



Architectural Review Board

Staff Report (ID # 9950)

Report Type: Action Items **Meeting Date:** 2/7/2019

Summary Title: 702 Clara Drive: Three Detached Units (1st Formal)

Title: PUBLIC HEARING / QUASI JUDICIAL. 702 Clara Drive [18PLN-00068]: Consideration for a Major Architectural Review to Allow the Demolition of an Existing 3,560 Square Foot, Four-Unit Apartment Building and Construction of Three Detached Single-Family Homes Totaling 5,000 Square Feet. Environmental Assessment: Exempt From the Provisions of the California Environmental Quality Act (CEQA) in Accordance With Guideline Section 15332 (In-Fill Development Projects). Zoning District: RM-15 (Residential Multi-Family). For More Information Contact the Project Planner Sheldon S. Ah Sing at sahsing@m-group.us

From: Jonathan Lait

Recommendation

It is recommended that the Architectural Review Board (ARB) take the following action(s):

1. Consider the information presented, provide comment, and continue the item to a date certain.

Report Summary

The applicant requests Architectural Review (AR) approval of a three, detached unit condominium development. The condominium subdivision request will occur subsequent to the AR process conclusion. The project will demolish the existing four-unit, two-story apartment building constructed in 1954. The Zoning District for the property is RM-15, which permits multiple family projects. The project overall results in a loss of one existing dwelling unit. The project is subject to the architectural review findings and the multi-family context-based design criteria.

The project did not have the benefit of a preliminary architectural review. This is the first instance that the project is being reviewed by the ARB. As such, staff recommends that the ARB

City of Palo Alto
 Planning & Community Environment
 250 Hamilton Avenue
 Palo Alto, CA 94301
 (650) 329-2442

review the project against the required findings (attached for reference), provide comment, and continue the item to a date certain. The project is compliant with the zoning development standards. The Board may also consider providing findings and direction to approve the project as presented if desired. The Board is encouraged to evaluate the architecture and provide comments on the diversity of the styles and the execution of the architectural styles, in particular Unit C.

Background

Project Information

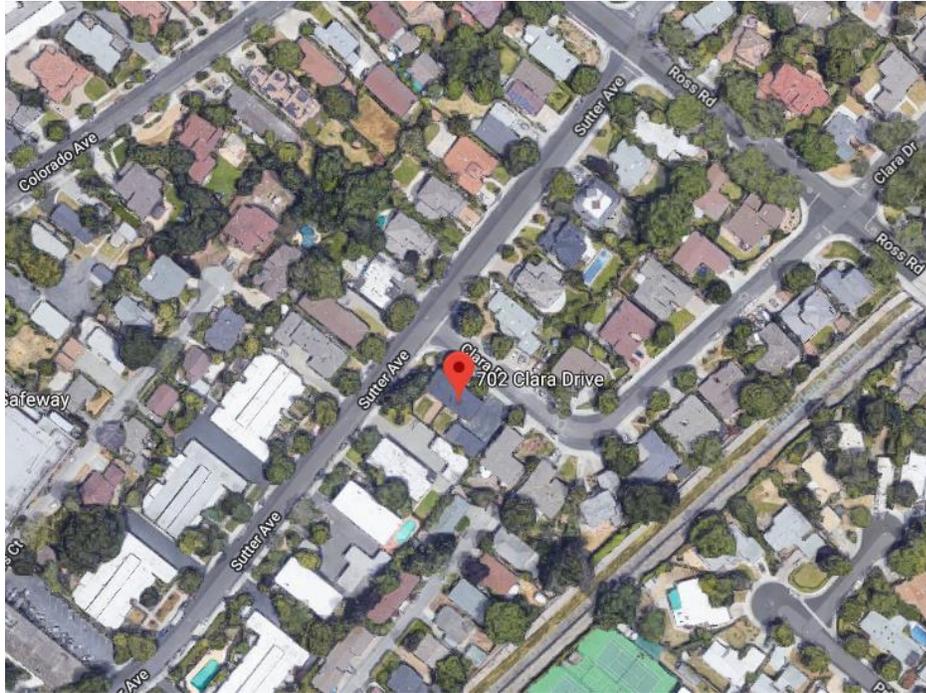
Owner:	Clara J LLC, c/o Tony Shi
Architect:	Gilbert Fernandez
Representative:	Tony Shi
Legal Counsel:	Not Applicable

Property Information

Address:	702 Clara Drive
Neighborhood:	Midtown
Lot Dimensions & Area:	80' x 125' / 10,018 square feet (0.23 acres)
Housing Inventory Site:	No
Located w/in a Plume:	No
Protected/Heritage Trees:	Three Redwoods
Historic Resource(s):	No

Existing Improvement(s):	3,560 sf; two-stories; 25 ft; 1954
Existing Land Use(s):	Four-unit apartment building
Adjacent Land Uses & Zoning:	North: R-1 (Single-family residences) West: RM-15 (multi-family residences) East: R-1 (Single-family residences) South: R-1 (Single-family residences)

