

Memorandum

Date: June 5, 2024
To: Jonathan Lait and Amy French, City of Palo Alto
From: Robert Eckols, Principal
Subject: **Trip Monitoring for Castilleja School Perimeter Parking**

SJ24-2276

Fehr & Peers has been providing 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. We continued to do biannual (fall and spring) monitoring of the morning peak hour vehicle trip activity until fall 2019, when the monitoring paused during the Covid 19 pandemic (2020 and 2021). The vehicle trip monitoring between 2012 and 2019 was only morning peak vehicle trips at the school driveways and daily activity was not monitored.

In fall 2022, we resumed monitoring Castilleja School trip activity. However, Castilleja was operating under a new Conditional Use Permit (CUP) approved by the Palo Alto City Council in June 2022. The new CUP set an upper limit of 383 vehicle trips during the morning peak arrival hour and 1,198 average daily trips (ADT).

A question has been raised about the need and ability to monitor school trips generated by the on-street parallel parking along the frontages of the school property, to include in the total morning and daily trip counts and then compared to the CUP trip caps. There are a number of reasons that the on-street parking trips should not be included in the ongoing monitoring and that only permanent driveway counters should be used for trip monitoring:

1. Conditions of Approval 22 b, d and e set forth the only mechanisms in the CUP (i.e., permanent driveway counters) to be used for accounting trips, as follows:

"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."

2. The trips generated by the on-street parking were not included in the EIR and traffic impact analysis (TIA) that established the CUP trip caps. The reason the EIR and TIA did not include any data on the trips generated by the on-street parking activity is because the street parking was a background condition. It therefore follows that if the street parking were to be included in the morning and daily trip counts at this time, that the morning peak arrivals and daily trip caps established by the CUP would need to be revised (increased) to include all the on-street parking spaces. The driveway counters are the proper way to measure trips as compared to the trip caps set forth in the CUP. Any additional trip counting of the on-street parking would be unjustified per the record and outside standard practice.
3. 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 EIR and 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.