INTRODUCTION

• Purpose of meeting

• PTC Role / Staff role

• Applicant’s Alternative Project

• Hearing process
TONIGHT’S PTC HEARING ORDER

1. Staff presentation then PTC Clarifying Questions
   • Brief History and Context
   • Project Overview (Applicant Requests)
   • Required Entitlements and Review
   • Final Environmental Impact Report (Dudek)

2. Applicant presentation then PTC Clarifying Questions

3. Community comments (3 minutes per individual, up to 10 minutes each rep for group of 5) and PTC comments

4. PTC to continue hearing

Castilleja School Project on City’s website: www.cityofpaloalto.org/castilleja
CASTILLEJA SCHOOL LOCATION
CASTILLEJA SCHOOL

Brief History and Context
CASTILLEJA SCHOOL 1907-1910
Began in Professorville @ 1121 Bryant

1121 Bryant

1907 Castilleja: 68 students grades K-12
CASTILLEJA SCHOOL BUILDINGS IN 1924

Of these 1924 buildings, only the Recitation Hall still stands; now the Gunn Administration Building.

In 1924 there were 230 students at Castilleja, in six buildings plus outbuildings and pool.

In 1926, Birge Clark designed the Chapel next to the Recitation Hall.
ENROLLMENT AND USE PERMIT HISTORY

• **1947**: K-12th enrollment @ 235 students
• **1958**: lower grades (through 4th) dropped from the program

• **1960 CUP #1**: For 90-student dormitory (with height variance)
• **1962**: School levels included 7th through 12th grades
• **1965 CUP #2**: Added dorm/classroom and library (1967)

• **1974 CUP #3**: Added visual-performing & physical arts buildings (1977)
• **1979 CUP #4**: Chapel addition, 52-space lot, student pick-up/deliveries

• **1992 CUP #5**: Campus increased (Melville abandoned, map); Reinstated 6th grade, added 28-space parking lot & softball, began TDM program
• **1995 CUP #6**: Dorm converted into library, classrooms and offices; established a 385-student enrollment cap

• **2000 CUP #7**: Increased cap to 415 students; required TDM program monitoring and put limitations on special events
• **2006 CUP #8**: Gym GFA replacement, double-basement with gym use restrictions
TWO HISTORICAL RESOURCES ON CAMPUS

In 1980, the Chapel became an auditorium
BRYANT STREET VIEW – RHOADES HALL CLASSROOM

1960’s Rhoades Hall is attached to the Gunn Administration Building, at right
VIEWS OF EMERSON STREET HOUSES

Historic Resource (NRHR Eligible)

Castilleja’s Two Houses

1215 Emerson built 1917

1235 Emerson built 1979

1263 Emerson built 1912
CASTILLEJA SCHOOL PROPERTY TODAY

Bryant Street

Emerson Street

Kellogg Avenue

Pool

Circle

Field

Historic Admin Building Chapel

Cat 3 Historic Resource

Classroom building

Fitness & Athletic Center

Fine Arts Center

Campus Center

Maintenance

Two separate R1 parcels

1215 Emerson

13

Embroadero Rd

13

Historic Cal-Register Eligible Resource

Rental home

Hockey Cage
PROJECT OVERVIEW

• Castilleja seeks to change the campus and upgrade the buildings and pool
• ‘Master Plan’ for phased redevelopment with rebuild of above grade floor area and basement expansion creating capacity for student enrollment increases up to a new cap of 540 students with phased redevelopment

August 26, 2020 www.cityofpaloalto.org/castilleja
BUILDINGS PROPOSED TO BE DEMOLISHED

- Casti’s R1(10,000) parcels
- Classroom-former dorm: Arrillaga Family Campus Center
- Rhoades Hall, Library next to Gunn building
- Ely Fine Arts Building
- Maintenance, pool equipment buildings
1215 Emerson ca 1917
Not owned by Castilleja

1235 Emerson, ca 1979
Castilleja ownership

1263 Emerson ca 1912
Castilleja owned since 1993
Vehicles restricted to right turn only

School buses to use driveway to a perimeter circle roadway

Trash, service and loading to occur under Academic Building
PROJECT ALTERNATIVE SITE PLAN

Distributes school drop offs to three locations around the campus.

