

From: [Sylvia Sturges](#)
To: [Luis Topete](#); [Angela Montes](#); planningcommission@smcgov.org
Subject: Proposed fence around Woodland School (aka Ladera School)
Date: Monday, May 6, 2024 3:03:26 PM

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My name is Sylvia Sturges, my husband and I live across from Woodland school at 375 La Cuesta Drive, Portola Valley, CA 94028, Ph: 650-854-9583, email: sylsturg@yahoo.com. We have lived here for 32 years. I was raised in Ladera and attended Ladera School.

I am concerned about having "a new 6-foot tall fence along the perimeter" of Woodland School. What is the purpose of putting up such a fence? Have there been a lot of problems at the school necessitating such a barricade? I think such a fence would make the school lose it's rural/suburban appearance and make it inappropriate for our residential neighborhood. What is the nature of the fence...steel, wood, locking?

A lot of residents use the school to walk to the Ladera Recreation Center, to take their children to play at the school, to walk their dogs on lease during non-school time and to exercise their dogs in the field. The school is part of the Ladera community and is used as a resource. A number of Ladera families have their children attending Woodland school. Hasn't Woodland School leased the school property and doesn't own it?

Please advise.

Sincerely

Sylvia Sturges

May 13, 2024

Luis Topete
Planning and Building Department
455 County Center - 2nd Floor Mail Drop PLN122
Redwood City, CA 94063

In Reference to: PLN2000-00352 – Referral

Dear Mr. Topete,

This letter is meant to replace our letter of November 3, 2023 and accounts for changing circumstances over the past six months and additional information about which we've become aware since our original letter.

We offer two new suggested conditions in response to actions by Woodland School over the past six months and to mitigate negative impact to the neighborhood caused by ongoing violations of conditions of the expired Use Permit.

By way of background, we live at 321 La Cuesta Drive, immediately across the street from the field on the Woodland school site. We have lived here since 2010, and as such, have the history and perspective to understand the impact on the neighborhood by changes to Woodland's CUP in 2012 and 2017. We have significant concerns about Woodland School's impacts on traffic and parking which are exacerbated by the school's failure to follow all of the conditions imposed by the county in 2012.

We support Woodland's CUP renewal only if subject to conditions described below. The intent of these requests is not to hinder the educational pursuits of Woodland School but to ensure that its growth and operational conduct are compatible with the residential community. We urge the County to enforce the conditions set forth in the CUP for the benefit and safety of our children and our community.

1) Limit the extension of the current CUP to five years instead of ten years.

This is prudent and appropriate due to 1) the failure of Woodland to follow existing conditions over the past decade 2) the failure of Woodland to apply for an extension no later than six months prior to the expiration of the existing permit, 3) the failure of San Mateo County to conduct the conditioned Administrative Review in July 2019, and 4) failure to consult with the Ladera Community Association during Administrative Review (Conditions 2, 3). If after a five year renewal, the school demonstrates substantial compliance at that time, we would support a ten year extension.

2) Limit Hours of Operation to existing Conditions. The school today operates in violation of both the purpose and Hours of Operation (Condition 1). Extended Care operates until 6 PM, while the Condition limits to 5:30 p.m. Further, the school operates summer programming which is not an activity of a "private elementary

school” as conditioned. This creates additional noise, traffic, and parking burden. Further, the school has begun telling the neighborhood that they may not use public recreation areas during the summer, during periods where the elementary school does not offer enrollment. As a response to Woodland conducting Use during portions of the year where it not authorized, we encourage the County to make explicit that Operating Hours are only during the regular school year.

3) Limit Expansion of School Facilities. Including the three new tent classrooms, Woodland has added 12 classrooms since 2012. This exacerbates traffic, parking, noise and other burdens on the community and may represent an approximately 50% increase in classrooms. We understand that Woodland wishes to build a parking lot on part of the public recreation area so as to support these buildings, some of which were built without authorization.

We oppose grandfathering of “tent” classrooms built in explicit violation of the existing Condition 6. Expanded facilities have enabled Woodland to increase enrollment from what we understand to be 275 in 2012 to 310 today which exacerbates traffic and parking problems.

Woodland School should remove the “temporary” classrooms that were installed on the tennis court prior to the construction of the additional classrooms at the northwest corner of the Woodland School site. These were promised (and permitted) to provide only temporary classroom capacity for the increased Woodland School enrollment until the additional classroom space was created. However, these have become a permanent part of the school site, the impact being the reduction of publicly available play-areas including the removal of the only publicly available tennis court within walking distance to the Ladera Community. Allowing both the temporary and permanent classrooms exceeds the CEQA 25% expansion exemption the county relied upon in Finding 1.

If the County will not enforce Woodland’s agreement with the County and the neighborhood to remove the “temporary” classrooms, we ask the county to require Woodland School to remove the temporary power pole across the street from 333 La Cuesta Drive that provides electricity to the “temporary” classrooms. This temporary power pole was not built with the intention or to the standards of being a permanent power-pole.

4) Limit Enrollment. We respectfully request that the county re-evaluate and consider reverting the enrollment cap from 325 to 275 students, in line with the conditions prior to the 2012 Conditional Use Permit (CUP). If not a full reversion to 275, hold enrollment at its current level to prevent further pressure on traffic, parking, and Woodland’s desire to pave our public recreation area. Woodland’s failure to abide by existing traffic and parking requirements, combined with

unauthorized expansion of facilities, warrants consideration of the change to the enrollment cap.

The increase to 325 students was conditioned upon Woodland School's adherence to regulations pertaining to traffic and parking. Regrettably, our observations as neighbors have led us to conclude that Woodland has not consistently met these conditions, specifically those mentioned in sections 5(a) and 5(d) of the CUP (although we noticed that they have improved quite a bit once the CUP renewal request was filed). The increased enrollment has resulted in parking and traffic issues that have placed a burden on a community infrastructure designed for a neighborhood school where the majority of students were expected to walk.

5) Do not grant fence height exception. We understand that Woodland has recently proposed to build a fence around school grounds and requested a fence height exception. They have not shared the fence design proposal despite our request, and I fear it will be an eyesore in our rural community. I hope that any perimeter fence will be limited to the school buildings and to standard height. There is no valid reason to build a fence higher than the standard or beyond the school buildings given that their lease does not extend beyond the classrooms.

6) Mitigate Parking and Traffic. Our requests and suggestions in 2-4 above are primarily to mitigate the impact of parking, traffic, and noise caused by a private commuter school using what was designed to be a neighborhood pedestrian school.

From our perspective across the street and walking our own children to the bus, we have witnessed repeated traffic violations by Woodland parents and staff, including illegal U-turns, crossing double yellow lines, and the particularly dangerous act of driving past school buses with stop-sign arms extended. These incidents raise serious concerns about child safety and adherence to traffic laws.

To that end, we ask:

a) Let the authorization to build a parking lot expire. We are strongly opposed to the construction of a parking lot. Any increase in parking will create a corresponding increase in traffic. The parking lot will permanently remove important public play areas and green space

b) Require addition of a sidewalk. This will reduce traffic and is consistent with SMC policies regarding walkability. SMC Public Works often requires this condition of homes in Ladera undertaking construction regardless of whether it is a high-pedestrian area.

This proposed sidewalk would extend from the existing sidewalk at Woodland to the north along the west side of La Cuesta Drive across from house numbers 309-333 where there is currently just a curb and dirt. Installing this sidewalk

would mitigate the significant and unsafe traffic during morning drop-off by allowing Woodland School to have parents drop their children off all along that sidewalk instead queuing up along La Cuesta Drive, which is on a very dangerous blind corner leading up to Berenda Way from Alpine Road.

c) Limit Traffic Count. Prior to 2012, Woodland operated with a condition that morning traffic count not exceed $\frac{1}{2}$ of enrollment (condition pre-2012). This outcome-based condition is prudent and necessary in the context of rising enrollment, expanded facilities, and a decade of following neither the letter nor spirit of the 2012 conditions.

Thank you for your attention to these matters. We are eager to see a resolution that maintains the quality of life in our community while supporting the educational needs of San Mateo County's children.

Sincerely,

Jason and Sandy Schroedl
321 La Cuesta Drive
Portola Valley, CA 94028
(650) 888-6298

June 10, 2024

Luis Topete
Planning and Building Department
455 County Center,
2nd Floor Mail Drop PLN122
Redwood City, CA 94063

RE: PLN2000-00352 – Parking Lot Clarification

Mr Topete –

We note that the design shown in Staff Report Attachment C is different than the one described throughout the Staff report.^{1 2 3} This discrepancy should be addressed prior to action by the Planning Commission so as to avoid ambiguity as to what is being considered for approval. Given the level of community concern regarding paving the public play area, we encourage the Planning Commission to correct the discrepancy and reissue for public review and comment.

The design shown in Attachment C (aka 2024 design) is approximately 65% larger and further into the public play field than the 2013 design in the report (See Exhibit 1).

