

HARDING LARMORE KUTCHER & KOZAL, LLP
ATTORNEYS AT LAW

WRITER'S DIRECT DIAL

(310) 451-3669

1250 SIXTH STREET, SUITE 200
SANTA MONICA, CALIFORNIA 90401-1602
TELEPHONE (310) 393-1007
FACSIMILE (310) 392-3537

WRITER'S E-MAIL ADDRESS

kutcher@hlkklaw.com

October 16, 2020

VIA E-MAIL

Santa Monica Planning Commission
1685 Main Street, Room 212
Santa Monica, CA 90401

Re: Agenda Item 9-A (Carlthorp School Improvements)
Application Nos. 19ENT-0250 (CUP Amendment) and
20ENT-0066 (Minor Modification for .06% increase in parcel coverage)
Addresses: 424-438 San Vicente Boulevard
Owner/Applicant: Carlthorp School
Our File No. 22270.003

Dear Commissioners:

This letter is submitted on behalf of Carlthorp School, a non-profit charitable educational organization. Carlthorp is seeking City approval to build new support space (not additional classrooms) at its existing elementary school campus. The School is located at 424-438 San Vicente Boulevard, where the School has been for nearly 80 years.

No increase in enrollment is proposed. These are simply physical improvements to improve the young students' learning environment. Moreover, the physical changes will be virtually undetectable from the street.

If in-person learning has resumed, construction will occur over three summers so that the school year is not interrupted. We are asking for an extended term of five years to exercise the CUP amendment due to (1) the intention to perform construction during the summer vacation breaks and (2) the current economic uncertainty that may affect the School's charitable fund-raising.

We have reviewed the Staff Report and the Draft Statement of Official Action ("STOA"), and we urge you to follow Staff's recommendation to approve the proposed Conditional Use Permit amendment and Minor Modification.

As described in the end of this letter, we ask that the Commission amend the following conditions in the draft STOA: 16 (TDM), 41 (public view to children's

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playfield), and 53 (construction fencing), **and delete the following conditions:** 57 (parking lot improvements), 74 (telecommunications vaults), and 75 (street lighting).

EXECUTIVE SUMMARY

The campus improvements will improve the educational environment for the School's existing elementary students (grades K-6). Carlthorp proposes to add about 6,500 sf of floor area, most of which will be located underground beneath the existing outdoor playfield. The School's existing footprint (at grade) will expand by less than 1,150 sf and that footprint expansion is located within a portion of the School's internal courtyard.

Specifically:

- The vast majority of new the space will be located underground beneath the existing outdoor playfield, allowing for the addition of a less than 4000 sf new multipurpose room (plus circulation corridors).
- About 850 sf of space will be added by enclosing the School's existing lunch seating area within the interior of the campus.
- About 850 sf will be added by the construction of second-story administrative offices immediately above the lunch seating area.
- An outdoor rooftop play court area will be established above the rear wing of the existing school building.
- Two new elevators will also be added.

As mentioned above, the proposed CUP amendment will not expand enrollment, the size of the faculty, the number of staff, or the number of classrooms at the School. The land area of the campus also remains unchanged.

The 80-year-old School is located in a multi-family zone. Schools in a multi-family zone require a conditional use permit ("CUP")--although Carlthorp was established long before that requirement. In 1996, the Planning Commission granted Carlthorp a CUP for the expansion of its campus, an expansion of land area which was only possible due to the 1994 earthquake damage sustained by the then-neighboring apartment building. Thus, although Carlthorp School was a pre-existing use in this neighborhood, the School has a lengthy list of 62 CUP conditions that were imposed in 1996. (CUP 95-012.)

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The 1995/96 CUP had an initial term of 10 years for commencing all phases of construction related to the land area expansion. As to this 2020 application, we are seeking a term of five years for the time to obtain a sequence of building permits to perform the work that will be authorized by the amended CUP because it includes expansion of the basement beneath the playfield, enclosure of the lunch area, and establishment of an outdoor rooftop play deck.

A Minor Modification is required because the enclosure of the School's lunch seating area and installation of two elevators will cause the school's parcel coverage to slightly exceed (by 26 sf) the 45% maximum percentage permitted by right in the R2 Zoning District (which is really intended for residential buildings, not schools).

