



Planning & Transportation Commission

Staff Report (ID # 10436)

Report Type: Action Items **Meeting Date:** 9/11/2019

Summary Title: 788 - 796 San Antonio Road: Scoping Meeting & Policy Discussion

Title: The Planning and Transportation Commission Will Conduct a Public Scoping Meeting to Receive and Provide Comments on the Notice of Preparation of an Environmental Impact Report Evaluating a Project That Would Allow the Application of the City's Housing Incentive Program on CS Zoned Properties Along San Antonio Road Between Middlefield Road and Charleston Road. The Project Also Includes the Concurrent Consideration of an Architectural Review Application to Allow the Demolition of an Existing 12,000 Square Feet of Commercial Space and the Construction of a Four-Story Mixed-Use Building that Includes 102 Residential Units and 1,780 Square Feet of Commercial Space. Sixteen of the Residential Units Would be Below Market Rate. Environmental Assessment: An Environmental Impact Report is Being Prepared in Accordance with the California Environmental Quality Act (CEQA). Zoning District: CS (Service Commercial). The Comment Period on the Notice of Preparation Began September 4, 2019 and Ends October 7, 2019. Contact Planner Sheldon S. Ah Sing at sahsing@m-group.us for Additional Information.

From: Jonathan Lait

Recommendation

Staff recommends the Planning and Transportation Commission (PTC) take the following action(s):

1. Conduct a Scoping Meeting and provide comment on the project's Notice of Preparation for an Environmental Impact Report in accordance with the California Environmental Quality Act (Attachment F);
2. Provide policy guidance to staff regarding the requested text amendment to extend the City's housing incentive program to CS zoned properties along San Antonio Road between East Charleston and Middlefield Roads.

Report Summary

No formal action is required by the PTC at this meeting. The purpose of the meeting is to provide a forum for the public, public agencies and commissioners to comment on the notice of preparation for the anticipated environmental impact report that will be required for a specific discretionary application and an associated legislative amendment to the City's zoning code.

Additionally, staff requests public and commission comments on the requested text amendment to extend the housing incentive program to a portion of San Antonio Road. These comments will help inform staff's evaluation and analysis of the proposal. For background purposes only, information is provided about the associated discretionary project. At a future date, the PTC would conduct a public hearing and forward a recommendation to the City Council on the policy, or legislative comment of this application, but not the specific project. The Architectural Review Board will evaluate the specific project based on actual or anticipated regulations and forward a recommendation to the City Council.

Background

The applicant, Ted O'Hanlon, on behalf of Yurong Han, proposes to demolish the existing buildings on two parcels located at 788 – 796 San Antonio Road. One of the buildings constructed in 1953 appears eligible for listing on the California Register for Historic Resources. The applicant proposes to construct a 102-unit, four-story mixed-use building with a single underground parking level, and 1,779 square feet of commercial space.

The project as preliminarily designed requires an amendment to the City's zoning code in a manner that reflects the development standards for the recently adopted housing incentive program (HIP). The HIP currently creates a process to increase the floor area ratio and a waiver of the lot coverage requirements (currently maximum lot coverage is 50% of the lot area) among other incentives to encourage additional housing.

On May 20, 2019, the applicant presented a less dense and smaller version of the project with 64 dwelling units to the City Council as a prescreening request for zoning amendments. Discussion at the meeting centered on the appropriateness of having housing along the San Antonio Road corridor and at more intense levels closer to 2.0:1 Floor Area Ratio (FAR). At that meeting, the City Council expressed interest in exploring the possibility of applying the HIP along the San Antonio Road corridor between Middlefield Road and East Charleston Avenue. The applicant has filed an Architectural Review application, which is being processed concurrently with the Zoning Amendment request.

On August 15, 2019, the project was heard by the Architectural Review Board (ARB) to specifically provide initial feedback on the project's architecture, massing and site design.

The project requires the completion of an Environmental Impact Report (EIR), which is in its initial stages. The purpose of this report is to introduce and seek comments on the zoning amendment concepts and seek early input on the EIR scope. The project plans are included for reference, however, it is not expected that the PTC would comment on the design of the project. The project plans do, however, provide a real representation of how the zoning amendments could be implemented.

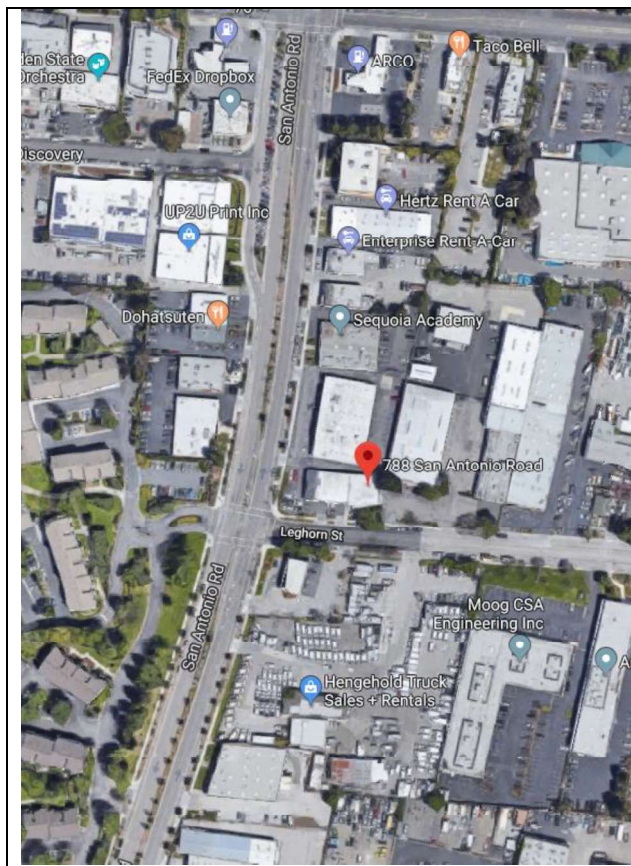
Project Information

Owner:	Yurong Han (788 SAPA Land LLC)
Architect:	Studio S Squared
Representative:	Ted O'Hanlon
Legal Counsel:	Jorgenson, Siegel, McClure & Flegel, LLP

