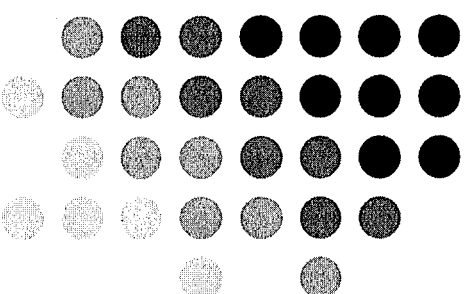


NEIGHBORHOOD STEERING COMMITTEE (NSC)

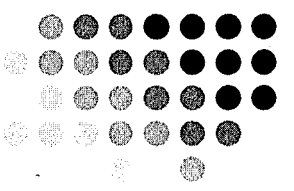
Opposition to Head Royce School (HRS) Conditional Use Permit Application, 2015

Presentation for
Claudia Cappio, Assistant City Administrator,
City of Oakland

October 30, 2015



NSC Introductions



Members of NSC representing over 350 households in the north and south residential neighborhoods surrounding HRS.

● 2

Paul Cowley

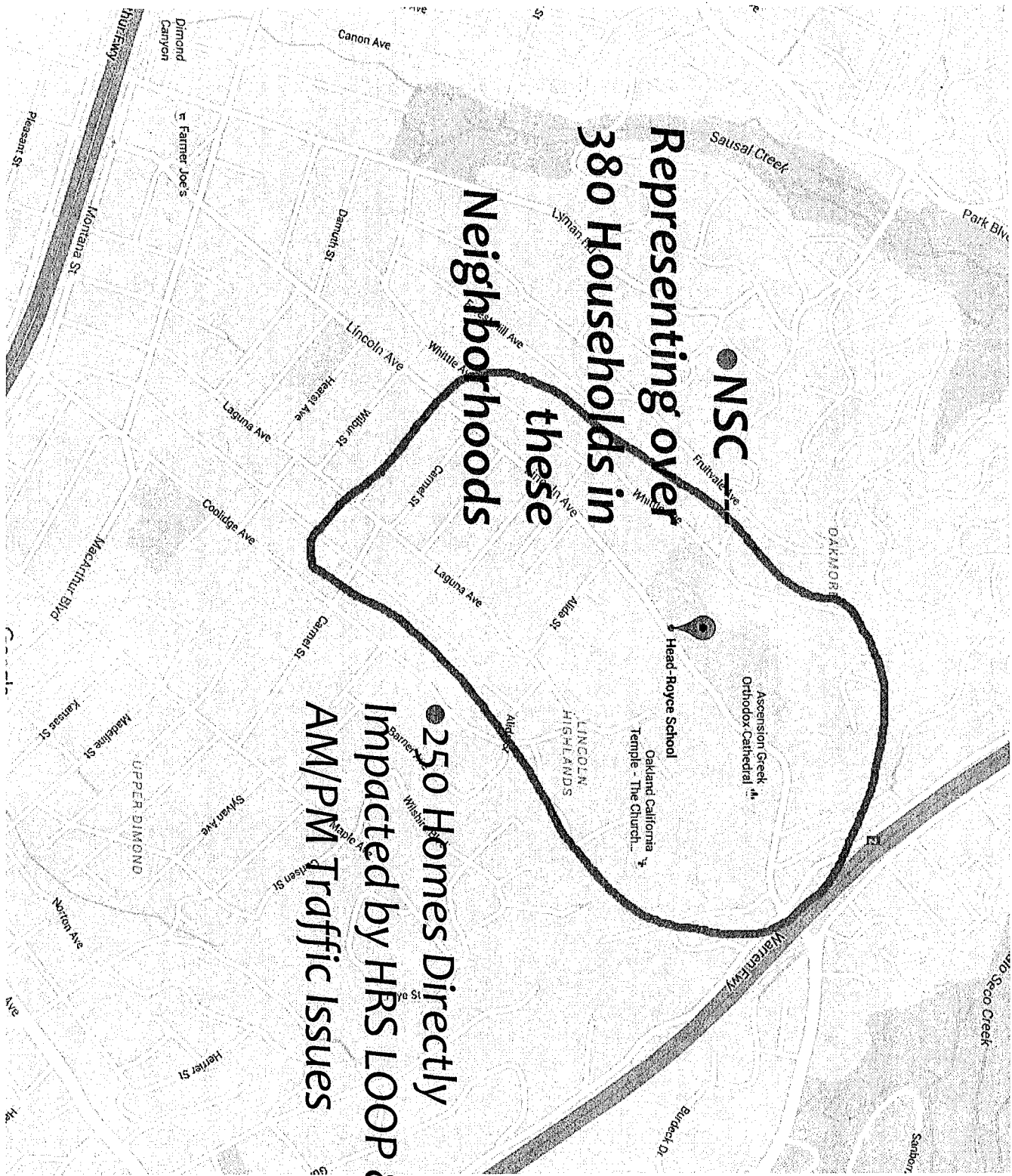
Hollis Matson

Karen Young

Cheryl Brown

Neighbors want relief from unacceptable traffic, parking and noise issues generated by HRS.

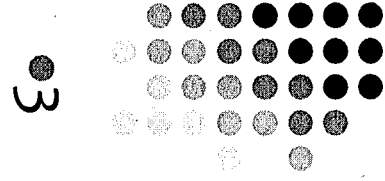
They expect support from City Planning process to allow them to enjoy their homes and families in peace and quiet.



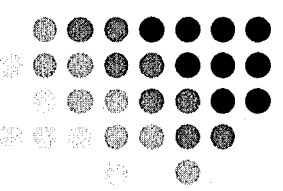
● NSC

Representing over
380 Households in
these
Neighborhoods

● 250 Homes Directly
Impacted by HRS LOOP &
AM/PM Traffic Issues



NSC Issues with Draft CUP Application - 2015



2015 Draft Permit continues issues still not resolved
by 2006 CUP.

4

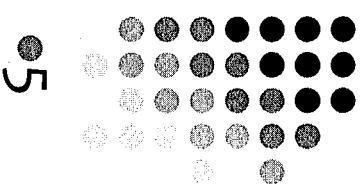
Has the same 2006 problem – *Unenforceable language*
and *nebulous future plans*.

NSC seeks straightforward, simply worded directives in
the conditions.

Compliance with a permit that included “*good faith*
effort” and “*encouraging parents*” will not be
enforceable by the City.