Aerial View of Property:



Source: Google 2018

Land Use Designation & Applicable Plans

Zoning Designation:	RM-15 (Low Density Multiple-Family Residence District)
Comp. Plan Designation:	MF (Multi-Family Residential)
Context-Based Design Criteria:	Yes, PAMC 18.13.060
Downtown Urban Design Guide:	Not Applicable
South of Forest Avenue Coordinated Area Plan:	Not Applicable
Baylands Master Plan:	Not Applicable
El Camino Real Design Guidelines (1976 / 2002):	Not Applicable
Proximity to Residential Uses or Districts (150'):	Yes
Located w/in the Airport Influence Area:	Not Applicable

Prior City Reviews & Action

City Council:	None
PTC:	None
HRB:	None
ARB:	None

Project Description

The project is located at the corner of Clara Drive and Sutter Avenue. A 3,560 square foot two-story apartment building with four units currently exists onsite. Seven large trees are located along the street frontage (either on or adjacent to the site), including four maple trees and three redwood trees.

The applicant requests to demolish the existing building and replace it with three, detached two-story dwelling units. All the trees mentioned would be retained. Each unit has an identical floor plan, with Units A and C having the same orientation. Each unit is three bedrooms with a porch and rear patio. Parking is provided in a one-car covered garage, with one uncovered space on the driveway in tandem with the garage space.

The project's open space plan includes usable, private and common space. Private spaces are accommodated in the rear yards and patio contiguous to the units. With the project having street-frontage on two sides, the common open spaces are located along the streets. The 720 square foot area along Sutter Avenue includes a grassy area with seating framed by shrubs and large boulders. The attached Zoning Comparison Table summarizes the project's open space.

The application anticipates applying for a condominium subdivision since the property is too small to be subdivided into separate lots. The condominium subdivision request would occur after the architectural review process is completed.

Requested Entitlements, Findings and Purview:

The following discretionary applications are being requested:

- 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. 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. The findings to approve an AR application are provided in Attachment B.

Analysis¹

Neighborhood Setting and Character

¹ The information provided in this section is based on analysis prepared by the report author prior to the public hearing. The Architectural Review Board 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 make alternative findings. A change to the findings may result in a final action that is different from the staff recommended action in this report.

The project is located in the Midtown area, where there is a mix of multi-family and single-family residences. One and two-story buildings are located within the vicinity of the site. Street trees line both Sutter Avenue and Clara Drive. Setbacks are typical in the area and the multi-family buildings transition in size to the lower density development. Within the neighborhood it is apparent which buildings are multi-family and which ones are single-family.

Since the proposed project is at the boundary of the multi-family and single-family zones, the design of the interface between the two types of development is important. The proposed development would be more akin to single-family development, albeit with smaller private areas delineated by wooden fences compared to standard single-family zoned parcels. The inclusion of the project would create a good transition between the larger single-structure multi-family sites and the single-family parcels.

Unit A is located adjacent to an existing single-family residence. The second story fenestration is designed and treated in such a way to promote privacy with obscured glass treatment for the bathroom and closet windows and bedroom windows that include high sills. These techniques are also used internal to the site, with the inclusion of high-sill windows between Units A and B to promote privacy on the second floor. Likewise, similar designed windows and obscure glass treatment promote privacy between Units B and C for the second floor.

Zoning Compliance²

A detailed review of the proposed project's consistency with applicable zoning standards has been performed. A summary table is provided in Attachment C. Attachment B also includes context-based criteria with which the project is expected to be consistent. The proposed project complies with all applicable codes or is seeking through the requested permits permission to deviate from certain code standards in a manner that is consistent with the Zoning Ordinance.

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. Further, ARB Finding #1 requires that the design be consistent and compatible with applicable elements of the Palo Alto Comprehensive Plan.

The Comprehensive Plan land use designation for the project site is Multiple-Family Residential, which prescribes a density range of eight to 40 dwelling units per acre. The project has a density of 13 dwelling units per acre, which complies with the intended multiple-family residential density. The Housing Element includes a policy to preserve the number of dwelling units (Policy H1.2). This project does result in a loss of one dwelling unit from what currently

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

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

exists. Therefore, staff has applied Program H1.2.1 to this site, which states that when a loss of rental housing occurs due to subdivision or condominium conversion approvals, the project shall require 25 percent of the units at below market rate.

On balance, the project is consistent with the policies in the Comprehensive Plan and therefore fulfills the goals of the Plan. A detailed review of the project's consistency with the Comprehensive Plan is provided in Attachment B.

Architectural Design

The project includes three homes with each unit representing a different architectural style. Unit A is a Mediterranean style that includes red barrel tiles, stucco walls with some stone veneer accents along the front porch and garage. The front porch includes a shed roof that differentiates the design from the other two units. Unit B is a Craftsman style that includes composition shingles, siding and some stone veneer accents for the front porch columns and garage. Unit C is a Texas ranch style with flat tile roofing, stone cladding and stucco walls. Shutters are proposed for the windows.

