b. Data from permanent driveway counters placed at all entrance and exit driveways will be used to calculate ADT. Refer to condition 24 regarding the monitoring report for the ways ADT shall be calculated. A violation of the ADT target occurs when the average daily trip for a reporting period exceeds 1,198 trips."*

*"d. Data from permanent driveway counters placed at all entrance and exit driveways will*



*be used to calculate AM Peak Trips. Refer to condition 24 regarding the monitoring report for the ways ADT shall be calculated. A violation of the AM Peak Trips target occurs when the average AM Peak trip for a reporting period exceeds 383 trips."*

*"e. 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."*

The City adopted Conditions of Approval 24 a – r describes in detail what the TDM monitoring reports shall contain. Conditional of Approval 24 includes the following sections:

*"b. Include the following data and metrics:*

*i. driveway volume counts by 15-minute increments (raw counter data);*

*x. an electronically transmitted appendix to the report containing the raw data from the driveway counting devices for the monitoring period."*

*"d. Driveway Counting Device: Describe installation, calibration methods, function and proposed maintenance of permanent traffic counting devices. Describe how records of traffic counts are to be preserved electronically and frequency of posting of this data to the School's website for accessibility to City officials and the public." [referenced in COA #22 b, d, and e above]*

In COA #22 there are 15 itemized requirements for the TDM Plan. In COA #24 there are 30 itemized components that are required to be included in the TDM monitoring reports. There is only one item in COA 24# related to parking, which reads:

*"b. Include the following data and metrics:*

*vii. 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.*

This statement is a reference to parking occupancy (number of vehicles) counts in the parking structure, surface lots, and on-street spaces. The on-street parking occupancy counts are included in the monitoring to determine the number of vehicles parked on the adjacent street frontages and if spillover parking is occurring on neighborhood streets in the expanded parking study area. The parking occupancy counts are not related to trip generation. The vehicle trips to the parking structure and surface lots are captured by the driveways counts; however, there are no references to vehicle trips made by vehicles that use the on-street parking.



### **On-Street Parking Vehicle Trips Data Collection Methodology**

Collecting the number of vehicle trips associated with the on-street parking and attributing them to the school, is unsupported by the TIA and the conditions of approval do not set forth a protocol nor mechanism for including on-street public parking to trip monitoring. For context, to capture the number of school trips generated by the on-street parking, it is necessary to have daily surveyors located on each street frontage to observe each vehicle when it parks. Because the on-street parking is public parking, the surveyor would need to identify each drivers' origin or destination and whether it was the school campus or elsewhere. This requires observing where each driver comes from or goes to. This is easier to accomplish when a vehicle arrives at the on-street parking but is more difficult to monitor when the driver returns to the vehicle. An alternative approach to collecting this information would be for the surveyor to ask the driver about their destination or origin, which is called an "intercept survey," which was NOT a condition of approval for the Castilleja project.

The original TIA surveys were conducted between 6:00 AM and 7:00 PM (13 hours) to establish the AM peak hour and the daily cap. By comparison, to capture vehicle trips associated with the on-street parking, standard for the industry would require three to five surveyors during the AM peak arrival and PM departure periods and a minimum of three surveyors would be required on-site during the mid-day period, one to monitor each frontage on Bryant Avenue, Kellogg Street, and Emerson Avenue. These parameters were not called out in the TIA or the CUP.

### **On-Street Parking was a Background Condition / Monitoring Driveway Trips Captures the Relative Change in Peak Arrival and Daily Trips**

The data collection methodology used to establish the AM peak hour and daily trip caps did not collect the number of vehicles trips associated with the on-street parking; rather these parking spaces were considered a background condition. Because there are no proposed or planned changes to the on-street public parking in terms of the number of available spaces or time limits, the trips associated with the on-street parking are a constant. Thus, not including the parking spaces does NOT impair the ability to monitor vehicle trips at the campus. The driveway counts serve that purpose.

By monitoring vehicle trips at driveways and loading areas with the required automated sensors, any change in either the AM peak hour or daily trips at the school is captured and reported. The monitoring procedure established by the Conditions of Approval provides the information needed to monitor the performance of the school's TDM programs and compliance with the no net new trip standard. As is evident in the historical trip monitoring reports provided to the City, the use of driveway counts is consistent with how trips have been monitored at the school since 2012.



## Conclusions

- Fehr & Peers was able to confirm that original surveys of the Castilleja campus in 2017 did not capture the on-street parking vehicle trips; therefore, the trip caps established by the City of Palo Alto in the Conditions of Approval do not account for the on-street parking vehicles trips.
- If the monitoring methodology is changed to include vehicle trips using the on-street parking, both the AM peak hour and daily trip caps must be revised (increased) to account for these trips.
- There are no proposed or planned changes to the on-street public parking in terms of the number of spaces or time limits; therefore, the TIA correctly assumed that the trips associated with the on-street parking are a constant. By assuming that the trips associated with the on-street parking are a constant, monitoring driveway trips activity accurately captures the relative change in the peak arrival hour and daily trips, which can be compared to the trip caps in the CUP that require "no net new trips."

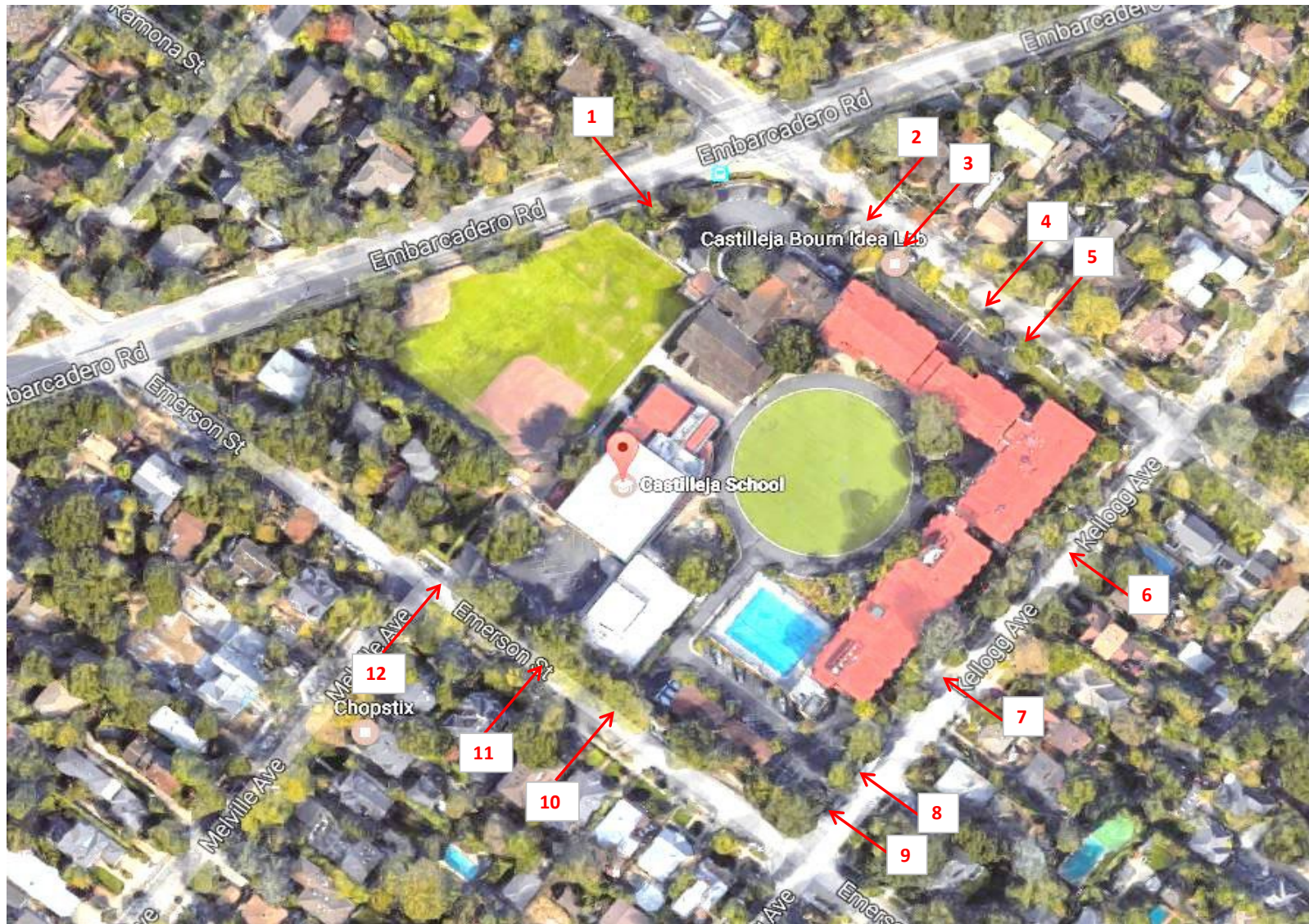


## **ATTACHMENT A**

### **W-TRANS DRIVEWAY DATA 2017**

- Location of Survey Stations
- Vehicle Counts – Wednesday & Thursday
- Pedestrian Counts – Wednesday & Thursday
- Bicycle Counts – Wednesday & Thursday