We very much appreciate the difficult job you have juggling competing priorities and appreciate any clarification you can provide ahead of this Wednesday's Public Hearing.

Sincerely,

/s/

Katie Garlinghouse
300 La Cuesta Dr
Portola Valley, CA 94028

/s/

Matt Garlinghouse

¹ "revert back to the design of the new driveway and parking lot improvements as approved by the Planning Commission on 07/24/2013 (Chronology, March 8, 2024, Page 9)

² "On March 8, 2024, Woodland School submitted a letter specifying their decision to revert back to the design of the new driveway and parking lot improvements approved by the Planning Commission in 2013 (providing 14 additional spaces) before the 2017 minor modification approval. (Discussion, Condition 2, Page 11)

³ "On March 8, 2024, Woodland School submitted a letter specifying their decision to revert back to the design of the new driveway and parking lot improvements as approved by the Planning Commission in 2013 before the 2017 minor modification approval. (2017 Minor Modification, Page 26)

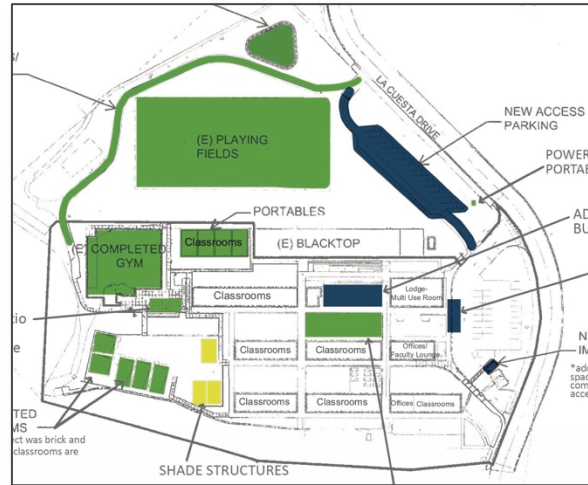
Exhibit 1 – Ambiguity of Staff Report - 2013 or 2024 Design

Staff report states that the applicant requested to “revert back to the design of the new driveway and parking lot improvements as approved by the Planning Commission on 07/24/2013” however Attachment C shows a new design.

2013 Design as approved by the Planning Commission



2024 Design as shown in the Staff Report released on June 5, 2024



Comparison of the 2013 design and 2024 design showing the 2024 design is 65% larger further into the public play area



Kelsey and Matt Lopez
291 Erica Way • Portola Valley, CA 94028

June 11, 2024

Luis Topete
Planning and Building Department
455 County Center,
2nd Floor Mail Drop PLN122
Redwood City, CA 94063

Dear Mr. Topete,

We would like to express our support for Woodland School's request to renew the school's conditional use permit and extend school operating hours until 6:00pm to align with Woodland's existing after school and extended care programs.

Our family built a home in Ladera in and have now lived here for just over a year, while our oldest child, Brooklyn, has attended Woodland for the last three years. Kelsey previously attended Woodland for eight years, graduating in 2001, then worked at the summer camp and extended care program for the next four years. We love both Woodland and Ladera for their warm and welcoming communities, and a significant factor in choosing Woodland was the on-site after school and summer camp programs as we both work full time and go into our offices three days a week (in Mountain View and Pleasanton).

Since we first joined the Ladera community in 2020, we've received regular updates from Woodland's Head of School via the neighborhood listserv, including the reopening of campus and notice of events at the school, as well as via the Ladera Community Association (LCA) board and regular mail. There have been timely communications about renovations, unexpected road closures, and other topics that may affect us as neighbors. We've also seen the school's responsiveness to community feedback about gym lights, carline noise, and clarity of policies.

As Woodland parents, we also receive very regular reminders about traffic safety and parking rules, including in parent newsletters, separate emails, and live while on campus. We sign an acknowledgement of the rules at the start of each year and are responsible for sharing them with any caretakers who help to drop off or pick up our children. We see the many staff and volunteers, including the Head of School, who are out every school day (rain or shine), helping to guide traffic efficiently and to allow us to safely cross the street as we walk to and from school.

Woodland has been an empathetic and responsive neighbor in Ladera, and we urge you to renew the conditional use permit with the school's requested modifications. Thank you for your consideration.

Thank you,

Kelsey and Matt Lopez

Ladera Community Association
3130 Alpine Road, Suite #288-123
Portola Valley, CA 94028

June 11, 2024

Luis Topete
Planning and Building Department
455 County Center,
2nd Floor Mail Drop PLN122
Redwood City, CA 94063

Re: Conditional Use Permit PLN2000-00352 (Woodland School)

Dear Mr. Topete:

I write on behalf of the Ladera Community Association (LCA) to supplement and update my September 28, 2023 letter. This supplemental letter is a further response to your June 20, 2023, request from San Mateo County that the LCA provide a referral letter regarding Conditional Use Permit (CUP) PLN2000-00352 for Woodland School (Woodland). This remains a significant issue in the community and, while the LCA submits this updated referral letter, I understand that others in the community will also submit individual referral letters and/or participate in the upcoming hearing.

As we have previously communicated, Woodland has been in violation of its existing CUP. We offer **Tab A** as a non-exhaustive list of past (and in some cases continuing) violations of the school's existing use permit.

Since the time of my September letter, the LCA and other volunteers attempted to reach a negotiated agreement with Woodland regarding the renewal of the CUP. We are appreciative of the effort extended to find bilateral resolution to issues of significant concern between the Parties.

The discussions resulted in a Memorandum of Understanding (MOU) that was shared with the community on June 3, 2024 and is attached at **Tab B**. The LCA held an informational session on June 5, 2024, in which individuals in the community were given an opportunity to speak prior to an on-line vote. After a 4-day period of voting that concluded on June 9, 2024, that final vote tally was: 199 votes in support of the MOU and 77 votes against the MOU (out of a total of approximately 530 potential votes representing roughly the number of homes in Ladera). With 72% of participating household votes cast in support of the MOU, the LCA thus endorses the MOU on the specific issues addressed therein and supports modifications to the CUP to the extent necessary.

The LCA's response to the Planning Staff's June 12, 2024 report (which are abbreviated in light of the short time frame) are attached at **Tab C**. This Tab includes a number of the most prevalent community concerns expressed in response to the Planning Staff's report and during the MOU voting process. The issues identified in Tab C are *not* specifically addressed in the MOU. One significant example includes the fact that the Planning Staff's report does not address traffic concerns which have been -- and continues to be -- of utmost importance to the community.

The LCA and Ladera Community continue to support operation of Woodland School. We have historically had amicable relations and sincerely desire to return to this state. We are optimistic -- but diligent -- that the concessions provided in the MOU place us on a path to returning to the constructive

relationship our community has previously shared with the school. However, it should be clear that the LCA and the Ladera Community do not support Woodland's continued efforts to expand its operations to the detriment of the neighborhood – including, *e.g.*, expansion of exclusive and non-exclusive operating hours, exclusive operation during summer vacation months, increased traffic and parking concerns, and encroachment into licensed Play Areas that are reserved for public use. Thus, while the MOU represents a compromise on some of these issues, the issues identified in **Tabs A and C** remain areas of concern.

Accordingly, the LCA supports an extension of the CUP only to the extent that conditions are imposed to clarify and/or address at least the issues and compromises identified in **Tab A, B and C**. We endeavored to harmonize the Tabs to the extent we were able in light of the short time frame.

Sincerely yours,

Wynn White

President
Ladera Community Association

cc: Sharon Chang, Board Chair, Woodland School
Heather Hopkins, Board President, Las Lomitas Elementary School District

TAB A

Summary of CUP Violations

Conditions of Approval	LCA Observation
<p>Condition 1: This use permit shall allow private elementary school operations for a maximum of 325 students, preschool through eighth grade. Hours of operation shall be 8:30 a.m. to 3:00 p.m. weekdays, and 7:30 a.m. to 5:30 p.m. for extended care students.</p>	<p>(1) Woodland conducts private elementary school operations outside of the conditioned times.</p> <p>In 2017, Woodland and LLESD amended their lease without input from the Ladera community to extend School Hours to 7:30 am – <u>5:00 pm</u>. Woodland restricted the community from accessing the field, playground, and blacktop (collectively, the “Play Areas”) until <u>5:30 pm</u> M-F when school is in session. Woodland conceded that it erroneously excluded the public for a longer period that it was entitled under the lease. In contrast, the LLESD school campuses of both Las Lomitas and La Entrada, are accessible to the community beginning at approximately 3:00 PM (depending on the day of the week and which school).</p> <p>(2) Woodland operates extended care outside of the conditioned times.</p> <p>Woodland also continues to operate beyond the authorized extended care until 6:00 PM. The previous CUP conditions were implemented to address evening traffic and noise concerns and should be followed. Woodland did not consult the LCA regarding its pending request to belatedly extend its extended care hours to 6:00 PM, and the request should be denied.</p> <p>(3) Woodland operates unauthorized summer programs.</p> <p>Woodland operates summer camps that are not “private elementary school operations.” For 2024, the summer programs includes “Woodland K-6 Summer Adventures” and “Early Childhood Summer Program.” These summer programs are not private elementary school operations or extended care. Woodland further erroneously asserts that it can exclude the public from licensed Play Areas during the summer.</p>
<p>Condition 2, ¶ 1: This permit shall be for ten (10) years until July 24, 2023, with two administrative reviews in July 2016 and July 2019. The applicant shall submit an application to continue the use, as conditioned, to the Planning and Building Department for renewal six (6)</p>	<p>Neither the LCA nor SMC have been able to find a record of a 2019 administrative review.</p> <p>Woodland does not appear to have submitted an application for renewal six months prior to expiration.</p>