While staff requested the applicant enhance the project to fit in with the various surrounding architectural styles, it is possible the applicant has now provided too much variety. Staff requests the Board's feedback on the design, the use of materials, and in particular the design of Unit C with the stone veneer.

Multi-Modal Access & Parking

The project site is near safe routes to schools (Middlefield, Ross and Colorado) but not directly connected to any routes. As noted above, the project site includes on-site parking (covered and uncovered) in a tandem configuration, as permitted by PAMC Section 18.54.020(d). Bicycle parking is located on the rear patio of the units within lockers.

Consistency with Application Findings

The project is subject to the Architectural Review findings as provided for in PAMC 18.76.020. The project is also subject to Performance Criteria in PAMC 18.23 because of the project's proximity to R-1 properties. While, the project is not recommended for approval currently, draft findings for approval are included for the Board's reference and consideration.

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 is Categorically Exempt under Class 32 15332 In-Fill Developments and Class 3 for new small structures since three single family (up to four multi-family) structures are proposed (Attachment D).

A historic resource evaluation was completed, given the existing building was constructed in 1954, to determine whether the building is eligible for historic listing under Federal, State or

local significance. The evaluation concluded that the building does not meet the threshold criteria to be determined an historic resource. No other conditions exist that would preclude the project from being categorically exempt from CEQA.

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 January 25, 2019, which is 12 days in advance of the meeting. Postcard mailing occurred on January 25, 2019, which is 12 in advance of the meeting.

Public Comments

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

Alternative Actions

In addition to the recommended action, the Architectural Review Board may:

1. Approve the project with modified findings or conditions;
2. Recommend project denial based on revised findings.

Report Author & Contact Information

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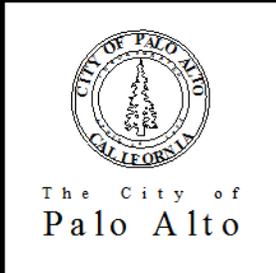
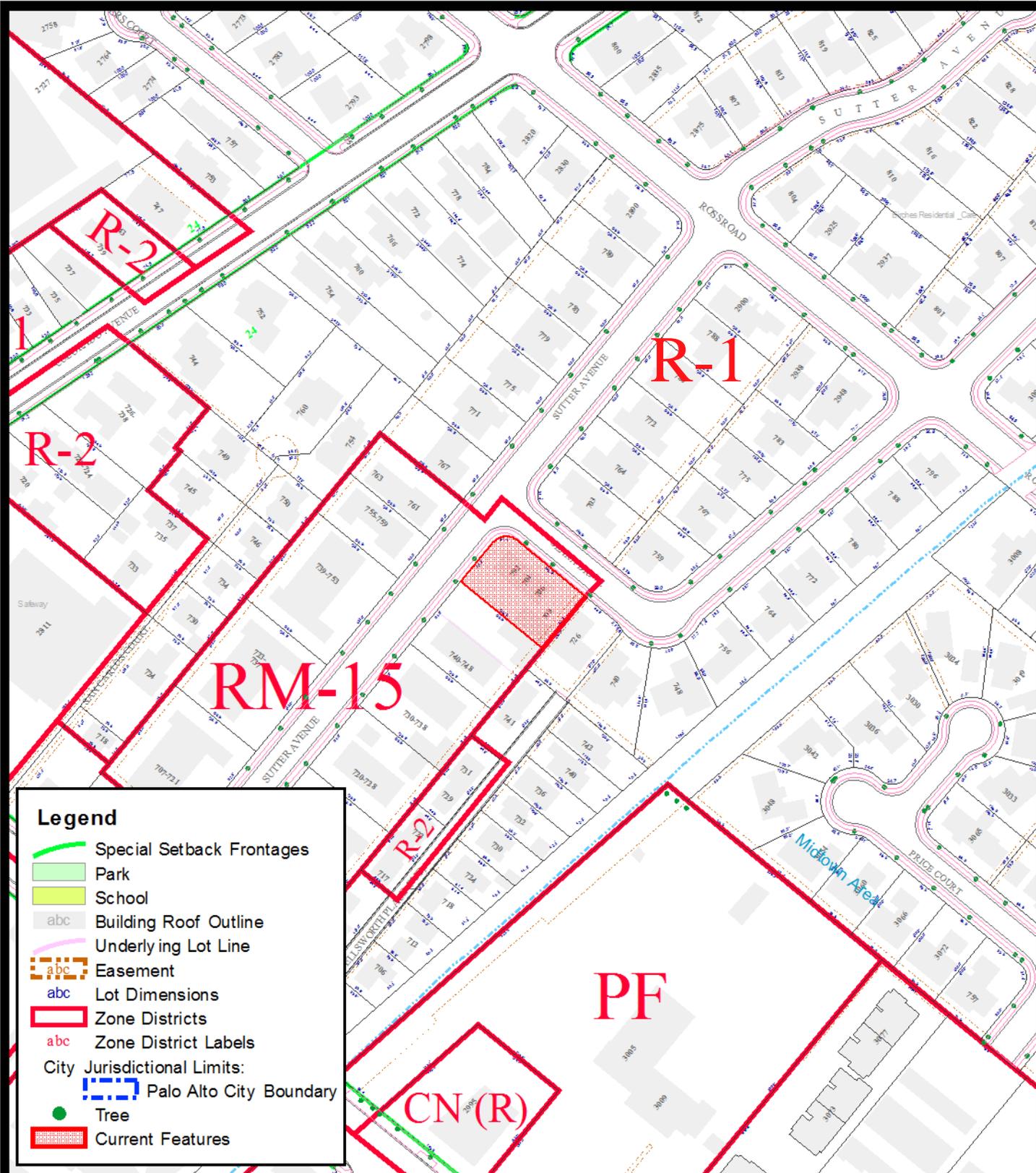
ARB⁴ Liaison & Contact Information

