April 28, 2017

Ms. Amy French, AICP
Chief Planning Official
Palo Alto City Hall, Planning & Community Environment
250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301

Re: Castilleja School Request for Vesting Tentative Map with Exception; 1310 Bryant Street and 1235, 1263 Emerson Street, Palo Alto (“Property”) [16PLN-00258] [SCH#2017012052]

Dear Ms. French:

On behalf of Castilleja School (“Castilleja”), this letter serves as a formal request for a Vesting Tentative Map with Exception to merge 3 adjacent parcels¹ (collectively, “Campus”) owned by Castilleja. By merging its adjacent lots, Castilleja seeks to provide improved programs for students, while taking significant measures to reduce its impact on the surrounding neighborhood. Specifically, the application seeks to merge the School Site with its two adjacent lots in the R-1 (10,000), which contain the Lockey/Alumnae House (used for school programs) and 1235 Emerson (a rental/employee housing unit), resulting in a total Campus size of 286,783 sf., or 6.58 acres. In conjunction with the project, the homes will be demolished to create an underground parking garage, among other impact reducing improvements. The Vesting Tentative Map with Exception will serve to memorialize the unified campus, existing over adjacent antiquated parcels. Merging these parcels will improve the City’s ability to plan the most appropriate campus suitable for surroundings.

¹ (1) APN 124-12-034 (1310 Bryant St.; “School Site”), (2) APN 124-12-031 (1235 Emerson St., Lockey/Alumnae House,” 7500 sf.), and (3) APN 124-12-033 (1263 Emerson St., 10,500 sf.)
Palo Alto Municipal Code ("PAMC") 21.08.020 requires the application for a Tentative Map where a new lot created via merger exceeds Two (2) acres. As provided in PAMC Chapter 21.13, Castilleja seeks to file a Vesting Tentative Map. PAMC Section 18.12.040(d) provides that no new lot in the R-1 District may be created which will be equal to or exceeding two times the minimum lot size prescribed for the zoning district and there will be no net loss of housing units on the site. Notwithstanding that Section, schools are allowed to operate in R-1 districts subject to obtaining a conditional use permit. Pursuant to PAMC Section 21.32.020, an exception may be granted by the City of Palo Alto ("City") to the maximum lot area and for the loss of housing units, provided certain findings are made. As described in further detail, below, there is substantial evidence by which the City can make the necessary findings and approve the Vesting Tentative Map with Exception. The City has long been aware of the existing conditions of the under lying R-1 lots and this action will enable the City to correct an obsolete lot configuration.

1. There are special circumstances and conditions affecting the Property.

Any school developed in a R-1 district in the City on land greater than 2 acres requires a Tentative Map with Exception for the maximum lot area and loss of housing units. Very few, if any schools, could be built on multiple small parcels subject to the maximum lot size restrictions and retain housing on site. Castilleja would not be able to develop an underground parking garage and other impact reducing amenities (i.e. relocated and below-grade pool, as well as below-grade waste and delivery services) as part of the Campus, if the two lots are not merged with the existing School Site. Furthermore, due to the irregular shape of the Property and the existence of Category 3 historic resources located at the Property (i.e. the administrative building and chapel), Castilleja would have difficulty meeting setbacks and other development standards without a map exception. Further, the school cannot build/retain residential units on the Property, as the residential units take FAR necessary for future school use and are inconsistent with the school's future programmatic needs.

2. The exception is necessary for the preservation and enjoyment of a substantial property right of petitioner.

Schools are allowed in R-1 districts upon the granting of a conditional use permit. Castilleja currently operates under an existing CUP and seeks to amend the CUP. In order to build or renovate any school in R-1 districts, the merger of lots is necessary to assemble sufficient land to build the school (which by its very nature, is larger than a single family home) as well as construct certain supporting uses in a way to mitigate the impacts of a school use in an otherwise residential zone (i.e. an underground parking garage). If map exceptions are not granted to schools to merge multiple lots into a single parcel exceeding 10,000 square feet, Section 18.12.040(d) would essentially prevent
construction improvements to a school in any R-1 neighborhood in the City, a result that was clearly not intended. Castilleja’s application involves the merger of two smaller lots with the School Site which already exceeds the 10,000 square foot maximum, and has exceeded the maximum since before the inception of the zoning code. The granting of the exception is necessary to preserve Castilleja’s right to build a sustainable new campus with amenities included to reduce impacts.

3. The granting of the exception will not be detrimental to the public welfare or injurious to other property in the territory in which the property is situated.

The purpose of the maximum lot size in the R-1 district is to prevent lot combinations resulting in homes out of scale with other homes in the surrounding neighborhood. In addition to residential use, the R-1 zone provides that schools can operate in the R-1 zone as conditional uses. While Castilleja currently operates via a Conditional Use Permit, historically, the School has existed in its location prior to the inception of the R-1 zoning designation, or the need for a CUP. Indeed many of the residences across the street from the Property were constructed long after the school owned the Property or obtained its first CUP.

The proposed Vesting Tentative Map with Exception will confirm the acting campus boundary, as it has been historically used, reflecting what has long been operated as an integrated campus. The Map will not result in any exterior changes to the territory owned and controlled by the School. Granting the exception will simply allow for the consolidation of the 3-lots owned by Castilleja, enabling the construction of a below-grade parking garage and other improvements intended to substantially reduce impact on the neighborhood. Furthermore, Castilleja intends to implement a Sustainability Program and continue its robust Transportation Demand Management Program to ensure no net new automobile trips, such that the merger of lots does not result in a detrimental change in traffic or other negative impacts.

In light of the foregoing, there is sufficient basis for the City to find that there is no detriment to the community from approval of the Vesting Tentative Map with Exception.

4. The granting of the exception will not violate the requirements, goals, policies, or spirit of the law.

Pursuant to Municipal Code Section 18.12.010, the purposes of the single family zoning district are to create, preserve, and enhance areas suitable for detached dwellings with a strong presence of nature and open area affording maximum privacy and opportunities for outdoor living and children's play. The granting of the exception will
permit the construction of improvements to the School Site by allowing for the Campus to provide for greater open space (an increase of 6,182 sf.), preserve most of the existing, mature trees, allow for an open-to-the community park, as well as other neighborhood amenities (i.e. a community bike pavilion). While not a detached dwelling, the School provides for a strong presence of open space affording valuable opportunities not only for children to play, but to learn. The School includes outdoor learning areas, patios and walkways. Furthermore, the purposes of the residential district include allowing community uses and facilities, such as schools. The above considerations, coupled with the proposed residential style and design of the school, do not violate the spirit of the PAMC; rather they support and complement the purposes of the residential district.

In light of the foregoing, the School respectfully requests that the City make the required findings and approve the Vesting Tentative Map with Exception, pursuant to PAMC 21.32.020 for the merger of lots exceeding the maximum lot size permitted by 18.12.040(d).

Sincerely,

[Signature]

Mindie S. Romanowsky

cc: Hillary Gitelman, Director of Planning & Community Environment
    Jonathan Lait, Assistant Director of Planning and Community Environment
    Nanci Kauffman, Head of Castilleja School
    Kathy Layendecker, Chief Financial and Operating Officer