Conditions of Approval	LCA Observation
months prior to expiration of this permit.	
<p>Condition 2, ¶ 2: If within this timeframe any operator enters into a lease with the property owner which deviates from the conditions of approval for this permit in any way, the operator shall submit to the Planning Department an operations plan for determination by the Community Development Director whether such plan triggers the requirement for the County's Major Development Pre-Application Review Process.</p>	<p>Woodland's 2017 change to its School Hours in the lease (7:30 am - 5 pm) deviates from the hours of operation under this condition specified to be 8:30 am - 3 pm weekdays, and 7:30 am – 5:30 pm for extended care students.</p> <p>Woodland does not appear to have submitted to the Planning Department an operations plan for determination by the Community Development Director whether such change triggers the requirement for the County's Major Development Pre-Application Review Process.</p>
<p>Condition 2, ¶ 3: Minor adjustments to the use permit may be submitted for approval to the Community Development Director to determine if they are in substantial conformance with the approved use permit. If the request is not in substantial compliance with the use permit, an amendment to the use permit through a public hearing will be required.</p>	<p>In 2017 SMC determined that a tripling of a size of a proposed parking lot and allowing “temporary” classrooms to become permanent was a minor adjustment.</p> <p>The LCA is surprised to learn that SMC believed these changes are minor as they clearly are not (see below). The proposed changes create unmitigated environmental impacts on the neighborhood and are not in substantial conformance with the original CUP. Please provide a detailed comment as to why the changes were approved without consultation with the public and more specifically the Ladera community since the changes have a direct impact on our community.</p> <p>The proposed change in the parking lots (from 14 to 41 spaces), would considerably shrink the publicly available Play Areas. While this plan was previously endorsed by the LCA, being now aware of alternative plans, we strongly prefer that similar to the original site plan from 2012 where a parallel driveway is constructed to La Cuesta with parking along it, therefore not displacing so much of the field area.</p> <p>The community requests that (1) there be no outdoor sports field lighting, and (2) any future exterior lighting shall be limited to the minimum necessary for safety and shall be designed and located so as to confine direct rays to the school property. This is to minimize impacts to neighbors and will also help maintain the natural night dark sky environment.</p> <p>Allowing temporary classrooms to become permanent (1) removes a portion of the public-use Play Area (2) requires use of “temporary” electrical service which is both unsightly and</p>

Conditions of Approval	LCA Observation
	itself permitted to be temporary, and (3) may violate the 25% CEQA exception.
<p>Condition 3: The two required administrative reviews by Planning staff shall include a referral to the Ladera Community Association requesting their comments about the operation of the school. The purpose of this referral is to ensure that the traffic and parking issues are being adequately managed by the school to minimize impacts on the surrounding neighborhood.</p>	<p>The LCA is unaware of consultation as conditioned during the required administrative reviews in 2016 and 2019.</p> <p>While SMC reports a 2016 administrative review was conducted, it was not referred to LCA as conditioned.</p> <p>SMC reports that a 2019 administrative review, was not conducted as conditioned.</p> <p>Because of repeated violations of the CUP and lack of administrative reviews, the LCA requests that any extension of the CUP be no longer than 5 years.</p>
<p>Condition 5(a): Notification Requirements:</p> <p>Notification at the Start of the School Year: At the start of every school year, the school shall submit a detailed calendar of all events during the year where heavier traffic and overflow parking may occur to the Planning Department, the Ladera Community Association, and property owners within 300 feet of the school boundaries.</p> <p>Event Notification: Notification of all events will be by way of direct notification of neighbors within 300 feet of the school. The school will send a notice via mail drop to neighbors immediately affected by the 12 events in which parking will occur on neighboring side streets and/or both sides of La Cuesta, at least one week prior to the event.</p>	<p>While Woodland frequently provides Event Notifications via a neighborhood opt-in email list, Woodland is not providing the required Notification at the Start of the School Year or the required Event Notification as prescribed by this condition.</p> <p>According to SMC, Woodland's traffic plan was distributed to all parents, teachers, and staff. However, it has not been distributed to the LCA or the County Planning Department as required by this condition.</p>
<p>Condition 5(b): The school shall distribute the traffic plan to all school parents, teachers, staff, the Ladera Community Association and the County of San Mateo Planning Department at the beginning of each school year and each summer session.</p>	<p>The LCA has no record of receiving a traffic plan from Woodland at the beginning of the school year or the beginning of summer session.</p> <p>A traffic plan was belatedly received for the 2023-2024 school year after the CUP renewal process highlighted this violation.</p>

Conditions of Approval	LCA Observation
<p>Condition 5(c): The applicant shall continue to maintain and promote a trip reduction program with the goal of reducing the number of car trips into Woodland School. A report on the program shall be submitted to the Planning Department at the time of an administrative review or renewal. The report shall include: (1) a description of how carpool information is distributed to parents; (2) what efforts occur to assist in carpool formation; (3) a 3-day car trip count for both drop off and pick up, conducted within a month of submitting the report, and (4) a bi-annual census enumerating the number of students participating in carpools in relation to the total number of students.</p>	<p>Woodland has not provided the LCA with a trip reduction program report containing the required elements.</p>
<p>Condition 5(d): On routine (non-event) days, the two adults will monitor the automobile backup line on La Cuesta Drive, such that it does not block the red zone below the school entrance.</p>	<p>Traffic regularly backs up and blocks the red zone below the school entrance. This creates both significant neighborhood congestion as well as unsafe conditions with neighborhood through-traffic frequently crossing centerline to overtake Woodland traffic.</p>
<p>Condition 6: Any expansion, demolition or new construction on the site shall require the applicant to apply for an amended or new use permit. The applicant is encouraged to present such plans to the Ladera Community Association.</p>	<p>(1) Woodland's 2017 Parking Lot approval should be rescinded</p> <p>As discussed above in connection with Condition 2, ¶ 3, Woodland's application for a new parking lot should be rescinded.</p> <p>(2) Woodland's 2024 Application for Fencing Should be denied</p> <p>On March 7, 2024, Woodland submitted to the County an application to construct new fencing around both the leased school buildings and licensed Play Areas.</p> <p>The LCA opposes this application as Woodland (1) did not seek any input from the LCA regarding the proposed fencing in the application; and (2) seeks to fence off land (the licensed Play Areas) that is not owned or leased by Woodland.</p>
<p>Condition 7: The relocatable temporary classrooms shall be</p>	<p>The temporary classrooms were not removed as required. While the LCA understands that SMC has relieved</p>

Conditions of Approval	LCA Observation
<p>removed at the time of the new classroom building is granted a Certificate of Occupancy.</p>	<p>this requirement through the 2017 minor amendment, as explained in the discussion regarding Condition 2, ¶ 3, the LCA is disappointed to learn that they are now allowed to be permanent.</p> <p>The assurance that these classrooms were “temporary” was an important component of the plans for which the community’s input was originally sought. The LCA is surprised SMC subsequently approved this change without community input. These temporary classrooms (1) remove a portion of the community-use play area, (2) require use of “temporary” electrical service which is both unsightly and itself permitted to be temporary, and (3) may result in inappropriately avoiding a CEQA analysis by cumulatively increasing capacity by more than 25%.</p>
<p>Condition 75: Prior to the final of the building permit for the project, the property owner shall coordinate with the Project Planner to enter into an Operation and Maintenance Agreement (O&M Agreement) with the County (executed by the Community Development Director) to ensure long-term maintenance and servicing by the property owner of stormwater site design and treatment control and HM measures (if applicable), according to the approved Maintenance Plan(s), for the life of the project. The O&M Agreement shall provide County access to the property for inspection. The Maintenance Agreement(s) shall be recorded for the property.</p>	<p>To the LCA’s knowledge, no O&M Agreement has been executed or recorded.</p>
<p>Condition 76: The property owner shall be responsible for conducting all servicing and maintenance as described and required by the treatment measure(s) [and HM measure] Maintenance Plan(s). Maintenance of all site design and treatment control [and/or HM] measures shall be the property owner's responsibility.</p>	<p>During heavy rainfalls, considerable water flows down the fire entrance overwhelming storm drains on La Cuesta. During the same heavy rainfalls, the bioswale appears to remain empty.</p>

TAB B

Memorandum of Understanding

Memorandum of Understanding (MOU)

Between Woodland School and Ladera Community Association

Date: June 03, 2024

Purpose:

This Memorandum of Understanding (MOU) outlines the mutual understanding between Woodland School ("Woodland") and the Ladera Community Association ("the LCA") (collectively, the "Parties") regarding 1) changes Woodland will seek to their lease amendment with LLESD regarding the topics covered in the MOU and have sought in their Conditional Use Permit ("CUP") renewal with San Mateo County, and 2) The MOU also governs the support the LCA will provide to Woodland in their application to amend and extend its CUP.