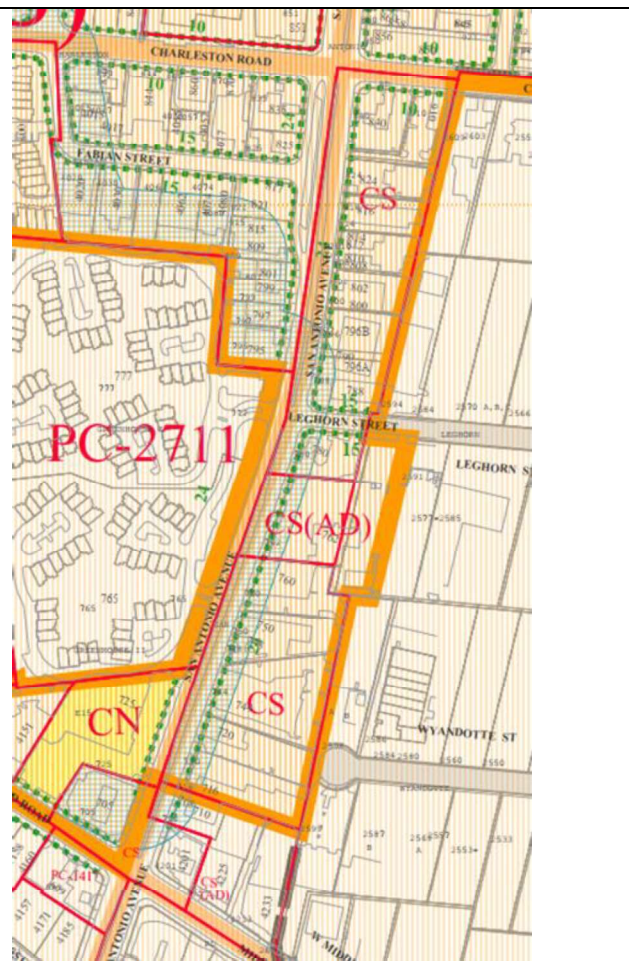
Property Information

Address:	788 – 796 San Antonio Road
Neighborhood:	Across from The Greenhouse Neighborhood
Lot Dimensions & Area:	178' x 254' (43,414 square feet)
Housing Inventory Site:	Yes, 0.57 acres of the site has a maximum yield of 17 units and realistic yield of 11 units
Located w/in a Plume:	No
Protected/Heritage Trees:	Yes, 13 protected trees
Historic Resource(s):	788 San Antonio Road (deemed eligible for individual listing in the California Register)
Existing Improvement(s):	788 San Antonio Road: 6,200 sf; one-story; 22 feet in height; 1953 796 San Antonio Road: 11,633 sf; one-story; 25 feet in height; 1967
Existing Land Use(s):	Martial arts studio; contractors office
Adjacent Land Uses & Zoning:	North: Service Commercial CS (commercial uses) West: General Manufacturing GM / PC 2711 (commercial & multi-family residential) East: City of Mountain View – General Industrial MM (automotive repair) South: Service Commercial CS (commercial uses, oil change facility)
Special Setbacks:	San Antonio Road: 25 feet Leghorn Street: 15 feet

Aerial View of Property:	Zoning Map View of Study Area:
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Source: Google maps, 2019



Land Use Designation & Applicable Plans/Guidelines

Zoning Designation:	Service Commercial (CS)
Comp. Plan Designation:	Service Commercial (CS)
Context-Based Design:	Yes
Downtown Urban Design:	Not applicable
SOFA II CAP:	Not applicable
Baylands Master Plan:	Not applicable
ECR Guidelines ('76 / '02):	Not applicable
Proximity to Residential Uses or Districts (150'):	Yes, across San Antonio Road
Located w/in AIA (Airport Influence Area):	Not applicable

Prior City Reviews & Action

City Council:	October 15, 2018: http://bit.ly/788A1stPrescreening May 20, 2019: http://bit.ly/788SA2ndPrescreening
PTC:	None.

HRB: None.

ARB: August 15, 2019: <https://bit.ly/2OWv9qW>

At the August 15, 2019 ARB meeting, (<https://www.youtube.com/watch?v=6IH8x4kO9L8&start=92&width=420&height=315> – video of meeting) the ARB provided limited comment regarding the zoning amendment to the extent that that there is a lack of transit along the corridor to support higher densities; and that there may be issues for the retail component because there is not enough parking for “drive-by” demand as exhibited by adjacent commercial uses.

The ARB also provided other comments on the design of the site and the building. Further revisions are expected by the applicant to be brought back to the ARB.

Project Description

The applicant proposes a residential mixed-use development proposal on a site that includes two lots. To implement the project, a zoning amendment is necessary. The project proposes to redevelop an approximately one-acre property located at the intersection of San Antonio Road and Leghorn Street with 102 for-sale residential units (32 studios, 63 one-bedroom units and seven two-bedroom units). Of those units, 16 (15%) are proposed to be restricted to Below Market Rate (BMR) households. The four-story mixed-use building would be 49'-10" in height. A single level basement would include 93 vehicle spaces (51 surface and 48 puzzle lift spaces), trash room, and elevator/stairwells. The required bicycle parking is provided at grade within the lobby and outside of the commercial space.

The existing buildings are 6,200 square feet and 11,600 square feet respectively. Of that, 5,897 square feet is occupied by an exercise/training use, which is considered “retail/retail-like”. These buildings will be demolished to accommodate the project. The 788 San Antonio Road building is eligible for listing on the California Register of Historic Resources.

Development Component

The following is provided for context to help the PTC with their discussion of the zoning amendment issues as it relates to an actual project.

The proposed residential FAR is 1.93:1 (84,175.3 square feet) and the non-residential FAR would be 0.04:1 (1,779.5 square feet). The total FAR for the project is 1.97:1 (85,954.8 square feet). The 1,779 square feet of retail would be located on the ground floor at the street intersection corner. This space has a floor to ceiling height of 10'-6". Access to the space is from the San Antonio Road or Leghorn Street elevations.

The vehicular entry to the basement parking is located off of Leghorn Street. The San Antonio Road and Leghorn Street intersection is signalized. Access to US 101 is provided for by heading east on Leghorn Street into the City of Mountain View or heading north on San Antonio Road. The basement has a floor to ceiling height of 12'-3" to accommodate the parking lift systems. In

addition to parking areas, the basement includes 1,000 square feet for storage and trash rooms.

The building is designed to have an open courtyard area in the center of the building over the podium deck, a large lobby area on the first floor fronting San Antonio Road, and a covered common deck on the fourth floor facing San Antonio Road. The lobby area will include the majority of the bicycle parking for the project. The remaining bicycle parking is located on the plaza area outside of the retail space. Each unit has access to its own balcony either looking away from the building or into the interior courtyard.

Sixteen trees were surveyed for the project. Nine of the trees are street trees, three are adjacent, off-site trees; and four trees are on site. All but three are considered protected. Four trees (three that are protected) are proposed to be removed (Sheets T-2 and AR-1). Proposed landscaping includes street trees, interior trees, shrubs, ground cover, and vines. Accompanying the vegetation is hardscape in the form of walkways or paved areas. The plaza areas include colored concrete.

Zoning Amendment

To implement the project, a rezoning request is necessary and proposed. The project seeks to amend the zoning code to allow for the application of the HIP to be applied to the site. This would entail extending these housing incentives to the subject property and more broadly to CS zoned property adjacent to San Antonio Road between Middlefield Road and East Charleston Avenue. The zoning amendment request would specifically include the following:

- Establishing a HIP that includes a waiver to allow up to a 2.0 FAR for housing projects and changes to lot coverage restrictions;
- Eliminating maximum housing density requirements;
- Allowing rooftop gardens to count towards required open space;
- Excluding the first 1,500 square feet of retail or retail-like floor area from parking requirements;
- Amending the citywide definition of gross floor area to exempt certain area in subterranean garages from counting toward the floor area ratio;
- Amending the citywide retail preservation requirements to:
 - Modify the standard for a waiver from the retail preservation ordinance to allow exceptions for housing projects; or
 - Establishing a minimum retail floor area requirement for housing projects required to replace retail or retail-like uses, but not require full replacement; or
 - Waiving all or a portion of the required replacement retail floor area from the maximum floor area ratio for housing projects.

Requested Entitlements, Findings and Purview:

The following discretionary applications are being requested and subject to PTC purview:

- **Amendment to Zoning Code:** This is a request to apply the Housing Incentive Program to the area along San Antonio Road between Middlefield Road and Charleston Road. The process for evaluating this type of application is set forth in PAMC 18.80. Rezone applications are reviewed by the Planning & Transportation (PTC) and recommendations are forwarded to the City Council.