## CASTILLEJA SCHOOL ACCESS/EGRESS POINTS, PALO ALTO, CA



# WILTEC

Phone: (626) 564-1944 Fax: (626) 564-0969 info@wiltecusa.com

## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
PROJECT: CASTILLEJA SCHOOL  
DATE: WEDNESDAY JANUARY 25, 2017  
PERIOD: 6:00 AM TO 7:00 PM  
CITY: PALO ALTO, CA

### VEHICLE COUNTS

15 MIN COUNTS	LOC 1		LOC 2		LOC 3		LOC 4		LOC 5		LOC 6		LOC 7		LOC 8		LOC 9		LOC 10		LOC 11		LOC 12		TOTALS	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
600-615	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	2	0
615-630	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	2	0	1	0	0	0	0	0	0	3	3
630-645	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	1	2
645-700	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0	0	0	0	0	6	0
700-715	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0
715-730	0	0	1	0	1	0	0	0	0	0	0	0	0	0	5	0	0	0	0	1	0	0	0	0	7	1
730-745	0	0	1	0	6	0	0	0	0	0	2	0	0	2	1	0	0	0	0	1	0	0	0	0	10	3
745-800	0	0	7	1	5	0	0	0	0	3	3	0	0	3	10	0	0	0	0	0	0	0	0	0	25	7
800-815	0	0	2	1	7	0	0	0	0	8	0	0	0	0	3	0	0	0	0	3	0	0	0	0	12	12
815-830	0	0	0	0	8	0	0	0	0	3	3	0	0	1	0	0	0	0	0	0	0	0	1	0	12	4
830-845	0	0	3	0	48	1	0	0	0	36	16	0	0	12	1	0	0	1	0	0	0	5	0	73	50	
845-900	0	0	7	3	28	0	0	0	0	43	29	0	0	33	3	0	0	1	0	1	0	15	9	82	90	
900-915	0	0	4	0	0	0	0	0	0	0	1	0	0	3	0	1	0	0	0	2	0	0	0	0	5	6
915-930	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	3	0	
930-945	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0	3	1	
945-1000	0	0	1	2	1	0	0	0	0	0	2	0	0	0	1	0	0	1	0	0	0	3	0	8	3	
1000-1015	0	0	2	4	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2	3	4	8	
1015-1030	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	
1030-1045	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	1	0	1	0	3	2	4	5	
1045-1100	0	0	6	6	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	8	8	
1100-1115	0	0	6	6	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	4	3	12	10	
1115-1130	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	
1130-1145	0	0	1	1	0	0	0	0	0	1	0	0	0	0	1	0	0	1	0	0	0	1	1	3	4	
1145-1200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	1	0	2	1	
1200-1215	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	3	3	5	
1215-1230	0	0	0	1	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	1	2	2	
1230-1245	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	
1245-100	0	0	5	2	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	1	0	7	3	
100-115	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	4	
115-130	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0	1	1	
130-145	0	0	0	3	0	0	0	0	0	0	1	0	0	0	1	0	0	0	1	0	0	1	0	3	4	
145-200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	
200-215	0	0	1	2	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	1	1	3	4	
215-230	0	0	5	3	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	5	4	
230-245	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	2	2	
245-300	0	0	4	2	6	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	11	3	
300-315	0	0	16	8	12	0	0	0	0	4	6	0	0	0	4	1	0	2	0	1	0	2	0	40	16	
315-330	0	0	4	9	20	0	0	0	0	35	22	0	0	21	3	1	0	3	0	8	0	2	7	51	84	
330-345	0	0	1	8	6	0	0	0	0	12	9	0	0	11	4	0	0	1	0	7	0	0	7	20	46	
345-400	0	0	3	2	1	2	0	0	1	4	6	0	0	5	2	0	0	1	0	1	0	3	1	16	16	
400-415	0	0	12	4	2	0	0	0	0	3	4	0	0	3	0	0	0	0	0	1	0	0	0	18	11	
415-430	0	0	7	14	3	0	0	0	0	2	1	0	0	1	1	0	1	1	0	2	0	3	3	16	23	
430-445	0	0	4	3	4	0	0	0	0	6	6	0	0	3	0	0	0	1	0	1	0	3	3	17	17	
445-500	0	0	7	5	7	0	0	0	0	3	7	0	0	8	1	1	0	0	4	0	0	3	7	25	28	
500-515	0	0	8	6	1	0	0	0	0	4	7	0	0	11	2	0	0	1	0	4	0	1	3	19	29	
515-530	0	0	7	5	2	0	0	0	0	3	3	0	0	3	4	1	0	0	1	0	0	1	0	17	13	
530-545	0	0	1	8	2	0	0	0	0	1	2	0	0	4	1	0	0	0	2	0	0	3	0	9	15	
545-600	0	0	1	3	3	0	0	0	0	4	1	0	0	0	3	1	0	1	1	4	0	5	3	14	16	
600-615	0	0	1	4	2	0	0	0	0	2	4	0	0	5	0	2	0	2	0	2	0	0	6	7	23	
615-630	0	0	4	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	7	
630-645	0	0	1	3	0	0	0	0	0	0	2	0	0	1	7	1	0	1	0	2	0	4	0	14	8	
645-700	0	0	5	7	1	0	0	0	0	1	2	0	0	3	9	0	0	0	8	0	0	9	1	26	20	
Total Daily Trips	0	0	147	142	179	3	0	0	1	179	142	0	0	135	86	13	1	26	1	61	0	0	82	68	639	627

## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
 PROJECT: CASTILLEJA SCHOOL  
 DATE: WEDNESDAY JANUARY 25, 2017  
 PERIOD: 6:00 AM TO 7:00 PM  
 CITY: PALO ALTO, CA

