
From: Jonathan Lait

Recommendation
It is recommended that the Architectural Review Board (ARB):
  1. Review and provide advisory comment on the design of the Homekey emergency shelter housing project.

Report Summary
Project Homekey is a proposed modular interim housing development consisting of 88 modular sleeping “pods,” and approximately 10 additional support structures for dining, offices, storage, and common space uses. It is being built under AB 2162 and AB 140 (Homekey), which deems the project in compliance with all local Zoning standards and requires ministerial approval. Therefore, the ARB shall act as an advisory body, and the ARB findings do not apply.

Council and staff are asking the ARB, in an advisory capacity, to review the architectural details of the project and provide comments.

Background
LifeMoves, a nonprofit partner, has teamed up with the City to construct an 88-unit emergency shelter, also known as interim supportive housing.\(^1\) The project will be constructed on City-owned property, a portion of the former LATP site, and will be funded by the State of California, Department of Housing and Community Development’s (HCD) Homekey Program. To get people housed, Homekey provides many exemptions and requires adherence to rapid deadlines with the project reviewed, approved, and built within one year or less. LifeMoves has taken the lead on the architectural drawings and is considered the project applicant.

Council has had many hearings on this project starting in August 2021. But this project officially started on September 27, 2021, when Council took a series of actions enabling staff to prepare necessary materials with LifeMoves to submit an application to HCD for Homekey 2.0 funds. These actions\(^2\) included:

A. Adopt Resolution 9994 declaring an emergency shelter crisis\(^3\) with a one-year deadline and return to City Council for discussion on renewal;

B. Adopt a resolution authorizing the City Manager to apply for California Project Homekey funds in conjunction with LifeMoves for an 88-unit emergency shelter project at a portion of the LATP site (1237 North San Antonio Road);

C. Direct staff to complete due diligence necessary for the application;

D. Direct staff to return with necessary actions related to capital and operating costs for the project and include the City’s portion of the operating expenses as part of the City’s Long Range Financial Forecasting, taking into account the funding from LifeMoves as a partner as well as financial support from other agencies (e.g., the State, and Santa Clara County);

E. Direct staff to identify the costs associated with moving GreenWaste operations within LATP Area C and to work with LifeMoves to identify funding sources for the relocation;

and F. Direct staff to continue to partner with Valley Water to identify a staging area in preparation for a purified water plant.

On November 1, 2021, the City Council amended the resolution authorizing the City Manager to apply for Project Homekey to reflect updated capital and estimated operating expenses (CMR 13702; Minutes).

On August 30 and August 9, the City Council discussed services for unhoused residents in Palo Alto and provided staff direction. Staff report CMR 13521; Minutes for August 30 and CMR 13453; Minutes for August 9.

Most recently, Council reviewed this project on June 21, 2022, where they discussed the proposed 3-story design concept.\(^4\) The ARB may wish to review the staff report linked in

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\(^1\) “Interim supportive housing” is a State term of art that is defined as an “emergency shelter” by the City’s Municipal Code, meaning it provides temporary housing for a maximum of six (6) months (PAMC 18.04.030(a)(50)).

\(^2\) September 27, 2021 Council Action Minutes: https://bit.ly/3mNX9ez

\(^3\) Page 277 of this link is the emergency shelter ordinance language: https://bit.ly/3mNX9ez

\(^4\) June 21, 2022 Staff Report #14282 (page 46) online at https://tinyurl.com/3p89hjvc
footnotes and/or the video (starting at 2:15). Council agreed the 3-story concept enhances site functional space for anticipated clients and site staff and reduces operational constraints for GreenWaste, the City’s refuse disposal service provider and adjacent land user on the parcel.

Staff are awaiting an official project award from the State; this is anticipated to arrive in July. The funding will come after the Standard Agreement is signed with the State and after the City has finalized the lease and design with LifeMoves (project applicant). These final steps are anticipated to be completed in August 2022.

