

From: [Andie Reed](#)
To: [Council, City](#)
Subject: Castilleja TDM
Date: Sunday, August 6, 2023 5:04:57 PM
Attachments: [Andie Reed Castilleja AM PEAK.pdf](#)

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Dear Mayor, Vice Mayor, and Council Members:

Aug 7, 2023

This is a review of the **Traffic Demand Management plan (TDM)** as written and submitted to the city by Castilleja School December 2022 and which is in your packet, and the **Fehr&Peers monitoring report** dated 4/15/23, which is not in your packet; here's the link: https://www.cityofpaloalto.org/files/assets/public/planning-and-development-services/new-development-projects/1310-bryant-street/castilleja_tdm_monitoring_winter2023_20230415.pdf). Both documents taken together reflect how errors in the TDM get amplified by the school's traffic consultant.

The school states that they will do what the city tells them to do. However, history shows us that the city has to be **very specific**. For example, the 6/6/22 City Council MOTION #3: "if students are moved off site during construction, then they can go to 450 enrollment immediately". Because this sentence doesn't say "if **all** students are moved off campus.....", the school has actually increased enrollment and is staying on campus anyway. Moving all the students shortens the construction timeline and eases the impacts on the neighbors and was offered to the school as an incentive.

Please require these clarifications listed below to the language of the TDM to tighten up loopholes and ensure all car trips are counted.

ROLUA:

"No net new trips", which was hard-won and which the school agreed to, will reduce impacts to the neighbors from a 30% enrollment increase. However, it depends entirely upon **how car trips are counted**. The TDM only counts some of the trips.

The TDM is based on the Record of Land Use Action. On page 26, both 22b and 22d, state one method of calculating car trips is to use electronic driveway counters. The very next sentence states "Refer to condition 24 regarding the monitoring report for the ways ADT shall be calculated", which talks about monitoring drive-and-park cars and street drop-offs. However, the school is ONLY counting driveway car trips towards the **ADT and AM peak caps**. Please add verbiage that includes **"add all additional car trips to the ADT and AM peak car trip counts"**, so that monitoring methods that result in witnessing car trips, like cars parking and cars dropping students off in the street, get included into the totals. It was never intended that only some car trips would be counted towards **Average Daily Traffic**, but unless it is stated, the school will only use driveways. The Fehr & Peers report bears this out (see below).

TDM

TDM page 5, #3, "Data Collection Methodology" states they are only using driveway counters. Cars driving to the school and parking don't get counted. Cars dropping kids off in the streets don't get counted.

TDM pages 7 and 8, and in many places throughout the document, refer to cars that drive to the school without passing over driveways, but doesn't require the school to count them as car trips, only to monitor them. The school will only do what they are specifically required to do. **Add the words "count towards car trips" every time the TDM uses the word "monitoring" or refers to driving and parking and street drop-offs.**

TDM, page 3, bottom of the page, bullet 2, states that the TDM incorporates "all applicable Mitigation Measures from the Certified Final EIR, particularly MM4a and 7a".

1. MM7a states that the driveway counters are "part of the monitoring" (not the only monitoring), using the term "monitoring" as counting car trips. Yet the school interprets this to mean ONLY driveway counters can count car trips.

Need to clarify, as cars are being under-counted.

2. MM7a states that the TDM plan is implemented during construction and in perpetuity. However, bottom of page 4, Performance Standards, third bullet: construction trips are excluded (your staff report, third page, footnote 5 links to the MMRP, see 7a.) **Please delete the exclusion of construction vehicles from the TDM to be consistent with MM7a.**

Fehr & Peers TDM Monitoring Report (see link at top of this email):

An important safeguard to keeping **impacts to the neighborhood at current levels**, as agreed to by Castilleja, is counting car trips. The counts are useless if only some of the car trips are counted.

Here's an example of why we can't rely on this report:

1. Page 7, 4.1.2 describes the **AM peak period as between 7 and 9 am**.
2. Page 11 reports the average AM peak hour volume is 197 car trips and the cap is 383, which is so low it inspired a look at the data.
3. Page 12 shows Fig. 3 and a graph, showing low AM Peak car trips.

Testing a random sampling of the raw data against Fig. 3 shows that 197 AM peak car trips as reported does not reflect the raw data.

See graph attached:

Fehr & Peers reported car trips from Fig 3, pg. 12 in the report (**grey line**).

Fehr & Peers actual data, from downloading and counting 7 am to 9 am car trips, shows higher results, closer to 335 average (**blue line**)

Fehr & Peers actual data plus 53 (the number of spaces on the street around the school; a minimum of drive-and-park car trips easily counted) (**red line**).

Dotted line shows the **cap of 383**.

As you can see, the counts go over the cap on this sampling, in violation of the ROLUA and the TDM, and that doesn't even include the drive-and-park car trips and street drop-offs.

Page 14 "Morning Arrival Mode Share" shows a zero for cars that "drive and park on street", indicating that no one arrived by car and parked on the street, which is easily refuted because 53 cars park on the streets surrounding the school every school day (see pg 17, Table 6). We don't mind that they park around the school, we just want them counted.

If we cannot trust these counts, how can we trust the reports?

Please require that the Transportation Department review this report and audit the data. If the report can't be relied upon, hire a new traffic consultant, so both the school and the neighbors can trust and feel comfortable that the reports are accurate.

Thank you for your attention to this matter. Please require respect for the spirit and intent of the TDM to be a true "trip reduction program, not a counting circumvention program", as Mayor Burt put it last year.

Andie Reed

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