Jodie Gerhardt, AICP, Planning Manager
(650) 329-2575
jodie.gerhardt@cityofpaloalto.org

Attachments:

- Attachment A: Location Map (PDF)
- Attachment B: Draft ARB Findings (DOCX)
- Attachment C: Zoning Comparison Table (DOCX)
- Attachment D: Environmental Exemption (DOCX)
- Attachment E: Project Plans (DOCX)

⁴ Emails may be sent directly to the ARB using the following address: arb@cityofpaloalto.org



702 Clara Drive
 Architectural Review
 18PLN-00068

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

ATTACHMENT B
ARB FINDINGS FOR APPROVAL
702 Clara Drive
18PLN-00068

In order for the ARB to make a recommendation of approval, the project must comply with the following Findings for Architectural Review as required in Chapter 18.76.020 of the PAMC.

Finding #1: The design is consistent with applicable provisions of the Palo Alto Comprehensive Plan, Zoning Code, coordinated area plans (including compatibility requirements), and any relevant design guides.

The following are relevant Comprehensive Goals and Policies:

<i>Comp Plan Goals and Policies</i>	<i>How project adheres or does not adhere to Comp Plan</i>
<i>The Comprehensive Plan land use designation for the site is Multiple Family Residential (MF).</i>	The project consists of three multi family dwelling units.
<i>Land Use and Community Design</i>	
<i>Policy L-1.3 Infill development in the urban service area should be compatible with its surroundings and the overall scale and character of the city to ensure a compact, efficient development pattern.</i>	The project site is surrounded by urban uses and is served by existing utilities.
<i>Policy L-3.1 Ensure that new or remodeled structures are compatible with the neighborhood and adjacent structures.</i>	The surrounding neighborhood includes a mixture of apartments and single-family detached units. The project proposes a similar use of three detached dwelling units on a single lot.
<i>Policy L-6.1 Promote high-quality design and site planning that is compatible with surrounding development and public spaces.</i>	The project includes three different types of architectural styles and proposes open space areas that are compatible with the surrounding development streetscapes.
<i>Policy L-6.6 Design buildings to complement streets and public spaces; to promote personal safety, public health and wellbeing; and to enhance a sense of community safety.</i>	The project integrates common open space along the street and uses the existing large trees as shade canopies and additional landscaping to form areas that are private and compatible with the neighborhood.

Housing	
<i>H1.4 POLICY Ensure that new developments provide appropriate transitions from higher density development to single-family and low-density residential districts to preserve neighborhood character.</i>	The project is similar in scale to surrounding development, is at the edge of the multi-family land use designation area and provides a transition to adjacent single-family development.
<i>H1.2 POLICY Support efforts to preserve multifamily housing units in existing neighborhoods.</i> <i>H1.2.1 PROGRAM When a loss of rental housing occurs due to subdivision or condominium conversion approvals, the project shall require 25 percent BMR units.</i>	Implementation of the project results in a loss of one unit. Per Program H1.2.1, this requires that 25 percent of the units be affordable. Given 25 percent is a fractional unit of 0.75, the project has the option to provide an in-lieu payment to satisfy this requirement.

While the project proposes a decrease in one dwelling unit from the existing condition, it will provide either one below market rate unit or make an in-lieu payment to the Residential Housing Fund. Therefore, on balance, the project is consistent with the City's Comprehensive Plan Goals and Policies.

The project has also been reviewed for conformance with the development standards in the Zoning Code and found to be in compliance with the intent and regulations contained therein. A comprehensive review of the project to applicable development standards is included in the administrative record.