Draft permit application has **NO Financial**
Consequences for Non-Compliance

Growth – Enrollment & Capacity



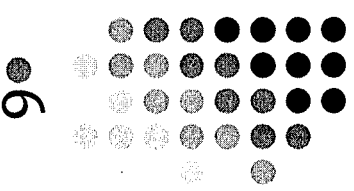
Expanding HRS Size = Increasing Impacts

HRS encroachment is bad now and will escalate unless City addresses **impact of growth**

HRS proposes 906 students, 6 years ahead of current permit

NSC proposes 875 students for 2015 application which includes students already illegally enrolled

Future HRS Growth & Impact



HRS campus is **TWICE** size of any other private school campus in Northern California

No other private school in region has placed 800+ students on single campus/neighborhood*

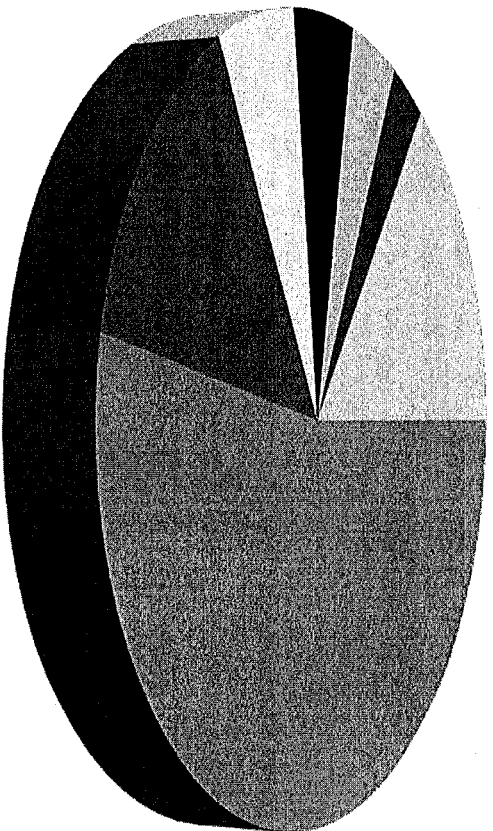
HRS estimates **existing** campus capacity @ **1,015-1460+ students****, based on current school space standards

*Harker School (SJ) 2,00 students on 4 campuses, in 4 neighborhoods

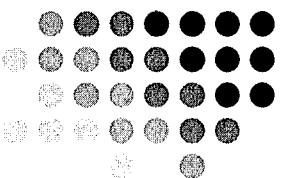
** SOM Letter, 10/13/15

HRS Student Population (2012-2013)

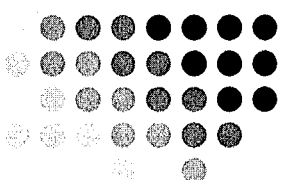
Student Home Cities



- Oakland 53%
- Berkeley 14%
- Alameda 6%
- Piedmont 5%
- Orinda 4%
- Lafayette 3%
- Other 15%



Operational Impacts - Transportation



HRS is a commuter school.

Generating more than 1500 vehicle trips per day.

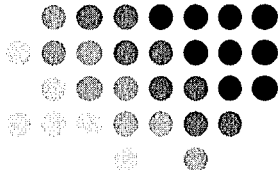
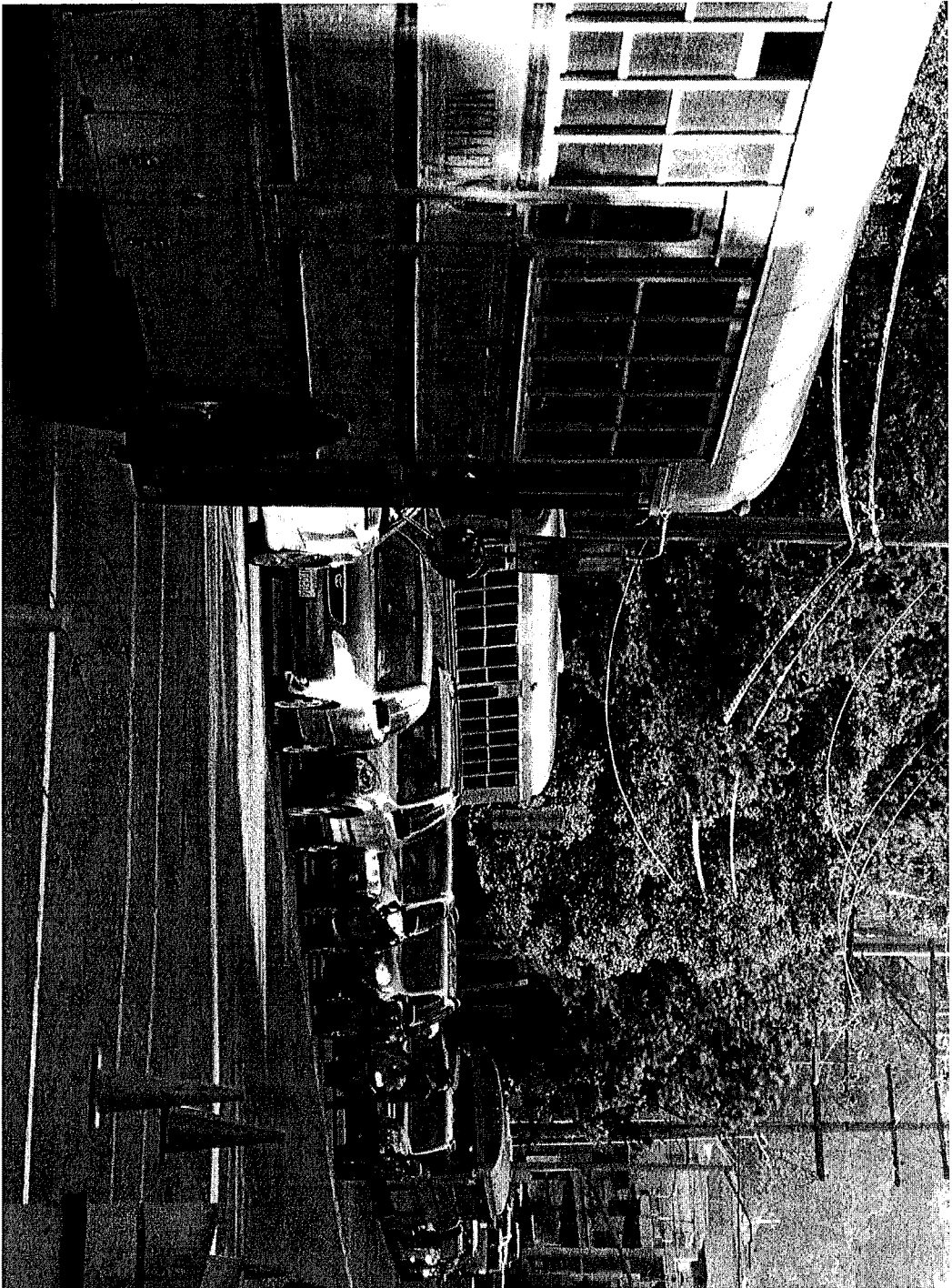
Only 463 students from Oakland (2013).