Additionally, the project also requires approval for the following, which is not subject to PTC review:

- **Architectural Review – Major (AR):** The process for evaluating this type of application is set forth in PAMC 18.77.070. AR applications are reviewed by the ARB and recommendations are forwarded to the Planning & Community Environment Director for action within five business days of the Board’s recommendation. Action by the Director is appealable to the City Council if filed within 14 days of the decision. However, since this project includes other actions that require approval by the City Council, the Board will make their recommendation to the City Council. AR projects are evaluated against specific findings. All findings must be made in the affirmative to approve the project. Failure to make any one finding requires project redesign or denial.
- **Parking Reduction – PAMC 18.52.050 (Transportation and Parking Alternatives):** Where effective alternatives to automobile access are provided, parking requirements may be reduced to an extent commensurate with the permanence, effectiveness, and the demonstrated reduction of off-street parking demand effectuated by such alternative programs. Examples of such programs may include, but are not limited to, transportation demand management (TDM) programs or innovative parking pricing or design solutions. The Director may allow a reduction up to 20%. The project requests a nine percent reduction.
- **Partial Waiver of Retail Space:** The process is set forth in PAMC 18.40.180(c). The Director may act or refer the decision to the City Council. This waiver request may also be addressed through legislative changes in the HIP.

Analysis¹

The study area includes the San Antonio Road corridor between Middlefield Road and East Charleston Road. San Antonio Road is 80 feet in width from curb to curb and includes four lanes and a landscaped median with left turn pockets. The corridor includes detached sidewalks that are five-feet in width.

¹ The information provided in this section is based on analysis prepared by the report author prior to the public hearing. Planning and Transportation Commission in its review of the administrative record and based on public testimony may reach a different conclusion from that presented in this report and may choose to take an alternative action from the recommended action.

A new 300 room hotel project is currently under construction at 744 San Antonio Road. This was approved with a 2.0:1 FAR and represents a similar scale project as the proposed project. There is a 25-foot special setback along San Antonio Road and a 15-foot special setback along Leghorn Street.

To the west of the project and across San Antonio Road, there are three-story multi-family buildings that make up the 15-acre The Greenhouse neighborhood. The buildings are over 150 feet from the project site. The project site is adjacent and within the vicinity of several one-story commercial buildings. These low-rise commercial developments currently dominate the San Antonio Road corridor, however, the area is slowly being developed with buildings that rise to the maximum 50 foot height limit. Another notable development with similar mass and height lies at the intersection of San Antonio Road and East Charleston Road (Taube Koret Campus).

To the south of the study area is the City of Mountain View with low intensity industrial and commercial uses.

Zoning Compliance²

A preliminary review of the proposed project's consistency with applicable zoning standards has been performed. A summary table is provided in Attachment D. This provides the context of the proposed project compared with the existing zoning and the proposed development.

Proposed Amendments

The Zoning Code was amended earlier this year to provide incentives to produce additional housing units that are an alternative to using the Density Bonus code. These incentives were packages as the Housing Incentive Program (HIP). In accordance with the City's Comprehensive Plan, the HIP targets properties along El Camino Real and the Downtown area. Specifically as it relates to the subject site and study area, the CS district properties along El Camino Real are eligible to use the HIP. The HIP includes several provisions that incentivize producing more housing. Other amendments proposed would further incentive housing, but would also assist in clarifying development standards that have been vague and problematic to implement.

HIP

- Allow up to 2.0:1 FAR for the corridor, which is 0.5:1 FAR higher than what is allowed along El Camino Real, but equal to the California Avenue and less than the 3.0 allowed downtown. This is proposed because of the higher height limits and the surrounding uses in the area. While there are residential properties across San Antonio Road, the immediate area does not have other sensitive land uses and generally backs up to light industrial and commercial uses in Mountain View.
- Eliminate the 30 units per acre density limit and rely instead on existing height, setbacks and other development standards and application of the City's architectural review findings.

² The Palo Alto Zoning Code is available online: http://www.amlegal.com/codes/client/palo-alto_ca

- Allow rooftop garden area to count up to 60% of the required open space. This would allow for some flexibility in design for projects.
- Exclude the first 1,500 square feet of ground-floor retail from the retail parking requirement for residential mixed-use projects.
- Extend provisions that support 100% affordable housing projects.

Gross Floor Area Definition

The City uses the term gross floor area to help regulate the size of buildings on property. The definition states what is included and excluded from this determination. Basements are generally exempt from gross floor area unless this space is deemed useable by the planning director. The term useable is overly broad and can lead to confusion among planners, applicants, and the public. Staff supports opportunities to add more objective standards to the code and would consider making some refinements to this code section. This may include a change to the definition that would exempt ancillary and incidental space such as storage and other space that does not generate parking or increase the intensity of the primary use. The commission may wish to offer some initial comments on this approach.

Retail Preservation

The purpose of retail preservation is to maintain the amount of retail or retail like ground-floor space in the City. Providing retail on sites is sometimes challenging and often odds for a developer of a housing project. During the May 20, 2019 pre-screening meeting, the Council debated the issue and provided comments suggesting a complete waiver may not be appropriate, but some exemption or reduction of retail may be required to promote housing development.

The project site includes 5,897 square feet of retail or retail-like space. The applicant for the subject property plans to retain approximately 1,779 square feet of retail floor area. The applicant also indicated their interest in requesting a waiver from the retail preservation ordinance to exempt (approximately) 4,118 square feet of retail or retail-like space.

For sites with substantially more retail or retail-like space, redevelopment for housing becomes less attractive for two primary reasons. First it reduces the amount of floor area that can be dedicated toward housing units, and second, retail area is parked at four spaces per thousand square feet, which adds to the project's overall construction costs.

PAMC 18.40.180, Retail Preservation requires that any ground floor retail or retail-like space permitted or operating as of March 2, 2015 be replaced with another retail or retail-like use. The section contains two grounds for a request of a waiver or adjustments to the retail preservation requirements. This includes "economic hardship" and "alternative viable active use". There is one complete exemption from the preservation requirement if the project is a 100% affordable housing project. Documentation is required to prove that these grounds have merit to warrant a waiver or adjustment. The bar to grant a waiver from the retail preservation ordinance is presently fairly high.

There are a variety of options that could be considered if there were interest in updating this policy, including, establishing a minimum retail floor area requirement; exempting some or all of the retail floor area from the floor area ratio calculation, though some other development standard concessions may be required depending on the amount of existing retail floor area; or, expanding the options to request a waiver from all or a portion of the retail preservation requirements for housing projects.

Consistency with the Comprehensive Plan, Area Plans and Guidelines³

The Comprehensive Plan includes Goals, Policies, and Programs that guide the physical form of the City. The Comprehensive Plan provides the basis for the City's development regulations and is used by City staff to regulate building and development and make recommendations on projects.

The Comprehensive Plan designation for the site is CS (Service Commercial), which is characterized in the Land Use Element as:

“Facilities providing citywide and regional services and relying on customers arriving by car. These uses do not necessarily benefit from being in high volume pedestrian areas such as shopping centers or Downtown. Typical uses include auto services and dealerships, motels, lumberyards, appliance stores and restaurants, including fast service types. In almost all cases, these uses require good automobile and service access so that customers can safely load and unload without impeding traffic. In some locations, residential and mixed-use projects may be appropriate in this land use category. Examples of Service Commercial areas include San Antonio Road, El Camino Real and Embarcadero Road northeast of the Bayshore Freeway. Non-residential FARs will range up to 0.4. Consistent with the Comprehensive Plan’s encouragement of housing near transit centers, higher density multifamily housing may be allowed in specific locations.”