Recitals:

WHEREAS, The Ladera community and Woodland School each desire good-neighborly relations with one another, and

WHEREAS, The Ladera community and Woodland jointly seek to resolve frustrations and misunderstandings arising from the 2017 lease amendment process.

Therefore, the Parties have Agreed:

1. Governance and Communication

- Each Party will designate an individual from its Board of Directors to serve as a representative ("the Woodland Representative" and "the Ladera Representative").
- From time to time (approximately twice per year, and otherwise as needed to ensure neighborly relations) the Woodland Representative and the Ladera Representative, will meet and discuss issues of concern and work constructively to find resolution. Woodland's communication responsibilities with Ladera as

separately documented in the Lease and CUP continue unmodified, with clarification (in recognition of the advancement of technology) that notices previously required to be sent to neighbors within 300 feet of the school (for example, notice of an upcoming “Major Event” which will impact access and parking) can be delivered electronically, including to the Ladera Listserv, to satisfy notice obligations. Notifications to the broader Ladera community (for example, the school’s annual traffic plan) remain unmodified and obligated in hard copy.

- In the same manner the CUP is renewed on a periodic basis, the Parties intend to review this MOU and make any agreed updates via a similar process (including for Ladera, an appropriate community process) to ensure the agreement best meets needs of the community and Woodland based on the facts and circumstances at the time.

2. Play Area (Non-Leased property) Exclusive Period for Woodland

- **Blacktop & Playground** – During the Woodland school year, Woodland has exclusive use of the blacktop and playground between 7:30 AM and 5 PM if Woodland students are on campus. Notwithstanding the forgoing, Woodland will not have exclusive use between June 15 and August 15. For the prior ten years as of this MOU, this two-month period has not conflicted with the Woodland school schedule. In the future event of a conflict, which is anticipated to be an exceptional occurrence, the Woodland Representative and the Ladera Representative will meet and jointly agree prior to the school year and an equivalent contiguous two-month period of non-exclusivity for that year. Any such change will require mutual agreement and formal communication to the Ladera community by the Ladera Representative of such changed non-exclusive period in advance of the relevant school year.
- **The Field** (i.e., the remainder of the Play Area) – During the LLESB school year, Woodland has exclusive use of the Field between 7:30 AM and 4:00 pm Monday-Friday if Woodland students are on campus.

2. Woodland Use Outside of Exclusive Period

- Woodland may freely use the Play Area in a non-exclusive manner outside of their exclusive periods. For example, Woodland operates a school year athletics program, and its practices and games often begin or extend past 4 p.m. on the Field. Woodland and Ladera agree to operate respectfully towards one another during periods of shared use.

3. User Groups

- The Parties recognize that User Groups (i.e., parties other than Woodland or informal community use) will from time-to-time request access to the Field outside of the exclusive periods. Requests are to be made to LLESB for such use. To facilitate User Groups accessing the field, Woodland will coordinate with the LLESB regarding Woodland’s own use (for example, after-school football) to avoid scheduling conflict.

4. Summer Usage

- Woodland agrees that during summer camp it will limit enrollment to 125. Summer school attendees will be comprised of members of the Woodland School community; an invitation will be extended to the Ladera community. Access to the Play Areas will be shared with the community. Woodland and Ladera agree to operate as good neighbors during summer camp and Camp Ladera.

5. Changes to Woodland's CUP - The LCA has been provided with, and has reviewed, Woodland's Use Permit application. It will support the following changes to the Conditional Use Permit:

- **Extended Operating Hours for Extended Care and other routine uses:** extend the permitted hours that Woodland may operate Extended Care during the regular school year until 6 PM instead of the current limit of 5:30 PM. Codify the ability for Woodland to conduct ad hoc after-hours meetings on the leased portions of the property, such as monthly board meetings and other activities that are incidental to operating a school, as long as parking is accommodated in the school parking lot.
- **Fencing:** Woodland has reviewed the perimeter fencing of the school and determined upgrades that need to be made. In the process, Woodland has worked to incorporate the concerns of the Ladera Community and proposed the attached (Figure 1) fence plan. Woodland agrees to ensure gates and access points are available to ensure community access to shared spaces outside of Woodland's Exclusive Periods (for example, the gates separating the Field and Blacktop & Playground will be accessible during Woodland's non-exclusive periods of use of the Blacktop & Playground).

6. Parking Lot Construction

- Woodland will not construct a new parking lot or slip road for the duration of its lease, including any extensions. Woodland will withdraw its plans and relinquish permission from both SMC and LLESD for parking lot construction on the licensed area.
- Woodland and the Ladera Recreation District (the LRD) have explored expanding the parking lot that services the LRD by creating a parking extension in the contiguous Licensed Area. No practical solution was identified at this time. In the future, should the LRD and Woodland find a mutually agreeable parking solution, this MOU should not be read to preclude such expansion, if jointly agreed by Woodland and the LRD, and by Ladera through a similar community process to this MOU.

7. Parking

- In order to provide for Woodland's need for additional parking, the LCA agrees to support additional accommodations to Woodland related to parking in Woodland's CUP beyond those identified in Section 5:
 1. Parking Locations – Except during Major and Minor Events, parking shall only occur off-street (in the school's parking lot), on the school side of La

Cuesta Drive, and on the field as further specified below. Woodland agrees to forego the right it has under the current CUP to parking on East and West Floresta Way.

2. Parking on the Field – The LCA will support Woodland using the field for parking for both Minor and Major Events. Additionally, the LCA will support Woodland using the field for parking for its morning activities three times per week, each for up to 120 minutes. Use of the field for parking would only take place when Woodland has exclusive use of the field and be limited to 15 vehicles in total. As part of this agreement, Woodland reaffirms its obligation to maintain the field.

8. Event Type Definition and Frequency

- Event Types will be defined as Minor and Major. Lighter-Parking as an event type will be eliminated and will no longer require notification to the community.
- Total Events will be decreased from 20 to 16. There will be eight (8) Minor events and eight (8) Major Events per school year.

Parking Permitted			
Event Type	Minor Events	Major Events	
<i>Permitted Parking Locations</i>	School side of La Cuesta Drive	Both sides of La Cuesta Drive	
	School side of La Mesa Drive between La Cuesta and Andeta	School side of La Mesa Drive between La Cuesta and Andeta	
	School side of La Mesa from La Mesa/La Cuesta through Gabarda Way	Both sides of La Mesa from La Mesa/La Cuesta through Gabarda Way	
	Field	Field	
<i>Total Events</i>	<i>8</i>	<i>8</i>	<i>16</i>