## VEHICLE COUNTS

HOUR TOTALS	LOC 1		LOC 2		LOC 3		LOC 4		LOC 5		LOC 6		LOC 7		LOC 8		LOC 9		LOC 10		LOC 11		LOC 12		TOTALS	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
600-700	0	0	1	0	0	0	0	0	0	0	0	0	0	0	11	2	0	3	0	0	0	0	0	0	12	5
615-715	0	0	2	0	1	0	0	0	0	0	0	0	0	0	9	2	0	3	0	0	0	0	0	0	12	5
630-730	0	0	3	0	2	0	0	0	0	0	0	0	0	0	11	0	0	2	0	1	0	0	0	0	16	3
645-745	0	0	3	0	8	0	0	0	0	0	2	0	0	2	12	0	0	0	0	2	0	0	0	0	25	4
700-800	0	0	10	1	13	0	0	0	0	3	5	0	0	5	16	0	0	0	0	2	0	0	0	0	44	11
715-815	0	0	11	2	19	0	0	0	0	11	5	0	0	5	19	0	0	0	0	5	0	0	0	0	201	23
730-830	0	0	10	2	26	0	0	0	0	14	8	0	0	6	14	0	0	0	0	4	0	0	1	0	59	26
745-845	0	0	12	2	68	1	0	0	0	50	22	0	0	16	14	0	0	1	0	3	0	0	6	0	122	73
800-900	0	0	12	4	91	1	0	0	0	90	48	0	0	46	7	0	0	2	0	4	0	0	21	9	179	156
815-915	0	0	14	3	84	1	0	0	0	82	49	0	0	49	4	1	0	2	0	3	0	0	21	9	172	150
830-930	0	0	15	3	76	1	0	0	0	79	47	0	0	48	4	1	0	2	0	3	0	0	21	9	163	146
845-945	0	0	13	4	28	0	0	0	0	43	31	0	0	36	4	1	0	1	0	3	0	0	17	9	93	97
900-1000	0	0	7	3	1	0	0	0	0	4	0	0	0	3	2	1	0	1	0	2	0	0	5	0	19	10
915-1015	0	0	5	7	1	0	0	0	0	0	3	0	0	1	2	0	0	1	0	0	0	0	7	3	18	12
930-1030	0	0	5	8	1	0	0	0	0	0	2	0	0	1	2	0	0	1	0	0	0	0	6	3	16	13
945-1045	0	0	4	7	1	0	0	0	0	0	2	0	0	1	2	1	0	2	0	1	0	0	8	5	17	17
1000-1100	0	0	9	11	1	0	0	0	0	0	0	0	0	1	1	1	0	1	0	1	0	0	6	7	17	22
1015-1115	0	0	13	13	2	0	0	0	0	0	0	0	0	0	2	1	0	1	0	2	0	0	8	7	25	24
1030-1130	0	0	12	15	2	0	0	0	0	0	0	0	0	0	2	1	0	1	0	2	0	0	8	7	24	26
1045-1145	0	0	13	16	2	0	0	0	0	1	0	0	0	0	2	0	0	1	0	1	0	0	6	6	23	25
1100-1200	0	0	7	10	1	0	0	0	0	1	0	0	0	0	3	0	0	2	0	1	0	0	6	4	17	18
1115-1215	0	0	3	5	0	0	0	0	0	1	0	0	0	0	2	1	0	2	0	0	0	0	3	4	8	13
1130-1230	0	0	3	3	0	0	0	0	0	1	0	0	0	0	4	1	0	2	0	0	0	0	3	5	10	12
1145-1245	0	0	2	2	0	0	0	0	0	0	0	0	0	0	3	1	0	1	0	0	0	0	3	4	8	8
1200-100	0	0	7	4	0	0	0	0	0	0	0	0	0	0	3	1	0	0	0	1	0	0	3	4	13	10
1215-115	0	0	5	6	0	0	0	0	0	0	0	0	0	0	3	0	0	0	0	1	0	0	2	2	10	9
1230-130	0	0	5	5	0	0	0	0	0	0	1	0	0	1	1	0	0	0	0	1	0	0	2	1	9	8
1245-145	0	0	5	8	0	0	0	0	0	0	2	0	0	1	2	0	0	0	0	2	0	0	2	1	11	12
100-200	0	0	0	6	0	0	0	0	0	0	2	0	0	1	1	0	0	1	0	1	0	0	1	1	4	10
115-215	0	0	1	5	0	0	0	0	0	0	2	0	0	1	2	0	0	1	0	2	0	0	2	1	7	10
130-230	0	0	6	8	0	0	0	0	0	0	1	0	0	0	2	0	0	2	0	2	0	0	2	1	11	13
145-245	0	0	8	5	0	0	0	0	0	0	0	0	0	0	1	0	0	3	0	1	0	0	1	2	10	11
200-300	0	0	12	7	6	0	0	0	0	1	1	0	0	0	1	0	0	2	0	1	0	0	1	2	21	13
215-230	0	0	27	13	18	0	0	0	0	5	7	0	0	0	4	1	0	4	0	1	0	0	2	1	58	25
230-245	0	0	26	19	38	0	0	0	0	40	29	0	0	21	7	2	0	6	0	9	0	0	4	8	104	105
245-345	0	0	25	27	44	0	0	0	0	52	38	0	0	32	11	2	0	6	0	16	0	0	4	14	122	149
300-400	0	0	24	27	39	2	0	0	1	55	43	0	0	37	13	2	0	7	0	17	0	0	7	15	127	162
315-415	0	0	20	23	29	2	0	0	1	54	41	0	0	40	9	1	0	5	0	17	0	0	5	15	105	157
330-430	0	0	23	28	12	2	0	0	1	21	20	0	0	20	7	0	1	3	0	11	0	0	6	11	70	96
345-445	0	0	26	23	10	2	0	0	1	15	17	0	0	12	3	0	1	3	0	5	0	0	9	7	67	67
400-500	0	0	30	26	16	0	0	0	0	14	18	0	0	15	2	1	1	2	0	8	0	0	9	13	76	79
415-515	0	0	26	28	15	0	0	0	0	15	21	0	0	23	4	1	1	3	0	11	0	0	10	16	77	97
430-530	0	0	26	19	14	0	0	0	0	16	23	0	0	25	7	2	0	2	0	10	0	0	8	13	78	87
445-545	0	0	23	24	12	0	0	0	0	11	19	0	0	26	8	2	0	1	0	11	0	0	8	10	70	85
500-600	0	0	21	26	6	0	0	0	0	9	14	0	0	21	16	1	0	1	0	15	0	0	14	4	71	77
515-615	0	0	9	16	7	0	0	0	0	8	6	0	0	7	8	2	0	1	1	7	0	0	9	3	40	44
530-630	0	0	3	15	7	0	0	0	0	7	7	0	0	9	4	3	0	3	1	8	0	0	8	9	30	54
545-645	0	0	6	14	5	0	0	0	0	6	5	0	0	5	3	3	0	3	1	6	0	0	5	9	25	46
600-700	0	0	6	14	2	0	0	0	0	2	6	0	0	6	7	3	0	3	0	4	0	0	4	6	25	38

# WILTEC

Phone: (626) 564-1944 Fax: (626) 564-0969 info@wiltecusa.com

## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
PROJECT: CASTILLEJA SCHOOL  
DATE: THURSDAY JANUARY 26, 2017  
PERIOD: 6:00 AM TO 7:00 PM  
CITY: PALO ALTO, CA

### VEHICLE COUNTS

15 MIN COUNTS	LOC 1		LOC 2		LOC 3		LOC 4		LOC 5		LOC 6		LOC 7		LOC 8		LOC 9		LOC 10		LOC 11		LOC 12		TOTALS	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
600-615	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0
615-630	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
630-645	0	0	0	0	0	0	0	0	0	0	0	0	0	1	3	0	0	0	0	0	0	0	0	0	3	1
645-700	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0
700-715	0	0	0	0	3	0	0	0	0	7	2	0	0	0	3	0	0	0	0	0	0	0	0	0	8	7
715-730	0	0	3	1	5	0	0	0	0	24	2	0	0	1	1	0	0	0	0	3	0	0	2	0	13	29
730-745	0	0	6	1	45	0	0	0	0	59	15	0	0	10	6	0	0	0	0	0	0	7	0	79	70	
745-800	0	0	6	3	37	0	0	0	0	2	33	0	0	34	6	0	0	0	0	1	0	0	13	0	95	40
800-815	0	0	5	5	3	0	0	0	0	1	2	0	0	6	2	0	0	0	0	2	0	2	1	14	15	
815-830	0	0	0	1	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	2	1	
830-845	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	0	0	0	0	0	0	0	1	2	
845-900	0	0	5	2	1	0	0	0	0	0	1	0	0	1	1	0	0	3	0	0	0	6	3	14	9	
900-915	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2	0	
915-930	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	2	1	
930-945	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	1	0	4	2	
945-1000	0	0	5	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	6	1	
1000-1015	0	0	1	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	3	0	
1015-1030	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	
1030-1045	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
1045-1100	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	2	4	
1100-1115	0	0	2	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	3	2	
1115-1130	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	2	5	
1130-1145	0	0	1	4	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	0	1	1	3	6	
1145-1200	0	0	1	4	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	4	4	
1200-1215	0	0	1	2	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	2	0	3	4		
1215-1230	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2	0	2	1	3	4		
1230-1245	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	2	
1245-100	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2		
100-115	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	1	2		
115-130	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	
130-145	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	2	2	
145-200	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	3	2	4	
200-215	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	2	
215-230	0	0	0	2	2	0	0	0	0	0	0	0	0	0	1	0	0	2	0	0	0	0	1	3	5	
230-245	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	1	2	
245-300	0	0	4	2	7	0	0	0	0	7	1	0	0	1	1	0	0	0	0	0	0	1	4	14	14	
300-315	0	0	6	1	6	0	0	0	0	3	17	0	0	13	3	1	0	3	0	1	0	1	2	33	24	
315-330	0	0	3	5	18	0	0	0	0	21	16	0	0	15	2	0	0	0	4	0	0	1	6	40	51	
330-345	0	0	3	6	8	0	0	0	0	8	9	0	0	12	3	0	0	1	0	4	0	1	6	24	37	
345-400	0	0	1	1	5	0	0	0	0	5	14	0	0	5	1	0	0	0	0	1	0	0	1	0	22	12
400-415	0	0	4	7	4	0	0	0	0	2	5	0	0	8	3	0	0	2	0	3	0	2	0	18	22	
415-430	0	0	5	6	4	0	0	0	0	4	12	0	0	5	2	0	0	2	0	1	0	1	0	24	18	
430-445	0	0	2	3	2	0	0	0	0	3	3	0	0	9	3	5	0	4	0	1	0	3	4	13	29	
445-500	0	0	1	1	1	0	0	0	0	4	6	0	0	8	2	0	0	1	0	3	0	3	1	13	18	
500-515	0	0	3	3	11	0	0	0	0	7	6	0	0	7	0	0	0	0	1	0	0	2	6	22	24	
515-530	0	0	6	6	1	0	0	0	0	2	4	0	0	7	6	0	0	0	4	0	0	1	4	18	23	
530-545	0	0	7	4	1	0	0	0	0	3	4	0	0	5	2	0	0	0	1	0	0	2	0	16	13	
545-600	0	0	3	3	2	0	0	0	0	2	2	0	0	2	2	0	0	0	4	0	0	2	4	11	15	
600-615	0	0	2	5	1	0	0	0	0	1	3	0	0	3	0	0	0	0	4	0	0	1	3	7	16	
615-630	0	0	0	7	1	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	1	1	2	10	
630-645	0	0	1	0	2	0	0	0	0	1	0	0	0	0	0	0	0	2	0	0	0	2	0	5	3	
645-700	0	0	2	2	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	2	0	5	3	
	0	0	100	97	174	0	0	0	0	172	159	0	0	155	62	7	0	22	2	49	0	0	69	61	566	563