HRS traffic volume (2015) impacting Lincoln Ave:

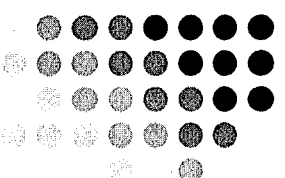
Morning (7:45-8:45) 1,615 vehicles

Afternoon (3:00-4:00) 1,417 vehicles

Traffic on Lincoln - Twice Daily



Transportation Impacts



HRS has not maximized bus ridership or routes

● 10

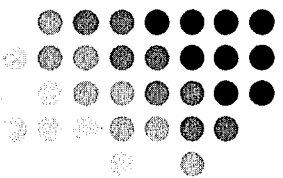
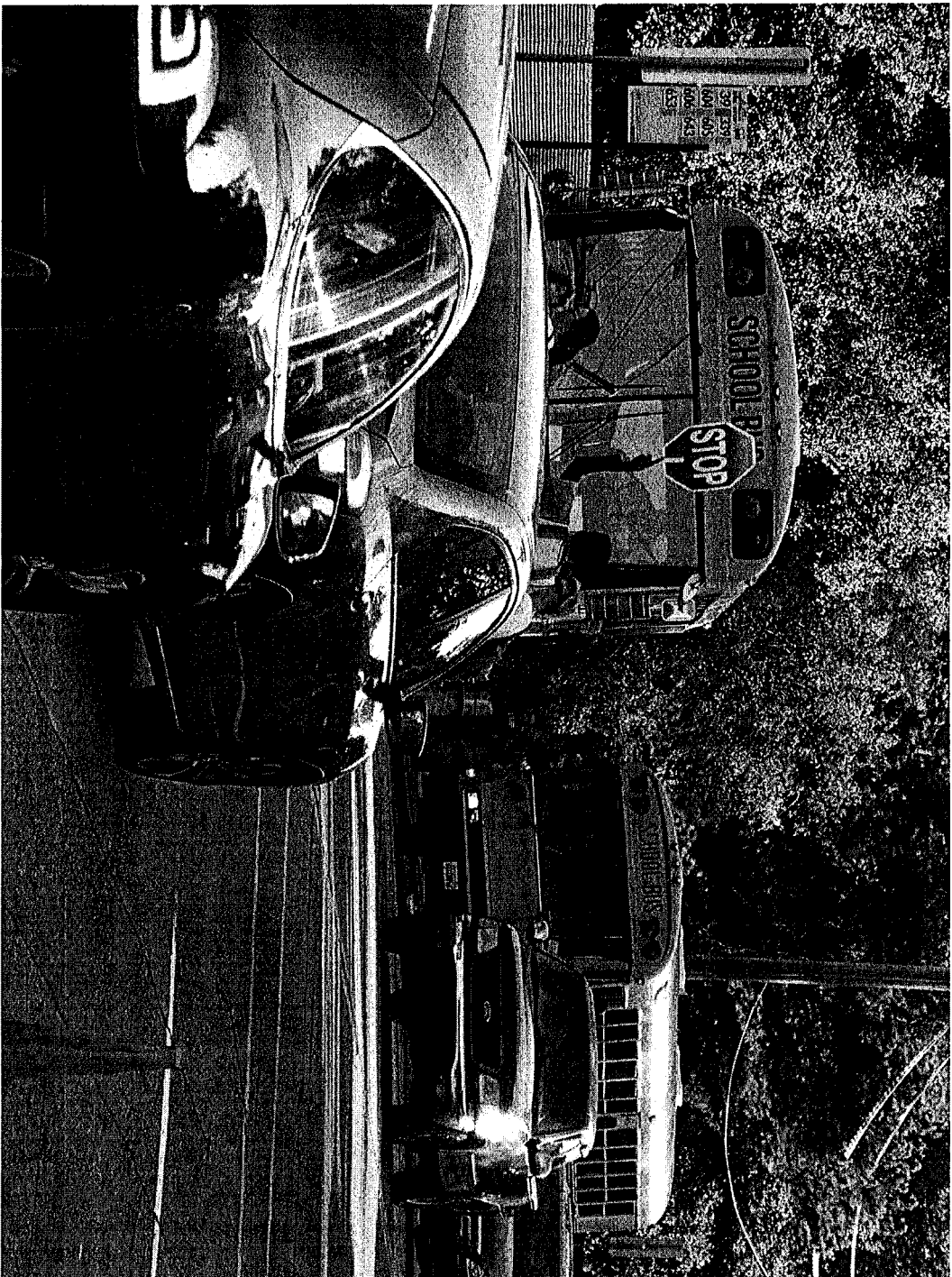
that do not impact neighbors.

HRS does not use any of its own properties or parking lots for **daily drop-off and pickup** activities.

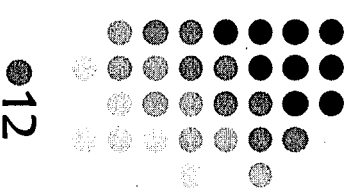
Drop-off and pickup chaos limits general and emergency **traffic access on Lincoln Ave.**

HRS Transportation Demand Management Plan (TDM)
2015 pushes vehicles and parking onto narrow (14' width) **residential streets** not designed for commercial traffic.