<table>
<thead>
<tr>
<th>Project Information</th>
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</thead>
<tbody>
<tr>
<td>Owner:</td>
</tr>
<tr>
<td>Architect:</td>
</tr>
<tr>
<td>Representative:</td>
</tr>
<tr>
<td>Legal Counsel:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Property Information</th>
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</thead>
<tbody>
<tr>
<td>Address:</td>
</tr>
<tr>
<td>Neighborhood:</td>
</tr>
<tr>
<td>Lot Dimensions &amp; Area:</td>
</tr>
<tr>
<td>Housing Inventory Site:</td>
</tr>
<tr>
<td>Located w/in a Plume:</td>
</tr>
<tr>
<td>Protected/Heritage Trees:</td>
</tr>
<tr>
<td>Historic Resource(s):</td>
</tr>
<tr>
<td>Existing Improvement(s):</td>
</tr>
<tr>
<td>Existing Land Use(s):</td>
</tr>
<tr>
<td>Adjacent Land Uses &amp; Zoning:</td>
</tr>
<tr>
<td>Aerial View of Property:</td>
</tr>
</tbody>
</table>
### Land Use Designation & Applicable Plans

<table>
<thead>
<tr>
<th>Designation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Zoning Designation:</strong></td>
<td>PF (Public Facilities)</td>
</tr>
<tr>
<td><strong>Comp. Plan Designation:</strong></td>
<td>MISP (Major Institution/Special Facility)</td>
</tr>
<tr>
<td><strong>Context-Based Design Criteria:</strong></td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Downtown Urban Design Guide:</strong></td>
<td>N/A</td>
</tr>
<tr>
<td><strong>South of Forest Avenue Coordinated Area Plan:</strong></td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Baylands Master Plan:</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>El Camino Real Design Guidelines (1976 / 2002):</strong></td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Proximity to Residential Uses or Districts (150'):</strong></td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Located w/in the Airport:</strong></td>
<td>N/A</td>
</tr>
</tbody>
</table>
Influence Area:

Prior City Reviews & Action
City Council: June 21, 2022; Nov. 1, 2021; Sept. 27, 2021; August 30, 2021
PTC: None
HRB: None
ARB: None

Project Description
The project proposes 88 modular sleeping “pods” (64 single/couple units and 24 family units), in eight three-story buildings and three two-story buildings. Approximately 10 additional one-story support buildings will contain dining, offices, storage, and common space uses. This will include a mix of modular structures under the jurisdiction of HCD and site-built structures that will be reviewed under our typical state and local building codes. All structures will incorporate solar panels on the roofs.

The site fronts San Antonio Road and is also home to a GreenWaste sorting facility that will be relocated behind the proposed emergency shelter. Significant grading, approximately 5 feet 1 inch, is required to elevate the site out of the flood zone. However, this grading will put the site at a similar height as buildings across the street and approximately 3.5 feet above the top of curb along San Antonio Road (see Sheet C4.0). Retaining walls will be required along the perimeter of the site.

As part of a separate staff-level Architectural Review project (22PLN-00113), LiveMoves is working with the City to ensure GreenWaste has sufficient space and facilities to continue operating as the City’s refuse disposal service provider. This project includes driveway access, grading, electrical service, new transformer, and electric vehicle changing stations. Staff is also working with the applicant to ensure GreenWaste can successfully continue during and after construction.

Requested Entitlements, Findings and Purview:
Typically, Site and Design review is required for a new use or a new building within the PF(D) Zone District and the project would be evaluated for consistency with the Zoning Code as part of that process. These discretionary acts, legislative amendment and design review, would also require analysis in accordance with the California Environmental Quality Act (CEQA).

However, projects funded under AB 140 (Homekey) are automatically deemed consistent with all local planning and zoning requirements and no discretionary approvals can be required. This is outlined in Health and Safety Code section 50675.1.3. Therefore, Site and Design review is not required; under State law the project must be ministerially approved. In addition, because there are no discretionary approvals, CEQA does not apply to approval of the proposed development.
That said, the City is leasing the land for this project and City Council decided that, though not required, the project will be heard by the ARB. The ARB’s discussion shall be a courtesy review and provide the public a forum to offer comments on the design. Accordingly, there will be no review of the project for adherence to the Architectural Review Findings in PAMC 18.76.020 since they do not apply.

**Analysis**

**Neighborhood Setting and Character**

The Palo Alto Homekey site is located adjacent to the Baylands. To the north are other portions of the former LATP site (Areas A and B). Area C of the LATP site is where GreenWaste, under contract with the City, has a sorting operation. Palo Alto Homekey is proposed for the front half of the LATP Area C site at 1237 North San Antonio. There is one remaining tank structure in Area B and the exact height of this structure is unknown, but it is estimated to be approximately 20 feet tall based on Google Maps images.