Finding #2: The project has a unified and coherent design, that:

- a. creates an internal sense of order and desirable environment for occupants, visitors, and the general community,**
- b. preserves, respects and integrates existing natural features that contribute positively to the site and the historic character including historic resources of the area when relevant,**
- c. is consistent with the context-based design criteria of the applicable zone district,**
- d. provides harmonious transitions in scale, mass and character to adjacent land uses and land use designations,**
- e. enhances living conditions on the site (if it includes residential uses) and in adjacent residential areas.**

The project's design including the placement of the structures and siting of open space complements the neighborhood, the streetscape and overall internal sense of order for the site. The project also preserves and protects the existing large street trees along Sutter Avenue and Clara Drive.

Pursuant to PAMC 18.13.060(b), the following context-based design considerations and findings

are applicable to this project. These context-based design criteria are intended to provide additional standards to be used in the design and evaluation of development in a multi-family district. The purpose is to encourage development in a multi-family district to be responsible to its context and compatibility with adjacent development as well as to promote the establishment of pedestrian oriented design.

1. Massing and Building Facades

Massing and building facades shall be designed to create a residential scale in keeping with Palo Alto neighborhoods, and to provide a relationship with street(s) through elements.

The project includes three identical floor plans with one plan type reversed. Each unit has a different architectural style. The scale of the structures is in keeping with the surrounding neighborhood. Two of the units include materials and architectural elements that are consistent with the architectural style of the unit. In particular, the Spanish designed unit includes a shed roof, which is different than the gables used on the other two units.

However, Unit C does not appear to provide consistency with the application of the materials proposed. While the massing of the units is consistent with the finding, the inconsistent facade of the one unit means that the finding cannot be made.

2. Low Density Transitions

Where new projects are built abutting existing lower-scale residential development, care shall be taken to respect the scale and privacy of neighboring properties.

The project is consistent with the Zoning Code development standards. The transition, massing and orientation of the structures provide privacy and is compatible with neighboring properties and internally within the project.

3. Project Open Space

Private and public open space shall be provided so that it is usable for the residents and visitors of a site.

The project provides an adequate amount of open space on the site in areas that are most appropriate for the use and privacy. The project provides private open space within fenced areas accessed only by each individual unit and provides a large common open space area protected by trees and shrubs along the street.

4. Parking Designs

Parking needs shall be accommodated but shall not be allowed to overwhelm the character of the project or detract from the pedestrian environment.

Each unit includes a street-facing garage that is well integrated into the massing and architecture of the structure.

5. Large (multi-acre) Sites

Large (in excess of one acre) sites shall be designed so that street, block, and building patterns are consistent with those of the surrounding neighborhood.

The project site is less than one acre, therefore, this criteria does not apply.

6. Housing Variety and Units on Individual Lots

Multifamily projects may include a variety of unit types such as small-lot detached units (Figure 6-1), attached rowhouses/townhouses (Figure 6-2), and cottage clusters in order to achieve variety and create transitions to adjacent existing development.

The project includes three identical floor plans with one plan type reversed. Each unit has a different architectural style. The scale of the structures is in keeping with the surrounding neighborhood. Two of the units include materials and architectural elements that are consistent with the architectural style of the unit. In particular, the Spanish designed unit includes a shed roof, which is different than the gables used on the other two units. The project is considered multi-family, which means that there will be areas that are shared.

However, Unit C does not appear to be provide consistency with the finding. There appears to be variety in architectural styles, however, the units are very similar in design because they are an identical plan type. For these reasons, the project does not meet the finding.

7. Sustainability and Green Building Design

Project design and materials to achieve sustainability and green building design should be incorporated into the project.

The project is consistent with the City's Green Building Codes, as further described in Finding #6.

Finding #3: The design is of high aesthetic quality, using high quality, integrated materials and appropriate construction techniques, and incorporating textures, colors, and other details that are compatible with and enhance the surrounding area.

The project includes three identical floor plans with one plan type reversed. Each unit has a different architectural style. The scale of the structures is in keeping with the surrounding neighborhood. Two of the units include materials and architectural elements that are consistent with the architectural style of the unit. Unit A is a Mediterranean style that includes red barrel tiles, stucco walls with some stone veneer accents along the front porch and garage. The front porch includes a shed roof that differentiates the design from the other two units.

Unit B is a craftsman style that includes composition shingles, siding and some stone veneer accents for the front porch columns and garage. Unit C is a Texas ranch style with flat tile roofing, stone cladding and stucco walls. Shutters are proposed for the windows. **However, Unit C does not appear to provide consistency with a style. There appears to be variety in architectural styles for the project, however, the units are very similar in design because they are an identical plan type. For these reasons, the project does not meet the finding.**

Finding #4: The design is functional, allowing for ease and safety of pedestrian and bicycle traffic and providing for elements that support the building's necessary operations (e.g. convenient vehicle access to property and utilities, appropriate arrangement and amount of open space and integrated signage, if applicable, etc.).

The project will function as three independent homes with one shared driveway for the first two units and one standard driveway for the third unit. The shared driveway reduces the amount of curb cuts, which improves pedestrian safety while still providing convenient vehicle access. Each unit will include its own garage and bicycle locker.

