

April 10, 2024

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

RE: Buena Vista Commons
Re-submittal SB 330 Planning Application Submittal

Dear Mr. Lait:

The Santa Clara County Housing Authority (**Housing Authority**) is pleased to re-submit this SB 330 Planning Application for the development of Buena Vista Commons at 3980 El Camino Real in Palo Alto. Buena Vista Commons is the apartment component of a larger redevelopment occurring at the Buena Vista Mobile Home Park (**Park**).

The original submittal was made on February 9, 2024. The updated drawings and planning documents that are enclosed in this re-submittal package were informed by comments we received from City staff following the initial submittal on February 9th. We have also made cost-informed design changes to allow project feasibility. These changes simplify the structural systems required for the apartment and improve feasibility by reducing cost. These changes are notable, but modest in physical impact. We have maintained the same unit count, increased the amount of parking available, and maintained the spirit of all design feedback that we received from our partners and community members during the conceptual and schematic design process.

As a reminder, Buena Vista Commons will consist of 61 affordable homes for families. 100% of the homes are subject to affordability restrictions in accordance with the tri-party regulatory agreement that is held between the Housing Authority, City, and County. The project will be developed on land owned by Poco Way HDC, Inc., a California nonprofit public benefit corporation that is wholly controlled by the Housing Authority, the developer.

The project uses The Housing Crisis Act (SB 330) and the California State Density Bonus Law (AB 1763). Buena Vista Commons satisfies the requirements of SB 330 and AB 1763, as detailed in the enclosed Project Description. On December 19, 2023, we submitted an SB 330 Preliminary Application to Palo Alto Planning staff.

We look forward to continuing to work with the City on this new project. Should you have any questions or need additional information, please feel free to contact Kris Adhikari at (650) 582-9359 or kris.adhikari@scchousingauthority.org.

Sincerely,



Flaherty Ward (Apr 10, 2024 09:28 PDT)

Flaherty Ward
Director of Real Estate

STREAMLINED HOUSING DEVELOPMENT REVIEW

Updated: Jul 19, 2024

3980 El Camino Real, Palo Alto, CA

Buena Vista Commons

Submitted by:

Santa Clara County Housing Authority

505 W. Julian Street

San José, CA 95110



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1. Introduction

a. Project Description

Buena Vista Commons is the apartment component of a larger redevelopment occurring at the Buena Vista Mobile Home Park (Park), Palo Alto's only mobile home park, located at 3980 El Camino Real, in the Barron Park neighborhood. Buena Vista Commons is proposed as a 61-unit apartment building, which occupies 1.69 acres of the existing 4.5 acre property. The location has been used for housing since at least the 1950s, when Buena Vista first converted from a car camp along El Camino Real to a mobile home park with spaces and hook-ups for homes. It eventually became a critical part of natural affordable housing stock in Palo Alto. Buena Vista Mobile Home Park had its last substantial renovation in 1970. As a result, the infrastructure is outdated and insufficient, the Park is overcrowded, and many homes require replacement. Buena Vista Commons is a critical part of the redevelopment that is necessary to address overcrowding at the Park and to achieve other project goals that are shared between the City, County and Housing Authority: to make substantial physical improvements, ensure financial sustainability, and maintain over 100 affordable homes.

Buena Vista Commons will be deed-restricted as 100% affordable housing. The apartment will serve existing renters who live at the Buena Vista Mobile Home Park, and it will increase affordable housing opportunities to more families in Palo Alto. Among the current resident population of the Park, a 2023 income recertification found that 90% of all current households are low-income (below 80% AMI and over half of households are very low-income (below 50% AMI). The average affordability level for each home at Buena Vista Commons is expected to be below 42% of AMI. The proposed project preserves affordable housing among the Park community and helps meet the larger community need for more affordable housing in Palo Alto.



Aerial illustration of Buena Vista Commons- the proposed 3-story apartment building

The location for Buena Vista Commons is an important one for more housing. It sits in the Barron Park neighborhood, which is an area that is rich in resources for families. It is less than a half-mile away from an elementary school, grocery store, public transit, and other restaurants, parks and cafes. In addition, housing costs throughout the Bay Area, including Palo Alto, have continued to skyrocket over time. Projects such as ours are critical to preserve and expand affordable housing opportunities in Palo Alto, helping maintain and increase socioeconomic and racial diversity. Immediately adjacent land uses to this site are another affordable housing property (Oak Manor Townhouses) to the west, commercial businesses to the east, and single family residential to the north.