9. Support for Lease Extension

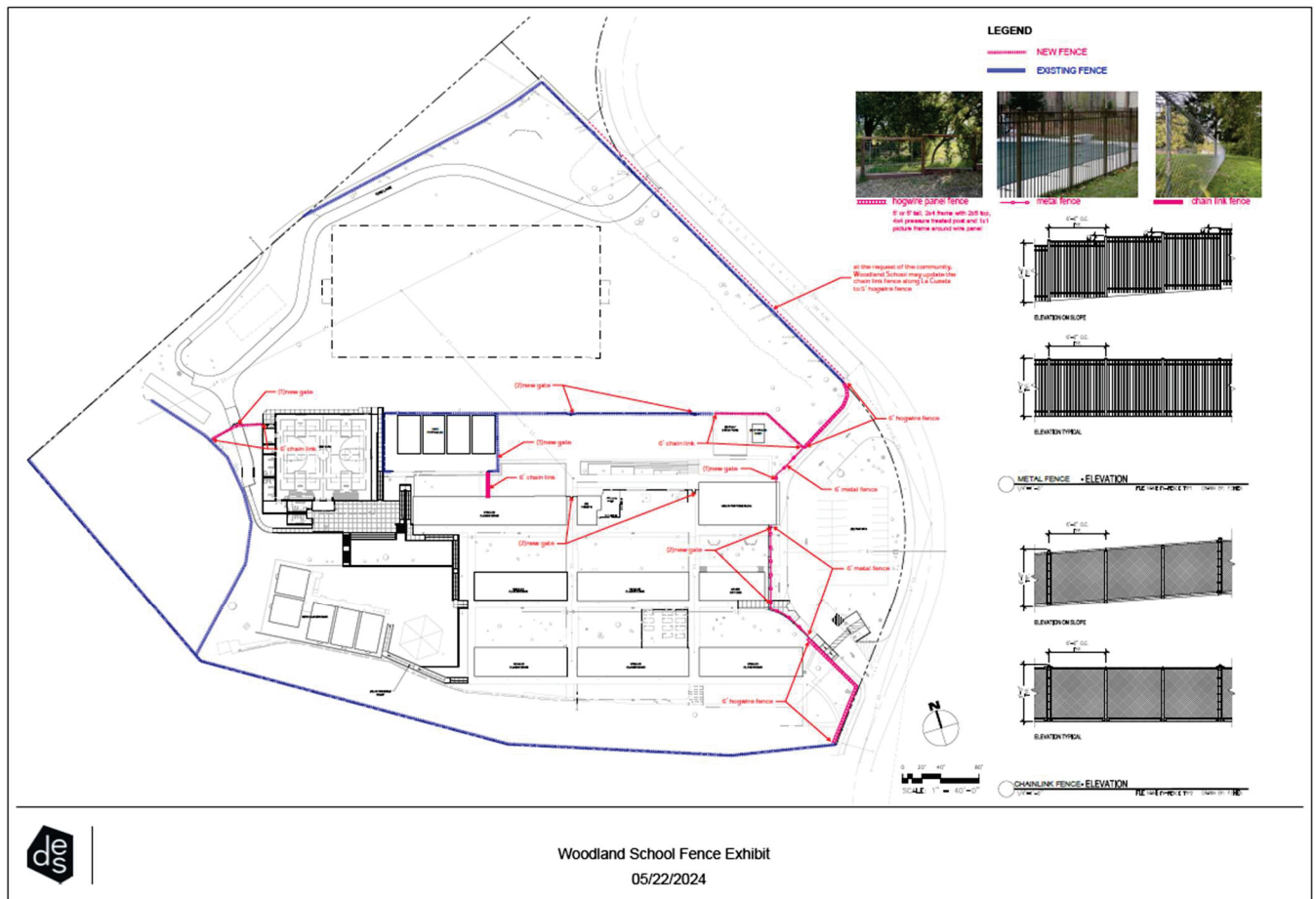
- The LCA agrees to support a request by Woodland and the LLESD to extend Woodland's lease term by an additional three (3) years.

10. Play Area Policies

- Maintenance - Woodland will not make meaningful changes to the Play Area without first engaging in discussion with a representative from the LCA.

11. Compliance

- The enforcement of this MOU will require trust, transparency and partnership between the Parties.
- Woodland will ask the County to conduct and complete the first of its two required administrative reviews required under the CUP within the first 24 months post CUP approval to ensure Woodland continues to abide by its terms.



TAB C

Preliminary Response to June 12, 2024 Planning Staff Report

Issue or Proposed Conditions of Approval	LCA Observation
Traffic	<p>Additional traffic mitigation efforts should be imposed as none were addressed, particularly with respect to the intersection of La Mesa and Alpine Road.</p> <p>This issue is particularly important in light of proposed additional housing construction along the Alpine Road Corridor (e.g., Stanford Wedge project).</p> <p>While the Planning Staff report notes (pp. 15-16) that some efforts have been made by Woodland to mitigate traffic, those efforts appear ineffectual, including a very small percentage of families using carpools, alternative drop-offs or walking to school.</p>
Notice	<p>The Planning Staff Report contains numerous references to modifications requested by Woodland that had not been shared with the LCA.</p> <p>The LCA requests that Woodland be required to provide at least 30-days notice to the LCA and the Ladera community prior to submission of any request for a change or modification to the CUP, and that any submission must include a certification of compliance with this notice provision.</p>
Fencing	<p>Any fencing or barrier that includes doors, gates or other lockable mechanism for the Leased or Licensed Play Areas should remain <u>unlocked</u> outside of hours of operation and periods of exclusive use, including weekends, holidays and summer.</p>
<p>Proposed Condition 1. This Use Permit shall allow private elementary school operations for a maximum of 325 students, preschool through eighth grade. Hours of operation shall be as follows: • 7:30 a.m. to 8:15 a.m. for staff arrival and staggered morning drop off • 8:15 a.m. to 3:30 p.m. for the regular school day and staggered afternoon dismissal/pick-up • 3:30 p.m. to 6:00 p.m. for extended care and seasonal athletics programs</p>	<p>Any extension of school operations, including weekends and extended hours, should pertain to the leased school buildings only. For weekends, any extended use should be limited to specifically agreed-to uses and parking in the existing lot.</p> <p>To the extent that Woodland would like to use the Licensed Play Areas during extended hours or weekends, any such permitted use should be on a non-exclusive basis.</p>

Issue or Proposed Conditions of Approval	LCA Observation
<p>This Use Permit also allows for other meetings conducted in the ordinary course of school operations/activities after 6:00 p.m. on weekdays and from 9:00 a.m. - 7:00 p.m. during weekend hours with parking accommodated in the school parking lot, including, but not limited to, Board of Trustee meetings, Parent Association meetings, admissions gatherings, and staff trainings.</p>	

June 11, 2024

Chair Lisa Ketcham and Members of the
San Mateo County Planning Commission
455 County Center, 2nd Floor
Redwood City, CA 94028

Re: Item #3 on the June 12, 2024 Agenda: Use Permit Renewal and Amendment and Fence Height Exception for continued operation of a private elementary school, expansion of operating hours, retention of three existing tents, and construction of a new 6-foot tall fence along the perimeter of the property. Owner: Las Lomas Elementary School District, Applicant: Woodland School, File Number PLN2000-00352; Location: 360 La Cuesta Drive, Portola Valley (unincorporated Ladera)

Dear Chair Ketcham and Commissioners,

I am writing as an affected neighbor directly across the street from Woodland School. I also served as President of the Ladera Community Association during the years when Woodland School successfully achieved their long-term lease of the former Ladera School property from the Las Lomas Elementary School District (LLESD). I urge your approval of the Use Permit Renewal/ Amendment with additional conditions requested by Woodland.

The Use Permit Renewal/Amendment has been pending since June, 2023, as the result of a deep division within the Ladera community, primarily over the issue of community access to the school's play areas/sports field/volleyball court/bocce ball court, and other recreational amenities when Woodland is in session and after school extended care hours.

Unfortunately, the County's 2017 Use Permit review/renewal process had significant flaws and errors which recently generated frustration and outright hostility in the community towards Woodland and the LLESD, owner of the property. While the frustration is understandable, the hostility has been extremely troubling in a close-knit community where many people have worked hard to promote kindness and neighborliness. Ladera has wonderful events/activities throughout the year that promote neighborliness, kindness, and celebration of the diverse cultures and backgrounds of our residents.

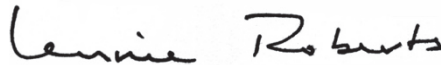
Unfortunately, much of this community spirit has been upset in the intense debate over perceived "rights" of the community to use the play areas at Woodland that were not included in Woodland's lease, but instead were separately licensed to Woodland by the LLESD.

The Ladera Community Association (LCA) and community negotiating team have worked tirelessly over many months to achieve a compromise through an MOU with Woodland, which also addresses issues that are beyond the County's purview under your Use Permit regulations.

A community-wide vote of households resulted in a 72% support of the MOU with half of our community households voting – a tremendous vote of confidence and interest given the “usual” turnout in state and national elections. Woodland is asking for Amendments to the Use Permit consistent with the MOU; the LLESD has sent you a letter (June 10, 2024) in support.

I urge your favorable consideration/approval of the Use Permit/Renewal per Staff, with additional conditions as requested by Woodland and supported by the LCA.

Thanks very much for considering my comments,

A handwritten signature in black ink that reads "Lennie Roberts". The signature is written in a cursive, flowing style.

Lennie Roberts,

339 La Cuesta Drive (opposite Woodland School's driveway)

Cc: Wynn White, President, Ladera Community Association
Jennifer Warren, Head of School, Woodland School
Heather Hopkins, Board President, Las Lomitas Elementary School District

June 11, 2024

Luis Topete
Planning and Building Department
455 County Center,
2nd Floor Mail Drop PLN122
Redwood City, CA 94063

RE: PLN2000-00352 – Referral

Mr Topete –

Eight months ago, on Oct 10, 2023, we wrote to you with our referral letter on the aforementioned application before the Planning Commission. We appreciate the subsequent compliance to existing use conditions that Woodland has made.

We write to you today with an updated letter in response to a) changes made by Applicant to their application (some of which we only became aware with the release of the staff report this past Wednesday), b) changes in Applicant's compliance with their existing Use Permit, and c) the Staff Report released on June 5, 2024. It is our hope that this new information will be useful to the Planning Commission in your efforts to develop appropriate conditions for continued use by Applicant. We support continued use by the Applicant.