Finding #5: The landscape design complements and enhances the building design and its surroundings, is appropriate to the site's functions, and utilizes to the extent practical, regional indigenous drought resistant plant material capable of providing desirable habitat that can be appropriately maintained.

The project provides complementary landscaping with some native plantings. It is suggested that the project provide additional native plantings where practical. The project maintains the existing mature street trees that provide shade and enhance the neighborhood.

Finding #6: The project incorporates design principles that achieve sustainability in areas related to energy efficiency, water conservation, building materials, landscaping, and site planning.

The project is consistent with the City's Green Building Code as detailed on Sheets GB-1 and GB-2 of the plan set.

Performance Criteria
PAMC 18.23

Pursuant to PAMC 18.23, the following performance criteria are intended to provide additional standards to be used in the design and evaluation of developments in the multi-family, commercial, and industrial zones. The purpose is to balance the needs of the uses within these zones with the need to minimize impacts to surrounding neighborhoods and businesses. The criteria are intended to make new developments and major architectural review projects compatible with nearby residential and business areas, and to enhance the desirability of the proposed developments for the site residents and users, and for abutting neighbors and businesses.

Performance Criteria	Project Consistency
18.23.020 Trash Disposal and Recycling	
<i>Assure that development provides adequate and accessible interior areas or exterior enclosures for the storage of trash and recyclable materials in appropriate containers, and that trash disposal and recycling areas are located as far from abutting residences as is reasonably possible.</i>	The project proposes individual totes for recycling and garage pick up that will be stored on the side of each unit under the eaves.
18.23.030 Lighting	
<i>To minimize the visual impacts of lighting on abutting or nearby residential sites and from adjacent roadways.</i>	The project proposes light fixtures that are appropriate with the scale of the buildings and are typical for individual residential units.
18.23.040 Late Night Uses and Activities	
<i>The purpose is to restrict retail or service commercial businesses abutting (either directly or across the street) or within 50 feet of residentially zoned properties or properties with existing residential uses located within nonresidential zones, with operations or activities between the hours of 10:00 p.m. and 6:00 a.m. Operations subject to this code may include, but are not limited to, deliveries, parking lot and sidewalk cleaning, and/or clean up or set up operations, but does not include garbage pick- up.</i>	Not applicable.
18.23.050 Visual, Screening and Landscaping	
<i>Privacy of abutting residential properties or properties with existing residential uses located within nonresidential zones (residential properties) should be</i>	The project is a residential project with three detached units. Landscaping is appropriate and

Performance Criteria	Project Consistency
<i>protected by screening from public view all mechanical equipment and service areas. Landscaping should be used to integrate a project design into the surrounding neighborhood, and to provide privacy screening between properties where appropriate.</i>	complements the surrounding neighboring properties.
18.23.060 Noise and Vibration	
<i>The requirements and guidelines regarding noise and vibration impacts are intended to protect residentially zoned properties or properties with existing residential uses located within nonresidential zones (residential properties) from excessive and unnecessary noises and/or vibrations from any sources in abutting industrial or commercially zoned properties. Design of new projects should reduce noise from parking, loading, and refuse storage areas and from heating, ventilation, air conditioning apparatus, and other machinery on nearby residential properties. New equipment, whether mounted on the exterior of the building or located interior to a building, which requires only a building permit, shall also be subject to these requirements.</i>	It is expected that the operation and use of the residential units would be consistent with the neighboring properties. The air conditioning equipment is located on the side elevation in notched area. Fencing will block the view of these units.
18.23.070 Parking	
<i>The visual impact of parking shall be minimized on adjacent residentially zoned properties or properties with existing residential uses located within nonresidential zones.</i>	Street-facing garages are proposed with uncovered parking in front of the garages. These garages are well integrated into the massing for the home.
18.23.080 Vehicular, Pedestrian and Bicycle Site Access	
<i>The guidelines regarding site access impacts are intended to minimize conflicts between residential vehicular, pedestrian, and bicycle uses and more intensive traffic associated with commercial and industrial districts, and to facilitate pedestrian and bicycle connections through and adjacent to the project site.</i>	The project includes three detached units with independent garages and bicycle lockers located in the rear of each lot.
18.23.090 Air Quality	
<i>The requirements for air quality are intended to buffer residential uses from potential sources of odor and/or toxic air contaminants.</i>	The project is a detached residential project and its occupants would use typical household supplies and cleaners.

Performance Criteria	Project Consistency
18.23.100 Hazardous Materials	
<i>In accordance with Titles 15 and 17 of the Palo Alto Municipal Code, minimize the potential hazards of any use on a development site that will entail the storage, use or handling of hazardous materials (including hazardous wastes) on-site in excess of the exempt quantities prescribed in Health and Safety Code Division 20, Chapter 6.95, and Title 15 of this code.</i>	It is not anticipated that the users of the units would store hazardous materials onsite.

