



Dylan Parker Project Planner Town of Portola Valley

Via Email: dparker@portolavalley.net

November 12, 2021

Re: Project Description - Woodside Priory Amendment to Conditional Use Permit - X7D-30

Dear Mr. Parker:

This letter supersedes and replaces earlier letters and communications to the Town regarding the above referenced project description. As explained below, the Priory's Amendment to Condition Use Permit X7D-30 application proposes: (1) to make permanent use of two existing modular buildings that have been used temporarily over the years during various phases of our campus construction; (2) to allow for a reasonable increase in our student body and accompanying increase in staff and teachers; and (3) to provide for additional parking spaces to accommodate these increases.

## A. Background/History

The Woodside Priory is a co-educational, private parochial college preparatory school for 6th through 12th grades. It was founded over 60 years ago in its current location in 1957 by a group of seven Hungarian Benedictine Monks from Saint Martin's Archabbey in Pannonhalma, Hungary. Our mission is to assist all students in creating meaningful and balanced lives, developing as lifelong learners and stewards, and productively serving a world in need of their gifts.

The approximately 50-acre campus is located at 302 Portola Road. As depicted on the enclosed revised Overall Master Plan, the campus currently consists of a total of 189,183 sf of building floor area broken down into 104,638 sf designated for scholastic uses (which include the two student dormitories and the monastery), 22,012 sf dedicated to athletics, and 62,533 sf of faculty residential buildings.

The campus is designated for "Institution" land uses in the General Plan and zoned R-E/1 acre (Residential Estate/1 acre). Schools are a conditional use in R-E/1 acre zoning district and, accordingly, the school is governed by Conditional Use Permit X7D-30 (CUP) first approved in 1968 and last amended on May 2, 2016 at which time a revised Overall Master Plan, which outlines phased development of the campus, was also approved.

## B. Explanation/ Justification for Requested CUP and Master Plan Amendments

- 1. **Modular Buildings**. The two existing modular buildings (totaling 1,776 sf) located at the south end of the Athletic Fields (and as shown on the enclosed revised Overall Master Plan) were originally purchased in 1996 and have been moved and used temporarily over the years during construction of various buildings on campus. They are currently vacant and have been for several years. Rather than develop and construct new space, the Priory wishes to conserve resources and make permanent use of these buildings for scholastic use. To convert these buildings to E (education)-occupancy, fire sprinklers will be installed. Additionally, native trees will be planted pursuant to the enclosed Landscape Plan to screen these buildings to the extent possible from Portola Road.
- 2. **Students, Teachers and Staff**. The Priory is requesting that current maximum enrollment of 350 students established 16 years ago in 2005 be revised to a maximum average daily attendance (ADA) of 394 students. To accommodate this approximately 12.5% increase, the Priory requests an increase in the maximum number of teachers from 50 to 55 and an increase in the maximum number of support staff from 40 to 45.

One of the purposes of the proposed revision is to align the language of the condition with how the Town has interpreted it in practice over the years and more appropriately restricts use of the property governed by the use permit. While the existing condition uses the term "enrollment", in practice this has been interpreted by Town staff as "average daily attendance" or "ADA" which is calculated by dividing the number of school days a student is present on campus in a school year by the total number of school days in that year.

Because average daily attendance captures the actual number of students traveling to and from and physically present on campus, it is a more accurate reflection of the use of the land governed by the Conditional Use Permit, and therefore a more valid condition of approval. As held in *Sounhein v. City of San Dimas* (1996) 47 Cal.App. 4<sup>th</sup> 1181, 81187, "[a] conditional use permit regulates land, not individuals." Moreover, a condition imposed on a conditional use permit must be reasonably related to the use (and deleterious impacts of the use) of the property for which the conditional use permit is requested. Cal. Gov. Code 65909; *San Remo Hotel v. City & County of San Francisco* (2002) 27 Cl. Ap. 4<sup>th</sup> 643, 670. Especially in this day and

age of remote learning which may continue for some time to a certain extent in the form of hybrid learning options and programs, placing a cap on average daily attendance on campus is more reasonably related to the use of the property governed by the Conditional Use Permit than a cap on total enrollment.

This proposed change from limiting enrollment to limiting ADA is also consistent with the concept of "baseline" under the California Environmental Quality Act (CEQA). CEQA requires that a project's potential environmental impacts be measured against the existing "environmental setting" which is made up of the "physical environmental conditions in the vicinity of the project". Because ADA captures the number of students physically present on campus, it more accurately reflects the physical environmental conditions or baseline against which to measure the potential environmental impacts of future proposed projects.

This requested increase allows for a reasonable increase in the maximum number of students on campus needed to accommodate operational cost increases. These cost increases, which include faculty and staff salary increases required to attract and retain those people necessary to maintain the high quality education offered by the school, have far outpaced the school's ability to offset them with corresponding increases in tuition. Despite that the school's revenue is primarily based on tuition from our students, -the maximum number of students has remained unchanged for 16 years and there is a very clear upper limit to the annual tuition increases that our school community is able to absorb

a. Parking. To address Planning staff's concerns about adequacy of parking on campus, we are proposing the ability to add 53 new parking spaces (43 new designated parking spaces and 10 new overflow spaces) in the locations shown on the enclosed Parking Plan (Sheet PA-1 dated 05/08/2020 prepared by CJW Architecture). This would bring our parking total to 359 spaces (from the 306 spaces currently existing). Of the proposed additional 53 spaces, 14 would serve new housing and 39 would be available for academic use. The Traffic and Parking Assessment dated June 9, 2021 prepared by Krupka concluded that the requested student increase would generate the demand for 15 additional parking spaces. Consistent with these findings, the Priory proposes to provide 15 new parking spaces to meet this demand while preserving the ability to provide up to an additional 38 parking spaces pursuant to the Parking Plan as it deems necessary in its discretion to meet increased parking demand on campus. Our continued collaboration with the Town to develop on-campus housing for many of our faculty and staff continues to help reduce the number of automobiles traveling to and from the campus each school day.