Through its design features, Buena Vista Commons will bring energy efficiency, community cohesion, and curb appeal. It will also use materials that are intended to maintain well over time. For energy efficiency, Buena Vista Commons will be all-electric, use natural flooring, use Energy Star appliances, have bicycle parking, and will be setup to accommodate electric vehicle charging. For the resident community, it will have a barbecue area, teen room, community room, and resident services offices. And compared to the built structures at Buena Vista Mobile Home Park today, the apartment will have playful angles, fresh colors, and new trees that will make it attractive to passers-by in the Palo Alto community.



Barron Park neighborhood



Barron Park Elementary School



Adjacent building: Oak Manor Townhouses by Alta Housing



Adjacent commercial building along El Camino Real

b. Project Team

- **Santa Clara County Housing Authority (SCCHA):** Is the project developer. SCCHA is a public agency whose mission is to provide and inspire affordable housing solutions to enable low-income people and families in Santa Clara County to achieve financial stability and self-reliance.
- **The John Stewart Company:** The John Stewart Company has been Property Manager at Buena Vista Mobile Home Park since 2020 and will remain property manager for Buena Vista Commons. They are experienced with affordable housing compliance requirements, such as annual income recertifications.
- **Burke, Williams & Sorensen, LLP:** Real estate and land use attorneys.
- **Van Meter Williams Pollack LLP:** Architect.
- **Sandis Civil Engineers:** Civil Engineer.
- **Associated Right of Way Services, Inc.:** Relocation consultant.

c. About the Santa Clara County Housing Authority (SCCHA)

Santa Clara County Housing Authority is a public agency whose mission is to provide and inspire affordable housing solutions to enable low-income people and families in Santa Clara County to achieve financial stability and self-reliance. It is one of the original 39 Moving to Work agencies (out of 3,200 nationwide public housing authorities), which gives it a special designation to make strategic program and policy changes.

The Housing Authority was established in 1967. One of its functions is as a developer and asset manager for affordable housing. It currently owns nearly 3,500 homes throughout Santa Clara County. It has an active development pipeline of over 1,200 homes, which is through large master-plan projects, smaller development sites, and deeply mission driven developments like Buena Vista. Currently, Bellarmino Place, Alvarado Park, and the Pavilion Inn are under construction and will provide 257 affordable homes for seniors, families, and transitional aged youth in San Jose when they are completed in 2024 and 2025. Our projects have utilized various different funding sources, including private and public sources such as Low-Income Housing Tax Credits (LIHTC) and conventional loans.

In addition to housing development and ownership, the Housing Authority administers federal rental assistance to over 19,000 households through the Housing Choice voucher program.

2. Community Engagement

To date, we have conducted a robust community and resident engagement process, going as far back as July 2017. Community and resident engagement has been organized into three distinct phases.

Phase 1 was Listening and Learning with Buena Vista residents, which took place from July 2017 through October 2022. During this phase there were town hall meetings, design exercises and surveys. The goal at that stage was to understand resident questions and needs, gather stakeholder preferences and information. Questions during this phase were things such as: “What do you love about Buena Vista today?” and “What are your hopes for the future?” The responses to those questions helped inform the initial concepts and ideas before design began in earnest.

Phase 2 was Formal Community Design Engagement, which took place from October 2022 to December 2023. This is the main component of community and resident engagement that informed design. The Community Engagement Report included in the Supplemental Documents section of this Project Description further outlines this period of the engagement process. The activities that took place were town hall style meetings, small group meetings, bus tours, various written communication and other activities. Residents were informed about what changes their feedback resulted in.

Phase 3 is Post-Entitlements and Construction Outreach. This phase has not yet begun, but it is part of ongoing engagement where we will continue to provide information on the development process to impacted households, inform leaders and elected officials about the development timeline, and be available for community stakeholder input.