Based on these new circumstances, to protect public welfare, property, and improvements to the neighborhood, we ask that the County:

- 1) Not renew permission for Applicant to build a new driveway and parking lot, or in the alternate, withhold renewal until completion of necessary studies.
- 2) Address ongoing non-compliance of the existing conditions of the CUP regarding traffic management, or in the alternate, extend the Use Permit for 5 years instead of 10.
- 3) Require Applicant to address ongoing stormwater mitigation which continue to impact downstream properties
- 4) *Require* staggered morning dropoff to mitigate traffic impacts arriving and departing Ladera
- 5) Not expand authorized Hours of Operations to include weekends, or in the alternate, make those Hours of Operation more restrictive in both time and location so as to not interfere with the Public enjoyment of the Play Areas.
- 6) Not allow structures built without prior county approval to remain including the Tent and Temporary Classrooms, or in the alternate, mitigate impacts

1 – Construction of New Driveway and Parking Lot

As shared in our June 10, 2024 letter “Staff Report Discrepancy,” we note that the design shown in Staff Report Attachment C is both larger and further into the public play field than the design described in throughout the Staff Report. The Attachment C location exacerbates a concern raised by LLESD with the original 2013 location due to impacts on the public play field.¹

Our comments are based on the proposed driveway and parking lot shown in Attachment C, though they can be generally applied to both designs.

Dangerous Right Entry

Right turns into the proposed driveway create a dangerous situation with frequent crossing of center line to overtake cars turning onto the fire road which is proposed to become the driveway. Exhibit 1 shows a 30 min period where Woodland School was using the field as a driveway and parking lot. During this period, at least 21 cars crossed the double yellow line on a blind corner. Approximately 70 cars used this entrance which is approximately one half what we understand to be a normal morning drop off.

Dangerous Left Entry

Left turns into the driveway do not have adequate Stopping Sight Distance. The maximum sight distance when making a left turn into the proposed driveway appears to be 170 feet. The 2001 AASTHO Green Book recommends 280’ for Stopping Sight Distance for a Left-Turn Maneuver based on a vehicle speed of 25 mph and a two-lane roadway. Speeds often exceed 25 mph in this section of roadway. Exhibit 2 shows perspective from 5.5’ AGL looking towards incoming traffic as though waiting to turn left into the proposed parking lot.

Red Curb

Moving the entrance to the school adjacent to the red curb will transpose the backup queue to a point where compliance with the Condition 5d for the red curb will impractical. Further, it will increase the overall burden on the neighborhood by moving the queue nearly 500 feet further down La Cuesta Drive.

We request that Applicant’s authorization to construct a parking lot not be extended with a renewal of the Use Permit. Or, in alternate, renewal of authorization to build any parking lot be withheld until a Traffic Impact Study, compliant with San Mateo County requirements,² evaluating the proposed new driveway entrance and parking lot has been conducted and reviewed by the public.

¹ Email from Suzanne Mitchell to Lisa Cesario and Carolyn Chow dated Dec 13, 2012, subject “Ladera mtg Dec 13”

² <https://www.smcgov.org/media/46076/download?inline=>

2 - Compliance with Traffic Management Conditions

Our experience living adjacent to Woodland has been inconsistent with the Staff Report's conclusions on compliance with Condition 5a regarding use of traffic monitors³. On June 5, 2024, the day after the release of the Staff Report, half the required traffic monitors were used during a Major Event as directly confirmed through a conversation with one of the two traffic monitors. Applicant's non-compliance with the existing traffic monitor condition led to additional non-compliance with Condition 5d regarding traffic blocking the red zone and led to unsafe situations for the neighborhood with cars crossing the double yellow line in a blind corner. See Exhibit 1.

We are deeply concerned about future compliance during a ten-year extension of the Use Permit if there is non-compliance six days ahead of the scheduled decision by the Planning Commission. Given ongoing non-compliance, we request that the approval of a Use Permit renewal be delayed until substantial compliance is achieved, or in the alternate, renew the Use Permit for five, instead of ten years.

3 - Stormwater Management

We recognize improved stormwater management as evidenced by the restoration of the bioretention basin. We note in the Staff Report the county engineer conducted inspection on May 18, 2023 and completed review on Aug 21, 2023. However, six months later, on Feb 19, 2024, we document considerable channelized flow where water is directed away from field drains that feed the bioretention basin. This appears to be caused by subsidence or compaction of the fire access road creating a channel. The stormwater is instead discharged directly onto La Cuesta Dr creating an alluvial fan of gravel in the street and discharging water onto neighboring properties. Please see Exhibit 3.

4 - Staggered Dropoff to Mitigate La Mesa Backup

Morning dropoff occasionally leads to a traffic queue of 1,000 feet past the entrance to Woodland School (for example, extending past 284 La Cuesta Dr on June 3, 2024). Cars exiting the neighborhood on La Mesa during morning drop off or Events (Major and Minor) frequently back up more than 800 feet (extending past Castaña Way) as they wait to turn north on Alpine Rd. This creates impacts on public welfare through noise, auto-emissions, and traffic burden.

Woodland's use of staggered end of day is effective in reducing the traffic burden on the neighborhood. While the proposed changes to the CUP would *allow* staggered start, they do not *require* it. We ask that the county require Woodland to use a staggered start in the morning

³ "at a minimum use four (4) traffic monitors to help with parking and traffic flow through the neighborhood on those 12 events." (Condition 5a, Page 13)

so as to mitigate the traffic impact on Ladera in the morning just as they have already done in the afternoon.

5 - Operating Hours & Authorized Uses

Weekdays

Woodland offers extended care until 6 pm in violation of condition 1 that authorizes extended care until 5:30 pm.⁴ We request the County enforce the existing condition as it was the result of a careful negotiation with the community in 2012 to limit noise and traffic. Failure to enforce existing conditions indicates to the community that new conditions negotiated with the community and agreed to by the Applicant will also go unenforced. In the alternate, if the County elects to allow compliance for Applicant by expanding the Applicant's hours of operation, we ask that it be limited only to the leased portion of the parcel.

Weekends

The Staff Reports introduces a proposed expansion of hours of operation to include weekends. Further, the proposed hours of operation on weekends are longer than those on weekdays. We see no conditions that would mitigate on the neighborhood through traffic, noise, and further limit on ability to access green spaces as part expanding hours of operation to weekends.

We request that the county not expand hours of operation to weekends. Alternatively, if the County elects to include weekends, so as to mitigate the impacts to neighbors, we ask that 1) it only include weekends during the LLESD school year, 2) it be limited to 30 people, and 3) be limited to between 9 AM and 3 PM.

6 - Tent Classrooms & Temporary Classrooms

The Applicant's request to allow the Tent Classrooms, built without the required approval stipulated in the Use Permit and without a required building permit, should be denied. Allowing them to remain would demonstrate to the community and other organizations that the conditions of a Use Permit can be flaunted without consequence. It would undermine the public's trust that the applicant will follow, and that the county will enforce, the conditions of the Use Permit.

By permitting after-the-fact both the Temporary Classrooms and Tent Classrooms, the county has enabled applicant to circumvent prior review. This would have triggered a) review under CEQA (for an expansion of more than 25% student capacity), b) review for Stormwater C.3, and c) review for compliance with County's parking requirements. Importantly, the increased

⁴ <https://www.woodland-school.org/student-life/extended-care> and public comment to the LLESD board on Oct 4, 2023 by Woodland Trustees.

capacity has led directly to an increase in enrollment, exacerbating the unmitigated negative impacts on the neighborhood.

a - CEQA

In 2012, the County found “that the project is exempt from CEQA, Section 15314, Class 14, which allows minor additions to schools which are less than ten classrooms.”⁵ Section 154314, allows exemptions for the lessor of either 1) no more than 10 additional classrooms, or 2) no more than 25% increase in student capacity. The applicant requested four temporary classrooms to be later replaced by five permanent classrooms. The additional of only five classrooms meets the lessor of 10 or 25% increase in capacity.

However, in 2017, the County approved a minor amendment, allowing the four temporary classrooms to remain. This created a cumulative increase of nine classrooms, which while passing the 10 classroom test, no longer passes the 25% increase in capacity. A 9 classrooms addition from a base of 22 classrooms⁶ represents a 40% increase. The County appears to have erred in approving the 2017 amendment without a CEQA review.

Approving an additional three classrooms represents a further increase in student capacity and as such, would be appropriate only after CEQA review.

b - Stormwater

We note that Minor Amendment in 2017 permitting the Temporary Classrooms to remain permanent may circumvent stormwater requirements that would have been applied prior to their authorization. We ask that the county confirm that it has applied C.3 stormwater measures to the 2012 Temporary Classrooms to ensure the “post-construction” rate of discharge not exceed the “pre-construction” rate, and that there is no channelization to off-site.

c - Parking

We note that County code Section 6117. Required Automobile Spaces require one parking spot for each classroom and one parking spot for each 100 square feet in the Auditorium, or any space so used.⁷ If the applicant were to apply in advance, it is unclear whether required parking exists. If it does not, approving the expansion exacerbates burden on, the neighborhood.

