ADDENDUM TO THE MENLO SCHOOL
ENROLLMENT INCREASE PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
50 Valparaiso Avenue (APN 070-360-070)

Atherton, California

January 2013

INTRODUCTION

The Town of Atherton has prepared this Addendum to the Menlo School Enrollment Increase Project Initial Study/Mitigated Negative Declaration (IS/MND) pursuant to the California Environmental Quality Act ("CEQA") and the State CEQA Guidelines. This IS/MND analyzes the impacts of amending Conditional Use Permit (CUP) No. 10-00007, specifically, Condition 22, which addresses traffic impacts from the enrollment increase. The proposed amendments to Condition 22 would 1) eliminate intersection improvements required as mitigation measures in the original IS/MND, 2) revise the afternoon peak hour trip generation goal to reflect a realistic and attainable threshold, 3) substitute annual three-day independent traffic monitoring with an annual average of daily counts collected throughout the academic year using the Menlo School's in-pavement counting system, and 4) amend the schedule in which the Menlo School would be required to reduce enrollment, if deemed out of compliance with the peak hour thresholds.

In 2010, the Menlo School (School) submitted CUP 10-00007 (2010 CUP) for the Menlo School Enrollment Increase Project (Enrollment Increase Project), requesting that the School's CUP be modified to allow the school enrollment to increase from 750 to 815. In March 2011, the Atherton Planning Commission adopted an IS/MND and Mitigation Monitoring and Reporting Program (MMRP) for the project, and ultimately approved the CUP on June 22, 2011, granting the School a maximum enrollment of 795 students.

The 2010 CUP required the School to construct intersection improvements and to implement a Transportation Demand (TDM) program to reduce the number of vehicle trips during peak traffic hours. The TDM includes thresholds for the maximum number of morning (AM) and afternoon (PM) peak hour trips. The amended CUP conditions also include parking utilization thresholds. The school's compliance with the TDM program, peak hour thresholds, and parking utilization thresholds require verification through annual monitoring. To mitigate the school's traffic impacts, the 2010 CUP requires that additional turn lanes be installed at the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue/Elena Avenue intersections, to facilitate turn movements and reduce delays.

Pursuant to the 2010 CUP conditions of approval, the School implemented the campus-wide Transportation Demand Management program (Go Menlo TDM Program) that has substantially reduced vehicular traffic generated by the School, and resulted in improvements to the level of service at the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue/Elena Avenue intersections. To monitor the success of the Go Menlo TDM Program and its compliance with the CUP, the School has installed a permanent in-pavement counting system that monitors

School traffic on a daily basis and improves the accuracy of traffic data collected for the school. The nearby Sacred Hearts Schools (SHS) has recently implemented a similar TDM program in addition to making on campus circulation improvements. These actions have also reduced area traffic and impacts to these intersections.

While the Go Menlo TDM Program has substantially reduced school traffic, both AM and PM peak hour trips still exceed the thresholds established by the 2010 CUP. Noncompliance with the thresholds requires the school to reduce enrollment to 755 within 3 years. Seeking to avoid the mandatory enrollment reduction, the School hired a transportation engineering consultant to examine the School's traffic count data and the assumptions used to arrive at the peak hour thresholds. After a review of the data, the traffic consultant concluded that even with the significant traffic reductions reached through the Go Menlo TDM Program, the PM peak hour threshold established by the 2010 CUP is infeasible because it is based on unrepresentative traffic data that warrants correction. In short, the analysis concluded that the peak hour trip ratio (AM versus PM) identified in the IS/MND's traffic study is not consistent with other traffic studies for the School, nor is it consistent with nationwide standard.

Therefore, the traffic engineer has recommended that the PM peak hour threshold be increased to reflect a realistic target based on an appropriate AM/PM trip ratio. Compliance with the new threshold would result in less traffic than existed under the approved use baseline (school enrollment of 750). Therefore, generation of less traffic than the approved use baseline would mean that the mitigation measures are not required.

Because the School has documented that the Go Menlo TDM Program has successfully reduced the School's traffic impacts at the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue/Elena Avenue intersections to below a level of significance, the School requests that intersection improvements be eliminated as required mitigation measures and deleted from the CUP. The requested changes to the conditions of approval constitute the subject of this Addendum.

After reviewing and confirming the success of the Go Menlo TDM Program, the Town has determined that implementation of the CUP for the enrollment increase will not result in significant traffic impacts at the specified intersections further discussed below. Accordingly, the Town has concluded that "Mitigation Measures #1 and #2" identified in the IS/MND are no longer necessary to mitigate significant traffic impacts.