Photos from various townhalls

3. Project Details

a. Site

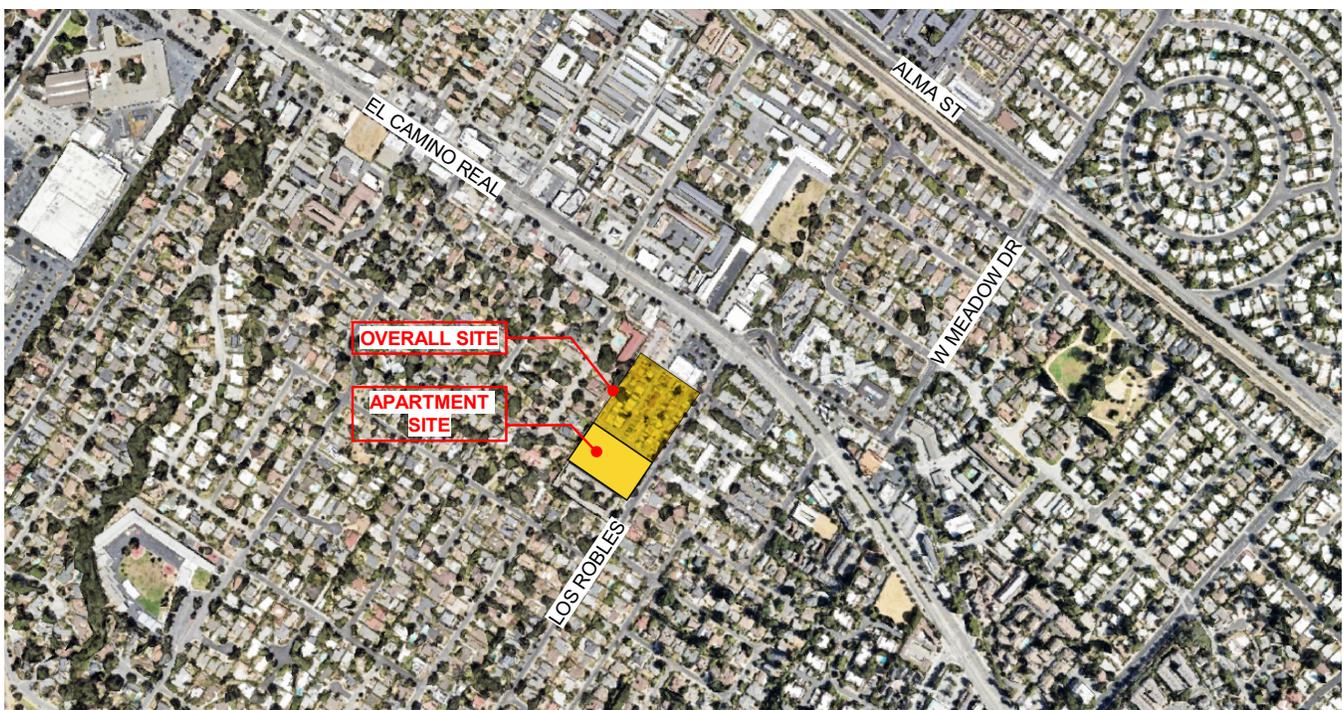
The project site, 3980 El Camino Real is currently the Buena Vista Mobile Home Park. The overall site has a gross area of 4.5 Acres and is situated alongside the commercial corridor of El Camino Real. Today it contains a variety of housing types- including RVs, park model RVs, mobile homes, cottages, and a single-family home. The site also includes an amenity building comprising laundry and shower rooms, as well as a small office area.

The site is located in the Barron Park neighborhood of Palo Alto, and has one street frontage along Los Robles Ave. It can also be accessed from El Camino real via an access easement on the adjacent property. Immediately north-east of the site is a multi-tenant commercial building and a Valero gas station. On the south-west side, the site is adjacent to another affordable housing property (Oak Manor Townhouses). The site abuts lower density housing developments on the north-east and across Los Robles.

The site is not located in a special flood hazard area as determined by FEMA. It is located in a liquefaction zone, but not in a delineated earthquake fault zone as identified by the California Geologic Surveys regulatory Zone map of Earthquake Zones.

To create the new apartment building Buena Vista Commons, the existing site will require a parcel split. The resultant 1.69 Ac parcel to the south-west is proposed as the site for the apartment building. The remainder is envisioned to continue being mobile home park- with upgraded units and new utilities.

The site is currently owned by the Santa Clara County Housing Authority (SCCHA), through the subsidiary entity of Poco Way HDC. SCCHA acquired the Park in 2017, with financial contributions made by the City of Palo Alto and County of Santa Clara.