The CS land use designation is categorized as primarily commercial in nature but permits residential in appropriate locations. The subject application proposes a mixed-use project with a small proportion of retail to residential. The residential designation exists on the west side of San Antonio Avenue, but would appear anomalous on the east side, which has a CS designation from Middlefield Road to Charleston Road.

The current Housing Element identifies the project site to be included in the San Antonio Road Housing Inventory Sites. However, the Land Use Element of the Comprehensive Plan (2017) indicates that the San Antonio Road Housing Inventory Sites should be removed in favor of concentrating residential density in the Downtown and California Avenue areas.

³ The Palo Alto Comprehensive Plan is available online:
<http://www.cityofpaloalto.org/gov/topics/projects/landuse/compplan.asp>

With this policy in mind, the PTC would need to determine whether the project, on balance, is in conformance with the Comprehensive Plan, including the Housing and Land Use Elements. Presently, the Housing Element identifies the realistic unit yield for the combined properties as 17 units based on existing CS zoning and its requirement for housing in conjunction with a mixed-use project. As part of this project, an amendment to the City's comprehensive plan may be required if higher density housing is determined to be appropriate.

Multi-Modal Access & Parking

This project increases density, which requires consideration of bicycle and transit mobility options. The nearest Santa Clara Valley Transportation Authority (VTA) bus stops are at Charleston and San Antonio Road, and Middlefield Road and San Antonio Road. There is no bus service on San Antonio Road between Middlefield Road and Charleston Road.

The site is within a five to 20 minute bike ride of many major employers in the area and a nine minute ride to Caltrain. San Antonio Road includes a Class III facility (no bike lanes and shared with through traffic). Class II bicycle facilities are found on Middlefield and Charleston. See Sheet A0.5 for a circulation exhibit in the project plan set.

The PTC may be interested in providing comment on the level of mobility within the study area as it relates to the proposed residential intensity with the HIP added. The concept of applying the HIP to this area was abandoned last year to focus on more transit rich areas.

Consistency with Application Findings

In order to approve the zoning amendment, the City Council would need to consider the following finding:

If, from the facts presented at the public hearing, including public testimony and reports and recommendations from the director of planning and community environment or other appropriate city staff, the commission finds that a change of district boundaries would be in accord with the purposes of this title and in accord with the Palo Alto Comprehensive Plan, the commission may recommend such change as it deems appropriate to the council.

Environmental Review

The subject project has been assessed in accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the City. Specifically, the project requires the certification of an Environmental Impact Report (EIR) because the existing building at 788 San Antonio is eligible for listing on the California Register and the project proposes to demolish the structure, which is considered a significant and unavoidable impact under CEQA.

Pursuant to CEQA, a Notice of Preparation (NOP) was posted for public comment on September 4, 2019. The purpose of the NOP is to state that an EIR is being prepared for the project and to allow the public and other affected agencies to provide comment on topics that they think should be covered by the EIR. Preliminary topics include Air Quality, Historical Resources, Energy, Greenhouse Gas Emissions, Noise and Transportation. Other topics would be covered in an initial study checklist. This consultation period is for at least 30-days after the issuance of the NOP. The due date for any comments on the NOP is October 7, 2019.

Public Notification, Outreach & Comments

The Palo Alto Municipal Code requires notice of this public hearing be published in a local paper and mailed to owners and occupants of property within 600 feet of the subject property at least ten days in advance. Notice of a public hearing for this project was published in the *Daily Post* on August 30, 2019, which is 12 days in advance of the meeting. Postcard mailing occurred on August 29, 2019, which is 13 in advance of the meeting.

Public Comments

As of the writing of this report, no project-related, public comments were received.

Report Author & Contact Information

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sahsing@m-group.us

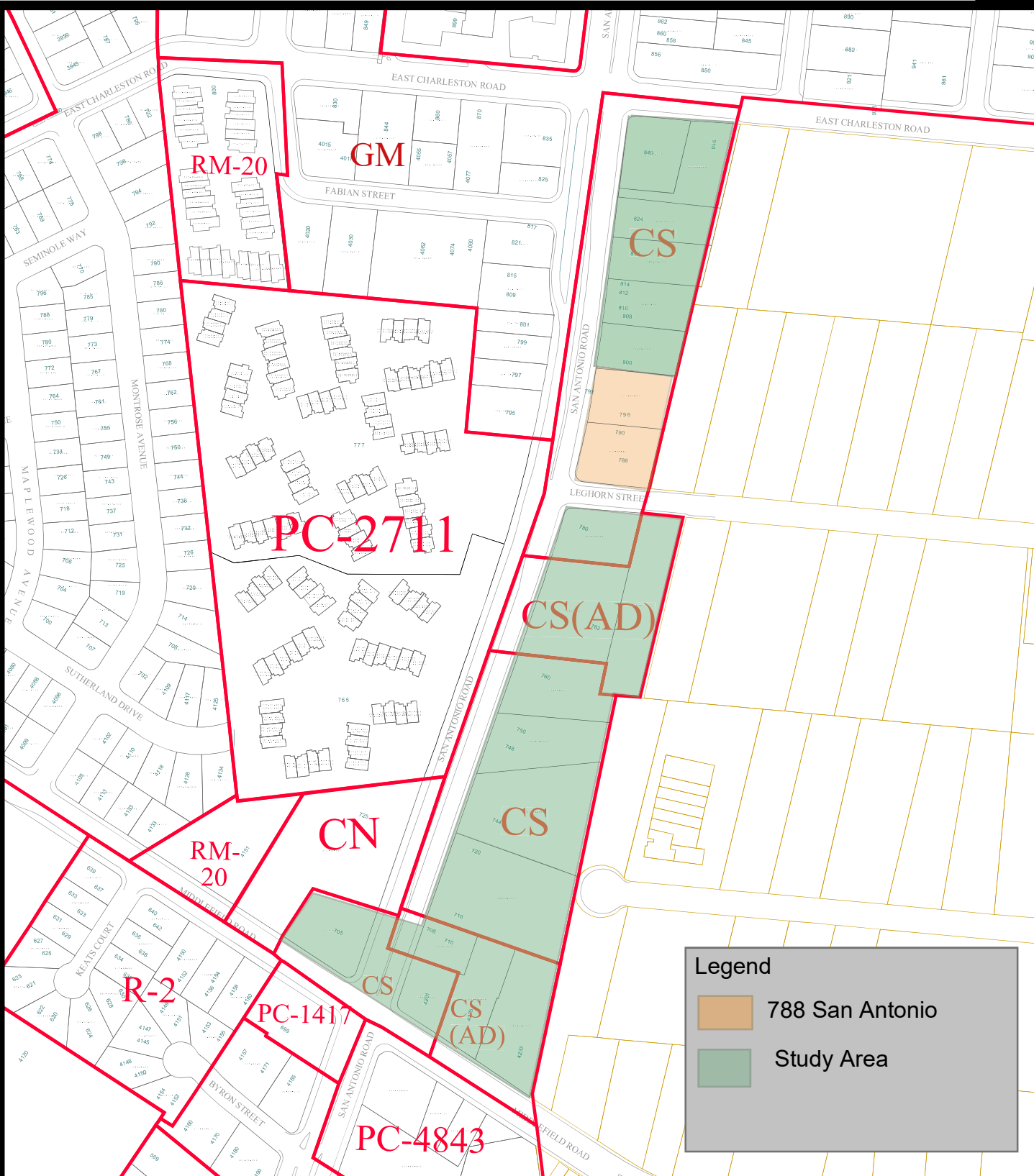
PTC⁴ Liaison & Contact Information

Jonathan Lait, AICP, Assistant Director
 (650) 329-2679
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Attachments:

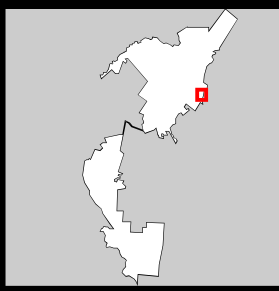
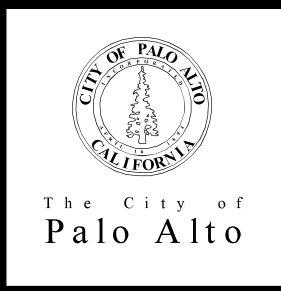
- Attachment A: Location map (PDF)
- Attachment B: Zoning Comparison Table (DOCX)
- Attachment C: Applicant's Project Description (PDF)
- Attachment D: Applicant's Retail Waiver Request (PDF)
- Attachment E: Project Plans & Environmental Review (DOCX)
- Attachment F: Notice of Preparation (PDF)

⁴ Emails may be sent directly to the PTC using the following address: planning.commission@cityofpaloalto.org




Legend


- 788 San Antonio
- Study Area



788-796 San Antonio & San Antonio Study Area

This map is a product of the City of Palo Alto GIS





ATTACHMENT B
ZONING COMPARISON TABLE
 788 San Antonio Road

Table 1: CS ZONING DISTRICT COMPARISON TABLE			
Zoning District	CS (Existing Zoning)	<u>Proposed</u> Housing Incentive Program (HIP)	Proposed Project With HIP
Regulation	Required	Required	Proposed
Minimum Site Area (ft²)	None Required	Not Applicable	43,390 sf
Site Width (ft)	None Required	Not Applicable	234-255 feet (varies)
Site Depth (ft)	None Required	Not Applicable	147-187 feet (varies)
Min. Front Yard (Leghorn Street)	0 – 10 feet to create an 8 – 12 feet effective sidewalk width ⁽¹⁾	Not Applicable	25 feet – 3 inches
Min. Rear Yard	10 feet for residential portion; no requirement for commercial portion	Not Applicable	10 feet – 3 inches
Min. Interior Side Yard	10 feet (for lots abutting a residential zone district)	Not Applicable	10 feet – 3 inches
Min. Street Side Yard (San Antonio Road)	5 feet	Not Applicable	25 feet – 2 inches
Special Setback	Yes, 24 feet along San Antonio Road and 15 feet along Leghorn Street	Not Applicable	25 feet along San Antonio Road and 15 feet along Leghorn Street
Build-to-Lines	50 percent of frontage built to setback; 33 percent of side street built to setback ⁽¹⁾	Not Applicable	Not Applicable
Maximum Site Coverage	50 percent	100 percent lot coverage	56 percent (24,266.1 sf)
Maximum Height	50 feet	Not Applicable	49 feet – 10 inches

Table 1: CS ZONING DISTRICT COMPARISON TABLE

Zoning District	CS (Existing Zoning)	<u>Proposed</u> Housing Incentive Program (HIP)	Proposed Project With HIP
Regulation	Required	Required	Proposed
Maximum Residential Floor Area Ratio (FAR)	0.6:1	May be increased to 2.0, subject to compliance with Retail Preservation.	1.93:1 (84,175.3 sf)
Maximum Non-Residential Floor Area Ratio (FAR)	0.4:1	Not Applicable	0.04:1 (1,779.5 sf)
Maximum Combined Residential and Commercial Floor Area Ratio (FAR)	1.0:1	2.0:1	1.97:1 (85,954.8 sf)
Minimum Mixed-Use Ground Floor Commercial FAR	0.15:1	Not Applicable	0.04:1 (1,779.5 sf)
Daylight Plane for lot lines abutting one or more residential zone districts	Daylight plane height and slope shall be identical to those of the most restrictive residential zoning district abutting the lot line	Not Applicable	Not Applicable
Maximum Residential Density per Acre Sites on El Camino Real	30 units/per acre No Maximum	Not Applicable	102.34 units per acre
Minimum Site Open Space (percent)	30 percent	Not Applicable	15,249.5 sf (35.1%)
Minimum Usable Open Space (sf per unit)	150 sf per unit (9,600 sf)	Not Applicable	155 sf per unit (15,823.86 sf)
Retail Preservation	Require retention of retail and retail-like floor area	Allow existing retail and retail-like floor area to be reduced	Existing 5,730 sf Proposed 1,779 sf

Table 2: PARKING COMPARISON TABLE

Type	Required		Proposed	Conforms?
Multiple-Family Off-Street Parking Requirement PAMC 18.15.050	1 space per studio and one-bedroom; 2 spaces per two-bedroom unit	Studio: 32 1-bedroom: 63 2-bedroom: 7 109 spaces	92 spaces, including 48 spaces in mechanical lifts*	Requires approval of a Transportation Demand Management Plan
Commercial	1 space per 350 square feet First 1,500 sf exempted from parking	1,779 -1,500 = 279 sf 1 space	1 space	Yes
Bicycle Parking PAMC 18.52.040 Table 1	1 space per unit/ 100% Long Term (LT) 1 space per 10 units (ST) 1 space per 3,500 square feet (20% LT/80%ST)	102 LT spaces 10.2 ST spaces 1 ST space 102 LT spaces & 11 ST spaces	104 LT spaces 11 ST Spaces	Yes

*Seeking a 15 percent reduction through Transportation Demand Management (TDM) program pursuant to PAMC 18.52.050 Table 4. (Transportation and Parking Alternatives).



Explore Real Estate
2625 Middlefield Rd, #101
Palo Alto, CA 94306
650.813.1077

July 9, 2019

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Subject: 788-796 San Antonio Road
Application for a Zoning Text Amendment
Architectural Review Board Hearing

Mr. Lait:

On May 20, 2019, the City Council held a pre-screening meeting to consider a Zoning Text Amendment to extend the recently adopted Housing Incentive Program (HIP) to the property located at 788-796 San Antonio Road (Property). The City Council was generally supportive of applying the HIP to the CS zoned property adjacent to San Antonio Road between Middlefield Road and East Charleston Avenue, which includes the Property. The Council was also generally supportive of this housing project.

The applicant requested that the HIP allow up to a 1.5 floor area ratio (FAR) or higher for housing projects, like the proposed project. Heights up to 50 feet are allowed in the CS zone and hotels are incentivized with a 2.0 FAR. Near the Property, a dual branded Marriott is being constructed. Due to the higher height limits and surrounding land uses, City staff recommended as follows:

1. Waive FAR up to 1.5 or 2.0 and lot coverage though the Housing Incentive Program, which would be an alternative to State Density Bonus Law;
2. Eliminate the 30 units per acre density limit and rely instead on existing height, setbacks and other development standards;
3. Allow rooftop garden area to count to 60% of the required open space;
and

4. Exclude the first 1,500 square feet of retail from the retail parking requirement.

As a result of City Council's support for these recommendations, the project proposal was updated to maximize housing potential on the Property utilizing these development parameters.

Project Summary

The project proposes to redevelop the approximately 1.0-acre Property with 102 for-sale studio (32 total), 1-bedroom (63 total) and 2- bedroom (7 total) residential units. Of these, 16 units, or 15.3% are proposed to be dedicated for Below Market Rate (BMR) households. The 4-story structure would measure less than 50' above grade. A single level below grade space would provide a total of 99 vehicle parking spaces (51 surface and 48 puzzle stackers). Bicycle parking is provided 100% at grade and consists of 104 for residents accessed via the main lobby and 11 short term spaces for guests.