Due to the proposed elimination of the mitigation measures identified in the IS/MND, the Town has prepared this Addendum in accordance with Section 15164 of the CEQA Guidelines. No other changes are proposed to the IS/MND. With the elimination of the mitigation measures (intersection improvements), and the other traffic-related changes to Condition 22 further described below, none of the changes to the 2010 CUP will result in any new significant environmental effects or in a substantial increase in the severity of the prior impacts disclosed in the IS/MND. Further, there are no changes in circumstances or new information that would otherwise warrant any subsequent environmental review under Public Resources Code section 21166 or CEQA Guidelines section 15162. The Town has therefore determined that the

IS/MND adequately addresses the potential environmental impacts of the Enrollment Increase Project, and no further environmental review is necessary.

BACKGROUND

On December 3, 2008, the Town of Atherton Planning Commission approved CUP 08-00010 (2008 CUP), granting the School's application to construct three new buildings: an Athletic Center, a Performing Arts Center, and a Creative Arts Classroom Building containing approximately 133,500 square feet of gross floor area. The 2008 CUP included Condition 13, which limited the enrollment of the combined Middle and Upper Schools at the School campus to a maximum of 750 students.

In 2010, the School filed CUP 10-00007 (2010 CUP) to amend the 2008 CUP for the campus construction project. This 2010 CUP application, which proposed to increase enrollment to 815 students, is referred to as the Menlo School Enrollment Increase Project (Enrollment Increase Project). No school facility improvements were proposed as part of the project. As required by CEQA, an Initial Study (IS) was prepared to evaluate the potential environmental impacts of the project. The IS found impacts to traffic from the project; therefore the Town required mitigation measures and an IS/MND was prepared. The IS/MND and related Mitigation Monitoring and Reporting Program (MMRP) was reviewed and adopted by the Planning Commission in March 2011. It included two mitigation measures to requiring improvements at two area intersections to reduce the Enrollment Increase Project's significant traffic impacts to less than significant. On June 22, 2011, the Planning Commission approved the 2010 CUP and limited the School enrollment increase to a maximum of 795 students.

The 2010 CUP granting the enrollment increase required the School to mitigate the project's traffic impacts through implementation of the IS/MND's mitigation measures and also through the implementation of a Traffic Demand Management (TDM) program, as specified in Condition 22. The goal of these requirements was to reduce traffic generated by the School during the morning and afternoon peak hours, which would also reduce traffic delays at impacted intersections near the school. The key requirements of Condition 22 are summarized below:

Intersection Improvements

- Valparaiso Avenue/Emilie Avenue Intersection (Emilie Avenue stop sign controlled approach): Add an exclusive left turn lane and restripe the left-shared-right lane as a right turn lane. This improvement would add an extra turn lane to the intersection.
- Valparaiso Avenue/Elena Avenue Intersection (Elena Avenue stop sign controlled approach): Add an exclusive left turn lane and restripe the left-shared-right lane as a right turn lane. This improvement would add an extra turn lane to the intersection.

TDM Program

- Implement a TDM program to reduce vehicle trips generated by the School during the AM and PM peak hours. Beginning with the 2012-13 school year, the maximum morning peak hour limit was set at 627 vehicle trips, with an afternoon peak hour limit of

302 vehicle trips. The CUP requires annual traffic monitoring (counts) to confirm compliance with the peak hour thresholds. Non-attainment of the thresholds requires the school to eventually reduce its enrollment to a maximum of 755 students.

Parking Utilization

- Maintain an on-campus parking capacity utilization rate equal to or less than 86.5%.

The CUP required that the School post a bond to ensure implementation of the required intersection improvements, the cost of which was to be shared with the Sacred Heart Schools, based on each school's proportion of the traffic impacts. The 2010 CUP Condition 22 required completion of the intersection improvements by December 31, 2011, or a later date as authorized by the City Engineer.

Since the Town's approval of the 2010 CUP in 2011, the School has successfully implemented the Go Menlo TDM Program that has resulted in significant reductions in traffic generated by the School. However, it has failed to meet the required peak hour thresholds.

Menlo School's Go Menlo TDM Program

- Implement a Transportation Demand Management (TDM) Program

Consistent with the CUP's requirements, the School began implementation of the Go Menlo TDM Program in August 2011 to encourage the use of alternative modes of transportation that reduce the amount of traffic to and from the school. The program was expanded for the 2012-13 school year. The program has an annual budget of $400,000, and is managed by the School's Director of Sustainability. The School's Transportation web page (https://www.menloschool.org/parents/transportation.php) contains comprehensive information about the Go Menlo TDM Program and links to pages that describe the many transportation options, which include carpools, private school buses, shuttles, public transit (SamTrans, Caltrain), bicycling and walking.