Vicinity Map showing the overall site and proposed parcel split

b. Design

In early 2019, SCCHA began working with Van Meter Williams Pollack LLP (VMWP) on the redesign and renovation of the Buena Vista Mobile Home Park. Through a series of evolving design challenges and iterations, the design program for the redevelopment ultimately landed on a hybrid model- including a new apartment building and a mobile home park as well as infrastructure upgrades and new amenities.



Concept view of Buena Vista Commons

Buena Vista Commons is the new apartment building piece of the redevelopment. It is currently envisioned as a 3-story building with a single street frontage along Los Robles Ave. It comprises 61 units ranging from Junior 1-BRs to 1-, 2- and 3-BR units. The apartment site also includes an internal street known as Main Street, that provides access to the mobile home park from Los Robles Ave. This will be shared between the two sites via a future access easement.

The building is configured as a C-shaped building with a courtyard in the middle. The 2 wings and the courtyard help it connect to the adjacent mobile home park and create a welcoming space with amenities that will be shared by residents of both developments. The courtyard also connects across an private internal street (Street 1) to proposed recreation areas in the mobile home park. This configuration is a result of multiple design iterations and incorporating resident and stakeholder feedback- the massing was flipped around to open up to the mobile home park. The building maintains a generous 60-70' setback from the existing property lines to the side and rear. The adjacent properties to the rear are lower density residential, and the setback is buffered with surface parking and a planting area.

The ground floor includes a lobby and 2 office suites- one for onsite Property Management and another for Resident Services. The Lobby and Property Management offices are located at the entry corner at Main Street and Los Robles. This helps to address resident concerns over safety and access to the site.

The ground floor also includes a spacious Teen Room that will house the Homework Club. Homework Club is an important part of the Buena Vista community and supports the kids who currently live here. There is also a Community Room located off the central courtyard. Both the Community Room and Teen Room are intended to be shared by residents of the apartment building as well as the residents of the upgraded mobile home park. Other resident amenities in the apartment building include a laundry room, bike room and a storage room.

The apartment building site will also include 79 surface parking spaces at the side and rear. Approx. 61% of these spaces are planned to have EV charging equipment installed at the outset, with the remaining spaces planned to be EV-ready. Rooftop solar panels are also planned for the building.

The overall redevelopment plan has a thoughtful landscape design that incorporates resident feedback received over time. It aims to create communal spaces and respite areas across the site. The apartment site includes a courtyard with an outdoor BBQ area and shaded seating. In response to stakeholder feedback about the lack of trees at Buena Vista currently, plenty of planting areas with trees and planned biotreatment are shown throughout the site.

In addition to incorporating feedback from residents and stakeholders, the project has been designed to respond to the City of Palo Alto's Objective Design Standards.

This entitlements package also includes the streetscape design for the complete site along Los Robles Ave. The current design shows a new sidewalk, new street parking, and planting bulb-outs, all while retaining existing underground and overhead utilities along Los Robles. New utilities serving the apartment building and the mobile home park are planned to be located along Los Robles.

c. Sustainability

Sustainability is integral to the design of Buena Vista Commons. Green building principles are a key to environmental responsibility and also help us create comfortable, high quality living spaces for future residents- many of whom will be relocating from the current mobile home park. Sustainable design will help to keep the building's operating costs low, while also helping to keep monthly utility bills manageable for the residents.

Buena Vista Commons will be designed to meet the City of Palo Alto's Green building ordinance. For new multifamily construction, this entails CALGreen Mandatory Plus Tier 2 with local amendments. The project is also currently aiming to meet LEED for Homes- which promotes the design and construction of high-performance green homes. A combination of these two rating systems will ensure a comprehensive approach to green design that translates across design disciplines.

Planned features at this time include: rooftop solar panels, EV charging, low-flow water fixtures, Energy Star appliances and biotreatment areas spread across the site.

d. Affordability

Buena Vista Commons will provide 61 rental apartments comprised of a mix of studio/junior one-bedroom (with an embedded bedroom), one-bedroom, two-bedroom, and three-bedroom apartments.