- Castilleja’s two Emerson houses to remain.
- Vehicles may make all movements.
- Retains a drop off driveway at Kellogg Avenue.
NEW DROP OFF LOCATION – PARKING DESIGN

- Project includes two surface lots (13 car spaces each) plus underground garage
- Use of tandems (deeper spaces not counted toward space requirement)
STUDENT ENROLLMENT

• Previously approved enrollment (2000 CUP): 415 Students

• Enrollment today: 426 Students

• Proposed enrollment: 540 Students

• 2013 City action resulted in: A penalty payment for over-enrollment, transportation demand management implementation, annual enrollment reductions, and the Applicant’s 2016 CUP application
PROJECT COMPONENTS

• Demolish 5 campus buildings (Fine Arts, classroom/campus center buildings)
• Replace campus GFA in new academic building with expanded below-grade area
• Construct subterranean garage from existing Bryant St. parking lot with a two-way access ramp, and one-way garage exit driveway opposite Melville Ave; garage completion is associated with the phase 1 student enrollment increase
• Provide below-grade pedestrian passage from the garage to campus buildings
• Demolish at-grade pool and constructs below-grade pool and pool sound wall
• Provide for below-grade delivery and trash enclosures/waste pick-up @ circle
• Install new landscaping and fences
• Enhanced TDM plan
• Removed two Emerson houses to merge campus with these parcels, extended garage below, and created open space above

• Garage extended under Embarcadero Special Setback

• All drop-offs were to occur inside garage and vehicles forced to turn right onto Emerson Street causing a TIRE impact (CEQA impact)
Project Alternative Garage:
(1) would not encroach into Embarcadero setback
(2) retains two Emerson Street homes
(3) preserves six Redwood trees next to Spieker Field
PROJECT ALTERNATIVE GARAGE EXIT

- Proposed exit gate would be 80 feet from Emerson
- Ramp separated by fence at 1263 Emerson
- Exit - vehicles leave multiple ways upon exiting
Project Alternative’s parking meets code rather than exceeds code, as does Project
PROJECT ALTERNATIVE

Achieves all Project objectives, while:

• Addressing several community concerns;
• Removing the significant and unavoidable CEQA traffic impact of the Project
• Enabling withdrawal of:
  • The Tentative Map application to merge Emerson parcels with the campus parcel, and
  • The Variance request for a below grade garage encroachment into the Embarcadero Road Special Setback
• Reducing Academic Building ground floor level by 754 square feet (offset by below-grade increase by 800 square feet (GFA definition)
• Retaining 11 more trees than the proposed project
• Changing the level of significance of CEQA impacts and would not require Council to adopt a ‘Statement of Overriding Considerations’ to approve it.
THREE YEARS PHASED CONSTRUCTION

- **Project Alternative First phase**: Complete construction of reduced subterranean garage and landscaping; increase enrollment up to 490 students through an annual increase of 27 students.

- **Subsequent Phases**: Enrollment increases to 520 and 540 students with these:
  - **Phase 2**: Relocate pool and increase enrollment to a maximum of 520 students
  - **Phase 3**: Relocate deliveries/waste pick-ups inside campus, 10% reduction in food service deliveries, implement a sustainability plan; and
  - **Phase 4**: Demolish campus buildings, replace removed GFA with academic building GFA, and increase enrollment to a maximum of 540 students
REQUIRED APPLICATIONS

Discretionary Review
PTC
Planning & Transportation Commission purview includes:

• **CUP**: Conditional Use Permit to increase enrollment to 540 students; phased increases tied to redevelopment phases; increase classrooms, with an enhanced TDM program

• **Variance for FAR (GFA Replacement)** associated with CUP

• **Variance for setback encroachment**: Embarcadero Road setback request is *not required for Project Alternative*

• **Tentative Map with Exception**: Merging campus with two residential lots is *not requested for Project Alternative*

• **Next PTC hearing**: PTC Discussion - Consider draft, tailored CUP and Variance Findings and Conditions for Project Alternative
ARB

Architectural Review (AR) application in ARB’s purview: Review of site plan, landscaping, lighting, fencing, designs of Academic Building in context, subterranean garage, circulation and parking lots, and temporary campus. Architectural review process determines whether the project design meets AR findings; AR process includes phased construction.