Students enroll in the private school bus service (or carpools) with Zimride, a private ridesharing network for Menlo School parents and staff. (http://www.zimride.menloschool.org/). For each alternative trip (carpool, school bus, public transportation, bike, or walk), students earn points for transportation incentives program. The points earned help local community service and environmental organizations selected by the student body.

Carpool
The Zimride private ridesharing network facilitates carpooling to and from the School by parents and staff by matching drivers with those seeking rides. In addition to participating in the Go Menlo Incentive Program, there are 30 dedicated carpool parking spaces in the main parking lot. Carpool parking permits are issued to vehicles meeting the School's definition of a carpool:

- Three Menlo School faculty, staff, or students (or combination) who arrive on campus in the same car; or

- Any combination of two or more families that takes at least one car off the road.

Bus Service
The School offers free bus transportation to and from the School, along four bus routes extending from nearby Peninsula communities where many students reside. Buses run during the morning and the afternoon. The four bus lines are:

- The San Mateo Bus: Serving San Mateo, Belmont, San Carlos
- The Woodside Bus: Serving Woodside, Atherton, Menlo Park
- The Palo Alto Bus: Serving Palo Alto, Menlo Park
- The Los Altos Bus: Serving Cupertino, Los Altos

Shuttles to Caltrain Station
The School runs shuttles between the campus and the Menlo Park Caltrain station during the morning and afternoon commute times.

Incentives
The Go Menlo TDM Program offers the following incentives to encourage students, faculty, and staff to utilize alternative transportation modes to reach the School. These include:

- Faculty and Staff participants qualify for a $1,000 annual bonus for utilizing alternative transportation. 42 faculty and staff participated in 2012-13.
- Two vehicles were purchased by the School for daily use for School errands by faculty/staff who use alternative transportation to get to the School.
- Guaranteed Ride Home Program, a partnership with Commute.org, ensures a ride home in case of emergencies, for those using alternative transportation.
- Students earn a $1 contribution to charities chosen by student body for each time they utilize alternative transportation.

Publicity and Communications
The Go Menlo TDM Program utilizes a variety of communication methods to publicize the program, including the Go Menlo Transportation website, phone-a-thons to families, promotions at parent & student meetings, banners, Back-to-School information, prospective student communication, broadcast e-mails, and also the Earth Day Challenge with Sacred Heart Schools, which include an inter-school competition to reduce traffic.

Annual Traffic and Parking Monitoring

Consistent with the requirements of the 2010 CUP, an independent traffic consultant has conducted annual parking and traffic counts at the School. The most recent traffic count results from 2013 are reported in an April 22, 2013 letter report from Hexagon Transportation Consultants to Neal Martin, Town Planner.

To more accurately monitor the success of the Go Menlo TDM Program, and to document compliance with the 2010 CUP conditions for annual monitoring, the school installed a permanent in-pavement trip monitoring system in December 2011. The vehicle detectors were installed in all entrance and exit lanes at the main entrance driveway (Valparaiso

Avenue/University Avenue), as well as the East Gate driveway near Crane Street, which is only open during mornings.

Annual counts have documented that the school is in compliance with the parking utilization rate specified in the CUP. However, annual trip monitoring has documented that while vehicle trips generated by the school have declined since the adoption of the amended CUP, the School is still not in compliance with the maximum peak hour thresholds.

Out of a desire to maintain its current enrollment of 795 students, and to better understand how it might achieve compliance with the thresholds, the School hired the traffic engineering firm Kittelson & Associates to conduct a comprehensive analysis of the School's traffic count data to determine why it has been unable to meet the thresholds set by the CUP. The Kittelson report concluded that the PM peak hour trip counts documented in the 2011 Kimley-Horn Associates Traffic Impact Study (TIS) were unusually low when compared to other PM peak hour counts for the School, because the PM peak data was only measured on one day, which proved to have an unusually low number of trips. It also concluded that the ratio of PM trips to AM trips was not consistent with other traffic data for the School, or with national standards. The report recommends changing the PM peak hour threshold to reflect an attainable goal, from 302 to 453 trips.

The success of the School's Go Menlo TDM Program in reducing school-generated traffic has resulted in a corresponding reduction of traffic impacts at nearby intersections, including those that were identified for improvements as mitigation measures in the IS/MND. Further, the nearby Sacred Heart Schools (SHS) has recently implemented its own TDM program, as well as improvements to its campus circulation system. The combined impact of these strategies is a significant reduction in neighborhood traffic, with corresponding improvements to the Level of Service (LOS) at area intersections that eliminate the need for the intersection improvements identified in the IS/MND.