Curbside Pedestrian Mix + Vehicles



Traffic – The LOOP

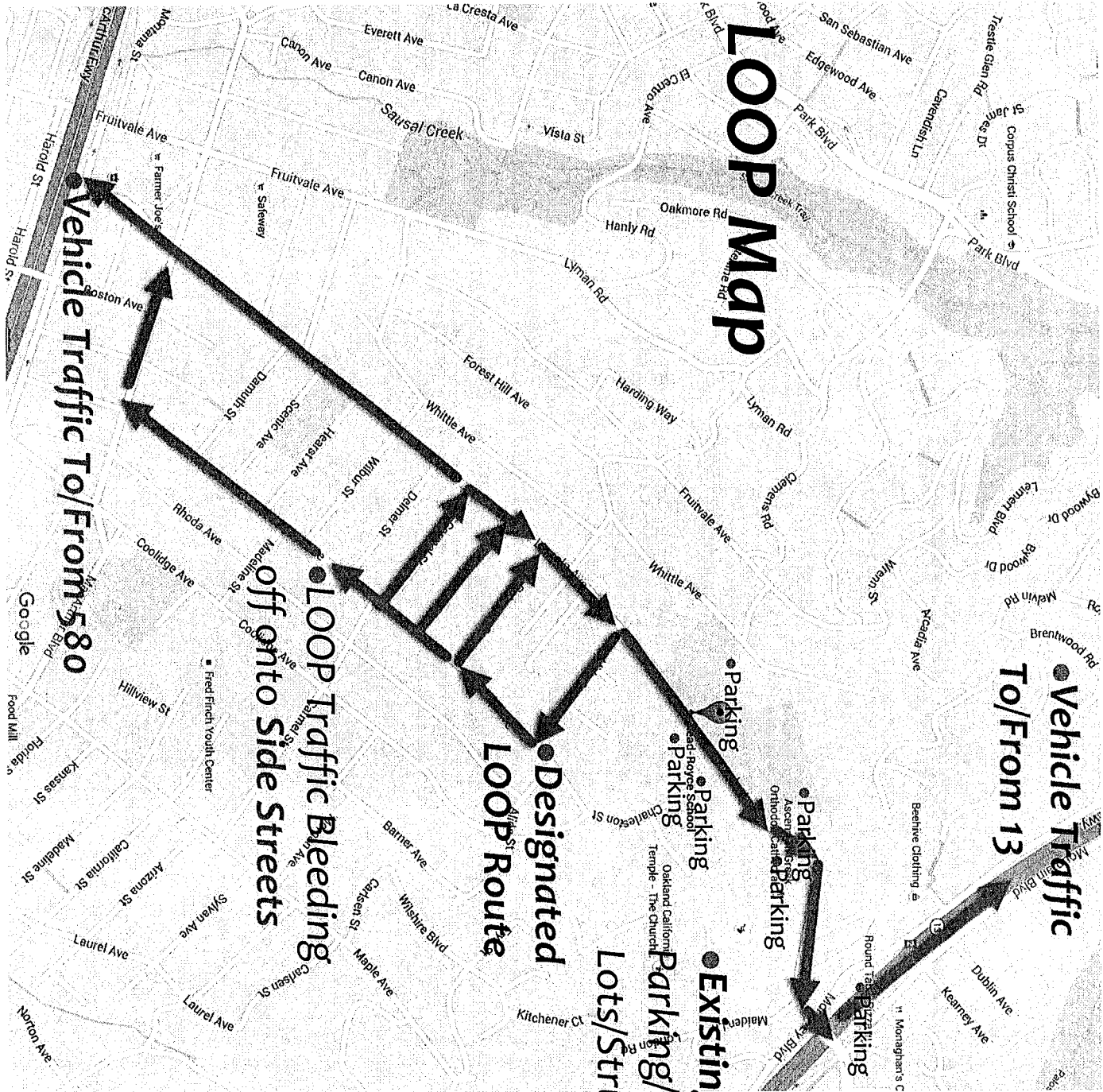


The LOOP pattern is an **accommodation, not a necessity** for HRS drivers returning to Highway 13
Creates dangerous nuisance, high volume, 30-35+ MPH traffic on narrow streets

LOOP was created by HRS with **NO neighborhood input or agency review.**

“No AC Transit documents, field reports, planning studies, approvals exist for the 604/605 LOOP Route”
CPRA Response, Office of General Counsel 9/17/15

LOOP Map



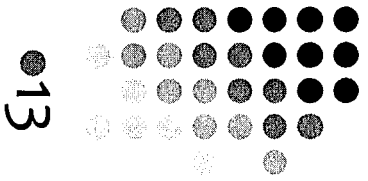
Vehicle Traffic To/From 580

LOOP Traffic Bleeding off onto Side Streets

Designated LOOP Route

Existing Parking/Staging Lots/Structures

Vehicle Traffic To/From 13



13

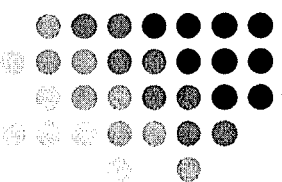
LOOP Issues

Increased HRS LOOP volume is dumped on top of neighborhood traffic of residents, blocking driveways, other service and emergency vehicles, local public school and daycare access for others.