The EIR Aesthetics section addressed the Project and Project Alternative, considered the neighborhood’s setting and character; analysis determined the proposed architectural style and landscaping would be compatible/appropriate to the neighborhood.
Collectively, the ARB (more than one member) voiced these comments:

- **The Project alternative is supported more than Project** (don’t encroach into Embarcadero setback, do not have a single garage drop off solution)

- **Kellogg side is an improvement over existing, but could use modification** (too long, plate height unbroken), needs to be broken up (roofline, style, mass); an entrance of importance, coordinated, should drive design

- **Consider tunnel length/where it ends up** (consider circle destination)/consider a symbolic entrance

- **Keep the circle, but consider landscape modifications**

- **More info/drawings/discussion is needed** on:
  - Sustainability (rooftop solar structures, rain screens, materials changes – metal?, solar study)
  - Landscaping including ROW, replacement oaks spacing issue, design intent, user comfort
  - Enlarged elevations to see detail
  - Modular units for temporary campus – need to know what this will look like
  - Other aspects not design: TDM management, FAR, construction traffic, noise; study not adding students until construction is complete.
HRB

**September**: Historic Resources Board to consider FEIR responses and assist on AR finding verbiage related to preservation of Gunn Building

HRB reviewed this façade treatment and stair option in September 2019
CITY COUNCIL

City Council considers Final EIR and ARB, HRB and PTC recommendations in public hearing(s) to act on project applications:

• Certify the Final EIR by Resolution, and
• Approve a Record of Land Use Action regarding the:
  • Mitigation monitoring and reporting program
  • Architectural Review application
  • Conditional Use Permit application
  • Variance for GFA Replacement application
FINDINGS/COMPLIANCE DISCUSSION (PP 15-18)

1. CUP for Project Alternative including Temporary Campus
2. Variance for Gross Floor Area (GFA) Replacement
3. Zoning Code Compliance
DISCUSSION #1: CUP FINDINGS

The CUP will address many aspects of the school’s operation such as the enrollment cap, pace of enrollment increases, school operations, TDM, events, and the temporary campus proposal.

Two General CUP Approval Findings are that the use will:

(1) Not be detrimental or injurious to property or improvements in the vicinity, and will not be detrimental to the public health, safety, general welfare, or convenience

(2) Be located and conducted in a manner in accord with the Palo Alto Comprehensive Plan and the purposes of this title (Zoning)
CUP INCLUDES TEMPORARY CAMPUS

- Temporary campus on Spieker field is proposed prior to and during Academic Building construction
- Two-story modular buildings would be removed after completion of construction, to restore athletic field
- This layout does not work for the Project Alternative, given retention of Emerson houses and Redwoods
DISCUSSION #2: VARIANCE TO REPLACE GFA

- The Project is consistent with zoning development standards (subject to Variance) and parking standards. Castilleja School is not a grandfathered use; it is permitted via CUP. Applicant requests a Variance from strict application of these zoning regulations/site development regulations:
  - **PAMC 18.70.100** limiting replacement of non-complying facilities on a site and/or
  - **PAMC 18.12.040** setting maximum Floor Area Ratio in the R-1 zone

- Academic Building
  - Basement is not counted toward GFA
  - Basement extends beyond first floor: basement area in that location is ‘repurposed’ as GFA – per PAMC definition of GFA

- Subterranean Garage
  - Not GFA (below- not above-grade parking) – precedent

**DEMOLITION OF GROSS FLOOR AREA**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>GFA to be demolished:</td>
<td>84,572 sf</td>
</tr>
<tr>
<td>Fine Arts building</td>
<td>5,868 sf</td>
</tr>
<tr>
<td>Maintenance building</td>
<td>1,901 sf</td>
</tr>
<tr>
<td>Campus Center</td>
<td>33,600 sf</td>
</tr>
<tr>
<td>Classroom buildings</td>
<td>42,000 sf</td>
</tr>
<tr>
<td>Pool equipment building</td>
<td>1,203 sf</td>
</tr>
</tbody>
</table>
## DISCUSSION #3:

### ZONING CODE COMPLIANCE/COMPARISON

**1998 code established FAR formula**

\[
0.45 \times \text{first 5,000 sf of site (2,250 sf)} + 0.30 \times \text{remainder 263,783 sf (79,134.9 sf)} = 81,384.9 \text{ sf}
\]