While actual historical enrollment is unknown to us, SMC’s Accella system reports enrollment of 200 in 2012 (see Exhibit 4). The enrollment cap of 325 has been in place since at least 2012. However, the addition of nine classrooms, and now potentially another three has enabled Woodland to increase their enrollment approximately 50% -- well beyond what the campus was

⁵ Findings and Conditions of Approval, PLN2000-0352, Attachment A, Finding 1.

⁶ Assumed based on Woodland’s 2020 marketing brochure stating they have “28 large classrooms (along with science, music, and art rooms)” 28+3 = 31 less the 9 classrooms added after the 2012 CUP = 22 original classrooms.

⁷ <https://www.smcgov.org/media/73176/download?inline=>

designed for. The expansion of classroom capacity has enabled increased enrollment which has exacerbated parking and traffic issues – ultimately leading to ongoing non-compliance with the Use Permit and erosion of goodwill with the neighborhood.

We ask the County to reject the permission to let the tent classrooms remain. In the alternate, it should require additional mitigation measures for the traffic, noise, and parking that are exacerbated by the increase in student capacity.

We ask the County to not renew permission for the Temporary Classrooms to remain. In the alternate, if the County allows the Temporary Classrooms to remain, the county should 1) confirm C.3 stormwater requirements are met and 2) require the Applicant to install permanent electrical service instead of continuing to rely, now 12 years later, on temporary electrical service.

We very much appreciate the difficult job you have juggling competing priorities and thank you for your consideration of these issues.

Sincerely,

/s/ Katie

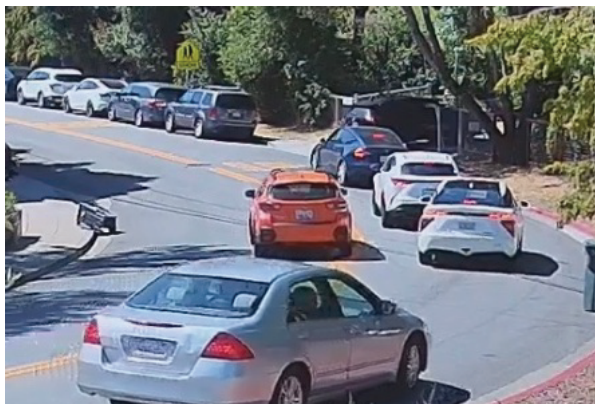
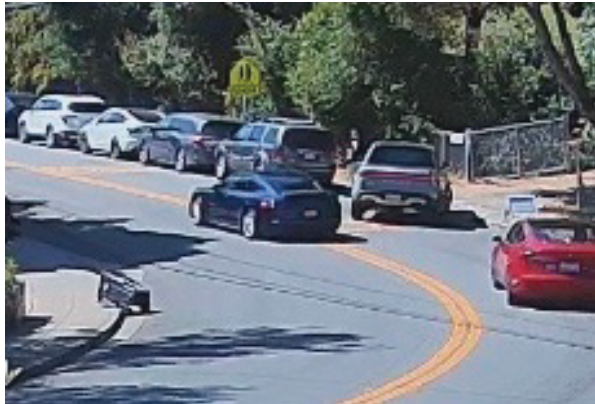
/s/ Matt

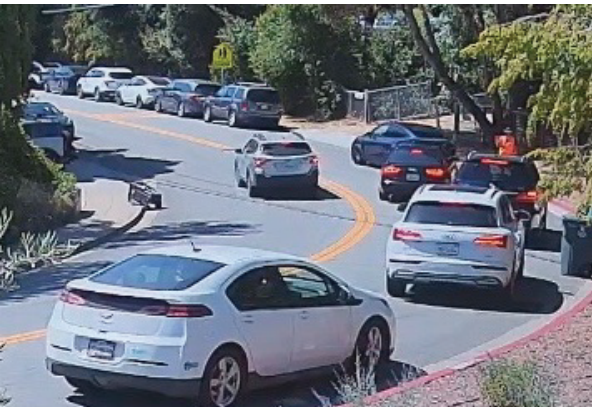
Katie Garlinghouse
300 La Cuesta Dr
Portola Valley, CA 94028

Matt Garlinghouse

Exhibit 1 – New Entrance - Dangerous Traffic due to Right Entry

Photos from June 6, 2024 during a “Major Event” where Woodland uses the proposed new parking lot entrance as an entrance to park on the public play field. The backup of traffic navigating this entrance led to at least 21 cars crossing the double yellow line into oncoming traffic on a blind corner over a 30 minute period.





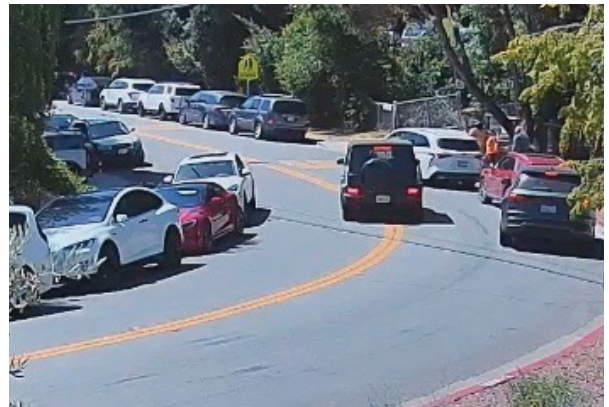
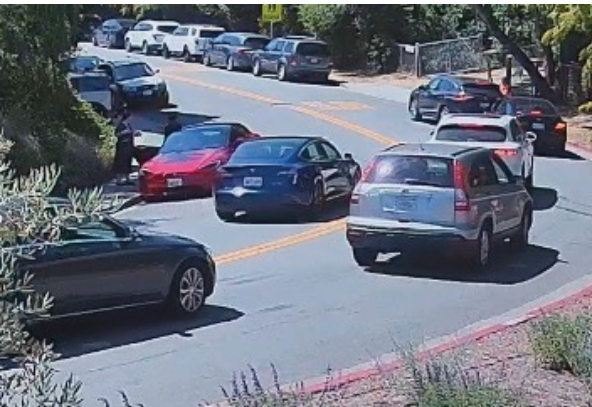
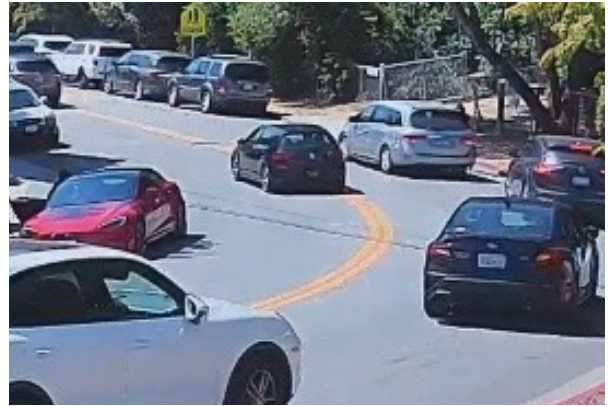


Exhibit 2 – Dangerous Left Entry



Photo taken from approximate location of a car turning left into the existing fire road proposed to be a new entrance and parking lot. Approximately 170 feet of Stopping Sight Distance



Pedestrian crossing road after emerging from community path. Path entrance is approximately 25 feet from the proposed driveway

Exhibit 3 – Stormwater Management



Looking east showing water from field flowing onto fire access road.



Looking north showing water on access road bypassing field drain



Looking west showing water on access road alongside bioretention basin bypassing both basin and field drain.



Water flowing onto La Cuesta from the fire access road showing accumulation of gravel driven by flows on access road.

Exhibit 4 – San Mateo County Accela System – Historical Enrollment
Record dated 09/05/2012 – “USE84-8HIST”


Record USE84-8HIST:
HISTORICAL
Record Status: Closed

Record Info ▼

Payments ▼

Conditions **1**

Custom Component



A notice was added to this record on 08/07/2015.
Condition: Temporary classrooms Severity: Notice
Total Conditions: 1 (Notice: 1, Met: 1)

[View Condition](#)

Work Location

360 LA CUESTA DR *

Record Details

<p>Applicant: LAS LOMITAS SCHOOL DISTRICT C/O LEASED MENLO PARK, CA, 94025</p>	<p>Project Description: PRIVATE SCHOOL PRIVATE SCHOOL Existing Use Permit for a Private Elementary School operations for a maximum of 325 students, preschool through 8th grade. PROPOSED AMENDMENT to allow 9th - 12th grade. Currently 200 students. Additional grades would not exceed student limit of 325. Parking area would be expanded, potentially eliminating some play area.</p>
---------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Accela record indicating 200 student enrollment in Sept, 2012 as shown in the Project Description above.

Luis Topete, ltopete@smcgov.org
Planning and Building Department
455 County Center, 2nd Floor, Mail Drop PLN122
Redwood City, CA 94063

Woodland School CUP hearing, June 12, 2024

Mr. Topete,

I can not be at the hearing in person, in my absence I present you this letter of my opinions on the matter.