# WILTEC

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## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
PROJECT: CASTILLEJA SCHOOL  
DATE: THURSDAY JANUARY 26, 2017  
PERIOD: 6:00 AM TO 7:00 PM  
CITY: PALO ALTO, CA

### VEHICLE COUNTS

HOUR TOTALS	LOC 1		LOC 2		LOC 3		LOC 4		LOC 5		LOC 6		LOC 7		LOC 8		LOC 9		LOC 10		LOC 11		LOC 12		TOTALS	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
600-700	0	0	0	0	0	0	0	0	0	0	1	0	0	1	5	0	0	0	0	0	0	0	0	0	6	1
615-715	0	0	0	0	3	0	0	0	0	0	7	3	0	1	7	0	0	0	0	0	0	0	0	0	13	8
630-730	0	0	3	1	8	0	0	0	0	0	31	4	0	0	2	8	0	0	0	3	0	0	2	0	25	37
645-745	0	0	9	2	53	0	0	0	0	0	90	19	0	0	11	11	0	0	0	3	0	0	9	0	101	106
700-800	0	0	15	5	90	0	0	0	0	0	92	52	0	0	45	16	0	0	0	4	0	0	22	0	195	146
715-815	0	0	20	10	90	0	0	0	0	0	86	52	0	0	51	15	0	0	0	6	0	0	24	1	201	154
730-830	0	0	17	10	85	0	0	0	0	0	62	51	0	0	50	15	0	0	0	3	0	0	22	1	190	126
745-845	0	0	11	9	40	0	0	0	0	0	4	36	0	0	41	10	0	0	0	3	0	0	15	1	112	58
800-900	0	0	10	8	4	0	0	0	0	0	2	4	0	0	8	5	0	0	3	0	2	0	8	4	31	27
815-915	0	0	6	3	1	0	0	0	0	0	1	2	0	0	2	3	0	0	3	1	0	0	6	3	19	12
830-930	0	0	7	2	1	0	0	0	0	0	1	1	0	0	2	2	0	0	3	2	1	0	6	3	19	12
845-945	0	0	10	2	1	0	0	0	0	0	0	1	0	0	1	1	0	0	3	2	3	0	7	3	22	12
900-1000	0	0	10	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2	3	0	0	1	0	14	4
915-1015	0	0	10	1	1	0	0	0	0	0	0	0	0	0	2	0	0	0	1	3	0	0	1	0	15	4
930-1030	0	0	9	3	1	0	0	0	0	0	0	0	0	0	2	0	0	0	0	2	0	0	1	0	13	5
945-1045	0	0	6	3	1	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	9	3
1000-1100	0	0	3	4	1	0	0	0	0	0	0	0	0	0	1	0	0	1	0	1	0	0	0	0	5	6
1015-1115	0	0	4	4	0	0	0	0	0	0	0	0	0	0	1	1	0	1	0	1	0	0	0	1	5	8
1030-1130	0	0	6	3	0	0	0	0	0	0	0	0	0	0	1	1	0	1	0	1	0	0	0	5	7	11
1045-1145	0	0	7	7	0	0	0	0	0	0	1	0	0	0	2	1	0	1	0	1	0	0	1	6	10	17
1100-1200	0	0	6	9	1	0	0	0	0	0	1	0	0	0	2	1	0	0	0	0	0	0	3	6	12	17
1115-1215	0	0	5	11	1	0	0	0	0	0	3	0	0	0	1	0	0	0	0	0	0	0	5	5	12	19
1130-1230	0	0	3	11	1	0	0	0	0	0	3	0	0	0	2	0	0	0	0	2	0	0	7	2	13	18
1145-1245	0	0	2	8	1	0	0	0	0	0	2	0	0	0	1	0	0	0	0	2	0	0	7	2	11	14
1200-100	0	0	1	5	0	0	0	0	0	0	2	0	0	0	1	0	0	0	0	2	0	0	5	3	7	12
1215-115	0	0	0	3	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2	0	0	4	5	5	10
1230-130	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	2	4	2	7
1245-145	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	2	3	3	7
100-200	0	0	1	1	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	2	0	0	3	5	5	9
115-215	0	0	1	1	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	3	0	0	2	4	4	9
130-230	0	0	1	3	3	0	0	0	0	0	1	0	0	0	1	0	0	2	0	2	0	0	2	5	7	13
145-245	0	0	1	2	3	0	0	0	0	0	1	0	0	0	1	0	0	3	0	2	0	0	1	5	6	13
200-300	0	0	5	4	9	0	0	0	0	0	7	1	0	0	1	2	0	0	3	0	2	0	1	6	18	23
215-230	0	0	11	5	15	0	0	0	0	0	10	18	0	0	14	5	1	0	6	0	2	0	2	7	51	45
230-245	0	0	14	8	31	0	0	0	0	0	31	34	0	0	29	6	1	0	4	0	6	0	3	12	88	91
245-345	0	0	16	14	39	0	0	0	0	0	39	43	0	0	41	9	1	0	4	0	9	0	4	18	111	126
300-400	0	0	13	13	37	0	0	0	0	0	37	56	0	0	45	9	1	0	4	0	10	0	4	14	119	124
315-415	0	0	11	19	35	0	0	0	0	0	36	44	0	0	40	9	0	0	3	0	12	0	5	12	104	122
330-430	0	0	13	20	21	0	0	0	0	0	19	40	0	0	30	9	0	0	5	0	9	0	5	6	88	89
345-445	0	0	12	17	15	0	0	0	0	0	14	34	0	0	27	9	5	0	8	0	6	0	7	4	77	81
400-500	0	0	12	17	11	0	0	0	0	0	13	26	0	0	30	10	5	0	9	0	8	0	9	5	68	87
415-515	0	0	11	13	18	0	0	0	0	0	18	27	0	0	29	7	5	0	7	0	6	0	9	11	72	89
430-530	0	0	12	13	15	0	0	0	0	0	16	19	0	0	31	11	5	0	5	0	9	0	9	15	66	94
445-545	0	0	17	14	14	0	0	0	0	0	16	20	0	0	27	10	0	0	1	0	9	0	8	11	69	78
500-600	0	0	18	15	14	0	0	0	0	0	13	14	0	0	19	8	0	0	0	0	6	0	7	10	67	75
515-615	0	0	116	110	178	0	0	0	0	0	179	169	0	0	169	72	7	0	22	2	58	0	74	69	52	67
530-630	0	0	12	12	4	0	0	0	0	0	6	9	0	0	10	4	0	0	0	0	9	0	5	7	36	54
545-645	0	0	5	15	4	0	0	0	0	0	3	5	0	0	6	2	0	0	0	0	9	0	4	8	25	44
600-700	0	0	3	12	4	0	0	0	0	0	2	3	0	0	4	0	0	2	0	5	0	0	4	4	19	32



# WILTEC

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## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
PROJECT: CASTILLEJA SCHOOL  
DATE: WEDNESDAY JANUARY 25, 2017  
PERIOD: 6:00 AM TO 7:00 PM  
CITY: PALO ALTO, CA