In order to avoid academic disruption, the associated construction is expected to take place over the course of two or three summer breaks, minimizing any construction during the school year. Delays in the entitlement process have already caused the School to miss the opportunity to fundraise and begin construction as early as the summer of 2020. But timing still matters. Given economic impacts of the current public health crisis, the School needs as much lead time as possible to see whether it will be possible to perform a successful capital campaign and commence the first phase of construction in summer 2021.

BACKGROUND

A. Carlthorp's History of Campus Improvements.

Carlthorp School (www.carlthorp.org) is the oldest independent school in Santa Monica. Carlthorp was founded in 1939 and moved to its longstanding location on San Vicente Boulevard in 1941. At that time, the campus consisted of a single house and served as both a day school and a boarding school.

During the 1950s, additional classroom buildings were added across the back of the campus. In 1976 the east building was added providing three additional classrooms. Carlthorp celebrated its 50-year anniversary with the opening of an administration and classroom complex in 1989. The campus was last expanded with a needed playfield through the acquisition of an adjacent red-tagged apartment building following the 1994 Northridge Earthquake.

Today Carlthorp serves grades K-6 with a total student enrollment of 280, and approximately 80 faculty, administrators and staff. The school has a strong commitment to diversity and inclusion, and awards over \$400,000 in financial aid and tuition remission each year in an effort to make the School affordable to as many families as

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possible. Historically, 97% of Carlthorp students have matriculated into the secondary school of their first choice.

Carlthorp has been a fixture within this neighborhood for almost 80 years and has strived to cultivate a respectful and reciprocal relationship with its residential neighbors as well as members and organizations in the community more broadly.



B. Carlthorp's Need for Educational Enhancements.

Carlthorp has not undergone a major renovation in almost 25 years. The School seeks approval for modest upgrades to various support facilities in order to continue providing a high quality exceptional educational program to its elementary students. While Carlthorp places a strong emphasis on academic excellence, art, music, dance, theater, child's play, sports, community service, and cultural celebrations are also important parts of school life at Carlthorp.

The School offers a wide range of educational programs that ensure students of all ages learn new things, acquire new skills, benefit from a greater understanding of themselves and others, have fun, play, and experiment. Annual celebrations of African American History, Latin American Culture, and the Lunar New Year, among others, are held with the goal of expanding student's understanding of our community and other communities throughout the world. Athletic programs give students the benefit of physical exercise, while reinforcing the importance of commitment, competition, time management and teamwork; and ample community service opportunities are offered to impart the importance of generosity and compassion for those in need. Students also receive instruction in music, drama and the fine arts. Over the years, as Carlthorp has developed an increasing number of these extracurricular activities, programs and educational events, the need for expanded non-classroom space has become more critical.

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The need for functional outdoor space has become more pressing than ever in light of the COVID-19 pandemic, and the need for adequate administrative space has also grown as school faculty and administration have taken on expanded roles and responsibilities. The School's existing multipurpose room, which was designed primarily for classroom instruction, has become inadequate to meet the School's needs, particularly with regard to assemblies and student presentations.

The relatively minor physical changes that are proposed in the pending application will help facilitate important aspects of pupil education and student development at Carlthorp, and ultimately aid the School faculty and administration in their mission of helping children mature into well-rounded teenagers and ultimately intelligent, caring, talented adults.



THE PROPOSED PROJECT

A. Proposed Campus Enhancements.

Carlthorp's campus enhancements consist of four major components:

1. The enclosure of 850 sf of existing outdoor lunch seating to allow for its utilization in all weather conditions; an equal-sized second-floor addition above the lunch seating would provide improved administrative space; two elevators, external to the existing building, are also needed to ensure campus-wide accessibility.
2. A new 4,000 sf subterranean multi-purpose room (plus associated basement corridor) which will be built under a portion of the existing play field adjacent to the School's existing multipurpose room and will not be

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visible from the street or neighboring properties at completion. This space will be used only for School-related performances and special events, such as recitals, plays, and schoolwide assemblies.

3. A rooftop outdoor recreational space (approximately 9,000 sf), which will be located adjacent to the alley at the rear of the campus away from San Vicente Boulevard, above a single-story (plus basement) wing of the campus. This unroofed recreational space would be encircled by soundproof perimeter walls (no taller than existing second story components of the campus) to contain noise and fitted with netting to contain sports equipment.
4. Improvements to an existing outdoor play area adjacent to and accessible from two Kindergarten classrooms along the east side of the campus.