ATTACHMENT C
ZONING COMPARISON TABLE
702 Clara Drive, 18PLN-00068

Table 1: COMPARISON WITH CHAPTER 18.13 (RM-15 DISTRICT)				
Regulation	Required/Allowed	Proposed		
		Unit A	Unit B	Unit C
Minimum Site Area, Width and Depth	8,500 sf area, 70-foot width, 100-foot depth	10,000 sf, 80-foot width, 125-foot depth		
Maximum Residential Density	15 units per 1 acre (3.45 units)	3 total units		
Minimum Front Yard	20 feet (Sutter Ave.)	20 feet (to the closest front exterior wall of Unit C)		
Min Street Rear Yard	16 feet (Clara Drive)	16 feet		
Min Interior Side Yard (for lots w/widths of > 70 feet)	10 feet	10 feet		
Max. Building Height	30 feet	26 feet, 2 ¼ inches		
Side Yard Daylight Plane	10 feet at interior side lot line then 45-degree angle	Compliant		
Rear Yard Daylight Plane	10 feet at rear setback line then 45-degree angle	Compliant		
Max. Site Coverage	35% (plus an additional 5% for covered patios or overhangs)	31% (3,117 sf)		
Max. Total Floor Area Ratio	0.5:1	0.49:1 (4,992 sf)		
Minimum Site Open Space	35% (3,500 sf)	49% (4,951 sf)		
Minimum Usable Open Space	200 sf per unit	934 sf	1,039 sf	971 sf
Minimum Common Open Space	100 sf per unit	315 sf (front) 240 sf (side)	386 sf (front) 240 sf (side)	318 sf (front) 240 (side)
Minimum Private Open Space	50 sf per unit	301 sf (yard) 78 sf (patio)	335 sf (yard) 78 sf (patio)	335 sf (yard) 78 sf (patio)

Table 2: CONFORMANCE WITH CHAPTER 18.52 (Off-Street Parking) for Multiple-Family Residential		
Type	Required	Proposed
Vehicle Parking	Two (2) spaces per unit, of which at least one space per unit must be covered.	Two (2) spaces per unit, with each unit providing one (1) covered parking space
Bicycle Parking	One (1) Long-term bicycle parking space	Three (3) total; one (1) for each unit



NOTICE OF EXEMPTION

Documentation of Project's Eligibility for Class 32 Categorical Exemption Under CEQA

The City has determined that the project is categorically exempt from CEQA under Class 32, In-fill Development Projects. CEQA Guidelines §15332 reads: "Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section." The information herein documents the project's compliance with these conditions in addition to confirming that no exceptions to the exemptions, as outlined in CEQA Guidelines §15300.2, apply to the project.

Class 32 Exemption Condition	Complies?
a. <i>The project is consistent with the applicable general plan policies as well as with applicable zoning designation and regulations</i>	■
b. <i>The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses</i>	■
c. <i>The project site has no value as habitat for endangered, rare, or threatened species</i>	■
d. <i>Approval of the project would not result in any significant effects relating to traffic, noise, air quality or water quality</i>	■
e. <i>The site can be adequately served by all required utilities and public services</i>	■
<hr/>	
a. <i>The project is consistent with the applicable general plan policies as well as with applicable zoning designation and regulations</i>	

The project is located with the Multi-Family Comprehensive Plan designation and the RM-15 multi-family residential zoning designation. The project is consistent with the density and development regulations with these designations. The project is consistent with the following comprehensive plan policies:

- Policy L-1.3 Infill development in the urban service area should be compatible with its surroundings and the overall scale and character of the city to ensure a compact, efficient development pattern.
 - Policy L-3.1 Ensure that new or remodeled structures are compatible with the neighborhood and adjacent structures.
 - Policy L-6.1 Promote high-quality design and site planning that is compatible with surrounding development and public spaces.
 - Policy L-6.6 Design buildings to complement streets and public spaces; to promote personal safety, public health and wellbeing; and to enhance a sense of community safety.
 - H1.4 POLICY Ensure that new developments provide appropriate transitions from higher density development to single-family and low-density residential districts to preserve neighborhood character.
- b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*

The proposed project is located on a site that is 10,000 square feet that is located wholly within the City of Palo Alto's jurisdiction. Surrounding uses include multi-family residential, single-family residential. There are no open space areas or natural features (such as creeks) within the immediate vicinity of the site.

- c. The project site has no value as habitat for endangered, rare, or threatened species*

As noted above, there are no open space areas or natural features within the vicinity of the project site. The area is entirely urban in nature. The recently adopted Palo Alto 2030 Comprehensive Plan includes Map N-1, which identifies sensitive animal and plant species within the Palo Alto quadrangle, a large geographic area that includes the urban portions and portions along the bay and within the foothills, based on information in the California Natural Diversity Database (CNDDDB). Based on this map and the urban nature of the site, the subject property does not contain any habitat for endangered, rare, or threatened species and has not historically supported any of these species.