### PEDESTRIAN COUNTS

15 MIN COUNTS	LOC 1		LOC 2		LOC 3		LOC 4		LOC 5		LOC 6		LOC 7		LOC 8		LOC 9		LOC 10		LOC 11		LOC 12		TOTALS		
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	
600-615	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
615-630	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
630-645	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
645-700	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	0	0	0	0	0	0	0	2	1	
700-715	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
715-730	0	1	0	0	0	0	0	0	0	0	1	1	2	0	1	0	1	0	0	0	2	0	0	0	7	2	
730-745	0	0	0	0	0	0	0	0	0	0	3	0	1	0	2	0	0	1	0	0	0	0	2	0	8	1	
745-800	2	0	0	0	0	4	0	2	0	0	3	0	1	1	1	0	3	0	3	2	0	0	4	1	23	4	
800-815	0	0	1	0	0	0	6	0	0	0	2	0	0	0	0	0	0	0	3	0	3	0	0	1	15	1	
815-830	1	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	0	5	1	
830-845	0	0	0	1	0	0	5	0	0	0	0	0	21	1	1	2	0	0	2	1	0	0	2	0	31	5	
845-900	4	0	0	1	1	0	16	0	0	0	0	0	15	0	1	0	3	1	6	4	8	0	6	0	60	6	
900-915	1	3	0	1	0	0	1	0	0	0	0	15	1	1	1	0	0	0	1	0	0	0	0	0	5	20	
915-930	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	1	2	
930-945	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	
945-1000	3	0	0	0	0	0	0	0	0	0	18	3	0	0	0	0	0	0	0	0	0	0	0	0	21	3	
1000-1015	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	
1015-1030	0	0	0	0	0	0	0	2	0	0	0	19	0	0	3	0	0	0	0	0	0	0	0	0	3	21	
1030-1045	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	1	0	1	0	0	0	1	0	5	1	
1045-1100	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	1	0	4	1	
1100-1115	0	0	0	0	1	1	0	0	0	0	19	0	1	1	0	1	0	0	1	0	0	0	0	0	21	4	
1115-1130	0	0	1	1	0	0	0	0	0	0	1	1	0	2	2	0	1	1	0	0	0	1	2	6	7		
1130-1145	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	1	0	0	0	0	1	1	3	
1145-1200	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	1	1	0	0	0	0	0	3	1	
1200-1215	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	0	0	0	1	3	
1215-1230	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	1	1	0	0	0	1	3	1	6	3	
1230-1245	1	2	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	3	2	
1245-100	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	2	3	
100-115	0	0	0	2	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	1	0	3	3	
115-130	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	
130-145	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	0		
145-200	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	1	1	1	1	1	4	3	
200-215	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	0	0	0	0	1	2	
215-230	0	1	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2	0	0	0	1	1	5	2	
230-245	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	1	0	0	0	1	0	3	1	
245-300	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	11	0	1	0	0	0	0	1	13	
300-315	0	0	2	5	0	0	4	0	0	0	4	0	0	0	0	0	0	0	0	2	0	0	0	3	2	18	
315-330	0	4	2	2	1	0	4	24	1	8	2	2	1	4	0	0	0	1	4	13	1	6	2	2	18	66	
330-345	0	0	1	4	0	0	0	6	2	3	0	1	1	3	0	0	0	0	3	9	0	4	0	0	7	30	
345-400	1	2	0	0	0	0	0	3	0	4	0	1	0	1	0	0	0	1	1	10	13	0	0	0	15	22	
400-415	0	0	2	2	0	0	1	2	2	1	1	2	0	3	0	0	1	0	11	2	0	0	0	0	18	12	
415-430	0	1	0	0	0	0	2	3	0	1	0	1	0	1	0	0	1	1	1	0	1	2	0	2	5	12	
430-445	1	0	0	1	1	1	1	2	0	4	0	1	1	0	0	0	0	0	0	0	0	0	0	1	4	10	
445-500	0	3	2	1	0	2	2	2	2	0	2	1	0	1	2	1	0	0	1	6	0	2	1	6	10	27	
500-515	0	0	1	0	1	0	0	3	0	0	1	0	0	5	1	0	0	0	1	4	0	0	2	1	7	13	
515-530	0	1	0	2	0	0	0	0	0	0	0	0	1	1	0	0	0	0	1	1	0	1	4	1	6	7	
530-545	0	0	1	2	0	0	0	2	0	0	0	0	0	1	0	1	0	1	0	0	0	0	0	0	1	7	
545-600	0	0	0	1	0	0	0	0	0	1	0	0	0	1	0	0	0	1	0	2	0	2	1	0	1	8	
600-615	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	1	1	1	0	5	4	
615-630	0	0	0	0	0	0	0	0	0	0	2	0	0	0	1	0	0	1	1	0	1	0	0	0	2	4	
630-645	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	4	0	0	1	0	0	0	0	6	1	
645-700	0	0	2	0	0	0	2	1	0	0	0	0	5	0	0	3	0	0	9	0	3	0	1	1	22	5	

## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
 PROJECT: CASTILLEJA SCHOOL  
 DATE: WEDNESDAY JANUARY 25, 2017  
 PERIOD: 6:00 AM TO 7:00 PM  
 CITY: PALO ALTO, CA