The improvements will be constructed over multiple phases during the School's summer breaks (June-August). Due to this segmented construction schedule, as well as the need to fundraise during economically uncertain times, the School is seeking a five-year term for exercising its amended CUP.

These improvements would add approximately 6,500 sf of floor area, while expanding the School's existing above-grade footprint by less than 1,500 sf. This is because most of the new floor area would be located underground with no visual impact on the surrounding community. The improvements would increase parcel coverage on the ground floor of the School to 45.06%, exceeding the 45% that the Municipal Code allows by right by a fraction of a percent. This slight exceedance of the parcel coverage percentage triggers the need for a Minor Modification. (Zoning Ordinance Table 9.08.030; Zoning Ordinance Section 9.43.020).

As a private school, Carlthorp is a conditionally permitted use in the R-2 Zoning District in which it is located. (Zoning Ordinance Table 9.08.020; CUP 95-012.) And although located in the San Vicente Boulevard Courtyard Apartments Historic District, Carlthorp School is not a historic resource (i.e., the School is a "non-contributor"). (Ordinance No. 2507 (CCS).)

B. Minimal Impact on the Surrounding Community.

Carlthorp has a strong and longstanding relationship with the Santa Monica community and its immediate neighbors and has reached out to and hosted its neighbors as part of the entitlement application process. The immediate neighbors are informed of the plans and many have expressed support for and appreciation of the School.

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Once fundraising is successful, the project is expected to be constructed over the course of three summers. After the improvements are completed, the vast majority of the improvements will be invisible from the exterior of the School. The exterior appearance of the School will not be meaningfully altered and the aesthetic impact on the neighborhood will be negligible.

A professional noise study of the rooftop play court was commissioned. The acoustic engineers (Veneklasen) determined that due to the protective installation of the parapet wall extensions encircling the rooftop play space, exterior sound from the School will not will not exceed the noise limits for residential zones as specified by the Santa Monica Noise Ordinance at the two immediately adjacent condominium and apartment buildings nor in the backyard of the single family home across the rear alley (all which were treated as “sensitive receptors” for purposes of the sound study). A copy of that study is attached to the Staff Report. Per the Draft STOA’s conditions of approval, further acoustical testing of the elevated play court will take place once it is in use to confirm the sound study’s assumptions, and remedial measures would be taken to address any unanticipated elevated readings. Netting will also be installed to prevent balls or other play objects from escaping the rooftop play area.

The School has listened to the concerns expressed by some neighbors regarding traffic impacts during in-person learning and is addressing those concerns by working with the City’s Mobility and Planning Staff to develop a voluntary Transportation Demand Management Plan (TDM Plan). The resulting TDM Plan includes detailed pickup and drop-off procedures designed to minimize traffic impacts in the neighborhood. Among other things, the TDM Plan incentivizes student carpooling by granting priority pick-up privileges to those vehicles picking up three or more students. This privilege provides a great incentive for students to carpool and thereby avoid waiting in queue.

The new TDM plan also documents the School’s detailed procedures for pickup and drop-off under which dedicated school employees are stationed at various points in the pick-up queue to ensure parents are cooperating and are courteous towards neighbors. In addition, the School has agreed to implement the use of walkie talkies with headsets instead of amplified speaker announcements of student departures, thereby eliminating noise disruption when linking parent vehicles with their student passengers.

As to School employees, the TDM Plan includes numerous incentives for employees to commute to campus via alternate modes of transportation, which will help free up on-street parking spaces and further reduce neighborhood traffic. As part of the campus improvements, the School will provide significant bicycle infrastructure (bike

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racks, showers, lockers), prioritize local hiring and residency for employees, provide detailed transportation information and orientations, and participate in a voluntary parking cash out program whereby employees will receive financial incentives to commute without cars.

Collectively, these TDM measures are expected to significantly decrease vehicle ridership for both students and employees. The School will also prepare and submit a parking and loading plan (PLOP) for City Staff review and approval as part of the plan check process. The School will institute appropriate traffic and parking management procedures for special events and provide valet parking (for vehicles and bicycles) to streamline parking for its largest event(s) (i.e., Grandparents' Day).