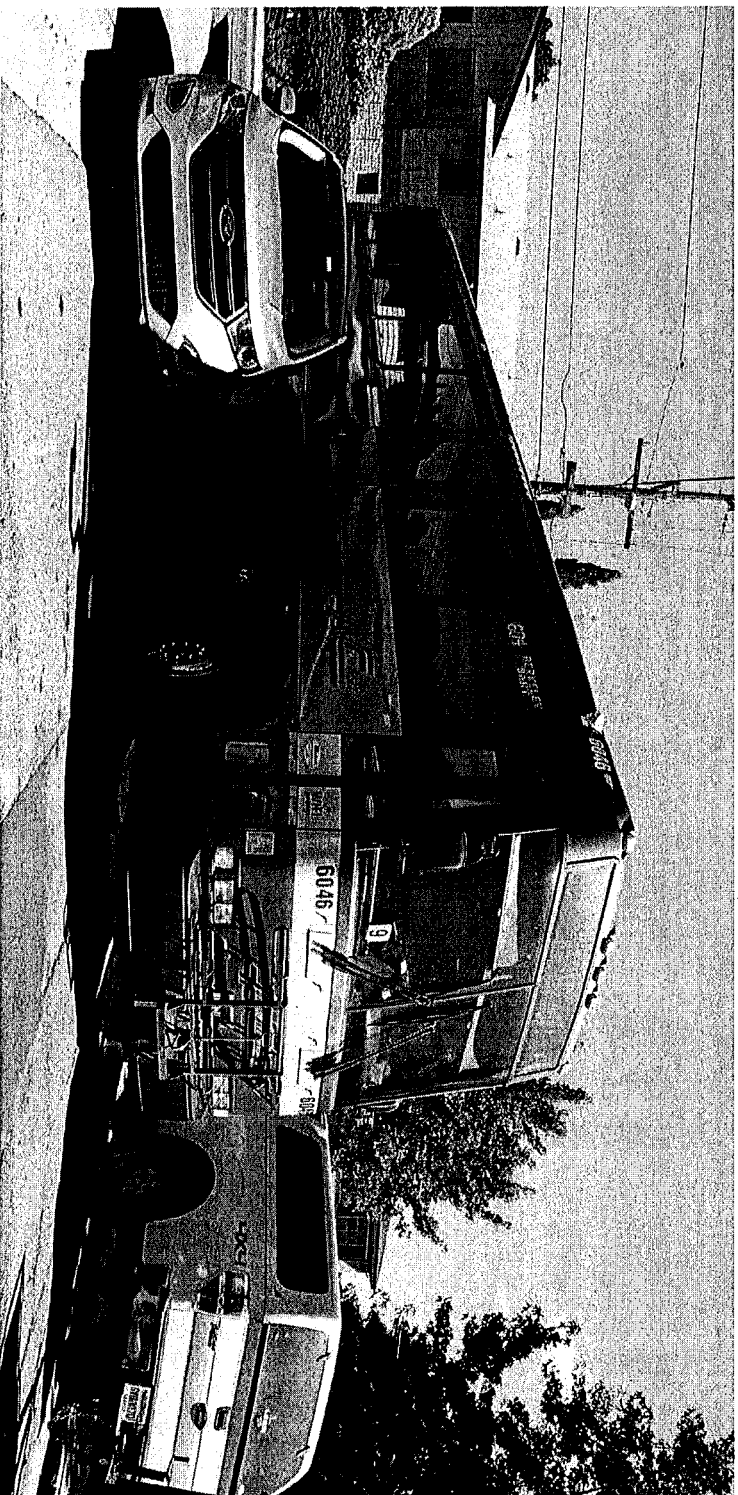
NSC wants an end to the LOOP

Alternative routes, parking and drop off locations exist and need to be explored and implemented in new CUP.

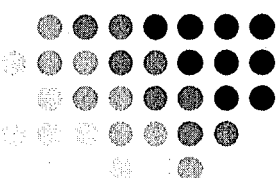
NSC has initiated review with AC Transit to audit LOOP route and multiple bus stops no longer in use.



Traffic Conditions



- Wrong AC Vehicles Used for Narrow 14' Traffic Lanes on Residential Streets (Potomac @ Laguna (LOOP Corner))



Highlights of Differences in Draft CUP Application

Employee Count

HRS wants **UNLIMITED** number of employees
with no additional parking, shuttle or
commute incentives.

NSC proposes **FIXED** cap on number employees
= to 2006 CUP

Highlight of Differences, cont.

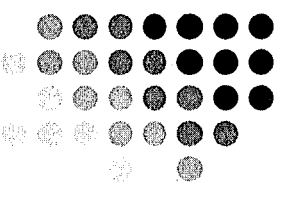
Events

HRS wants **no limit** on the number of weekday events during school year

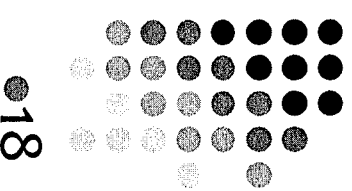
Plus approval for **75 weekend events**.

NSC proposal **limits total events**.

Prohibits lending, renting or partnering with individuals or any group for use of the school facilities.



Highlight of Differences, cont.



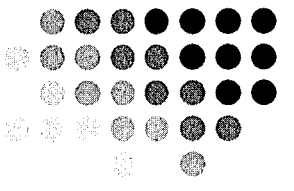
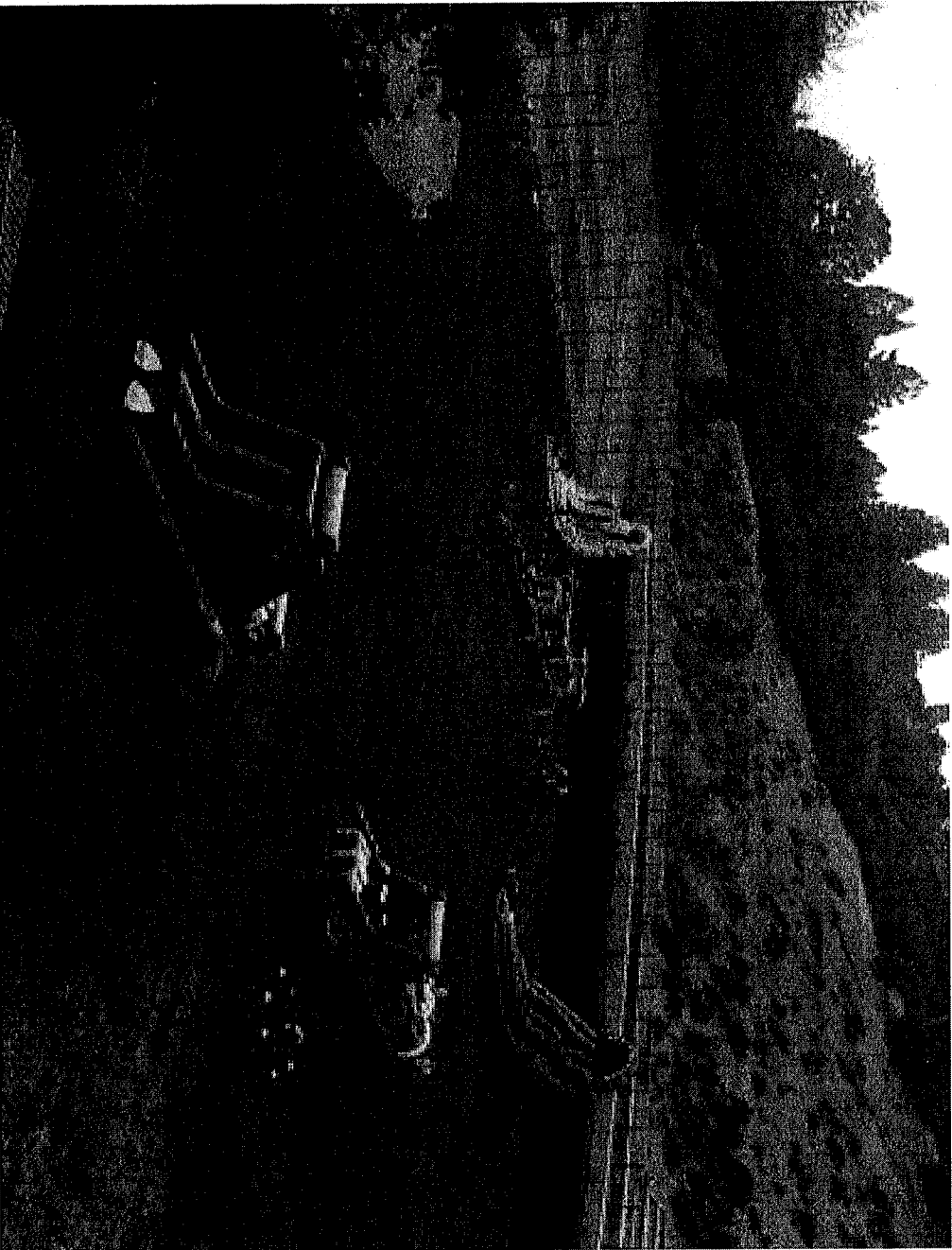
Summer School/Camp Program

HRS wants 2 summer sessions with
780 students/session.