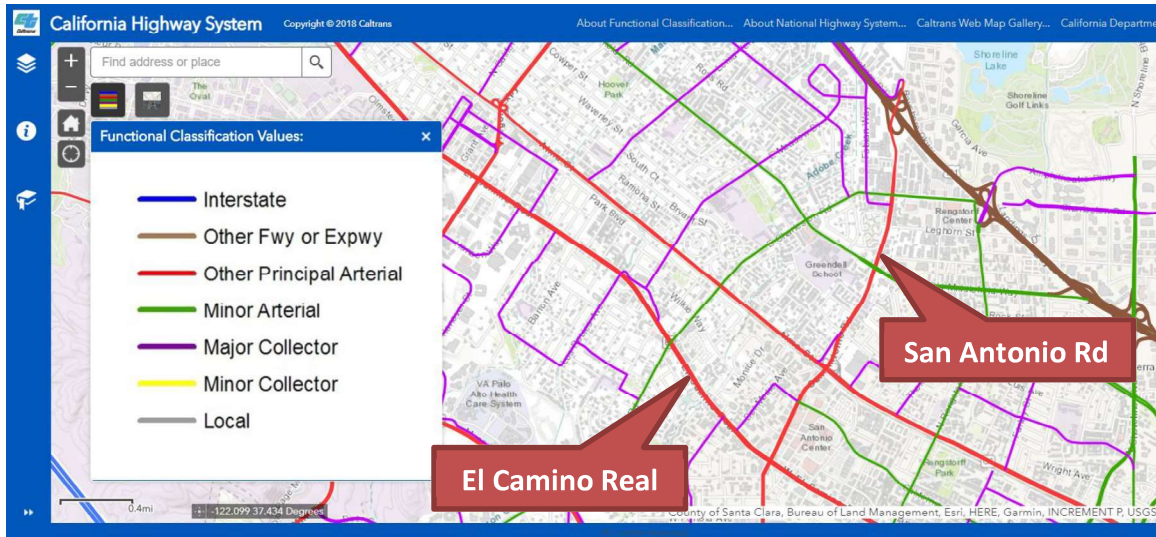
This residential project would replace two existing buildings with a mix of uses. One building, which is approximately 6,200 square feet, is currently leased by a general contractor to store equipment and materials. The other building, which is approximately 11,500 square feet is shared by a moving company for administrative offices and storage and an exercise/training facility. The exercise/training facility which occupies approx. 5,895 square feet is the only retail/retail-like use currently on the property. Based on a previous City Council suggestion, the project would provide a 1,779 square foot ground floor retail space in addition to the much-needed housing units.

HIP Discussion

In January 2019, City Council passed and effective May 1, 2019, various zoning changes to promote the creation of greatly wanted and needed residential units in Downtown Palo Alto and on the El Camino Real (ECR) corridor. These changes, including the HIP, are the most significant response to date to the November 2017 *Colleagues' Memo Regarding Zoning Updates to Encourage Diverse Housing Near Jobs, Transit and Services*. Specifically, the HIP encourages housing and provides an alternative to SDBL that retains more local control to the City in approving housing developments. The HIP has been called an important step to address the jobs-housing imbalance at a time where the City needs to aggressively adopt pro-housing policies. To avoid falling short of the City's adopted goal of generating 300 housing units this year (and it is currently anticipated that the City will fall short), the City is considering (and has shown preliminary support for) a zoning text amendment to apply the HIP more broadly. Doing so will allow projects like this one to maximize the production of residential units on the Property to help the City meet its housing unit goals.

The Property is located on San Antonio Road which is similar to El Camino Real in that each are classified as "Principal Arterials" by Caltrans and each connecting

Palo Alto with Mountain View (see embedded image). This Property and others on San Antonio are near transit and employment centers and provide an opportunity to create more housing for the City under locally created rules.



In fact, the Housing Element identifies the Property as an opportunity site for mixed-use development with 30 dwelling units per acre. This proposal for a zoning text amendment to apply the HIP to this Property creates a greater opportunity for housing in the City. To avoid falling short of its housing goals, the City can do more to “go big” as recommended in the Draft Housing Work Plan by approving a zoning text amendment to apply the HIP to the Property.

If the HIP as recommended by City staff is applied to the Property, we are proposing the new site plan that includes 102 residential units (including 16 BMR total) and a 1,779.5 square foot ground floor retail space. By unit count this is 72 more units than the existing zoning might allow. This creates both more market rate and below market rate units to achieve the City’s housing production goals, while the fully complying with the City’s locally created HIP ordinance.

Project Details

The building presents itself as a four-story form to both public streets with a 29,467 square foot below grade garage level. Following the HIP parking requirements, the project would require 109 total parking spaces. The proposed project provides 99 total parking spaces, using a 9% reduction of parking spaces of a maximum 20% parking reduction through utilizing a TDM program outlined by Nelson Nygaard. Only 44 parking spaces are proposed to be accessed with a parking stacker system intended for residents. The majority of parking spaces will be conventional stalls, including required retail, van accessible, standard accessible and EVSE parking spaces.

The residential units are a mix of 32 studio, 63 1-bedroom, and 7 2- bedroom residential units, providing 102 total units. Of these, 16 will be designated for below market rate (BMR) programs for qualified moderate income households. Residential and common space areas total 84,776 square feet, with a 1.95 residential FAR. When including the retail space of 1,779 square feet and below

grade non-parking spaces (mechanical, retail and residential trash areas, electrical, storage, elevator shaft and stairwells) of 1,478 square feet, the total FAR of the project yields a 1.99 FAR.

We look forward to the Architectural Review Board hearing and continuing to engage the City of Palo Alto and the community on this project and devising an excellent opportunity to address the housing crisis.

Best Regards



Ted O'Hanlon

cc: Yurong Han, 788 SAPA Land LLC
Leigh F. Price, Jorgenson, Siegel, McClure & Flegel, LLP
Sheldon Ah-Sing, M-Group
Architectural Review Board Members

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 (1932-2017)

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 JOHN L. FLEGEL
 DAN K. SIEGEL
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 BRITTNEY L. STANDLEY

July 10, 2019

VIA U.S. MAIL & EMAIL – jonathan.lait@cityofpaloalto.org

Mr. Jonathan Lait
 Planning Director
 City of Palo Alto
 250 Hamilton Avenue
 Palo Alto, CA 94301

Re: 788 San Antonio Road Alternative Viable Active Use Waiver Request

Dear Jonathan:

This letter will serve as a request on behalf of the owner of 788 San Antonio Road for a modification of the retail preservation requirements pursuant to Palo Alto Municipal Code Section 18.40.180(c). The owner is requesting a reduction from 5,897 square feet of retail-like use on the property to 1,779 square feet of retail or retail-like uses. Although the property includes a total of 17,827 square feet, the other uses on site are not retail or retail-like and therefore not subject to the retail preservation ordinance. The owner intends with the proposed project to maximize the residential square footage and provide desperately needed housing while preserving a reasonable amount space for retail or retail-like use on the property.

The property is located in the Service Commercial (CS) zoning district, which is intended to accommodate citywide and regional services and shopping areas that generally require automotive access for customer convenience. These uses do not necessarily benefit from being in high volume pedestrian areas such as shopping centers or downtown. The CS zoning district also permits office uses such as administrative office services and general business offices. This is exemplified by two of the current tenants on the property which are not retail -- a moving company and a general contractor both of whom use the site for administrative and storage uses. The only retail-like use on the property is

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commercial recreation use, Studio Kicks, a martial arts training center. This use, like the zoning intends, is also not pedestrian oriented.