I am a Portola Valley native, past Woodland parent, for 17.5 years (1/2001 - 6/2019) and Ladera resident for 17.5 years (12/2006 - today) ... Oh, and I live directly across the street from the school. I feel the school is a tremendous asset to our community, education and the Peninsula.

Most importantly, Woodland offered our family options that our public schools, although VERY good schools, could not. Having their resources and options was invaluable to us as parents and to our children and their success. My husband and I are self employed, our work hours are unpredictable and Woodland's extended care and summer school/camp programs gave us immeasurable peace of mind that our children were safe, getting enrichment and being cared for. They had space to run around with friends and learn the lessons that team sports offer, especially how to lose gracefully, LOL! We simply did not have to worry, the extended care option was VITAL to me and so many other parents, especially my Woodland parent friends that are doctors and nurses. I can not emphasize this enough, extended care is a lifeline, literally! PLEASE allow them to offer extended care until 6:00 PM, it could save lives!

Woodland has been a very good neighbor. There have been times of irritation for sure, but they have been addressed immediately, and far better than some of my human neighbors. Especially over the last 3+ years, Woodland has worked very hard to remedy all concerns and complaints within their control. I am sure you will hear comments to the contrary, but there are just some people that will never choose to be happy, I am sad for them.

Because I am directly across the street and along a curve in the road from Woodland, safety, parking and traffic has been and always will be my #1 concern. We have had one cat hit and killed (by a van turning left out of the school parking lot) and three of our cars have been side-swiped (pre-COVID) but only when big events happen at Woodland. Using the field for limited and temporary parking has ended the utter insanity on La Cuesta and alleviated danger unlike any solution we have seen. It is the least of many evils IMHO. BTW, I think dog poop on the field is just as damaging to the ecosystem and children if not more so than cars on the field. Parking on the field is seldom, and the safety benefits to everyone are so absolutely enormous that I FIRMLY believe it should remain as an option for the big events as needed. As with the many other steps Woodland has taken to control traffic and safety, the employees that are out there daily are always pleasant and helpful and go the extra mile to assist everyone.

Ladera has spoken clearly with votes for the MOU that it wants to collaborate and move forward in a good, neighborly relationship with Woodland. I believe there are claims by a few that are trying to count the abstained voters in Ladera to dilute the percentage, as I'm sure you know, this is a "Hail Mary" and silly. You can not count an uncast vote either way, just as you can't force someone to eat their veggies, you can't force someone to vote. Not wise, but their choice.

Please grant Woodland the CUP they are seeking. I am available to discuss further any issue surrounding this matter and encourage you to call or email me at your convenience.

Thank you.

Sincerely,

Janie Barman
351 La Cuesta Drive
Portola Valley, CA 94028
(650) 759-1182

June 11, 2024

Chair Lisa Ketcham
Members of the San Mateo County Planning Commission
455 County Center,
2nd Floor Redwood City, CA 94028

Re: Item #3 on the June 12, 2024 Agenda: Use Permit Renewal and Amendment and Fence Height Exception for continued operation of a private elementary school, expansion of operating hours, retention of three existing tents, and construction of a new 6-foot tall fence along the perimeter of the property.

Owner: Las Lomas Elementary School District,
Applicant: Woodland School, File Number PLN2000-00352;
Location: 360 La Cuesta Drive, Portola Valley (unincorporated Ladera)

Dear Chair Ketcham and Commissioners,

I write in opposition to Woodland's application for renewal of its Conditional Use Permit ("CUP").

There are numerous and significant issues underlying Woodland's current use of the Ladera School Site, which form the basis of a pending litigation.¹ Attached hereto as Exhibits 1, 2, and 3 are relevant, publicly filed documents from that case.² These documents demonstrate that, since the County last approved Woodland's CUP, the public's legal, valid, and enforceable rights to use the recreation portions of the Ladera School Site have been grossly impacted, without first informing the public, rendering the public with little recourse. Because of this conduct, Woodland's legal rights to operate on the Ladera School Site as presented here are uncertain

¹ See *Ladera Taxpayers for Integrity in Governance v. Las Lomas Elementary School District et. al*, Case No. 24-cv-2412-WHO.

The underlying Lease agreement giving Woodland rights to the Ladera School Site clearly and unequivocally limit's Woodland's CUP to only the leased portions of the Ladera School Site, which no one currently disputes. An issue before the Court is whether Woodland is allowed to operate over the recreation (or un-leased, in-use District property, which LLESB reserved for District and community use) portions of the Ladera School Site. This issue directly implicates the scope of this CUP and Woodland's legal permissions to implement the permissions/restrictions contained in any issued CUP. Tandem state court actions will likely also be filed, including a petition for writ of mandate to order LLESB to enforce binding, ministerial Board Policies and state law regarding how it treats the public's recreation areas on the Ladera School Site. Until this dispute is finally settled, then Woodland's CUP should reflect its contractual rights (Woodland may obtain a CUP over the property it leases). Additionally any issued CUP should be short-term.

² Exhibit 1 is the legally operative Complaint. Exhibit 2 is Plaintiff's reply to Defendants' opposition to Plaintiff's TRO/OSC. Exhibit 3 is Plaintiff's opposition to Defendants' motion to dismiss, filed June 11, 2024.

and, until such rights are resolved finally by a court of law, this CUP as-proposed should not issue.

Instead, this CUP should issue only on a temporary or short-term basis, subject to yearly renewal and review, until the underlying dispute regarding rights to the recreation portions of the Ladera School Site is settled. Woodland and Dr. Warren are named defendants in this pending, active litigation and their disputed claims to the recreation portions of the Ladera School Site should be settled before this County authorizes Woodland's proposed application, which suggests that Woodland possesses a fundamental (willful) misunderstanding of its rights to the Ladera School Site, presenting greater rights than it has.

Woodland's CUP application proposes several new additions since I last submitted comments on PLN2000-00352 in November 2023. Woodland now seeks new weekend hours, to retaining outside tents (previously described by Woodland to the County as "classrooms"), to build a new tall fence, and expansion of weekday operating hours. These increased operations tax the Ladera School Site; Woodland has not first negotiated with its landlord, LLESD, to amend its Lease to allow for these changes to its rights to the Ladera School Site. Woodland pays nothing more to the school for this increased use. Instead, Woodland bypasses the public school, which answers to its constituents, and takes its desire for greater use and control directly to the County. In doing so, Woodland omits the contractual bases for its rights to use the Ladera School Site, which are more limited than what Woodland presents here. By allowing this conduct, the County (knowingly) inserts itself into a land use dispute and (knowingly) assists a private entity with taking public taxpayer property.

For example, Woodland's proposed fence design crosses existing and recorded easements. See Court Documents *and* Exhibit 2. providing recorded easement. Woodland's proposed fence also destroys the public's contractual rights given by LLESD to access the Ladera School Site. *Id.* Woodland omits these facts from its CUP application. Woodland made no attempt to clarify its v. the public's contractual rights to the Ladera School Site with LLESD before submitting its fence request to the County. Woodland also failed to report known, existing easements *that Woodland itself signed*, which would be terminated by Woodland's proposed fence.

This is classic putting the cart before the horse and must not be permitted. Woodland cannot, by intentionally failing to disclose, use a County permitting process to terminate a public easement or the public's rights to public property. Such a result will end in (additional) legal action. More review, diligence, and research is thus necessary before the County authorizes Woodland's proposed changes to its CUP, or any CUP longer than one year.

To be clear, Woodland needs a CUP to operate and one must issue. This letter does not intend to prevent that. This letter instead opposes issuing a 10-year CUP unless and until the underlying property dispute is resolved. Until the public's and Woodland's rights to the Ladera School Site are clarified and settled, yearly CUP renewals are necessary and proper here.

Additionally, since 2012, Woodland added over 15,000 sq ft of enclosed classroom and auditorium space (Woodland uses the gym as an auditorium) to the Ladera School Site. Woodland was never subject to CEQA review for these significant construction projects. I respectfully request full CEQA review of all of Woodland's proposed changes to its current operations, including the outdoor classrooms, retaining the portables on the blacktop (they are temporary structures, never intended to be permanent, and thus may be removed/modified as originally required at any time), building a parking lot, constructing a fence (the fence will necessarily affect mature, established oak trees which are located where Woodland's proposed fence will be). CEQA review is necessary because Woodland previously should not have qualified for the "school" CEQA exception because ultimately its construction project exceeded the 25% capacity threshold for the exception. A parking lot on the public's recreation areas (instead of on Woodland's leased property), which has not yet been built, is precisely the type of project CEQA was developed to address.

Finally, I attach emails from the husband of Lennie Roberts sent on June 10, 2024 after the LCA's MOU process resolved. See Exhibit 3. These emails reflect the strong bias and dedication that the Roberts' have towards protecting Woodland's interests, even at the expense of neighbors and children having access to their local public recreation area, which still remains in-use, un-leased, public property, subject to significant restraints on exclusive private use.

Sincerely,

/s/Susanna Chenette

Susanna Chenette

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