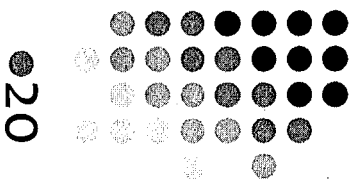
HRS is operational **11 months/year.**

NSC wants no more than **500 students/session**
Equal to current limit. Based on high level of
nuisance traffic, poor monitoring and noise.

Summer Camp Noise 85-95 dB @ Curb



Solutions



Recommend to the Commission an

ENFORCEABLE Use Permit that adopts the
NSC proposal,

Or

Recommend **DENIAL** of the application for modification
of the current 2006 Use Permit and require HRS
immediately reduce its enrollment to the Phase 2
level.

Thank You.

November 2, 2015

Honorable Members of the Oakland Planning Commission
250 Frank Ogawa Plaza, Suite 3315
Oakland, CA 94612

Re: **Head Royce School: Request to Amend PUD:** REV130003 (related: PUD04-400;
PUDF05-339; ER04- 0014)

Dear Planning Commissioners:

On behalf of the students, faculty, staff and Board of Trustees of the Head-Royce School (“HRS” or the “School”), I’m writing to ask you to approve HRS’s request for an amendment to its use permit. Although staff’s proposed conditions are rigorous and lengthy, we are willing to accept them and respectfully ask that you follow staff’s recommendation.

This letter provides an overview of our request, the reasons for it and additional information about the HRS’s relationship with its neighbors.

A. The School’s Request to Reach 906 Enrollment Sooner Than Anticipated

HRS is Oakland’s only independent K-12 school. It just celebrated its 125th anniversary. Its current enrollment is 875 students, nearly 50% of whom are Oakland residents and 50% of whom are kids of color. A further description of the School’s demographics, financial aid program and other ways it serves as a community asset are set forth in **Exhibit A**.

When the City granted HRS permission to build out the current campus in 2006, the parties anticipated three phases of enrollment: 783 students (Phase I); 845 students (Phase II) and 906 students (Phase III). No time limits were imposed on reaching Phases I and II enrollment. The permit allowed Phase III enrollment 15 years after the approval of the Master Plan, or 2021. Thus, at our current enrollment of 875, the School is at 96% of currently allowed enrollment.¹ We are requesting permission to stay at our current enrollment of 875 and to move to 100% of

¹Under State of California school capacity metrics and City parking requirements, the physical capacity of the existing campus could accommodate more than 1000 students. The school does not intend to request permission to increase enrollment at the current campus beyond 906 students. It is committed to small class sizes and a high teacher to student ratio.

already approved enrollment (906) during the 2017 – 2018 academic year instead of waiting until 2021 (i.e. about two and one-half years early).

As indicated by planning staff,

“[t]he School has implemented all the items in the [Neighborhood] Agreements to reach the 3rd phase of enrollment. . . . City sees no reason why the School should not be permitted the enrollment now since the [2006] master plan has been completed and all the items required in the Agreements have been achieved.” (Staff Report dated November 4, 2015 at p. 12.)

We agree and thank planning staff for its diligent and very detailed work in reviewing our use permit and carefully crafting revised conditions of approval.

B. How Did the School Allow Itself To Grow Faster Than Allowed?

HRS is nationally acclaimed for providing an excellent educational experience. Each year, enrollment applications greatly exceed the number of students to whom the school is able to offer admission. This demand has only accelerated with the completion of the improvements contemplated by the 2006 Master Plan and the economic recovery. On virtually a daily basis, Oakland is attracting new businesses and residents. More people want to live and raise a family in Oakland than almost any other time in the School’s 50 year history on Lincoln Avenue. Like other private schools in Oakland, HRS has been having a harder time managing its enrollment in the face of this demand. In the past few years, both Bentley School and College Preparatory School have been over-enrolled and have sought use permit amendments. (We do not claim that other schools’ over-enrollment excuses ours, just that we are not alone in struggling with this issue.)

Further, the School did not wantonly disregard the timing limits its use permit when it admitted 45 additional students for the 2012 school year.² Although it turns out to have been mistaken, the School believed it was allowed to “absorb” the unused enrollment permitted at the Lincoln Child Center (LCC) site after HRS became the owner of both sites. The LCC property has been used as a school/treatment facility for children for many years. In the 1970s, it was the site of the Josiah Royce School for Boys; later it was the campus of Beacon Day School. In the 1990s, it was acquired by LCC. Until 2012, LCC ran an educational treatment program for up to 92 mentally and emotionally disturbed children at this campus under a City-approved use permit. In 2010, the Board of LCC resolved to sell its Lincoln campus and began discussions with HRS. As those discussions became more concrete, LCC gradually down-scaled its operations in anticipation of the sale to HRS. By 2012, when the parties entered in a formal contract, no LCC children remained on site.

Under California law, use permits “run with the land.” Thus, when HRS bought LCC’s land, it also acquired the right to run a program serving up to 92 students at that site. However, HRS

² In 2011, enrollment was at 832 students, below Phase II limits.

mistakenly believed that, as the new common owner of the proximate HRS and LCC properties, it could use LCC's allowed enrollment (which LCC itself was no longer using) on its existing campus. We acknowledge now that our interpretation of how LCC's use permit rights could be exercised was not correct and HRS regrets this error. But the School did not simply admit additional students in bad faith. It believed that by buying the LCC campus, it was allowed to absorb up to 92 students from LCC's use permit. As discussed in more detail below, when the City and neighbors called out the enrollment issue in 2012, the School promptly filed an application to amend its use permit to remove the 15 year horizon requirement and regularize its existing enrollment on its current campus. For the past two years, staff and HRS have been studying the best ways to amend this use permit to address and minimize neighborhood impacts.

C. Head Royce's Compliance History

The neighbors have attempted to paint the School as a "bad actor" with respect to use permit compliance. As a school that places a high value on good citizenship and ethical behavior, the entire Head-Royce community is dismayed at this portrayal. Although our record has not been perfect, in many instances, we have been unfairly accused of violations that turn out to be untrue and/or are highly exaggerated. In addition to working closely with City staff on compliance, we have taken many actions over the years to go above and beyond our use permit to help the neighborhood. A chronology of our many actions that benefit the neighborhood and reduce burdens is attached as **Exhibit B**.

1. **Traffic.** A frequent and continuing cause of complaint is about driving behavior. We acknowledge that not all of our drivers follow the rules all of the time but the Head-Royce community has the same population of good and bad drivers as any school community. In a recent traffic study, Nelson Nygaard reported that "no fast or aggressive driving was observed by Head-Royce vehicles through the study area." (Nelson Nygaard Memorandum on "The Loop Count Analysis," dated October 22, 2015 at p. 3, **Attachment G** to Staff Report.)³ Planning staff also observed our pick up and drop off operations first-hand earlier this year and remarked that it was orderly and well-run.