SUGGESTED EDITS TO CONDITIONS OF APPROVAL

We have the following suggested edits to the recommended conditions of approval set forth in the draft Statement of Official Action ("STOA"):

Condition 16

The applicant is required to implement the Transportation Demand Management Plan as described in Attachment H of the Planning Commission staff report, **as may be amended from time to time with review and approval by the City's Mobility Division.**

This condition should be edited to reflect that changes to the TDM plan may be warranted from time to time.

Condition 41

For security purposes, the overheight front yard fence shall be constructed and landscaping installed and maintained so as not to obstruct as approved in 1996 may be reestablished following construction but is no longer required to provide a clear view through the front fence.

Per the 1996 Planning Commission STOA, an overheight fence and hedge are allowed along the San Vicente property line in front of the School's playfield. SMPD School Resource Officers, as well as insurance agents, have regularly advised the School of the added security benefits of obscuring view of the outdoor playfield from the public right-of-way. We believe that the area residents would also prefer dense

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landscaping along this frontage. Accordingly, we request that Condition 41 should be modified to remove the requirement of transparency under these special circumstances.

Condition 53

~~Immediately after demolition and~~ During construction, a security fence, the height of which shall be the maximum permitted by the Zoning Ordinance, shall be maintained around **any portions of the construction site exposed to public rights of way** ~~the perimeter of the lot~~. The lot shall be kept clear of all trash, weeds, etc.

This condition should be amended to reflect that (1) no traditional “demolition” will take place, although there will be interior demolition work as part of the new construction and (2) only those portions of the property under construction will need to be protected by construction fencing, not the entire perimeter of the campus.

Condition 57

Parking areas and structures and other facilities generating wastewater with potential oil and grease content **are required to pretreat the wastewater** before discharging to the City storm drain or sewer system. Pretreatment will require that a clarifier or oil/water separator be installed and maintained on site.

No changes to the existing tuck-under parking are proposed. This condition should be deleted.

Condition 74

No Excavation Permit shall be issued without a Telecommunications Investigation by the City of Santa Monica Information Systems Department. The telecommunications investigation shall provide a list of recommendations to be incorporated into the project design including, but not limited to measures associated with joint trench opportunities, location of tie-back and other underground installations, telecommunications conduit size and specifications, fiber optic cable specifications, telecommunications vault size and placement and specifications, interior riser conduit and fiber optic cable, and

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adjacent public right of way enhancements. Developer shall install two Telecommunications Vaults in either the street, alley and/or sidewalk locations dedicated solely for City of Santa Monica use. Developer shall provide two unique, telecommunication conduit routes and fiber optic cables from building Telecommunications Room to Telecommunications Vaults in street, alley and/or sidewalk. Developer will be responsible for paying for the connection of each Telecommunications Vault to the existing City of Santa Monica fiber optic network, or the extension of conduit and fiber optic cable for a maximum of 1km terminating in a new Telecommunications Vault for future interconnection with City network. The final telecommunications design plans for the project site shall be submitted to and approved by the City of Santa Monica Information Systems Department prior to approval of project.

- a. Project shall comply with any City of Santa Monica issued Telecommunications Guidelines
- b. Project shall comply with City of Santa Monica Right-of-Way Management Ordinance No. 2129CCS, Section 3 (part), adopted 7/13/04

This condition should be deleted in its entirety. This is not a new ground-up development. This application involves relatively minor additions to an existing school campus. The School should not be compelled to provide the City with free telecommunications equipment and/or infrastructure as part of this campus improvement project.

Condition 75

Prior to the issuance of a Certificate of Occupancy for the Project, provide new street-pedestrian lighting with a multiple circuit system along the new street right-of-way and within the development site in compliance with the PWD Standards and requirements. New street-pedestrian light poles, fixtures and appurtenances to meet City standards and requirements.

No new street right-of-way is being proposed. This condition should be deleted.

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CONCLUSION

Based upon the foregoing, Carlthorp respectfully asks the Planning Commission to approve its application for an amendment to its existing CUP and a minor modification for parcel coverage. We further request that Conditions 16, 41 and 53 be revised to address the concerns raised above and that Conditions 57, 74 and 75 be deleted.

Very truly yours,

A handwritten signature in black ink, appearing to read 'K. Kutcher', followed by a horizontal line extending to the right.

Kenneth L. Kutcher

cc: David Martin
Jing Yeo
Stephanie Reich
Regina Szilak
Heidi von Tongeln
Steve Springer
Ken Parr
Tarrah Beebe