The apartments will have affordability restrictions at or below lower income levels, defined as 80% of the area median income. In practice, it is our intention and plan to provide the affordable units at lower income levels as determined by multiple regulatory agreements that will be held on the property including those held with the California Tax Credit Allocation Committee (CTCAC) and the tri-party regulatory agreement that is held between the City of Palo Alto, County of Santa Clara, and Santa Clara County Housing Authority. A development goal of Buena Vista is to maintain it as an affordable housing asset for the long-term, while preventing the displacement of all existing households. To that aim, any households currently residing at the Buena Vista site who are moderate or high-income will be allowed to remain, however, those units will be made available to lower income households at affordable rents after the returning households voluntarily vacate their units. This provision is codified in the tri-party regulatory agreement.

The tables below show the current income limits of eligible households, based on household size, as determined by the CTCAC. The 80% of AMI incomes affording to California Department of Housing and Community Development (HCD) are included for reference, as these figures are what the City of Palo Alto uses to define “low income.”

2023 CTCAC Income Limits					
	30% Income Level	50% Income Level	60% Income Level	80% Income Level	HCD 80% Income Level (For reference only)
1 Person Household	\$ 31,080	\$ 51,800	\$ 62,160	\$ 82,880	\$ 96,000
2 Person Household	\$ 35,520	\$ 59,200	\$ 71,040	\$ 94,720	\$ 109,700
3 Person Household	\$ 39,960	\$ 66,600	\$ 79,920	\$ 106,560	\$ 123,400
4 Person Household	\$ 44,370	\$ 73,950	\$ 88,740	\$ 118,320	\$ 137,100
5 Person Household	\$ 47,940	\$ 79,900	\$ 95,880	\$ 127,840	\$ 148,100
6 Person Household	\$ 51,480	\$ 85,800	\$ 102,960	\$ 137,280	\$ 159,050
7 Person Household	\$ 55,020	\$ 91,700	\$ 110,040	\$ 146,720	\$ 170,050
8 Person Household	\$ 58,590	\$ 97,650	\$ 117,180	\$ 156,240	\$ 181,000

The project’s monthly rents are determined by the CTCAC to ensure that rents are affordable to the lower-income residents earning between 30% to 80% of AMI. The following table shows the range of net rents (after utilities) currently projected to be charged to residents during the first year of operations based on CTCAC’s currently published rents. We note that if the project were to receive project-based rental assistance, the rents paid by residents could be even lower, as they would only need to pay 30% of their income towards rent.

PROPOSED MONTHLY RENTS	
Unit Type	Monthly Rent
Junior 1-Bedroom Apartment	\$829-2,677
1-Bedroom Apartment	\$882-2,677
2-Bedroom Apartment	\$595-3,212
3-Bedroom Apartment	\$1,203-3,711

The following table summarizes the income and rent restrictions that will apply to this project to receive the state density bonus.

Unit Type	Number of Units	Unit Square Footage (approx.)	Maximum Affordability Restriction*
Junior 1-BR	2	490 SF	80% of AMI
1-BR Apartment	27	460-485 SF	80% of AMI
2-BR Apartment	16	700-785 SF	80% of AMI
3-BR Apartment	15	920-975 SF	80% of AMI
Total Restricted Units	60		
Total Non-Restricted Units (Manager)	1 (2-BR Unit)		
TOTAL PROJECT UNITS	61		

*Existing tenants at the property will be allowed to return to the apartment regardless of whether they income qualify at move-in. Those units are considered as restricted low-income units because the tri-party regulatory agreement requires that future units will be made available to lower income households at affordable rents after any initial moderate or high-income households voluntarily vacate their units. After any initial moderate or high-income households vacate their units, those units will continue be restricted as low-income units with affordable rents for at least an additional 55 years or greater.

4. Zoning and Development Standards

a. Comprehensive Plan and Zoning Code

The 2030 Comprehensive Plan land-use designation for the site is “Multi-Family Residential”, and the site is currently zoned “RM-20”. As per PAMC 18.13.010:

RM-20 is a low-density multiple-family residence district is intended to create, preserve and enhance areas for a mixture of single-family and multiple-family housing which is compatible with lower density and residential districts nearby, including single-family residence districts. The RM-20 residence district also serves as a transition to moderate density multiple-family districts or districts with nonresidential uses. Permitted densities in the RM-20 residence district range from eight to twenty dwelling units per acre.