To be sure, traffic is congested on Lincoln Avenue during peak school pick-up and drop-off periods, but it is a wild exaggeration to say that traffic conditions at the School are "terrifying," as recently alleged in print by a neighbor. There is no basis for this allegation and it is patently not true. Nelson Nygaard's Transportation Impact Analysis (2015) concludes that neither existing enrollment (875) nor projected enrollment (906) will cause traffic to exceed any City-adopted threshold of significance. (See **Attachment G** to Staff Report.)

³ Under the existing use permit, the School already has a Transportation Policy Guide, numerous traffic monitors, a system for tracking bad behavior and a system of escalating consequences for repeat offenses. Under the proposed revisions to the use permit, more monitors will be posted, and more stringent enforcement will be required.

In addition, it is not true that when drivers make illegal U-turns, park in driveways or drive too fast that this behavior causes the School to be in violation of its use permit. Indeed, the school's use permit does not prohibit U-turns, parking in the neighborhood or driving too fast. As recognized by the staff report, use permits do not and should not govern driving behavior. (Staff Report at p. 13.) Driving behavior is governed by the California Vehicle Code and enforced by the police department not by the planning department. The existing (and proposed) use permit *does* require the School to educate its affiliates about traffic rules, monitor driving behavior on Lincoln and nearby residential streets and to attach internal consequences to reports of un-neighborly or illegal driving behavior. As a review of the Transportation Policy Guide and Big Ten Driving Rules demonstrates, the School repeatedly and diligently tries to instill into its parent and student population the serious importance of good driving behavior. The School regularly sanctions violations of the Big Ten Driving Rules and has, from time to time, banned certain drivers from drop-off or pick-up.

2. Busses and the Loop. A critical element of the School's attempt to reduce traffic impact in the neighborhood is represented by our efforts to persuade our families to use busses, both AC Transit busses and private busses. The School spends approximately \$400,000/year subsidizing the bus program. Since the school voluntarily expanded the bus program in 2011-12 school year, HRS has spent nearly \$1.6 million subsidizing the bus program. Unfortunately, as the City's hearing of our amendment request has neared, certain neighbors employed tactics in an effort to convince the City and AC Transit to eliminate "the Loop," a traffic pattern agreed to by the Neighborhood Liaison Committee in 2004 to alleviate U-turns on Lincoln Avenue. Specifically, neighbors intentionally parked cars in strategic locations on streets used by the busses for the sole purpose of preventing the busses from turning. These neighbors only agreed to remove their cars after the bus drivers called the sheriff to intervene, stranding students on the busses for nearly an hour. See **Exhibit C** for an additional description of neighbors' activities. These types of tactics, particularly because they involved students, were very difficult for us to understand. We also don't understand how neighbors can call for us to reduce traffic when our efforts are being intentionally undermined by certain neighbors.

2. Noise

Neighbors also say the School has a history of non-compliance because the School's activities are loud and violate the City's noise ordinance. Undeniably, some noise is generated by the operation of a school. However, the School recently commissioned two noise studies to test whether noise levels violate the City's noise ordinance. Studies were made of the School's annual Walk-a-Thon (October 2013) (See **Attachment H** to the Staff Report) and its annual All School Fair in October 2015 (See **Exhibit D**.) In both instances, the independent acoustical engineering firm found compliance with the City's noise ordinance, even during fairly large, outdoor, special events. (The Walk-a-Thon involves 200-300 people and the All School Fair involves 400-500 people.)

Neighbors also have made unsubstantiated accusations of noise violations when the noise was unrelated to Head-Royce.

- In 2013, a neighbor complained that Head-Royce was violating the noise ordinance when unrelated people on Lincoln Avenue were yelling encouragement to runners in the Oakland Marathon.
- About a month ago, NCS' attorney alleged that two HRS boys were disturbing the peace by driving go-karts on School property. She claimed this noise was making it difficult for non-HRS kids in the neighborhood to study and that this would impede their ability to go to college. This complaint was circulated to City staff, this Commission and City Council Members (an email was also sent to the alleged HRS parent of the alleged go-kart driver causing great confusion, consternation and alarm since the student in question was participating in a City of Berkeley's Park and Recreational program during the incident). The School's security video quickly showed that the go-karts were driven not driven by HRS students but instead by trespassers unaffiliated with HRS.
- The School was recently accused of constructing "a large circular driveway" without permits on property the School purchased for faculty housing on Whittle Avenue. The neighbor further alleged that the School was planning to relocate truck deliveries to this house in violation of our use permit. In fact, the realtor photos listing the property for sale show the driveway as in existence prior to the School's purchase of the property. Moreover, the School has no intention of shifting deliveries to this location nor was the neighbor's speculation on this point supported by any evidence. The only use to be made of this property will be residential. Given the escalating cost of housing in Oakland, the School does intend to continue to make these homes available for affordable housing for teachers.

We provide these examples to show that the oft-repeated claims about our "long history of non-compliance" are demonstrably exaggerated and one-sided. When our neighbors don't like some of the inconveniences of living near a school, they accuse us of violating our use permit. As described below, with the exception of enrollment, compliance issues have been fairly circumscribed and promptly corrected.

3. Other Compliance Issues

We acknowledge that the School has received letters from City staff citing non-compliance with specific conditions or requesting additional information about compliance. In each instance, the School responded promptly with more information or in certain instances, disputing the charge. Staff acknowledges, and we agree, that trying to enforce the existing use permit, which includes provisions from three private Neighborhood Agreements, creates significant room for disagreement since some of these provisions are very unclear. The proposed revisions to the use permit correct this problem.

In August 2012, the attorney for the neighbor group filed a "Revocation Complaint" asking the City to revoke or modify the School's use permit based on a long list of alleged violations, many of them from the Agreements. The School responded in September 2013 and included a compliance matrix and requesting that staff conduct a "point by point" audit of compliance. The City also agreed not to send the matter to a hearing officer if the School agreed to amend its use permit and prepare a TDM. The School filed that application in February 2013.

In February 2014, the staff completed its "point by point" audit of the school's compliance matrix and found four discrete areas in which it requested further documentation of compliance: (1) completion of hillside landscaping above the athletic field; (2) provision of written procedures describing the School's traffic monitoring and violation program; (3) payment of a fee for staff time to review compliance documents and (4) submission of documentation that the School had informed its vendors in writing about rules regarding deliveries. Between February 2014 and February 2015, the School worked with staff to show compliance with all these requests. On May 15, 2015, planning staff determined that, except for enrollment, the School is in compliance with the terms of its existing use permit.