- d. Approval of the project would not result in any significant effects relating to traffic, noise, air quality or water quality*

Traffic

VTA TIA Guidelines suggest that projects generating less than 100 new trips per peak hour do not require quantitative analysis, subject to the Congestion Management Program requirements, because they are unlikely to result in noticeable changes in area traffic conditions, even where

traffic conditions are already degraded [VTA Transportation Impact Analysis Guidelines, October 2014]. To be conservative, the City of Palo Alto typically requires a focused traffic analysis that quantifies potential project impacts for projects generating more than 50 trips per peak hour. The project would have two trips in the AM peak hour and three trips in the PM peak hour. Considering the existing site use generates two trips in the AM peak hour and two trips in the PM peak hour, the project has one new net trip in the PM peak hour.

Noise

The project would be required to comply with the regulations outlined in Title 9 of the PAMC with respect to construction noise, which stipulate maximum allowed decibels and construction hours. Operation of the proposed project, which three residential units would be similar to the existing residential use at the site. For these reasons, the project would not result in any significant impact to noise.

Air Quality

Construction activities would generate emissions from construction vehicle trips, equipment use, and ground disturbance. However, consistent with Comprehensive Plan Policies and the City's Municipal Code, the project would comply with standard Bay Area Air Quality Management District (BAAQMD) recommendations to reduce construction emissions such as limiting vehicle idling and implementing best management practices to reduce dust emissions. The project would also be required to comply with all standard BAAQMD regulations for demolition. Given the size of the project, the project would not generate emissions that would exceed the BAAQMD thresholds of significance for any criteria pollutants during construction. The project would demolish a residential building with four dwelling units and replace it with three detached dwelling units; therefore, changes in operational emissions would be nominal and would not exceed BAAQMD thresholds. Further, this in-fill development project would, by design, encourage reduced Vehicle Miles Traveled based on its location in proximity to public transit opportunities. For these reasons, the project would not result in any significant impact to Air Quality.

Water Quality

The project site is not located in close proximity to any waterways. The current project site is completely developed; therefore, the proposed project would not substantially alter the existing drainage of the site. The project would follow public works engineering's required standard practices to ensure to control erosion and siltation during construction activities so as not to degrade water quality. The project does not include a basement feature; therefore, extensive excavation that could require dewatering is not anticipated. Project operation would be serviced by existing utilities and would not affect groundwater supply. Therefore, the project would have no impact on groundwater. For these reasons, the project would not result in any significant impact to Water Quality.

e. The site can be adequately served by all required utilities and public services

The site is within an urban area that is already served by utilities and public services. While utility hook-ups will be required, no expansion in capacity or special services would be necessary.

Exceptions to the Exemptions

The City is aware that there are six categories or exceptions that preclude the use of Categorical Exemptions, as listed in CEQA Guidelines 15300.2. These categories followed by the reason(s) the City believes they are not applicable to this project, are as follows:

15300.2(a) Location. Classes 3,4,5,6 and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact may in a particularly sensitive environment

By definition, this exception does not apply to Class 32 Exemptions. This project is also located in an urbanized area.

15300.2(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The project is a stand-alone, site specific construction project that would not be phased. No other projects are planned for this site in the foreseeable future.

15300.2(c) Significant Effect. There are no unusual circumstances creating the possibility that the project will have a significant effect on the environment pursuant to CEQA.

The proposed project would be required to comply with standard conditions of approval designed to address construction-related impacts. For example, all construction activities are subject to the City's Noise Ordinance (PAMC 9.10), which limits noise and construction hours; large projects are required to prepare a City approved Construction Logistics Plan that reviews traffic impacts, noise, parking etc.; and Best Management Practices (BMPs) are required of all construction sites to address ground, water and air pollution related to the daily activity. There is nothing unusual about this project site such as any historic or archeological resources or natural features.

15300.2(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, with a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The project site is not visible from a scenic highway. I-280 and Skyline Blvd (HWY 35) are the only State scenic highways in Palo Alto. The project is designed to complement the surrounding buildings and also preserves the existing mature street trees.

15300.2(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The City has reviewed the Cortese List on the Envirostor database to confirm that the project site is not on a list of hazardous waste sites compiled pursuant to Sec 65962.5 of the Government Code.

15300.2(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of an historical resource.

For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.

The site was the subject of a Historic Resource Evaluation completed in April 2018 by Richard Patenaude, AICP, a qualified historian with M-Group. The structures at 702 Clara Drive, in the City of Palo Alto, do not possess historical significance, are not strong examples of a style or type, were not designed by a master architect or builder, and are not associated with important events or persons. It is the professional opinion of M-Group that the structures are not individually eligible for California Register of Historical resources and do not qualify as historical resources under CEQA Guidelines §15064.5(a)(3).

Attachment E

Project Plans

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 “702 Clara Drive” 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=4230>