**Proposed Conditional Use Permit Revisions** 

To implement our proposal, reflect current conditions and eliminate requirements that have already been satisfied or are no longer relevant, we are requesting the following revisions to the March 2, 2016 Conditional Use Permit X7D-30 with deletions shown in red strikeout and additions shown in red underline:

## Woodside Priory School site, Permitted Uses and School Population

1. The use permit shall apply to the following parcels owned by the applicant identified as Benedictine Fathers of the Woodside Priory, Inc., with a total land area of 50. 56374 acres: Woodside Priory School-campus located at 302 Portola Road, in the Town of Portola Valley, County of San Mateo, State of California, as more particularly described and depicted on Exhibit A, attached hereto.

Prior to issuance of building, site development or other permits necessary for implementation of the new construction authorized by this permit, the above parcels shall be merged into one parcel pursuant to the lot line adjustment provisions of the Town.

2b: Maximum enrollment average daily attendance (ADA) on campus shall be 350 394 students. Of these a maximum of 50 60 students may reside on campus. ADA is calculated by dividing the number of school days a student is present on campus in a school year by the total number of school days in that year. A student with perfect attendance on campus every school day of the year would equal one (1) ADA.

2c: Maximum lay faculty shall be <del>50</del> <u>55</u> teachers.

2e: The support staff shall be approximately 40 <u>45</u> persons. It is understood that there may be minor variations in this number as the school's need for support staff varies.

2h: The maximum permitted building floor area shall be 204,144 205,505sf and the maximum permitted impervious surface shall be 315,693 sf.

- 2i: Expansion of on-site parking from 261 spaces to total of 325 359 improved which includes overflow parking in Zone B (Athletic Fields).
- 3. The campus master plan elements are generally shown on the Overall Master Plan dated February 3, 2016 May 4, 2020.

## Conditions of the Conditional Use Permit

- 4. Prior to issuance of building permits for any of the new building authorized by the master plan, the document entitled "Description of Architectural Vocabulary" Woodside Priory School" dated 6/16/1969 shall be revised to the satisfaction of the Architectural and Site Control Commission (ASCC) and, after revision shall set the guidelines for consistent architectural character for all new site improvements. The revised document shall include an "exterior materials palette."
- 5. Prior to issuance of building permits for any of the new buildings authorized by the master plan, an overall site landscaping master plan shall be prepared by a registered landscape architect to the satisfaction of the ASCC. The plan shall set forth the framework for the landscape treatments of both hardscape and planting areas and shall be consistent with the overall drainage master plan that is to be prepared pursuant to the requirements of Mitigation Measure HWQ-2. Legan new or replacement landscaping shall utilize native vegetation to the maximum extent feasible Prior to ASCC action on the proposed landscape master plan, it shall be referred to the conservation committee for review and comment. As components of each phase of the master plan are pursued through building and site development permits, pursuant to detailed landscaping plans shall be prepared and-implemented to the satisfaction of the ASCC-in accordance with the approved master plan.
- 6. There shall be no night lighting on athletic fields, and all site lighting shall be of an intensity that is compatible with surrounding residential uses and subject to ASCC approval. Further, prior to issuance of building permits for construction of new buildings, an overall exterior lighting master plan shall be developed to the satisfaction of the ASCC. This master plan shall include all existing lighting to remain and the framework for any new site or building lighting to be added as part of the master plan implementation process. Thereafter, d Detailed exterior lighting plans shall be submitted with each building permit or development proposal, consistent with the overall master plan and the ASCC approved exterior lighting master plan. All specific, detailed lighting plans shall be

reviewed by the ASCC for conformity to the approved master exterior lighting plan. In approving a new exterior lighting master plan, the ASCC may require modification or reduction of existing exterior lighting for conformity to Town lighting guidelines and regulations and/or to compensate for increased lighting that may be required to serve the new improvements. Any modification to existing exterior lighting required by the ASCC in approving the lighting master plan-shall be implemented according to a schedule acceptable to the ASCC.

- 18. The Priory shall provide 15 parking spaces (in addition to the 306 currently existing parking spaces) for a total of 321 parking spaces. The Priory may provide an additional 38 parking spaces (pursuant to the approved Parking Plan Sheet PA-1 dated 05/08/2020 prepared by CJW Architecture) in its discretion as it deems necessary to meet any additional parking demand. Handicap parking on the project site shall be provided pursuant to the standards set forth in the uniform building code to the satisfaction of the building official.
- 22. Car pooling and van pooling currently serve approximately 150 of the school's students. While the revised initial study determined that there are not significant traffic flow issues with the projected 350 student population, The Priory shall take measures to expand the school population served by car and van pooling. A target population served by van and car pooling that either lives on campus or arrives by alternative means other than a single occupancy vehicle should be 200 45% of the total number of students, teachers and staff attending campus. A plan shall be prepared by The Priory showing how this will be pursued and over what time period and this plan shall be presented to the planning commission within six months of the effective date of this permit. As part of the permit annual review required under condition number 9 of this permit, the Priory shall inform the Town of the progress being made in expansion of the students, staff and teachers that either live on campus or arrive to campus by served by van and carpooling alternative transportation.

We thank you for your work today on our application and look forward to working collaboratively with you and the Town through its approval process. Should you have any questions or wish to discuss further, please do not hesitate to contact me or any member of our team copied below.

Sincerely,

Patrick Ruff, Head of School

Cc: Cater J. Warr, CJW Architecture

Kevin Schwarckopf, CJW Architecture

Camas J. Steinmetz, Esq