To the south are tall one-story office buildings currently occupied by Google. The existing grade of these sites are low, approximately 2.5 to 4 feet lower than the adjacent San Antonio Road. Across the street from the project site, in the City of Mountain View, are additional tall one-story office buildings that are elevated a couple of feet above the grade of San Antonio Road and separated from San Antonio Road by landscaped berms.

Palo Alto Homekey is required by flood zone regulations to elevate the finished floor by 5 feet, which brings the grade slightly higher than the height of the existing road, similar to the buildings across the street, but higher than the neighboring sites on the same side of San Antonio. The buildings on these sites pre-date the requirement to raise the finished floor above the base flood elevation.

**Zoning Compliance**

As a Project Homekey development, it is exempt from local Zoning Regulations. However, a Zoning Analysis has been provided in Attachment D for information purposes.

**Consistency with the Comprehensive Plan, Area Plans and Guidelines**

The Comprehensive Plan land use designation for the project site is Major Institution/Special Facilities, which prescribes governmental and community service uses and lands that are either publicly owned or operated as non-profit organizations. An interim housing services facility owned by the City and operated by LifeMoves (non-profit) fits within this classification.

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5 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.


7 The Palo Alto Comprehensive Plan is available online: [bit.ly/PACompPlan2030](bit.ly/PACompPlan2030)
Another design consideration is the proximity to the Baylands, and visibility from the Baylands trails. The Palo Alto Baylands Nature Preserve Design Guidelines (2005) primarily provide guidance for the trails and parklands. However, the following design principles are relevant and encouraged for this project:

- Use only muted, natural colors. Choose materials and finishes that will weather without degrading. Avoid bright, reflective colors, including white.
- Preserve the horizon line with low and horizontal elements. The dominant landscape feature of the Baylands is the horizon line of the open, treeless landscape and the flat water of the bay. Vertical elements that puncture this line have a large impact on the view. Therefore, keep elements low and horizontal.

It should be noted, however, that the Guidelines encourage gray paint, and allowing materials including wood and metal to naturally weather. For this project, a slightly wider, possibly darker, natural color palette is encouraged, as well as durable materials that will not degrade substantially over time. The proposed palette includes various light wood stains on plywood panels, light teal metal accents on the exterior-facing residential buildings, and yellow metal accents on the interior-facing support buildings. The catwalks connecting the residential buildings will also be in the light teal family.

**Multi-Modal Access & Parking**

The site is located within walking distance from the VTA ACE shuttle stop near San Antonio Rd. and Casey Ave, and the MVgo shuttle stop near Marine Way and Casey Ave. Both lines run limited morning and evening weekday services and connects to other lines. The nearest bus stop with weekend service is located 1.5 miles away at Charleston Road and Huff Ave. in Mountain View, though it is safely bikeable through Baylands and Shoreline Park trails.

There is no required parking minimum for this land use. The project will provide 24 on-site parking spaces. For reference, the Homekey project in Mountain View provides 19 parking spaces for 100 sleeping pods (88 single and 12 family units).

**Consistency with Application Findings**

While this project is not required to meet all ARB Findings in order to be approved, with private development, the ARB would ensure the project meets the following finding: “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.” While not required, the City endeavors to hold public projects to this same standard.

Staff provided the following feedback to LifeMoves, and as noted below, they have incorporated many of the changes to enhance the project aesthetic. The table below includes staff’s comments and the responses to date.

<table>
<thead>
<tr>
<th>Staff’s Comments/Direction</th>
<th>Applicant Response</th>
</tr>
</thead>
</table>
- Use various colors on the buildings to break up the massing.
  
- Paint the proposed building muntins a darker color to break up the façade. Make the muntin a wider material to give more of a Baylands feel.
  
- Provide a greater setback for some of the buildings to break up the flat project façade along San Antonio Road.
  
- Use balconies/decks to break up flat facades facing San Antonio Road.
  
- Add roof eaves to all sides of the building to create additional shadows and visually reduce the massing of the buildings.
  
- Change the roof style from a hipped roof to a shed roof, in keeping with the more natural surroundings.
  
- Ensure all windows are recessed from the façade to create interest/shadow lines.
  
- Enhance the proposed security fencing by using decorative metal panels or similar. Provide cost comparison between wood and metal, including maintenance costs.
  
- Ensure black vinyl fencing at the rear of the property is not visible from the PROW.
  
