



City Council Staff Report

From: City Manager

Report Type: ACTION ITEMS

Lead Department: Planning and Development Services

Meeting Date: August 7, 2023

Report #:2306-1673

TITLE

Approval of Castilleja School's Transportation Demand Management Plan Document for a Previously Approved Redevelopment Project at 1310 Bryant Street. Environmental Analysis: The City Council Previously Certified a Final Environmental Impact Report for this Project.

RECOMMENDATION

Approve the transportation demand management plan as consistent with the conditions of approval for the Castilleja School redevelopment project.

BACKGROUND

On June 6, 2022, the City Council approved various discretionary land use entitlements and one legislative text amendment to the zoning code to allow Castilleja School redevelop and expand student enrollment, subject to certain findings and conditions of approval. These actions are memorialized in the City Council adopted record of land use action, or RLUA, which is available online.¹ Condition number 20 in the RLUA required the applicant to prepare a final version of the complete transportation demand management plan, or TDMP. TDM provisions for the project were previously approved by the City Council and included components from the following documents:

- Castilleja's prior TDMP;²
- An enhanced TDMP prepared by transportation consultant Nelson\Nygaard for Castilleja;³

¹ City Council approved record of land use action, dated June 6, 2022:

<https://www.cityofpaloalto.org/files/f65eb77d-4d17-41a6-8158-44f1df3b649f/Casti-Signed-ROLUA-and-Exhibit.pdf>.

² This is summarized in the Nelson\Nygaard memo (next footnote)

³ Nelson\Nygaard enhanced TDMP, dated June 9, 2016:

<https://www.cityofpaloalto.org/files/assets/public/planning-amp-development-services/current-planning/uploads-for-website/castilleja-eir-appendices-b3-through-b7.pdf>.

- A supplemental, or draft, TDMP previously prepared by the applicant and updated in 2021⁴
- Mitigation measure 7A from the mitigation and monitoring report included in the City's prepared final environmental impact report;⁵
- Other conditions of approval from the RLUA, notably conditions 20 – 26; and,
- The City Council's motion from June 6, 2022.⁶

Since the various TDMP provisions were distributed in different source documents, the City Council required a single source compilation that is cohesive, well-organized and indexed. The final form document is subject to the City Council's approval.

The City Council's action to approve the document affirms that the TDMP incorporates all relevant transportation-related conditions of approval. Importantly, the TDMP is intended to summarize key requirements and implementation measures, but the RLUA and supporting documents, such as the mitigation monitoring and reporting program, are the official records that govern the TDMP and Castilleja School's operations. In this regard, as the Council has already taken a final action on the project, this review does not present the City Council with an opportunity to add new requirements that were not previously included in the source documents. If, however, the City Council believes the TDMP failed to accurately describe a previously approved requirement or is ambiguous, direction can be given to address clerical errors in the document.

While the City Council previously indicated that this TDMP could be placed on the Council's consent calendar for approval, at the request of the Mayor and Vice Mayor in coordination with the City Manager, it was decided this item was more appropriate as an action item to receive public comment and Council deliberation.

ANALYSIS

The TDMP, included with this report as Attachment A, was prepared by Castilleja School. It was reviewed by City staff in Planning and Development Services and the Office of Transportation. These two City departments will be responsible for ensuring compliance with various components of the TDMP and the RLUA.

The document identifies performance standards, data collection methodology and reporting requirements, mitigation strategies, fees for City monitoring, information on enforcement and

⁴ Applicant's draft TDMP from 2021: <https://www.cityofpaloalto.org/files/assets/public/planning-and-development-services/new-development-projects/1310-bryant-street/castilleja-tdm-operations-manual-updated-2021.pdf>.

⁵ Project FEIR Mitigation Monitoring and Reporting Program: <https://www.cityofpaloalto.org/files/assets/public/agendas-minutes-reports/agendas-minutes/city-council-agendas-minutes/2022/20220523/20220523pccsm-revised.pdf#page=292>.

⁶ City Council action minutes from June 6, 2022: <https://www.cityofpaloalto.org/files/assets/public/agendas-minutes-reports/agendas-minutes/city-council-agendas-minutes/2022/20220606/20220606smccsmct.pdf>

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's review of the attached TDMP finds it consistent with the Council's interest to compile all relevant requirements into one document. Key provisions of the RLUA, including conditions 20-26 that address average daily and AM peak trips are included in the TDMP, as are requirements for permanent driveway counters, procedures for data collection, shuttle service to appropriate Caltrain stations, monitoring neighborhood drop-off and pick-up compliance, tri-annual reporting requirements, engagement with parents and students about the plan requirements, and many other provisions from the RLUA and mitigation monitoring report. In its motion to approve the project, the City Council also included several other requirements such as affirmative acknowledgement from Castilleja School that it agrees to only use onsite and street parking along the perimeter of the school building for all parking; that it will prohibit juniors from driving to the school; and, imposes a requirement that 40 percent of its student enrollment be located within a five mile radius of Castilleja School. These and many other provisions are included in the TDMP.

FISCAL/RESOURCE IMPACTS

Enforcing compliance with the project's land use entitlements and the TDMP will require City staff resources. Castilleja School is required to maintain a balance of \$15,000 with the City to investigate complaints and for ongoing monitoring and reporting. The deposit amount will be replenished when the balance reaches \$5,000. While the City will be compensated for its time engaging with this private development project, staff resources in several departments are expected to be diverted from other initiatives at times to address the requirements of the RLUA and TDMP. Timely compliance review is key to satisfy the community and target dates for long range planning efforts may be adjusted.

STAKEHOLDER ENGAGEMENT

Staff has communicated with representatives of neighbors near Castilleja School to answer questions about the project, the RLUA and its implementation. Staff provided a draft version of the subject TDMP for neighbor review and comment prior to preparing this report. Staff continues to maintain the project website posting information as it becomes available or relevant.

ENVIRONMENTAL REVIEW

The City Council previously certified a final environmental impact report for this project; the recommendation in this report is consistent with the prior review and no further environmental analysis is required.

ATTACHMENTS

Attachment A: Castilleja School's Transportation Demand Management Plan

APPROVED BY

Jonathan Lait, Director of Planning and Development Services