PROJECT DESCRIPTION

The proposed project (Project) that is the subject of this Addendum consists of amendments to conditions of approval that were adopted as part of CUP 10-00007 (2010 CUP) for the Enrollment Increase Project. The CUP, approved by the Planning Commission on June 22, 2011, allowed the School to increase its enrollment from 750 to 795 students. The School seeks to modify the requirements of Condition 22, which address the traffic impacts from the Enrollment Increase Project. The proposed amendments to Condition 22 would 1) revise the PM peak hour trip generation goal to reflect a more realistic threshold, 2) substitute annual three-day independent traffic monitoring with an annual average of daily counts collected throughout the academic year, using the Menlo School's in-pavement counting system, 3) eliminate intersection improvements required as mitigation measures for the original IS/MND, and 4) amend the schedule in which the Menlo School would be required to reduce enrollment, if deemed out of compliance with the peak hour thresholds. These changes are described in greater detail below.

Condition 22 requires the School to construct intersection improvements and to implement a TDM program to reduce the number of vehicle trips during peak traffic hours, and it includes

thresholds for the maximum number of AM and PM peak hour trips. Condition 22 also specifies maximum parking utilization thresholds for the campus. The School's compliance with the TDM program, peak hour thresholds, and parking utilization thresholds require verification through an annual monitoring. To mitigate the school's significant traffic impacts identified in the IS/MND, the CUP requires that additional turn lanes be installed to facilitate turn movements and reduce delays at both the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue/Elena Avenue intersections,

As required by the Condition 22, the School currently implements a Go Menlo TDM Program to encourage the use of alternative modes of transportation to reduce vehicular traffic to and from the campus. The Project would continue implementation and refinement of the Go Menlo TDM Program. No other changes to the Menlo School are proposed as part of this Project.

In order to approve the Project, which includes the elimination of mitigation measures adopted as part of the IS/MND, the Town must:

1. Make a finding based on substantial evidence that the intersection improvements are no longer necessary to mitigate the prior identified significant traffic impacts, due to reductions in vehicle trips resulting from implementation of the School's Go Menlo TDM Program and the SHS TDM program.
2. Amend the Use Permit condition to delete the existing intersection improvements condition;
3. Amend the Use Permit condition requiring annual monitoring and substitute an annual average traffic count for the school year, using data collected by the school's permanent in-ground traffic count system;
4. Amend the PM peak hour threshold specified in the Use Permit condition from 302 to 453 vehicle trips; and
5. Amend the schedule in which the school would be required to reduce its enrollment to a maximum of 755 students, if it fails to comply with the revised thresholds.

Pursuant to the 2010 CUP, the School would continue to implement its Go Menlo TDM Program in order to minimize its trip generation. As described above, the existing program includes morning and afternoon bus service, carpool ride matching program, dedicated carpool parking, shuttles to the Menlo Park Caltrain station, off-site parking, vanpool, incentives for faculty, staff, and students, bike and walk-to-school encouragement, and a communications program.

LEGAL STANDARDS

An Initial Study is generally prepared by a lead agency to determine whether a project may have a significant effect on the environment. An Initial Study and Negative Declaration (IS/ND) or Mitigated Negative Declaration (IS/MND) may be prepared instead of an Environmental Impact Report (EIR) if the project's significant environmental effects can be reduced to less than significant levels through the adoption of mitigation measures. Once an IS/MND for a particular project has been approved, that IS/MND is conclusively presumed valid unless a lawsuit to challenge the IS/MND is filed in a timely manner. (Pub. Res. Code, § 21167.2.) This presumption precludes reopening the prior CEQA process even if the IS/MND is later discovered

to have been inaccurate or misleading in the description of a significant effect or the severity of its consequences. (*Laurel Heights Improvement Ass'n v. Regents of Univ. of California* ("*Laurel Heights II*") (1993) 6 Cal.4th 1112, 1130.)

Once an IS/MND has been adopted for a project, no subsequent IS/MND is required unless, "on the basis of substantial evidence in the light of the whole record," the agency determines one or more of the following:

> (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
>
> (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
>
> (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration shows any of the following:
>
> > (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
> >
> > (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
> >
> > (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
> >
> > (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(*CEQA Guidelines*, §§ 15162(a)(1)-(3); *see also* Pub. Res. Code, § 21166.)

If a subsequent EIR or IS/MND is not required, the lead agency may document its decision and supporting evidence in an addendum to the EIR or IS/MND. (*CEQA Guidelines*, §§ 15164(b), (c), (d), (e); *see also Santa Teresa Citizens Action Group v. City of San Jose* (2003) 114 Cal.App.4th 689, 702-803.) The addendum and lead agency's findings should include a "brief

explanation of the decision not to prepare a subsequent EIR [or IS/MND]," and the explanation "must be supported by substantial evidence." (*CEQA Guidelines*, § 15164(e).) "An addendum need not be circulated for public review," but must be considered by the lead agency prior to making a decision on the project. (*Id.*, § 15164(c)-(d).)