ZONING INFORMATION	
COMPREHENSIVE PLAN	Multi-Family Residential
Allowed Uses	Commercial and Retail uses that serve the immediate neighborhood, Mixed-use (housing+retail)
CURRENT ZONING	Zoning District: RM-20
Allowed Uses	Multi-family housing compatible with lower density and residential districts nearby, including single-family residence districts [transition district].
Height Limit	30'
Max Density	20 du/ac
Setbacks	Front yard: 20' Interior Side yard: 10' Interior Rear yard: 10' Street Side and Rear yards: 16'
Site open space	35% min.
Usable open space	150 sq ft per unit min.
Common open space	75 sq ft per unit min.
Private open space	50 sq ft per unit min.
Max FAR	0.5
Parking (Multi-family residential)	1 per micro/studio unit, 1 per 1-bedroom unit, 2 per 2-bedroom or larger unit (at least one covered). Tandem parking allowed for any unit requiring two spaces, up to a maximum of 25% of total required spaces. 1 bike parking space per unit (100% long-term)

b. Eligibility for Streamlining

The project uses The Housing Crisis Act (SB 330) and the California State Density Bonus Law (AB 1763). The eligibility for both laws is as described:

The project meets eligibility criteria under SB 330 because it complies with the following provisions:

1. The project will replace all existing or demolished protected units.
2. The project will include at least as many residential dwelling units as the greatest number of residential dwelling units that existing on the project site within the last five years.
3. Existing residents are allowed to occupy their units until six months before the start of construction.
4. The developer agrees to provide the affordable rental unit occupants relocation benefits and a right of first refusal for units available in the new development at an affordable rent for the household.

The project meets eligibility criteria under AB 1763 because it complies with the following provisions:

1. One hundred percent of the total units are for lower income households except that 20 percent of the total units may be for moderate-income households.
2. The applicant agrees and ensures the continued affordability of all very low and low-income rental units that qualified the applicant for the award of the density bonus for 55 years.
3. For a one hundred percent affordable project, rent for 20 percent of the units shall be set at affordable rent using definitions in the Health and Safety Code, and rent for the remaining units may be regulated using rents and incomes as determined by CTCAC regulations.

Note that all our waivers and concessions are in the interest of maintaining the project's feasibility. These waivers and concessions help to reduce development costs without compromising the quality, livability, and durability of the development we will build. We have worked with our General Contractor, Nibbi Brothers Associates, to estimate impact of not receiving the waivers and concessions. In total, obtaining these waivers/concessions brings the project cost down by more than \$1 million. While we understand it is disappointing to see some of the city's objective standards relaxed, the city also benefits from the project by seeing its affordable housing stock and RHNA numbers increase because of our development. Additionally, the city can feel confident that this housing stock will remain affordable in perpetuity with the Housing Authority, the City and the County maintaining long-term control over the property. Without the waivers and concessions, it would not be possible to utilize the bonus units allowed under the state density bonus law.

And, in our current moment, it is more important than ever that we closely monitor project costs and ensure we have a cost-efficient building, as funding for affordable housing developments is significantly limited at the Local and State level.

c. Regulatory Agreement

Currently, there is a tri-party regulatory agreement held by the City, County, and Housing Authority. It restricts all units under an affordability covenant for 75 years from 2017. It is expected that this regulatory agreement will be amended and recast by the time of construction start, starting a new 75 year term to ensure the long-term affordability for 100% of units.

d. Modifications under State Density Bonus Law

Since the residences will be 100% affordable for lower-income households, the project qualifies for an 80% density bonus, four incentives or concessions, and unlimited waivers under the State Density Bonus Law (AB 1763). The project also utilizes the by-right parking incentive associated with this law.

The project seeks four concessions. Together, these concessions result in actual, identifiable cost reductions by allowing a more efficient building and site design that results in a net reduction in the cost per dwelling unit of construction. The concessions, with estimated cost savings identified.

Additionally six waivers, which would otherwise prevent the development from achieving the density its allowed under the State Density Bonus Law, are identified below as well.

Concession 1: Façade breaks

The general contractor estimates an added cost of more than \$500k to meet the design standards. Increasing the depth of façade breaks from two to four feet increases skin material cost and framing wall costs. In addition, this change might make current unit layout unrealistic, and increase the square footage of the building.

Concession 2: Ground floor unit direct connection to path or common open space

The general contractor estimates an added cost of approximately \$350,000 to add direct connections from units to an outdoor pathway or common open space. Additionally, private open space would infringe upon the amount of common open space we can provide.