## PEDESTRIAN COUNTS

HOUR TOTALS	LOC 1		LOC 2		LOC 3		LOC 4		LOC 5		LOC 6		LOC 7		LOC 8		LOC 9		LOC 10		LOC 11		LOC 12		TOTALS	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
600-700	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	0	0	0	0	0	0	0	2	1
615-715	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	0	0	0	0	0	0	0	2	1
630-730	0	1	0	0	0	0	0	0	0	0	2	1	2	0	2	1	1	0	0	0	2	0	0	0	9	3
645-745	0	1	0	0	0	0	0	0	0	0	5	1	3	0	4	1	1	1	0	0	2	0	2	0	17	4
700-800	2	1	0	0	4	0	2	0	0	0	7	1	4	1	4	0	4	1	3	2	2	0	6	1	38	7
715-815	2	1	1	0	4	0	8	0	0	0	9	1	4	1	4	0	4	1	6	2	5	0	6	2	53	8
730-830	3	0	1	0	4	0	8	1	0	0	8	0	3	1	3	0	3	1	6	2	3	0	9	2	51	7
745-845	3	0	1	1	4	0	13	1	0	0	5	0	23	2	2	2	3	0	8	3	3	0	9	2	74	11
800-900	5	0	1	2	1	0	27	1	0	0	2	0	37	1	2	2	3	1	11	5	11	0	11	1	111	13
815-915	6	3	0	3	1	0	22	1	0	0	0	15	38	2	3	2	3	1	9	5	8	0	11	0	101	32
830-930	6	3	0	3	1	0	22	0	0	0	0	15	37	2	3	2	3	2	9	5	8	0	8	1	97	33
845-945	6	3	1	2	1	0	17	0	0	0	0	15	16	1	2	0	3	2	7	4	8	0	6	1	67	28
900-1000	5	3	1	1	0	0	1	0	0	0	18	18	1	1	1	0	0	1	1	0	0	0	0	1	28	25
915-1015	4	0	1	0	0	0	0	0	0	0	18	3	0	0	0	0	0	1	0	0	1	0	0	1	24	5
930-1030	3	0	1	0	0	0	0	2	0	0	18	22	0	0	3	0	0	0	0	0	1	0	0	0	26	24
945-1045	3	0	1	1	0	0	0	2	0	0	18	22	0	0	4	0	1	0	1	0	1	0	1	0	30	25
1000-1100	0	0	2	2	0	0	0	2	0	0	0	19	0	0	5	0	2	0	1	0	1	0	2	0	13	23
1015-1115	0	0	2	2	1	1	0	2	0	0	19	19	1	1	5	1	2	0	1	1	0	0	2	0	33	27
1030-1130	0	0	3	3	1	1	0	0	0	0	20	1	1	3	4	1	3	1	1	1	0	0	3	2	36	13
1045-1145	0	0	2	2	1	1	0	0	0	0	20	2	1	3	3	2	2	1	1	1	0	0	2	3	32	15
1100-1200	0	0	1	1	1	1	0	0	0	0	20	2	1	3	3	2	2	2	2	1	0	0	1	3	31	15
1115-1215	0	1	1	1	0	0	0	0	0	0	1	2	0	2	3	2	2	2	2	1	1	0	1	3	11	14
1130-1230	0	1	0	0	0	0	0	0	0	0	0	1	1	0	2	2	2	2	2	1	1	1	3	2	11	10
1145-1245	1	3	0	0	0	0	0	0	0	0	0	0	1	0	3	1	3	2	1	1	1	1	3	1	13	9
1200-100	2	4	1	0	0	0	0	0	0	0	0	0	1	0	2	1	2	1	0	3	1	1	3	1	12	11
1215-115	2	3	1	2	0	0	0	0	0	0	1	0	1	0	2	0	2	1	1	3	0	1	4	1	14	11
1230-130	2	3	1	2	0	0	0	0	0	0	1	1	0	0	1	0	1	0	1	3	0	0	1	0	8	9
1245-145	1	1	2	2	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	3	0	0	2	0	7	7
100-200	0	0	1	2	0	0	0	0	0	0	2	1	0	0	1	0	0	0	1	2	1	1	3	1	9	7
115-215	0	0	1	0	0	0	0	0	0	0	1	1	0	0	1	0	0	1	1	2	1	1	2	1	7	6
130-230	0	1	2	0	0	0	0	0	0	0	2	0	0	0	1	0	0	1	3	2	1	1	3	2	12	7
145-245	0	1	1	0	0	0	0	0	0	0	2	1	1	0	1	0	0	1	4	2	1	1	3	2	13	8
200-300	0	2	1	0	0	0	0	0	0	0	1	1	1	0	0	0	1	12	4	2	0	0	2	1	10	18
215-230	0	2	3	5	0	0	0	4	0	0	1	5	1	0	0	0	1	11	3	3	0	0	2	4	11	34
230-245	0	5	4	7	1	0	4	28	1	8	2	7	2	4	0	0	1	12	5	16	1	6	3	5	24	98
245-345	0	5	5	11	1	0	4	34	3	11	2	7	2	7	0	0	1	12	7	25	1	10	2	5	28	127
300-400	1	6	5	11	1	0	4	37	3	15	2	8	2	8	0	0	0	2	8	34	14	10	2	5	42	136
315-415	1	6	5	8	1	0	5	35	5	16	3	6	2	11	0	0	1	2	19	34	14	10	2	2	58	130
330-430	1	3	3	6	0	0	3	14	4	9	1	5	1	8	0	0	2	2	16	21	14	6	0	2	45	76
345-445	2	3	2	3	1	1	4	10	2	10	1	5	1	5	0	0	2	2	13	12	14	2	0	3	42	56
400-500	1	4	4	4	1	3	6	9	2	8	2	4	2	6	2	1	2	1	13	8	1	4	1	9	37	61
415-515	1	4	3	2	2	3	5	10	0	7	2	2	2	8	3	1	1	1	3	10	1	4	3	10	26	62
430-530	1	4	3	4	2	3	3	7	0	6	2	1	3	8	3	1	0	0	3	11	0	3	7	9	27	57
445-545	0	4	4	5	1	2	2	7	0	2	2	0	2	9	3	2	0	1	3	11	0	3	7	8	24	54
500-600	0	1	4	4	1	0	2	6	0	0	1	0	6	7	1	4	0	1	11	5	3	1	7	3	36	32
515-615	0	1	1	5	0	0	0	2	0	1	0	0	1	3	0	1	0	2	1	3	0	3	5	1	8	22
530-630	0	0	4	3	0	0	0	2	0	1	0	0	0	2	0	1	0	3	0	4	1	3	2	0	7	19
545-645	0	0	3	1	0	0	0	0	0	3	0	0	0	2	0	0	0	3	1	4	2	3	2	0	8	16
600-700	0	0	3	0	0	0	0	0	0	2	1	0	1	1	0	0	4	2	1	3	2	1	1	0	13	9

## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
 PROJECT: CASTILLEJA SCHOOL  
 DATE: THURSDAY JANUARY 26, 2017  
 PERIOD: 6:00 AM TO 7:00 PM  
 CITY: PALO ALTO, CA

## PEDESTRIAN COUNTS

15 MIN COUNTS	LOC 1		LOC 2		LOC 3		LOC 4		LOC 5		LOC 6		LOC 7		LOC 8		LOC 9		LOC 10		LOC 11		LOC 12		TOTALS		
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	
600-615	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
615-630	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
630-645	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
645-700	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0	0	0	3	0	0
700-715	0	0	0	0	1	1	3	0	0	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	8	1	1
715-730	0	1	1	0	2	0	7	1	0	0	3	0	0	0	0	0	0	0	0	0	4	0	1	0	18	2	
730-745	1	0	1	0	2	0	31	1	2	0	3	0	12	1	1	1	0	0	2	1	0	1	0	0	55	5	
745-800	4	0	1	0	0	0	0	0	3	0	1	0	29	0	0	0	2	0	18	3	12	0	5	0	75	3	
800-815	1	0	0	0	1	0	0	0	1	0	2	0	3	1	0	0	0	0	1	1	1	0	3	0	13	2	
815-830	0	0	0	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	1	0	0	0	1	0	3	1	
830-845	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	0	2	1	0	
845-900	1	0	0	0	0	0	0	0	3	0	1	0	1	0	0	0	0	0	0	0	0	1	0	7	0	0	
900-915	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	2	0	1	0	5	0	
915-930	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	1	1	0	1	0	0	3	3	
930-945	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	2	1	1	1	6	2	
945-1000	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	3	
1000-1015	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	1	0	0	1	2	
1015-1030	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	3	0	
1030-1045	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	1	1	0	0	0	1	3	
1045-1100	0	0	1	0	0	0	0	0	0	0	0	0	0	1	1	0	2	0	0	0	0	0	0	0	4	1	
1100-1115	0	1	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	5	
1115-1130	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	1	
1130-1145	0	0	0	0	0	0	0	0	0	0	0	0	0	2	1	1	0	0	0	0	1	0	0	0	2	3	
1145-1200	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	1	0	0	0	1	1	4	
1200-1215	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	1	0	0	0	0	2	2	
1215-1230	1	0	1	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2	0	2	1	1	7	2	
1230-1245	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	2	1	1	0	5	1	
1245-100	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	2	0	0	0	0	0	0	0	3	1	
100-115	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	2	0	0	0	1	0	3	2	
115-130	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	1	
130-145	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	1	1	1	3	
145-200	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	1	0	1	3	1	1	3	6	
200-215	0	1	0	0	0	0	0	0	0	0	0	1	1	2	0	0	1	0	0	0	0	0	0	0	2	4	
215-230	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	2	2	
230-245	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	1	1	2	0	0	1	4	2	9	
245-300	0	0	0	0	0	0	0	8	2	1	0	0	1	4	0	0	0	0	3	0	3	2	2	2	5	21	
300-315	0	1	1	2	0	0	4	9	5	1	0	2	0	0	0	0	2	2	4	7	0	6	0	8	16	38	
315-330	0	6	0	1	0	0	2	12	0	8	5	0	0	1	0	0	0	0	4	3	2	2	0	11	13	44	
330-345	0	2	0	0	0	1	0	2	3	1	0	0	0	1	0	0	1	1	3	6	0	1	2	0	9	15	
345-400	0	0	1	0	0	0	0	1	2	3	1	0	0	4	0	0	1	0	3	1	1	0	2	0	11	9	
400-415	0	0	0	0	0	0	0	0	0	1	2	1	0	1	0	0	1	1	2	0	0	0	4	1	9	5	
415-430	0	1	0	0	0	0	0	0	0	6	2	0	0	0	0	0	0	1	1	1	0	1	3	3	6	13	
430-445	0	1	1	2	0	0	0	2	0	0	0	1	0	3	0	0	0	0	0	0	4	1	2	2	2	15	
445-500	0	1	0	0	0	0	0	2	1	5	4	2	0	3	0	2	1	1	1	0	1	2	0	1	8	19	
500-515	0	0	0	0	0	0	0	1	0	4	4	2	0	1	2	7	0	1	2	1	2	3	0	2	10	22	
515-530	0	2	1	5	0	0	0	2	0	0	0	0	3	0	1	0	0	2	0	0	0	0	0	1	5	12	
530-545	0	0	1	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	1	1	0	0	1	3	4	
545-600	0	0	1	2	0	0	0	1	2	1	1	3	1	1	0	0	0	0	0	2	0	4	4	3	9	17	
600-615	0	0	0	0	0	0	0	0	0	0	0	0	0	3	2	2	0	0	0	1	0	6	2	1	4	13	
615-630	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	
630-645	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	1	2	
645-700	0	1	0	0	0	0	0	4	0	1	0	1	0	0	0	0	3	0	0	0	0	1	0	0	3	8	

## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
 PROJECT: CASTILLEJA SCHOOL  
 DATE: THURSDAY JANUARY 26, 2017  
 PERIOD: 6:00 AM TO 7:00 PM  
 CITY: PALO ALTO, CA

## PEDESTRIAN COUNTS

HOUR TOTALS	LOC 1		LOC 2		LOC 3		LOC 4		LOC 5		LOC 6		LOC 7		LOC 8		LOC 9		LOC 10		LOC 11		LOC 12		TOTALS	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
600-700	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0	0	0	3	0
615-715	0	0	0	0	1	1	3	0	0	0	1	0	2	0	1	0	2	0	1	0	0	0	0	0	11	1
630-730	0	1	1	0	3	1	10	1	0	0	4	0	2	0	1	0	2	0	1	0	4	0	1	0	29	3
645-745	1	1	2	0	5	1	41	2	2	0	7	0	14	1	2	1	2	0	3	1	4	1	1	0	84	8
700-800	5	1	3	0	5	1	41	2	5	0	7	0	42	1	2	1	3	0	21	4	16	1	6	0	156	11
715-815	6	1	3	0	5	0	38	2	6	0	9	0	44	2	1	1	2	0	21	5	17	1	9	0	161	12
730-830	6	0	2	0	3	0	31	2	6	0	7	0	44	2	1	1	2	0	22	5	13	1	9	0	146	11
745-845	5	0	1	0	1	0	0	1	5	0	4	0	32	1	0	0	2	0	20	5	13	0	10	0	93	7
800-900	2	0	0	0	1	0	0	1	5	0	4	0	4	1	0	0	0	0	2	2	1	0	6	0	25	4
815-915	1	0	0	0	0	0	0	1	4	0	3	0	1	0	0	0	0	0	2	1	2	0	4	0	17	2
830-930	2	0	0	0	0	0	0	0	4	0	3	0	1	0	0	0	0	1	2	2	2	1	3	0	17	4
845-945	2	0	0	0	0	0	0	0	3	0	3	0	1	0	0	0	0	1	5	1	4	2	3	1	21	5
900-1000	1	0	0	0	0	0	0	0	0	1	2	0	0	0	0	0	0	1	5	2	4	2	2	2	14	8
915-1015	1	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	2	5	2	2	3	1	2	2	10	10
930-1030	0	0	2	0	0	0	0	0	0	1	0	0	0	0	0	0	1	1	4	1	2	2	1	2	10	7
945-1045	0	0	2	0	0	0	0	0	0	1	0	2	0	0	0	0	1	1	1	2	1	1	0	1	5	8
1000-1100	0	0	3	0	0	0	0	0	0	0	0	2	0	1	1	0	3	1	1	1	1	1	0	0	9	6
1015-1115	0	1	3	3	0	0	0	0	0	0	0	2	0	1	1	0	3	0	0	1	1	0	1	1	9	9
1030-1130	0	1	1	3	2	0	0	0	0	0	0	2	0	1	1	0	2	0	0	2	1	0	0	1	8	10
1045-1145	0	1	1	3	2	0	0	0	0	0	0	0	3	2	1	2	0	0	1	1	0	1	1	1	9	10
1100-1200	1	1	0	3	2	0	0	0	0	0	0	0	3	1	1	1	0	1	0	2	1	0	1	2	6	13
1115-1215	1	0	1	0	2	0	0	0	0	0	0	1	0	3	1	1	0	1	1	3	1	0	0	1	7	10
1130-1230	2	0	2	0	0	0	0	0	0	0	0	1	0	4	2	1	0	1	1	2	3	0	2	2	12	11
1145-1245	2	0	2	0	0	0	0	0	0	0	1	1	0	2	2	0	0	1	1	2	4	1	3	2	15	9
1200-100	2	0	2	0	0	0	0	0	0	0	1	1	0	2	2	0	2	0	1	1	4	1	3	1	17	6
1215-115	2	0	1	0	0	0	0	0	2	0	1	0	0	2	2	0	2	0	0	2	4	1	4	1	18	6
1230-130	1	0	0	0	0	0	0	0	2	1	1	0	0	1	1	0	2	0	1	2	2	1	2	0	12	5
1245-145	1	0	0	0	0	0	0	0	2	2	0	0	0	1	0	0	2	0	1	3	0	0	2	1	8	7
100-200	0	0	0	0	0	0	0	0	2	3	0	0	0	0	0	0	0	1	2	3	1	3	3	2	8	12
115-215	0	1	0	0	0	0	0	0	0	3	0	0	1	2	0	0	1	1	2	1	1	3	2	2	7	14
130-230	0	1	0	0	0	0	0	0	1	2	0	1	1	2	0	0	1	1	1	1	1	3	3	4	8	15
145-245	0	1	0	0	0	0	0	0	1	2	0	1	1	2	0	1	1	2	2	2	1	3	3	7	9	21
200-300	0	1	0	0	0	0	0	8	3	2	0	1	2	6	0	1	1	1	1	5	0	3	4	8	11	36
215-230	0	1	1	2	0	0	4	17	8	3	0	2	1	4	0	1	2	3	5	12	0	9	4	16	25	70
230-245	0	7	1	3	0	0	6	29	7	11	5	2	1	5	0	1	2	3	9	15	2	11	3	25	36	112
245-345	0	9	1	3	0	1	6	31	10	11	5	2	1	6	0	0	3	3	11	19	2	12	4	21	43	118
300-400	0	9	2	3	0	1	6	24	10	13	6	2	0	6	0	0	4	3	14	17	3	9	4	19	49	106
315-415	0	8	1	1	0	1	2	15	5	13	8	1	0	7	0	0	3	2	12	10	3	3	8	12	42	73
330-430	0	3	1	0	0	1	0	3	5	11	5	1	0	6	0	0	3	3	9	8	1	2	11	4	35	42
345-445	0	2	2	2	0	0	0	3	2	10	5	2	0	8	0	0	2	2	6	2	1	5	10	6	28	42
400-500	0	3	1	2	0	0	0	4	1	12	8	4	0	7	0	2	2	3	4	1	1	7	8	7	25	52
415-515	0	3	1	2	0	0	0	5	1	15	10	5	0	7	2	9	1	3	4	2	3	10	4	8	26	69
430-530	0	4	2	7	0	0	0	7	1	9	8	5	3	7	3	9	1	4	3	1	3	9	1	6	25	68
445-545	0	3	2	6	0	0	0	5	1	9	8	4	3	5	3	9	1	4	4	2	4	5	0	5	26	57
500-600	0	3	2	6	0	0	0	7	0	5	4	3	3	2	3	7	3	3	3	2	3	4	0	4	21	46
515-615	0	2	3	8	0	0	0	3	2	1	1	3	4	2	1	0	0	2	1	3	1	4	4	5	17	33
530-630	0	0	2	3	0	0	0	1	2	1	1	3	1	5	2	2	0	0	1	4	1	10	6	5	16	34
545-645	0	0	1	3	0	0	0	1	2	1	1	3	1	4	2	2	0	0	0	3	0	10	6	4	13	31
600-700	0	0	0	1	0	0	0	0	1	0	0	1	0	3	2	2	0	0	0	1	0	7	2	1	5	16

## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
PROJECT: CASTILLEJA SCHOOL  
DATE: WEDNESDAY JANUARY 25, 2017  
PERIOD: 6:00 AM TO 7:00 PM  
CITY: PALO ALTO, CA

[illegible]

## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

CLIENT: W-TRANS  
PROJECT: CASTILLEJA SCHOOL  
DATE: WEDNESDAY JANUARY 25, 2017  
PERIOD: 6:00 AM TO 7:00 PM  
CITY: PALO ALTO, CA

[illegible]



CLIENT: W-TRANS  
PROJECT: CASTILLEJA SCHOOL  
DATE: THURSDAY JANUARY 26, 2017  
PERIOD: 6:00 AM TO 7:00 PM  
CITY: PALO ALTO, CA

[illegible]

## 13-HOUR TRIP GENERATION SURVEY RESULTS SUMMARY

Phone: (626) 564-1944 Fax: (626) 564-0969 [info@wiltecusa.com](mailto:info@wiltecusa.com)

CLIENT: W-TRANS  
PROJECT: CASTILLEJA SCHOOL  
DATE: THURSDAY JANUARY 26, 2017  
PERIOD: 6:00 AM TO 7:00 PM  
CITY: PALO ALTO, CA

[illegible]

## **ATTACHMENT B**

### **LETTER FROM W-TRANS REGARDING TRIP GENERATION DATA COLLECTION METHODOLOGY**



August 7, 2024

Mr. Robert Eckols, PE  
Principal  
Fehr & Peers  
60 South Market Street, Suite 700  
San Jose, CA 95113

## **Documentation of Trips at Castilleja School**

Dear Mr. Eckols;

To inform the traffic analysis and CEQA report that was prepared on behalf of the City of Palo Alto (as the CEQA lead agency), W-Trans oversaw the traffic data collection effort at Castilleja School. Among the activities conducted included a count of vehicle activity at multiple driveways serving the school. Vehicle activity along the public streets was not included with this counting exercise since these are public spaces that are not exclusively used by the school. These traffic counts occurred on January 25 and 26 in 2017 and served as the basis for identifying a trip rate unique to Castilleja School. As such, the trip rate was established to reflect the traffic that accesses the school, based solely on driveway counts at the school.