ANALYSIS

The Town has determined that no subsequent EIR or negative declaration is required for this Project based on the following analysis.

The Enrollment Increase Project IS/MND (2008 CUP, amended by the 2010 CUP) was prepared by the Town in accordance with the requirements of CEQA and the CEQA Guidelines. The IS/MND examined the potential environmental effects of the proposed enrollment increase from 750 students, as allowed by the 2008 CUP, to a maximum of 815 students as requested in the 2010 CUP application. The approved 2010 CUP permitted a maximum enrollment of 795 students. The proposed Project, which would modify Condition 22 dealing traffic impacts, does not include any changes to the student enrollment, nor does it involve any changes to the approved programs and facilities.

The IS/MND identified environmental impacts and recommended mitigation measures to address the traffic impacts associated with the proposed Enrollment Increase Project. The IS/MND evaluated the standard comprehensive range of environmental topics listed in CEQA Guidelines, Appendix G. Through implementation of mitigation measures specifying improvements to the Valparaiso/Emilie and Valparaiso/Elena intersections, all of the identified potentially significant environmental impacts of the Enrollment Increase Project would be mitigated to a less than significant level. The Town adopted the IS/MND and mitigation measures to reduce traffic impacts generated by the Enrollment Increase Project, and incorporated these requirements as conditions of the 2010 CUP.

The Project evaluated by this Addendum would modify the 2010 CUP Condition 22 to 1) eliminate intersection improvements required as mitigation measures in the original IS/MND, 2) revise the afternoon peak hour trip generation goal to reflect a realistic and attainable threshold, 3) substitute annual three-day independent traffic monitoring with an annual average of daily counts collected throughout the academic year using the Menlo School's in-pavement counting system, and 4) amend the schedule in which the Menlo School would be required to reduce enrollment, if deemed out of compliance with the peak hour thresholds.

With these changes to the transportation/traffic mitigation measures and the additional changes to Condition 22, only one impact addressed in the IS/MND warrants detailed discussion in this Addendum: transportation/traffic. The Project would have no new significant impacts or a substantial increase in the severity of the prior-disclosed impacts with respect to all other environmental topics evaluated in the IS/MND because the Project does not involve any physical changes to the environment. Elimination of the mitigation measures requiring the intersection improvements would avoid these any physical changes to the environment. Because the Town has determined that the Go Menlo TDM Program has been effective in reducing the School's impacts to a less than significant level, this Addendum evaluates whether the elimination of the

existing intersection improvement mitigation measures, and the other changes to the CUP conditions, would result in new significant or substantially more severe traffic impacts.

Transportation/Traffic

1. Traffic Reductions due to Menlo School and Sacred Heard Schools TDM Programs

In May 2013 the School submitted a letter to the Town summarizing the status of the School's efforts to meet the traffic and parking goals specified in the 2010 CUP. The letter included an April, 22, 2013 report from Hexagon Transportation Consultants, Inc. documenting that the School was meeting its parking goals, but was not meeting the CUP goals for reducing the AM and PM peak hour goals. However, the letter points out that the School has successfully implemented a TDM program required by the 2010 CUP, which has resulted in a significant reduction in traffic generated by the School.

The success of the Go Menlo TDM Program in reducing school-generated traffic has resulted in corresponding reduction of traffic impacts at nearby intersections, including those that were identified for improvements as mitigation measures in the IS/MND. Further, the nearby Sacred Heart Schools (SHS) has recently implemented its own TDM program, as well as physical improvements to its campus circulation system as part of its Master Plan improvements. The combined impact of the SHS TDM program and its campus improvements, along with the Go Menlo TDM Program, have resulted in significant reductions in neighborhood traffic, with corresponding improvements to the Level of Service (LOS) at area intersections.

The SHS Master Plan EIR Addendum, adopted by the City Council on December 18, 2013 demonstrates that with the cumulative traffic reductions from the SHS TDM program and campus circulation improvements and the Go Menlo TDM program, delay times have been significantly reduced at the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue /Elena Avenue intersections from 2009 to 2013. For example, in 2009 at the Valparaiso Avenue/Emilie Avenue intersection, delay during the AM Peak, was 536 seconds and the Level of Service (LOS) was F. In 2013 at the same intersection during the AM Peak the delay was 37.4 seconds and the LOS improved to E. Similar improvements to delay times, but not levels of service, also occurred at the Valparaiso Avenue/Elena Avenue intersection. The Park Lane/Emilie Avenue and Park Lane/Elena Avenue intersections also experienced improvements in delay times. These improved conditions reflect the combined effectiveness of the Schools' TDM programs and also the on-campus physical improvements implemented by SHS.