Furthermore from an operations standpoint, in affordable housing, the best practice is to have a single point of entry for resident security and safety. And, considering equity, it is unfair to offer select residents' private entries when other units cannot offer that amenity.

Concession 3: Percentage of frontage dedicated to utilities/parking/driveway

The general contractor estimates that changing the utility design would add more than \$100k to the project budget. Reducing the available space for utilities along building's front facade will push mechanical areas to the rear of the building, and thus increase the length of joint trench and utility lines to the street.

Concession 4: Private Open Space

The apartment does not have any private open space. To provide private open space for every unit, it would require balconies to be built. Each balcony adds approximately \$35,000 to the project budget, according to the general contractor.

On the ground floors, it will also reduce the amount of public open space that is available, and it will impact the building footprint by encroaching upon setbacks.

Balconies have been proven over time to pose significant challenges in multifamily affordable projects. They add significant cost to the project, and during operations, pose several different kinds of risk: construction defects and waterproofing issues, wear and tear, and being used as storage, despite prohibitions in lease agreements, which create additional enforcement issues for management. Instead, we are providing high quality open space throughout the apartments and the mobile home park.

Waiver 1: FAR

The allowed Floor-Area ratio is 0.5, however, the proposed project has a ratio of 0.89. Reducing the FAR will result in a loss of density.

Waiver 2: Height

We are proposing to modestly exceed the height limit. Maximum height allowed by zoning on this site is 30 feet. Buena Vista Commons proposes three stories that partially exceeds the height limit due to its parapets and stair penthouse. The parapets rise to 37 feet and six inches, when measured from the lowest adjacent grade.

For Buena Vista Commons to provide the same number of units and be below the height limit, we would need to put third floor units at the lower levels. To do that, it would require widening the base of the building. As a result, the foundation would become much larger. That is not possible given the size of the parcel, thereby prohibiting the project from achieving the density it is allowed under the State Density Bonus Law.

Waiver 3: Site Open Space

Zoning requires that 35% of the site be open space. The proposed project has 24% allocated toward open space. Achieving the amount of open space required would decrease the size of the building, causing a loss of units. It is necessary to have this waiver to maintain the density allowed under the State Density Bonus Law.

In addition, there will effectively be a shared use with the mobile home park open space, which is not contemplated in the application for the apartments.

Waiver 4: Tree Canopy Cover in the Parking Area

Zoning requires tree plantings to shade 50% of the parking lot surface area within 15 years. The proposed project achieves 47% tree canopy cover over surface parking area. As per the State density bonus law's parking incentive, we are required to provide 77 parking spaces. Additionally, as per city comments, we are also required to provide 1 loading space onsite.

Parking is extremely impacted at family housing properties and parking has been a consistent concern voiced by residents over time. We are currently showing 79 spaces. Increasing the canopy cover further to 50% would result in the loss of parking spaces, dropping the overall parking count to below 77- thereby impacting the number of dwelling units proposed.

However, in response to ARB comments, we have made changes to improve the canopy cover from 33% in the previous iteration to 47% in the current resubmittal.

Waiver 5: Reduction in Street Trees

The city's objective design standards require one street tree for every 30 linear feet of sidewalk length and located within 6 feet of the sidewalk. We are unable to provide this along the Los Robles Ave frontage due to the presence of a 10' storm drain easement controlled by Santa Clara County Valley Water District (Valley Water). As per Valley Water comments, no trees or wooded plants may be planted in their easement area.

For Parcel A, we are able to push the proposed trees out of the easement area (further than 6' behind the proposed sidewalk). However, for Parcel B, we do not have the space to push trees out of the easement. We are instead proposing to retain 2 of the existing trees along the frontage. Thus we are only able to provide 8 trees where 19 are required.

e. Relocation and Displacement

The proposed project will require some amount of relocation and displacement for a number of existing households who currently live at Buena Vista Mobile Home Park. The manner in which relocation will take place has not been determined yet.

A relocation plan is being developed currently. It will be circulated for public review and adopted by a public agency prior to it being applied.

Displaced residents will receive any relocation benefits that they are entitled to in accordance to all State and Federal relocation law that is associated with public financing. It is a high priority to minimize impact to displaced households including ensuring that impacted children can continue to attend their current schools throughout the duration of construction.