<table>
<thead>
<tr>
<th>Campus Parcel only</th>
<th>Existing/Approved</th>
<th>Original Project</th>
<th>Alternative Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Floor Area Ratio (FAR) = Square footage (SF) remaining above grade (GFA) plus SF to be added above grade (GFA) on campus parcel</td>
<td>116,297 sf exists; 31,725 sf to remain (GFA) comprised of Fitness Building (13,944 sf) and Admin/Chapel (17,781 sf)</td>
<td>115,849 sf includes retained (31,725 sf) plus 84,124 sf replacement GFA – mostly above grade (this # includes 3,713 sf below grade GFA*)</td>
<td>115,257 sf includes retained (31,725 sf) plus 84,170 sf replacement GFA to – mostly above grade (this # includes 4,513 sf below grade GFA*)</td>
</tr>
<tr>
<td>Campus parcel = 268,783 sf</td>
<td>FAR 0.43:1</td>
<td>FAR 0.43:1</td>
<td>FAR 0.42:1</td>
</tr>
<tr>
<td>Square footage to remain below grade plus added below grade</td>
<td>43,913 sf exists; 29,187 sf to remain below grade (not GFA) comprised of Fitness Building (19,661 sf) and Admin/Chapel (9,526 sf)</td>
<td>47,356 sf added below-grade (not GFA) Academic Building</td>
<td>47,356 sf added below grade (not GFA) Academic Building</td>
</tr>
<tr>
<td>Academic Building</td>
<td>NA</td>
<td>115,211 sf (above and below)</td>
<td>115,257 sf (above and below)</td>
</tr>
<tr>
<td>Library Building</td>
<td>NA</td>
<td>16,269 sf</td>
<td>16,269 sf</td>
</tr>
<tr>
<td>Building height</td>
<td>34’6” building via variance approval</td>
<td>30’ proposed</td>
<td>30’ proposed</td>
</tr>
<tr>
<td>Enrollment</td>
<td>415 approved CUP 2000</td>
<td>540 student cap</td>
<td>540 student cap</td>
</tr>
<tr>
<td>426 enrolled 2020-21 year</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking for Automobiles/Bike Parking</td>
<td>82 surface spaces above grade; 102 existing bike spaces on campus</td>
<td>Garage 105 spaces (plus 10 tandem) plus 26 surface spaces (13 each in Bryant and Kellogg lots) = 131 tandem excluded/140 bike spaces</td>
<td>Garage 78 spaces (plus 5 tandem) plus 26 surface spaces (13 each in Bryant and Kellogg lots) = 104 tandem excluded/140 bike spaces</td>
</tr>
<tr>
<td>Trees Removed / Added</td>
<td>168 trees counted June 2016</td>
<td>Removals: 35 trees (7 protected and 3 street trees); Relocations: 34 trees (5 protected trees and 1 street tree); retains 99 trees in place</td>
<td>Removals: 22 trees (8 protected and street trees); Relocations: 32 trees (5 protected and street trees) retains 114 trees in place</td>
</tr>
</tbody>
</table>
STUDIES OF PROJECT ALTERNATIVES
The Final EIR’s revised Transportation Impacts Analysis (TIA) studied the disbursed circulation/reduced garage alternative

• The TIA recommended different distribution percentages @ each drop location to avoid TIRE impacts to other streets

• Alternative 4 fixes the TIRE impact on Emerson (no longer a CEQA impact) by removing restriction to only turn right onto Emerson upon exiting the garage

• Alternative 4 does not necessitate recirculation since it does not create new impacts; it reduces some of the Project’s effects (less tree removals, retains houses) in response to comments, and the TIRE impact
OTHER PROJECT ALTERNATIVES STUDIED

• The DEIR’s *two on-site alternatives* had a 506 student cap, fewer classrooms and garage size reductions; one of these alternatives retained Castilleja’s house at 1235 Emerson Street

• The Draft and Final EIR discussed and rejected ‘off-site’ alternatives:
  • Castilleja to create a second campus
  • Castilleja to relocate its entire campus

• The Final EIR further discussed the no garage alternative
ALTERNATIVE 5: NO GARAGE

• ‘No Garage’ alternative (not proposed) - considered but rejected in Draft EIR, since: (a) it would not avoid the project’s significant impacts and (b) could increase impacts in aesthetics and noise

• Final EIR compares the environmental impacts of the ‘no garage’ alternative with those of the Project. Analysis addresses suggestions this alternative could reduce adverse effects to the neighborhood from project construction and traffic volumes/patterns

• Responses to comments (Draft EIR Chapter 13, Alternatives): reduced some impacts but increased others and did not change the level of significance of any impacts

Under the ‘no garage’ alternative:

• The existing surface lot on Emerson Street next to the gym would be demolished and/or replaced with the pool, as proposed with the Project

• A new surface lot would be constructed where the two Emerson Street residential structures are currently located, where the Project plans show open space