Table A from SHS Master Plan EIR Addendum illustrates the change in traffic congestion at four of the 12 intersections evaluated in the IS/MND, including Valparaiso Avenue /Emilie Avenue and Valparaiso Avenue /Elena Avenue, which were identified for improvements as mitigation for the enrollment increase at both the Menlo School and SHS. This data is derived from the 2009 SHS EIR and the 2013 TDM Program report, which analyzed the same intersections under cumulative conditions (including traffic from both SHS and Menlo School). The SHS EIR contains an evaluation of traffic conditions at three points in time:

- Existing (2009) Without SHS Project (i.e. without SHS increased enrollment)
- Base Case (2014) + SHS Project (i.e. SHS enrollment increased to 1,196)
- Future (2030) (i.e. cumulative condition)

Table A shows the level of service and average delay for the Base Case (2014) + SHS Project and the Future (2030) points in time at the four intersections. The Base Case (2014) + SHS Project scenario represents the SHS campus traffic conditions as they exist today. The reference to "SHS EIR Alternative A Mitigation Implemented" means the reconstruction of the Valparaiso Avenue /Emilie Avenue, Valparaiso Avenue/Elena Avenue intersections described in the "Background" section above, as well as the addition of a second lane to the southbound Elena Avenue approach to the Park Lane all-way stop intersection, which was required mitigation in the SHS Master Plan EIR. The calculated LOS and delay data as compared to the 2013 counts show significant reductions in average delay. These improvements in average delay at all of the intersections result from the combined effect of the TDM programs implemented by both the Menlo School and SHS plus the SHS circulation improvements. In fact, these strategies have resulted in improvements in delay far beyond those predicted for both the Base Case (2014) + SHS Project and the Future (2030) scenarios.

Table A: Level of Service and Average Delay Comparisons
(Menlo School and SHS Cumulative Conditions)

	2009		2014		2014		2030		2030		2013	
Intersection	Existing		SHS EIR Base Case + Project		SHS EIR Alt. A Mit. Implemented		Future		SHS EIR Alt. A Mit. Implemented		Existing 2013	
	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak
Valparaiso/Emilie	F/536	F/300	F/817	F/475	F/684	F/292	F/1034	F/584	F/836	F/364	E/37.4	F/50.5
Valparaiso/Elena	F/915	F/366	F/1623	F/622	F/886	F/189	F/2086	F/785	F/1138	F/245	F/116.9	F/101.4
Park/Elena	C/20.6	B/11.7	C/34.2	B/13.9	D/27.3	No impact	E/43.3	B/14.5	D/33.7	No impact	B/12.9	B/10.9
Park/Emilie	C/16.2	B/11.7	C/20.0	C/18.2	No impact	No impact	C/21.7	C/19.2	No impact	No impact	B/13.2	B/12.7

Source: SHS Master Plan EIR, 2010.

The Hexagon report also provides data about the peak AM and PM traffic volumes accessing the campus during the 2011-12 and 2012-13 academic years. The report documents that the School generated a combined 1,266 peak hour trips when traffic counts were taken in 2010 and the school enrollment was 810 students. During the 2012-13 academic year, when the enrollment was 793 students, combined peak hour trips averaged 1,090 per day, representing a 14% reduction in peak hour trips with a corresponding 2% decrease in enrollment (17 fewer students).

In addition, current counts for SHS reflect a 21% reduction in vehicles accessing the Sacred Heart Schools campus over the past 5 years, despite an increase in the number of students of 10%. Similarly, improvements in roadway segment conditions have been experienced.

Therefore, as shown above, the cumulative traffic reductions from the SHS TDM program and campus circulation improvements and the Go Menlo TDM program, have significantly reduced

the delay times at the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue /Elena Avenue intersections from 2009 to 2013, and the impacts from the School Enrollment Increase Project have been reduced to below the pre-project (Approved Use Condition with 750 students). As such, the intersection improvements are no longer required mitigation measures and can be eliminated.

2. Change in Peak Hour Thresholds

Annual traffic counts have documented that the school is in compliance with the parking utilization rate specified in the 2010 CUP. However, annual trip monitoring has documented that while vehicle trips generated by the school have declined since the adoption of the Go Menlo TDM Program, the School is still not in compliance with the maximum thresholds.

The 2010 CUP Condition 22.C.iv. specifies that non-attainment with the trip reduction thresholds requires the school to reduce its enrollment to a maximum of 755 students. In this condition, the School would no longer be required to implement the TDM program, nor would it be required to construct the intersection improvements to the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue/Elena Avenue intersections.