The retail preservation ordinance was adopted by the City Council in 2015 to protect ground floor retail and retail-like uses. Specifically, the City was concerned about record high monthly rental rates for office and low vacancy rates that were creating incentives to replace retail with office uses. These pressures were most severe in the downtown and California Avenue commercial areas. The public health, safety and welfare purpose of the retail preservation ordinance was to activate the street frontage by creating pedestrian activity and visual interest. However, the one retail-like use on the property is not pedestrian oriented and does not contribute to activating the street. Instead, as appropriate to the zoning district, it is accessed by automobile. The property is not in the downtown or California Avenue commercial areas. The retail-like use is not transitioning, as the ordinance is concerned from retail to office, but from retail to much needed housing. Thus, the approval of a waiver for this property would not undermine the purpose of the retail preservation ordinance and would support much needed housing in the City.

When the owner purchased this property, they knew it was identified as an appropriate location for housing as per the City of Palo Alto's Housing Element and that it was not an ideal location for pedestrian-oriented retail, except perhaps for resident-serving retail. The property is located on San Antonio Road, where the surrounding uses and zoning districts in the immediate vicinity vary greatly. There are automotive, commercial, and warehousing uses to the north and south. Directly across San Antonio Road is the Greenhouse planned residential community. There are commercial and industrial uses to the east across the City limits in Mountain View. Despite the variety of uses in the surrounding area, there is no pedestrian-oriented retail on San Antonio that would benefit from the preservation of the auto accessible retail-like use on this property.

San Antonio Road, which is a main arterial with steady automobile traffic, is not a location that supports pedestrian friendly retail. Nearby retail centers are destination locations that include larger retailers to which customers drive. See the attached map showing the surrounding uses. The remaining retail or retail-like locations on San Antonio Road are not only not pedestrian-oriented, they are remnants of a time gone by when the per square foot rental cost was on a gross basis and did not include the significant cost of real estate taxes as modern triple net leases do. Undoubtedly, the question will arise that if there is an existing retail-like use that appears viable, why does it not make sense to maintain the same amount of footage for that business. Studio Kicks pays \$1.00 per square foot on a gross basis (well below market rate) as the previous owners paid very little in real estate taxes. However, upon lease renewal or redevelopment the cost will increase substantially and the lease will become triple net. Therefore, it is unlikely even if the retail-like space were preserved that Studio Kicks, which needs a large amount of floor space per customer, could continue to afford renting the space at market rate. It should also be considered that a fitness user generally requires a more automobile accessible space for student drop-offs. Given development standards, parking would be below grade which

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would greatly complicate accessing the space. Furthermore, it is unlikely that the space would be rented by another retail or retail-like use. When the owner marketed space on the property for lease, no retailers or retail-like uses called. Instead of preserving a large retail-like space that may, once completed remain vacant, the owner respectfully requests a waiver to provide a smaller resident serving retail space is both more viable and would be pedestrian-friendly for residents.

The owner is respectfully requesting permission to develop housing by applying the Housing Incentive Program and provide 1,779 square feet of retail space, which is a reasonable and appropriate amount of space to serve the residents who will occupy the property. For example, a coffee shop or a salon would need only approximately 1,500 to 2,000 square feet and would be an amenity that residents would utilize. Therefore, the owner is respectfully requesting a waiver to reduce the amount of square footage devoted to retail-like use on the property to more appropriately provide not only resident-serving retail, but to provide much needed housing close to retail centers that would be supported by new residents and generate additional sales tax dollars for the city.

Sincerely,


Leigh F. Prince

Enclosure

cc: Yurong Han, 788 SAPA Land LLC (Via Email – yhan@goldengatehomes.us)
Ted O'Hanlon, Explore Real Estate (Via Email – tedohanlon@gmail.com)
Sheldon Ah-Sing, M-Group (Via Email – SAhsing@m-group.us)
Architectural Review Board Member (Via Email - arb@cityofpaloalto.org)



Explore Real Estate
2625 Middlefield Rd, #101
Palo Alto, CA 94306
650.813.1077

July 9, 2019

Jonathan Lait, Director of Planning
Planning and Community Environment Department
250 Hamilton Avenue
Palo Alto, CA 94301
650.329.2679
jonathan.lait@cityofpaloalto.org

Subject: 788-796 San Antonio Road
Retail Preservation Waiver

Mr. Lait:

In support of the development application for 788-796 San Antonio Road, the following information provides guidance on both tenant uses and market data on leasing rates regarding the property.

New Tenancies

After closing the purchase of the property in May 2018, we were notified by long-term tenant Buckles-Smith of their 30-day termination of tenancy. This was an operational consolidation by the business-to-business electrical power, automation and control products wholesaler.

In August of 2018, long-term tenant, Mechanica Automotive, notified us of their termination of tenancy due to their discontinuation of operations.

As a licensed real estate broker, I marketed both spaces on appropriate listing platforms and placed signage on site of the available spaces. With plans to redevelop the entire property, we were focused on finding users comfortable with a 12-18 month need and on a full-service lease basis in-line with the method the leases had historically operated. Interest in each space, as anticipated, was limited and did not in fact include any retail use inquiries, aside from another auto mechanic. Generally, inquiries were for commercial and light industrial uses.

Eventually, after being marketed for approximately 6 months, a moving company called The One Move signed a lease to occupy the Buckles-Smith space. The business provides temporary storage services, furniture home staging equipment for residential sales and administrative offices for the business.

The Mechanica space received many inquiries from start-up type businesses seeking light industrial space for the development of self-driving equipment, for example. In December 2018 a lease to a general contractor was signed, Palo Alto Concrete, and the space is used to store equipment and materials for their construction projects.

Commercial Lease Rates

The only retail/retail-like use on the property is Studio Kicks. Recognizing the Retail Preservation Ordinance and the ownerships intent to redevelop the property, we polled several commercial real estate brokerages with expertise in the Palo Alto market place and researched alternative availabilities. We focused on lease rates on San Antonio Road for retail and fitness uses to better understand market rate lease rates and the viability of retail-like uses on the property.

Premier Properties is a highly active brokerage and property owner in Palo Alto particularly for commercial and retail spaces. Currently, Premier has three spaces available for lease in Palo Alto that would be an appropriate, or formerly occupied by a fitness business.

- 707 High Street, 6,069 square feet, asking \$4.75 NNN per month. The NNN component is a “net lease” where a tenant is required to pay a portion, or all, of the taxes, fees and maintenance costs for a property.
- 2741 Middlefield Road, 5,671 square feet, asking \$3.50 NNN per month
- 261 California Avenue, 6,750 square feet, asking \$5.33 Full Service. This type of lease is more than NNN as the property owner pays tax, fees and maintenance.

CBRE, Palo Alto provided a leasing comparable for 24 Hour Fitness at San Antonio Center in Mountain View. The 23,892 square foot space was renewed for 7 years at a base rate of \$2.33 per square foot NNN.

Newmark Knight Frank, Palo Alto provided lease comparables and opined that the space at 788-796 San Antonio would lease for \$2.50 NNN per month. Among the leases referenced, two pertinent to the subject property included:

- 760 San Antonio Road at \$2.60 NNN for 800 square feet on an 18-month lease.
- 960 San Antonio Road, \$5.95 Full Service on a 5-year lease for 6,370 square feet.