4. Recent Additional Allegations by NCS Counsel on Personnel Issues, Internal Assessments and Other Topics

A few days ago, NCS counsel sent the Planning Commission additional allegations concerning private personnel matters and budgetary assessments unrelated to the School's land use permit. We are shocked, but perhaps not surprised, that certain disgruntled neighbors are trying to inject these unrelated topics into this discussion. Not only are these allegations unrelated to the School's land use permit, they are inaccurate and lacking in context. If the City has additional questions concerning these matters that are related to our land use permit, we would be happy to make ourselves available to privately discuss them.

NCS Counsel also sent a powerpoint to Commissioners with several inaccuracies which we correct below:

- NSC claims HRS is twice the size of any other private school in Northern California. This is inaccurate. Numerous private schools in Northern California are bigger or about the same size as HRS and are located on a single campus. These include:
 - Bishop O'Dowd (grades 9-12) = 1100 students
 - St Mary's High School (9-12) = 700 students
 - Sacred Heart Cathedral (9-12) = 1200 students
 - Menlo School (6-12) = 750 students
 - Lycee Francais de San Francisco (6-12) = 800 students
 - Nueva School (6-12) = 700 students

Noise, traffic and parking impacts of schools are the same whether they are public or private. HRS is about the same size or much smaller than many Oakland public schools in residential neighborhoods:

- Montera Middle School (6-8) = 900 students
- Bret Hart Middle School (608) = 700 students
- Oakland Technical High School = 1,700 students
- Skyline High School = 1,900 students
- Oakland High School = 1,800 students

- NCS indicates that ‘the Loop’ was initiated unilaterally by HRS. In fact, ‘the Loop’ was initiated jointly by HRS and members of the neighborhood to alleviate U-turns on Lincoln has been used without objection for at least the past 9 years.
- The blockaded bus on Slide 15 was engineered by the neighbors who refused to move their cars when asked to do so by AC Transit drivers. This problem only occurred because neighbors purposefully interfered with normal operations.

5. Litigation about ‘Development Agreement’ on LCC Campus

Neighbors have also brought up now-resolved litigation as a basis for alleging bad behavior by the School. While this litigation involves a private agreement concerning the future use of the LCC campus and is not related to the matter before the Commission, we want to set the record straight, especially because the outcome of this litigation helps demonstrate that certain neighbors have not been reasonable.

This litigation was initiated by LCC against certain neighbors to interpret a private agreement about uses of the LCC campus. HRS was obliged to enter the litigation when the court found that it was an indispensable party. From the outset, HRS endeavored to bring the parties together to find a mutually consensual resolution but the parties could not settle and so the matter was presented to the Alameda Court. The Court ruled in favor of HRS and awarded HRS attorneys’ fees in the amount of \$104,420.95 and \$8,000 of costs.⁴ The Court stated that the neighbors’ positions were ‘absurd’ as well as ‘illogical and unworkable.’ The title company involved with this litigation wrote that the neighbors’ behavior was ‘strange, unpredictable and irrational.’ In contrast, HRS tried a number of times to seek compromise before having to submit the matter to the court, which vindicated the School’s position. Ultimately, after years of litigation between the neighbors and LCC, the neighbors reached an agreement with LCC whereby the Development Agreement was eliminated altogether.

D. The School’s Many Compromises to Address Neighborhood Concerns

Finally, over the course of the last year, planning staff has been working on an almost completely revised set of operational conditions that it now recommends be adopted as part of the School’s request to regularize enrollment and lift the 15 year restriction.

We concur with these revised conditions and note their depth and breadth below:

1. Enrollment

- 875 students to be allowed now
- No more than 15 per year until 906 reached, which will be no earlier than the 2017 – 2018 school year.

⁴It is very rare for a Court to award attorney’s fees against homeowners. This only occurs where a Court believes that they were taking extreme, frivolous or unsubstantiated positions.

2. Traffic and Parking

- TDM
 - o 27% non-SOV ridership, to increase to 30% at 906 enrollment
 - o Increased number of traffic assistants and monitors to 9 in the a.m. and 12 in the p.m.
 - o Tightened violation and enforcement policy
 - o Video-taping of queue for compliance monitoring
 - o Independent audit of TDM compliance 4x per year (at the cost of probably 2-4 scholarships)
 - o Parking rules to discourage parking on neighborhood streets

3. Special Events

- Cap on special events (no current cap)
- Special traffic and parking rules during special events

4. Summer Program

- Cap of 780 students per session (no current limit)
- No use of pool before 9 a.m. in summer (no current restriction)
- No use of bullhorns
- No loaning or renting out school to outside organizations (no current restriction)

5. Whittle Gate

- Limits on delivery hours on vendors (no current limits)
- Recall pedestrian key cards from faculty who have parked on Clemens Street

Neighbors have asked for a number of conditions that we cannot accommodate without impairing our existing rights or hobbling our ability to run a thriving, vibrant K-12 school. These include:

- Eliminate right to go to 906 enrollment
- Cap # of employees to 157
- 500 student cap on summer program enrollment
- Limit evening special events to 42 per year
- Increase non-SOV ridership to 70%
- Eliminate bus loading on south side of Lincoln
- Eliminate Loop (would simply increase U-turns and/or force traffic to another street)

As noted in the point by point responses staff has made to these neighbor comments, these demands are overly stringent and unreasonable. Some seem calculated to prevent the School from complying with the terms of its permit. As explained, staff has appropriately rejected these requests.

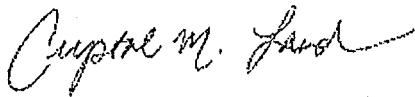
CONCLUSION

Head-Royce provides many tangible benefits to Oakland including an exceptional academic experience for hundreds of Oakland kids, affordable housing for teachers, the Heads Up program and the summer program, which predominantly serves kids attending Oakland's public schools. We also have a true mutual interest in being a good neighbor by controlling traffic, limiting use of the athletic fields, sharing institutional parking with the Greek Cathedral, Ability Now Bay Area (formerly known as the Cerebral Palsy Center) and Mormon Temple, providing neighborhood security and allowing neighbors to use some of our facilities on weekends.

Through the use permit process, the City has the ability to impose operational land use restrictions on HRS that it would have no power to impose on a public school. This provides an opportunity for HRS, City and the neighborhood to work together to balance our considerable number of mutual interests.

We respectfully request that the City allow us to maintain existing enrollment of 875 and to reach full 906 enrollment 2 ½ years earlier than we would be allowed to under the existing permit. In return, we have voluntarily worked with planning staff to substantially rewrite our use permit and construct a broad and detailed series of use restrictions designed to benefit the immediate neighborhood and allow the School to continue to perform as a first class institution. We thank the Commission for its time and efforts in considering our application.

Yours very truly,



Crystal Land
Head of School

cc: Planning staff