Out of a desire to maintain its current enrollment of 795 students and to address the compliance with the peak hour thresholds, the School hired the transportation engineering firm Kittelson & Associates (Kittelson) to conduct a comprehensive analysis of the School's traffic data to determine why it has been unable to meet the thresholds set by the 2010 CUP. The Kittelson report concluded that the PM peak hour trip counts documented in the 2011 Kimley-Horn Associates Traffic Impact Study (TIS) were unusually low when compared to other PM peak hour counts for the School, because the PM peak data was only measured on one day (April 13, 2010), which proved to have an unusually low number of trips.

Table B, below, excerpted from the Kittelson report summarizes the peak hour traffic generation as documented in traffic counts since 2001.

Table B: Summary of Trips for Menlo School[1]

Source	Memo to Neal Martin (Kimley-Horn 2010)	Memo to Neal Martin (Kimley-Horn 2010)	Sacred Heart School MP DEIR (CAJA 2010)	Traffic Impact Study-Menlo School (Kimley-Horn 2011)	Menlo School Automatic Counter	Menlo School Automatic Counter	Letter to Neal Martin (Hexagon 2013)	Current Menlo CUP Targets	Proposed Menlo CUP Targets
Dates of Data Collection	Nov. 15, 2001	April 8,9,10 2003[2]	March & Dec. 2009	10/13/10-AM & PM, 10/14/10-AM[2]	January - May 2012[3]	Aug. - Dec., Feb.-May 2013[2]	April 9, 16 2013[2]		
Enrollment at Time of Measurement	740	756	786[4]	810	794	793	793	795	795
East Gate Counted	No	No	No	Yes (136)	Yes	Yes	Yes		
Proforma Adjustment for East Gate[5]	124	127	132	0	0	0	0		
AM Peak Hour Trips	706	685	648	856	641	648	656	627	627
PM Peak Hour Trips	551	481	465	410	465	432	436	302	453
Ratio PM Trips / AM Trips	78%	70%	72%	48%	73%	67%	66%	48%	72%

Notes:

1. Trips are defined as vehicles entering or exiting Menlo School. A vehicle that enters and then exits generates two trips.

2. Trips are averages of the dates when data were collected.

3. Trips are averages of the dates when data were collected excluding three abnormal PM peak hours on days in June at the end of the school year.

4. Enrollment was 780 students in March and 791 students in December 2009. The DEIR does not identify specific dates of data collection.

5. Adjustment is based on 2010 counts at east gate times the enrollment ratio.

Source: Kittelson & Associates, Inc., 2013.

The Kittelson report also identified that the PM to AM peak hour trip ratio specified by Condition 22 (302 / 627 = 48%) was highly unusual, as it is significantly different than other traffic data for the School, and is also inconsistent with national studies documented in the Institute of Transportation Engineers (ITE) Trip Generation Manual. As a result of the inaccurate PM to AM peak hour trip ratio, the Kittelson report concluded that the PM peak hour threshold established in the CUP is not feasibly attainable, and recommends a change to the threshold reflect the ITE standard PM to AM peak hour trip ratio of 72%, which is close to the actual ratio observed for the School's in traffic studies conducted since 2001. The report recommends that the AM peak hour threshold remain at 627, but that the PM peak hour threshold be increased from 302 to 453.

By approving the change in the PM peak hour threshold from 302 to 453, as requested by the School, the PM peak hour threshold would be reflect a realistic, attainable threshold, and reflect a PM to AM peak hour trip ratio that is consistent with past traffic studies and national standards.

3. Traffic Monitoring

CUP Condition 22 requires that annual monitoring be conducted by a qualified independent third party, approved by the Town, to assess both vehicle trips and parking capacity utilization. The School is proposing to utilize its permanent in-ground traffic count system to document compliance with the conditions of approval. The benefit of this system is that it documents AM and PM trips daily, and allows for the exclusion of unrepresentative dates, as opposed to the annual Spring counts specified in the 2010 CUP, which only offer a snapshot in time. However, because the trip monitoring system is owned, managed and controlled by the School, the Town will continue to require the option of annual independent audits of the traffic counts .