- Eight (8) foot fences are generally reserved for industrial areas or when residential abuts an industrial area (16.24.050).
  
- Separate the Greenwaste and the Homekey vehicle/pedestrian access points.
  
- Continue to work with staff on stormwater (C3) and runoff requirements to ensure no increase in runoff.
  
- A darker color has been added to the lower floors of the 3-story structures. An accent color is provided at each floor and around the doors and windows.
  
- No change proposed at this time.
  
- The security fencing has been setback from the front building facades by 4 feet to break up the street façade.
  
- A terrace has been added to the southernmost module, and the heights of the buildings are varied. The spacing between modules attached by the decks has increased slightly.
  
- 1.5-foot roof eaves have been added to all sides of the buildings.
  
- No change proposed at this time.
  
- All windows are recessed 5 inches back from the front façade.
  
- No change proposed and no cost comparison submitted to date.
  
- See Sheet A3.12 for details
  
- Discuss black vinyl vs powder coated
  
- Applicant is working on gate solution that will be presented at the hearing.
  
- Applicant is continuing to work with staff on a solution.

### Environmental Review

Numerous state laws, including but not limited to AB 140 (2021) and AB 2553 (2020) have exempted emergency shelter projects, and specifically projects funded by the Project Homekey program, from the requirements of the California Environmental Quality Act. To the extent any
of the actions contemplated by the City Council in relation to this project are not covered by these statutory exemptions, they are exempt pursuant to CEQA Guidelines Section 15269 as actions to mitigate an emergency related to the unhoused population in Palo Alto.

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 July 8, 2022, which is 13 days in advance of the meeting. Postcard mailing occurred on July 5, 2022, which is 16 days in advance of the meeting.

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

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jodie.gerhardt@cityofpaloalto.org

Attachments:
• Attachment A: Location Map (PDF)
• Attachment B: Zoning Comparison Table (DOCX)
• Attachment C: Project Plans (DOCX)

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*Emails may be sent directly to the ARB using the following address: arb@cityofpaloalto.org*
NOTE: Under Project Homekey, this project is exempt from the Zoning Code Development Standards. Comparison is for reference only.

### Table 1a: COMPARISON WITH CHAPTER 18.28 (PF DISTRICT)

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Required</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Front Yard</td>
<td>20 feet, equivalent to adjacent ROLM (D)(AD)</td>
<td>0 feet to lease line (12 ft to the property line)</td>
</tr>
<tr>
<td>Rear Yard</td>
<td>20 feet, equivalent to adjacent ROLM (D)(AD)</td>
<td>Approx. 44 ft to lease line</td>
</tr>
<tr>
<td>Interior Side Yard</td>
<td>20 feet, equivalent to adjacent ROLM (D)(AD)</td>
<td>Right - approx. 21 ft to lease/property line</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Left - approx. 25 ft to lease line (varies)</td>
</tr>
<tr>
<td>Max. Building Height</td>
<td>50 ft</td>
<td>33 ft (three stories) from finished grade to roof, plus 5 ft 1 in from existing to finished grade</td>
</tr>
<tr>
<td>Maximum Lot Coverage</td>
<td>30% (17,883 sf)</td>
<td>26.17% (15,727 sf)</td>
</tr>
<tr>
<td>Max. Total Floor Area Ratio</td>
<td>100% (59,609 sf) = leased area</td>
<td>54.02% (32,460 sf)</td>
</tr>
</tbody>
</table>

### Table 1b: CONFORMANCE WITH CHAPTER 18.52 (Off-Street Parking and Loading)

<table>
<thead>
<tr>
<th>Type</th>
<th>Required</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Parking</td>
<td>Ratios for unspecified uses are determined by the Director of PDS.</td>
<td>24 parking spaces</td>
</tr>
<tr>
<td></td>
<td>Chapter 18.20 (Office/R&amp;D) requires one parking space for each three (3) emergency shelter beds. Proposed project has 112 bedrooms = 37 parking spaces</td>
<td></td>
</tr>
</tbody>
</table>
Attachment C

**Project Plans**

During Shelter-in-Place, project plans are only available to the public online. Hardcopies of the plans have been provided to Board members.

**Directions to review Project plans online:**

1. Go to: bit.ly/PAtendingprojects
2. Scroll down to find “1237 San Antonio” 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-Articles/Planning-and-Development-Services/1237-San-Antonio-Road