• A new surface lot would be twice as large as the existing surface lot to be replaced by the pool
FINAL EIR HISTORY AND OVERVIEW
CASTILLEJA PROJECT EIR HISTORY

2016-2020

• **2016:** CUP Application; City CEQA consultant funded by applicant
• **2017:** PTC 2017 EIR Scoping Meeting; Council received Scoping Report
• **2018-2019:** Draft EIR preparation; Completion of CUP and Variance applications
• **2019:** AR Application (April); July 15 Draft EIR publication and 60-days comment period contained: (1) Applicant’s eight project objectives; (2) Project’s ‘significant and unavoidable’ CEQA traffic impacts; (3) explanations and mitigation measures to address other impacts; (4) two on-site alternatives to the Project; (5) six other project alternatives, rejected from further analysis.
• **2020:** Submittal of Project Alternative = Disbursed Circulation/ Reduced Garage Alternative; July 29-30 Final EIR publication with responses to comments on DEIR
AMY FRENCH
Chief Planning Official
Castilleja.expansion@cityofpaloalto.org
Next - EIR: Katherine Waugh of Dudek
Final EIR Contents
- Responses to comments
  - Master Responses
  - Individual Responses
- Revisions to the Draft EIR
- Updated Technical Appendices

Draft EIR Contents
- Project Description
- Environmental Analysis
  - Baseline Conditions/Existing Setting
  - Thresholds of Significance
  - Impact Analysis and Mitigation Measures
  - Project Alternatives
Final EIR Master Responses

- Project Description
- Conditional Use Permit
- Construction
- Disbursed Circulation/Reduced Garage Alternative
- Project Alternatives
- Land Use and Planning Impacts
- Tree Impacts and Mitigation
- Aesthetics
- Historical Resources
- Vehicle Transportation
- Bicycle and Pedestrian Safety
- Garage Circulation
- Noise
Master Responses

**Project Description**
- Site plan revisions, additional specificity

**Conditional Use Permit**
- CUP history, violations, enforcement

**Construction**
- Phasing, excavation, traffic volumes and management, noise, air quality
Master Responses

Disbursed Circulation/Reduced Garage Alternative

• Site plan, circulation and garage layout, retained residential structures, changes in requested entitlements
• Summary of elements that are consistent with the proposed project
• Drop-off/pick-up traffic distribution
| Both Projects                                      | • 540 students  
|                                                 | • Special events: 5 major, 90 additional  
|                                                 | • Below grade pool, sound wall, loudspeaker  
|                                                 | • Pedestrian and bicycle circulation plan  |
| Proposed Project                                | • Demolish Emerson Street residential structures, create landscaped area at grade  
|                                                 | • Garage with 107 parking spaces (plus 10 tandem), garage used for all drop-off/pick-up  
|                                                 | • Academic building 84,124 sq ft gross floor area, with 47,356 sq ft below-grade  |
| Disbursed Circulation/Reduced Garage Alternative | • Retain Emerson Street residential structures  
|                                                 | • Garage with 78 parking spaces (plus 5 tandem), drop off lane added to Kellogg Avenue; three drop-off/pick-up locations used  
|                                                 | • Academic building 84,170 sq ft gross floor area, with 47,356 sq ft below-grade  |
Master Responses

Disbursed Circulation/Reduced Garage Alternative

• Land Use – avoid TIRE Index impact on Emerson; reduced tree removals

• Aesthetics – avoid changes in views from Emerson Street north of Melville

• Transportation - avoid TIRE Index impact on Emerson, mitigation to avoid new TIRE Index impacts on Bryant
Master Responses

Project Alternatives
• No garage
• Enrollment cap
• Relocate or split campus

Land Use and Planning Impacts
• Land use compatibility - Aesthetics, noise, traffic, special events
• Mitigation Measures 4a, 7a, 8a
• Floor Area Ratio, aesthetics, housing, special events, noise, construction
Master Responses

Tree Impacts and Mitigation

- Updated tree protection plan and impacts
- Tree canopy
- Updated Mitigation Measure 4b:
  - protection for retained trees,
  - replanting per Tree Technical Manual ratios including for relocated trees;
  - monitoring and reporting
Master Responses

Aesthetics
- Baseline (existing) conditions
- Views from each key viewpoint
- Tree canopy
- Light and glare – Mitigation Measure 5a

Historic Resources
- Administration/Chapel building
- Lockey House
- Consideration of potential historic district
Vehicle Transportation