4. Determination that IS/MND Mitigation Measures No Longer Necessary

Mitigation measures adopted when a project is approved may be changed or deleted if the agency states a legitimate reason for making the changes (see e.g., *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 359). The reason for the changes must be supported by substantial evidence (*Mani Brothers Real Estate Group v. City of Los Angeles* (2007) 153 Cal. App. 4th 1385). Here, the evidence contained in this Addendum and the referenced traffic studies supports the finding that the intersection improvements mitigation is no longer necessary for the reasons summarized below. In summary, the reductions in trip generation, which result from implementation of the Go Menlo TDM program, and the SHS TDM program and its campus improvements, reduce the School's traffic impacts to a less-than-significant level. This traffic reduction is evidenced by the following facts documented in the Addendum for the SHS Master Plan EIR:

a. The average delay time at the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue /Elena Avenue intersections have been reduced from 72% to 93% from 2009 to 2013.
b. The level of service at the Valparaiso Avenue /Emilie Avenue intersection has improved from F to E from 2009 to 2013.
c. The average delay time at the Valparaiso Avenue /Emilie Avenue and Valparaiso Avenue /Elena Avenue intersections have been reduced from 47% to 95% from the projected 2014 SHS Master Plan EIR Base Case + SHS Project with EIR Alternative A Intersection Improvements Implemented compared to Existing 2013 conditions.
d. The level of service at the Valparaiso Avenue /Emilie Avenue intersection has improved from F to E from the projected 2014 SHS Master Plan EIR Base Case + SHS Project with SHS EIR Alternative A Intersection Improvements Implemented compared to Existing 2013 conditions.
e. Similar but greater improvements in average delay times are projected at the Valparaiso Avenue /Emilie Avenue and Valparaiso Avenue/Elena Avenue intersections for the Future (2030) case with SHS EIR Alternative A Intersection Improvements Implemented as compared to Existing 2013 conditions.
f. In addition, the Menlo School's the 2013 peak hour counts reflect a 14% reduction in peak hour trips at the School campus over the past 3 years. In the same time frame the student enrollment was reduced just 2% from 810 to 793.

Therefore, as shown above the IS/MND mitigation measures to improve the Valparaiso

Avenue/Emilie Avenue and Valparaiso Avenue /Elena Avenue intersections are no longer required to reduce traffic impacts from the Enrollment Increase Project to less than significant.

5. Determination that the Deletion of Intersection Improvements required as Mitigation Measures does not Result in New Significant Impacts

CEQA also provides that once an IS/MND has been completed for a project, the Town may not require preparation of another IS/MND unless there are substantial changes in the project or there are substantial changes in the circumstances in which the project is undertaken which trigger major revisions to the prior IS/MND within certain limitations (Pub. Resources Code § 21166; 14 Cal. Code Regs. § 15162). Further, under CEQA Guidelines section 15162(a)(3), a subsequent IS/MND is required when new information shows that mitigation measures considerably different from those described in the prior IS/MND would substantially reduce one or more significant environmental effects but the project proponents decline to adopt the mitigation measures.

Although the elimination of the intersection improvement mitigation measures is substantially different than implementation of these same intersection improvements described in the IS/MND for the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue/Elena Avenue intersections, the Town proposes to delete the mitigation measures from Condition 22 of the 2010 CUP because they are no longer necessary. Further, as described above, the elimination of the mitigation measures would not result in any new significant environmental impacts that would result in the need for major revisions to the prior IS/MND. For these reasons, the elimination of the Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue/Elena Avenue intersection improvements set forth in the IS/MND transportation mitigation measures would not trigger the need for further environmental review.

CONCLUSION

The Town has determined that an Addendum is the appropriate CEQA clearance document for its approval of the modifications to the Menlo School Conditional Use Permits. Prior to making this determination, the Town reviewed the Menlo School Enrollment Project IS/MND to determine if any further environmental review was required for the proposed improvements and anticipated operations for the Project. Through this Addendum, the Town has determined that no subsequent EIR or negative declaration is required for this project.

REFERENCES

Hexagon Transportation Consultants, Inc. Letter report to Neal Martin, Town Planner, April 22, 2013.

Kimley-Horn and Associates, Inc. Traffic Impact Study, Menlo School, Atherton, CA - Final Report, May 31, 2011.

Kittelson & Associates, Inc. Memorandum to Bill Silver, CFO and Business Manager, Menlo School, October 8, 2013.

Menlo School. Letter to Atherton Planning Commission, May 8, 2013.

Menlo School. Letter to Atherton Planning Commission, October 21, 2013.

Menlo School Website, Transportation Home Page: https://www.menloschool.org/parents/transportation.php

Neal Martin and Associates. Menlo School Enrollment Increase Project, Initial Study and Draft Mitigated Negative Declaration, March 2, 2011.

Town of Atherton. Planning Commission Approved Conditional Use Permit Certificate, CUP 10-10-00007 Amending CUP No. 08-00010 by Increasing Permitted Enrollment from 750 to 795 Students, June 22, 2011.

Town of Atherton. Addendum to the Sacred Heart Schools Master Plan Environmental Impact Report (EIR), June 2013.

Zimride Carpool Sharing Service Website: http://www.zimride.menloschool.org/