Cubberley Community Center could provide an alternative new location. The center offers both event space rentals and longer-term leases to various users. It is well-known that the center is in a public co-design process to redevelop the property. Also, the arrangement between the City of Palo Alto and Palo Alto Unified School District is also currently under review so it is difficult to determine current availabilities and duration of such a space. The current rate to lease space is quoted at \$2.00 per square foot.

In considering the potentially protected retail-like use at 788-796 San Antonio Road, we think it is critical for City Staff and decision makers to understand the market rates when considering the redevelopment of the property and replicating the existing retail-like uses on the property.

The current tenants are each below market rate on Full Service leases (tenants pay for utilities) of approximately \$1.00 to \$1.60 per square foot. Tenant lease obligations at market rate would be \$2.50 per square foot, with a NNN basis of another approximately \$0.75 per square foot, which would effectively be 2-3 times the amounts currently being paid by tenants at the property.

Since taking ownership, the Property Owners, rather than maximize short-term income, have kept the tenant leases at the same rates and been transparent with plans to ultimately demolish the existing buildings and build a new, and much needed, residentially focused project. We very much appreciate the review and consideration of a waiver to not preserve the existing amount of commercial spaces on the property.

Best Regards



Ted O'Hanlon

cc: Yurong Han, 788 SAPA Land LLC
Leigh F. Price, Jorgenson, Siegel, McClure & Flegel, LLP
Sheldon Ah-Sing, M-Group
Architectural Review Board Members

Attachment E

Project Plans & Environmental Documentation

Hardcopies of project plans are provided to Board members. These plans are available to the public online and/or by visiting the Planning and Community Environmental Department on the 5th floor of City Hall at 250 Hamilton Avenue.

Directions to review Project plans online:

1. Go to: bit.ly/PApendingprojects
2. Scroll down to find “788 San Antonio Road” and click the address link
3. On this project specific webpage you will find a link to the project plans and other important information

Direct Link to Project Webpage:

<https://www.cityofpaloalto.org/news/displaynews.asp?NewsID=4575&TargetID=319>


PLANNING & COMMUNITY ENVIRONMENT

CITY OF
**PALO
ALTO**
250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301
650.329.2441

Notice of Preparation of an Environmental Impact Report

A notice, pursuant to the California Environmental Quality Act of 1970, as amended (Public Resources Code 21,000, et sec.) that the following project may have a significant effect on the environment.

File Number	APN(s)	Date
19PLN-00079	147-3-41 and 147-38-42	9/4/2019
Project Name	Project Type	
788-796 San Antonio Road Mixed-Use Project	Mixed-Use	
Owner	Applicant	
788SAPA Land LLC, Yurong Han, Manager 2225 East Bayshore Rd, Suite 200 Palo Alto, California 94303	Ted O'Hanlon 2625 Middlefield Road, #101 Palo Alto, California 94306	
Project Location		
The project site encompasses 0.997 acres (43,414 square feet) on two parcels (Assessor's Parcel Numbers 147-3-41 and 147-38-42) located at 788, 790, and 796 San Antonio Road in the City of Palo Alto. The site is located on the northeast corner of the intersection of San Antonio Road and Leghorn Street.		
Project Description		
<p>The proposed project would involve an amendment to Palo Alto Municipal Chapter 18.16 (Neighborhood, Community, and Service Commercial [CN, CC and CS] Districts), Section 18.16.060(k), to expand the Housing Incentive Program to CS zoned properties along San Antonio Road between Middlefield Road and East Charleston Road. This would allow for increased residential density up to a floor-area-ratio of 2.0 for applicable parcels in that area.</p> <p>The project would also involve construction of a mixed-use project at 788-796 San Antonio Road under the Housing Incentive Program. This project would include the demolition of the two existing one-story commercial structures and the construction of a four-story mixed-use structure with one retail tenant space, 102 dwelling units, and a subterranean parking garage. Each floor would be arranged according to the same general footprint, with an empty rectangular space in the center to allow solar access to the central courtyard at the first floor. Uses on the first floor would include a 1,779 square-foot retail space at the southwestern corner of the site, common area along the San Antonio Road, including a main entrance and lobby, mailroom, two bicycle parking rooms, a bicycle repair room, and dwelling units arranged around the north, east, and south portions of the site. The floors above the first would include residential units arranged around the central courtyard space. Most units would include attached private outdoor patios with views either towards the central courtyard or out towards the perimeters of the site. A communal landscaped roof garden would be located at the fourth floor at the western portion of the building along San Antonio Road.</p> <p>A Historic Resource Evaluation of the building at 788 San Antonio Road, prepared by Page & Turnbull in March 2019, found that the building has been identified as an historic resource per a finding of eligibility to the California Register of Historical Resources because of its association with historic events, specifically it is associated with the California Chrysanthemum Growers Association, which provided Japanese American growers on the San Francisco Peninsula with shared access to growing technologies, shipping options, and stabilized markets from its founding in 1932 to the end of the twentieth century (CR Criterion 1). Because the project involves demolition of an eligible historic resource, an EIR is being prepared.</p>		

Purpose of Notice

The City of Palo Alto will be the lead agency and will prepare an environmental impact report (EIR) for the proposed project. This Notice of Preparation is sent pursuant to Section 15082 of the California Environmental Quality Act (CEQA) Guidelines to announce the initiation of the EIR process and to solicit comments from responsible and trustee agencies and interested parties concerning the scope of issues to be addressed in the EIR. The Draft EIR will address the potential physical and environmental effects of the proposed project in accordance with the CEQA.

Scoping Meeting

The City of Palo Alto, in its role as Lead Agency, will hold a public scoping meeting to provide an opportunity for the public and representatives of public agencies to address the scope of the Environmental Impact Report. The Scoping Meeting will be held and the regular meeting of the City of Palo Alto Planning and Transportation Commission (PTC) on Wednesday, September 11, 2019. The meeting will start at 6:00 PM and will be held at the City of Palo Alto Council Chambers, located in City Hall at 250 Hamilton Avenue. The meeting agenda will be posted to the PC's website. Interested parties should check the PC agenda on the City's website to confirm the meeting time, date, and location:

<https://www.cityofpaloalto.org/gov/boards/ptc/>

Comment Period:**Begins: 09/04/19****Ends: 10/07/19**

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but no later than 30 days after receipt of this notice. Please focus your comments on the project's potential environmental impacts and recommendations for methods of avoiding, reducing, or otherwise mitigating those impacts. If you are a governmental agency with discretionary authority over initial or subsequent aspects of this project, describe that authority and provide comments regarding potential environmental effects that are germane to your agency's area of responsibility. We also respectfully request the name of a contact person for your agency.

Written comments should be addressed to:

Sheldon S. Ah Sing, AICP, Principal Planner
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301

Or emailed to SAhsing@m-group.us. Oral comments may be made at the hearing.

A file containing additional information on this project may be reviewed at the Planning Office under the file number appearing at the top of this form.

<https://www.cityofpaloalto.org/news/displaynews.asp?NewsID=4575&TargetID=319> For additional information regarding this project and the Draft EIR, please contact Sheldon S. Ah Sing at (408) 340-5642 ext. 109.

Responsible Agencies that received a copy of this document:

No responsible agencies have been identified for this project.

Potential Environmental Effects:

It is anticipated that the proposed project would result in potentially significant environmental effects relating to Air Quality, Historical Resources, Energy, Greenhouse Gas Emissions, Noise, and Transpiration. These issues will be analyzed in detail in the Draft EIR.

Prepared by:

Sheldon S. Ah Sing
Print Name

Sheldon S. Ah Sing
Signature

30 AUG 2019
Date