- CEQA statute and guidelines change - Level of Service a local effect only; VMT standards not applicable
- Address TIRE Index and alternative travel modes
- Mitigation Measure 7a – TDM plan
  - Performance standards
  - Implementation procedures
  - Monitoring and reporting
  - Enforcement
Master Responses

Bicycle and Pedestrian Safety

- Existing traffic volumes and safety
- Construction conflicts; vehicle traffic conflicts
- Suggested mitigation measures:
  - Staggered start times
  - Crossing guard
  - Disbursed drop-off/pick-up
  - Embarcadero bike lane
Master Responses

Garage Circulation
- Traffic and pedestrian management
- Wheel stop time
- Queueing
- Emergency Response

Noise
- Special Events
- Pool
- Construction
WHAT WE DO NEXT - PTC FOCUS

1. **PTC clarifying questions on staff and CEQA consultant presentations, e.g. why:**
   (a) Some alternatives were considered and rejected, including ‘no garage’ alternative? Not proposed in the application, but studied further in the Final EIR
   (b) A subterranean garage can be constructed in the R1 zone for non-residential use? Code reading, precedent
   (c) Applicant’s Project Alternative does not require recirculation? Though it is wordy document, does not generate new impacts and lessens impacts compared to the Project’s impacts

2. **Applicant presentation and PTC Clarifying Questions**
   Applicant’s focus is now on the Project Alternative (Alternative 4) – reflects the Applicant’s response to community comments; PTC questions should also now focus on this proposal and the CEQA analysis of this proposal

3. **PTC comments on Project Alternative (Alternative 4) and continue hearing**
   PTC can continue to September 9 for additional discussion (no new staff report) or to a date uncertain to allow preparation of the next staff report; PTC comments on EIR typos and verbiage issues can be provided to staff; substantive comments can be discussed in these hearing(s)
UNDERGROUND PARKING

• Both the Project and Project Alternative feature an underground parking lot.

• Public comment has raised two issues:
  1) Does the Municipal Code allow this parking to be placed underground?
     • Parking can generally be placed below grade unless the code specifically prohibits it.
     • PAMC 18.12.060(e) and 18.12.090(a) do not apply to non-residential uses.

  2) Should the underground parking be counted as Gross Floor Area?
     • Castilleja’s underground parking is not “covered parking,” a “carport,” nor a “garage”
     • The underground lot fits the definition of “basement”
Can Parking Be Located Underground?

Basic parking requirements are provided in PAMC 18.52 and 18.54

- 18.52.030(g) (Location) – requires parking to be located on the same site as the use being supported, unless an exception is granted.
- 18.54.020(a) – establishes parking facility design standards for parking at, above, and below grade.

PAMC 18.12 provides some limitations on location specific to the R-1 zone, but only for residential uses

- 18.12.030(e) – Underground parking is prohibited for single-family uses, except pursuant to a variance granted in accordance with the provisions of Chapter 18.76, in which case the area of the underground garage shall be counted in determining the floor area ratio for the site.

- 18.12.090(a) – Basements may not extend beyond the building footprint and basements are not allowed below any portion of a structure that extends into required setbacks, except to the extent that the main residence is permitted to extend into the rear yard setback by other provisions of this code.
Should Underground Parking Count as GFA?

PAMC 18.04.030(a)(65)(C) and 18.12.040

• “Carports and garages shall be included in gross floor area”
  • “Carport” means a portion of a principal residential building or an accessory building to a residential use designed to be utilized for the parking or storage of one or more motor vehicles, which is at least 50% open on two or more sides, including on the vehicular entry side, and covered with a solid roof.
  • “Garage, private” means a portion of a principal residential building or an accessory building to a residential use designed to be utilized for the parking or storage of one or more motor vehicles, which is enclosed on three or more sides and covered with a solid roof.
Should Underground Parking Count as GFA?

PAMC 18.12.090(b)

• Basements shall not be included in the calculation of gross floor area, provided that:
  1. basement area is not deemed to be habitable space, such as crawlspace; or
  2. basement area is deemed to be habitable space but the finished level of the first floor is no more than three feet above the grade around the perimeter of the building foundation; or
  3. basement area is associated with a historic property as described in Section 18.04.030(a)(65)(D)(vii).

"Basement" means that portion of a building between the lowest floor and the ceiling above, which is fully below grade or partly below and partly above grade, but so located that the vertical distance from grade to the floor below is more than the vertical distance from grade to ceiling.