Please call if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "KJ", is positioned above the typed name of the sender.

Kenny Jeong, PE (Traffic)  
Senior Engineer

Enclosures: None

**From:** [Alan Cooper](#)  
**To:** [Council, City](#)  
**Cc:** [Alan Cooper](#)  
**Subject:** Castilleja TDM: Count ALL cars, not just some  
**Date:** Monday, August 19, 2024 12:13:02 PM

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**CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.**

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Dear City Council members,

**REQUEST: Please modify the Castilleja TDM to count all cars coming to the school, and not just some of them.** Currently, cars are counted when they enter a school driveway, **but they are not counted** when they park on the streets adjacent to Castilleja or in the nearby neighborhood.

There has been a long-standing debate about the validity of the original traffic study used to establish the TDM. The study did not include cars coming to Castilleja and parking on streets, as it should have. A parallel example is the Stanford TDM that includes all cars coming to Stanford whether parked on streets or in designated lots.

The staff report for tonight's meeting (Aug. 19), addresses the car counting issue and proposes a minor adjustment to the TDM to accommodate counting cars parked on the three streets adjacent to Castilleja.

**I support the city staff report's recommendation of counting Castilleja cars parked on streets.**

I live across the street from Castilleja, and am highly impacted by car trips to the school. Thank you for your consideration!

Alan Cooper  
270 Kellogg Ave

**From:** [Andie Reed](#)  
**To:** [Council, City](#); [Sauls, Garrett](#); [Lait, Jonathan](#)  
**Subject:** Castilleja TDM Item #13, Aug 19, 2024  
**Date:** Sunday, August 18, 2024 11:08:46 AM

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**CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.**

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Aug 19, 2024

Dear Mayor Stone, Vice Mayor Lauing and Council Members,

I live close to Castilleja and have been involved with my neighbors over many years to try to understand how the school reports car trips. Thanks to staff for taking steps to resolve conflicts.

"No Net New Trips" was the school's continuous mantra during the years leading up to the City Council approval of their expansion project. Our goal, therefore, is to quantify how many car trips are generated by the school now so we can know if traffic increases when construction is complete and enrollment increases. Sounds simple enough.

Former Mayor Pat Burt got it right, on May 23, 2022, talking about how to make the TDM work, "to drive the TDM program to really be what it's intended to be, which is a trip reduction program and not a counting circumvention program". The method the school is using defines car-trips as those cars that cross over driveways. Everybody else defines car-trips as all cars that drive to and from the school.

At the Aug 7, 2023 CC meeting, Council Members **disagreed that the TDM they had to review was what they expected or intended:**

1. CM Stone asks why other car trip counts would be excluded, that was not intended by the City Council; he quotes from June 6, 2022 meeting "many of CMs were interested in ALL cars being counted" and "Layendecker (assoc head of school) supported that. Please see that all car trips get added."
2. CM Veenker states RLUA has other methods of tracking car trips; why only driveway counters counted? Why wouldn't ADT count all vehicles?
3. Mayor Kou states car trips need to include parking and dropping off.
4. CM Veenker – it's ambiguous, so City Council **can** provide direction. Where does it say how ADT can be calculated? Please clear up.
5. CM Lauing states "on June 6 (2022) it wasn't ambiguous .... We're only dealing with a subset of counting. We have to count all the cars".
6. CM Stone – Amendments are necessary if we want to add teeth. We've got time, a couple of years. We've been clear on the issues. Yes, leave amendments (suggestions how to count cars). **Want to make sure we're not in this same situation a few months from now.**

Staff is trying to take the direction they were given by proposing **alternative methods** that will set up a car-trip counting system to include street-parked car trips in addition to the car trips they currently report, which we support. Castilleja's attorneys take the position that Palo Alto City Council direction does not matter. Their job is to benefit the school by cherry-picking the information and by threatening lawsuits. What the Castilleja attorneys don't acknowledge is that the cars along the street (mostly) have **Castilleja stickers!** And the people in the cars that don't have Casti stickers go into the school anyway. Come sit and watch!

*The attorney letter includes a statement from W-Trans that they didn't count "street" car trips in 2017. But they used **more information than just the electronic counters**, so Mr. Jeong's letter is deceiving. **See direct quotes from the W-Trans 2020 report at the bottom of this letter. If Castilleja ONLY wants to count driveway counts, then 352 is the proper AM PEAK rather than 383. Ask Mr. Jeong what the raw counts were for ONLY driveways for the ADT analysis. Lower the caps!***

If you remember, the school installed electronic counters in their driveways, and all car trips that go

over driveways are counted by these counters. The **Fehr&Peers reports** that the school publishes and upon which Castilleja bases whether they go over "caps", **don't use ALL the school days, only those school days with no events**. Planning staff doesn't address this, but we think it's very important, **even if event trips don't count towards the "caps"**.

One suggestion presented to the Castilleja Neighborhood Committee during this past year as we've reviewed these quarterly reports is to require Fehr & Peers to continue to show "non-event" school days car trips numbers, and add in the street-parked car trips, as staff recommends. Those can count towards the "caps" of 383 AM PEAK and 1198 ADT. **ADDITIONALLY, Fehr & Peers will report ALL school day driveway car trips** (the raw data is available) and graph those numbers, too, showing the same data they already use, plus "event" school days and "event" weekend days and street-parked car-trips. This raw data contains valuable traffic information and provides a wider perspective to observe trends and changes in car trips. Neighbors don't have limitless funds to do the work; Castilleja has the resources, and Fehr&Peers has the raw data and the algorithms, so it would be easy to provide.

The school tells us at every meeting: "we will do what the City tells us to do!".

In summary, here's my understanding of where we are:

**A. The current staff report for Aug 19th's meeting recommends a method that requires the school to report as car trips the sum of these two counts:**

- 1. Driveway car trips, as they do now,**
- 2. A reasonable estimate of street-parked cars.**

This can suffice as determining whether they come in under "caps" or not, which would determine "No Net New Trips".

**B. Additionally, we are requesting Fehr & Peers also report the available raw data representing the numbers of driveway car trips on ALL school days, plus street-parked cars, and event weekend car trips, and graph that information as they do the limited subset of non-event days, for informational purposes.**

I want to express my thanks to staff for digging deep and seeing where the current counts mislead and suggesting solutions.

And thanks to you for reading this.

Andie Reed  
Palo Alto

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#### **W-Trans June 2020 Report, page 20:**

At the time of the January 2017 **intersection, roadway and driveway counts**, the enrollment at Castilleja School was 438 students. Site-specific trip generation rates for the a.m., school p.m. and p.m. peak hours were developed based on driveway counts and adjusted based on results from a student travel pattern survey. It is estimated that the school site currently generates **352 vehicle trips during the a.m. peak hour**, 274 vehicle trips during the school p.m. peak hour, and 176 vehicle trips during the p.m. peak hour, resulting in estimated trip generation rates of 0.82, 0.63 and 0.41 vehicle trips per student for the a.m., school p.m. and p.m. peak hours respectively.

#### **W-Trans June 2020 Report, page 38:**

This data is summarized in Table 15 and a worksheet showing the calculation of the average trip distance is provided in Appendix E. Table 15 – Vehicle Miles Traveled (VMT) Comparison (Informational Purposes Only) Scenario No. of Students Daily Trips Average Trip Distance  
2 Estimated Total VMT  
Current 438 1,198 1 7.69 Proposed 540 1,477 7.69 11,358 Difference 102 279 9,213 Notes: 2,145

#### **Footnote #1**

(these counts are) Based on observed intersection, roadway and driveway counts conducted in January 2017

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Andie Reed  
Palo Alto, CA 94301  
530-401-3809