



Planning & Transportation Commission Staff Report

From: Planning and Development Services Director
Lead Department: Planning and Development Services

Meeting Date: February 28, 2024
Report #: 2312-2397

TITLE

4075 El Camino Way [23PLN-00202, Palo Alto Commons]: Consideration of a Planned Community (PC) Project Amending an Existing PC (PC-5116) to Allow Additions to an Existing 121 Unit Assisted Living and Memory Care Facility. The Additions Would Include 18 Assisted Living Units. Environmental Assessment: Pending. Zoning District: PC-5116 (Planned Community).

RECOMMENDATION

It is recommended the Planning and Transportation Commission (PTC) take the following action(s):

- Provide initial comments/feedback and recommend that staff forward the proposed application to the Architectural Review Board for review of the development plan.

EXECUTIVE SUMMARY

The Planned Community (PC) amendment project includes the addition of 18 units (approximately 6,800 sf) to an existing 121-unit, 83,500 sf assisted living facility. The existing PC would need to be amended to allow for increases in density, floor area, lot coverage, and for the building to protrude up to 1'8" into the daylight plane in some areas. The additions would be consistent with the existing building height. The application is subject to environmental review under the California Environmental Quality Act (CEQA); the review is in process.

The City Council reviewed a prescreening project in August 2023. The current application requires initial review by the PTC, followed by review by the Architectural Review Board (ARB) of the development plan. After ARB review, the PTC will review a draft PC ordinance and provide a final recommendation on the development plan before it is presented to the City Council for final action.

BACKGROUND

Project Information

Owner:	Stephen Reller, R and M Properties
Architect:	Daniel Bowman, IPAOC
Representative:	n/a
Legal Counsel:	n/a

Property Information

Address:	4075 El Camino Way
Neighborhood:	Ventura
Lot Dimensions & Area:	110,642 sf, irregular shaped lot
Housing Inventory Site:	No
Located w/in a Plume:	No
Protected/Heritage Trees:	Yes, street trees
Historic Resource(s):	No
Existing Improvement(s):	Palo Alto Commons: 83,511 sf, 3 stories, 32'6" height, built 1989 The Avant: 47,500 sf, 3 stories, built 2014
Existing Land Use(s):	Senior Assisted Living, Senior Independent Living
Adjacent Land Uses & Zoning:	North: Single Family Residential (R-1) West: Multi-Family Residential (RM-20) East: Multi-Family Residential (RM-20), Goodwill Store, and Preschool (CN) South: Animal Care, Retail, Mixed-Use (CN)
Special Setbacks:	No
Aerial View of Property:	



Source: Google

Land Use Designation & Applicable Plans/Guidelines

Comp. Plan Designation: Planned Community (PC-5116)

Zoning Designation: Multiple-Family Residential (MF), Neighborhood Commercial (CN)

	Yes		Yes		Yes
Baylands Master Plan/Guidelines (2008/2005)		El Camino Real Guidelines (1976)		Housing Development Project	
Downtown Urban Design Guidelines (1993)		South El Camino Real Guidelines (2002)		Utilizes Chapter 18.24 - Objective Standards	
Individual Review Guidelines (2005)		Within 150 feet of Residential Use or District	yes	Context-Based Design Criteria applicable	
SOFA Phase 1 (2000)		Within Airport Influence Area			
SOFA Phase 2 (2003)					

Prior City Reviews & Action

City Council: Prescreening: 8/7/23 [report](#), [video](#)

PTC: None

HRB: None

ARB: None

City Council reviewed a Prescreening application for a project with 14 new units on August 7, 2023. Minutes of the prescreening are provided as Attachment E. Council supported the concept to add more units to Palo Alto Commons. However, Council raised concerns about the encroachment into the daylight plane adjacent to single-family homes, on-site parking, and affordability of the assisted living units. Members of the public also echoed similar concerns. Council encouraged the applicant to consider if it was feasible to add a fourth floor that would be stepped back from the current edges of the building, rather than nestling the new units into the existing step-backs.

In response to this, the applicant submitted a memo, Attachment C, explaining why it is not feasible to add a fourth floor. Primary reasons include the existing location of egress stairs and elevators, increased displacement of residents during construction, structural capacity of the existing structure, and cost. However, the project has been redesigned to reduce the intrusion into the daylight plane. Additionally, four more units, for a total of 18, were added to the project. These four units are smaller, and potentially more affordable by design, than the current units.

PROJECT DESCRIPTION

This project is a request to amend an existing Planned Community (PC) for an Assisted Living facility. The project site currently consists of two Senior Living communities, Palo Alto Commons, providing 121 Assisted Convalescent units and approved in 1987 (PC 3775), and The Avant providing 44 Independent Living units and approved in 2011 (PC 5116). The existing Palo Alto Commons building is three stories tall and tapers down to two and one stories closest to the adjacent single-family (R-1) neighborhood. The project would add 18 units (approximately 6,800 sf) to the Palo Alto Commons building by adding second floor area and in some locations third floor area to the “step backs”, as well as three modestly sized ground floor additions which will vary in height from two to three stories.

If approved, the amended PC would allow for increases to the density, floor area, lot coverage, and allow an up to 1’8” protrusion into the daylight plane in some areas. The development plans are provided in Attachment F.

Requested Entitlements, Findings and Purview:

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

- **Planned Community (PC):** The process for evaluating this type of application is set forth in PAMC 18.38. Planned Community is intended to accommodate all types of developments, including combinations of uses appropriately requiring flexibility under controlled conditions not otherwise attainable under other districts. The planned community district is particularly intended for unified, comprehensively planned developments that are of substantial public benefit and which conform with and enhance the policies and programs of the Palo Alto Comprehensive Plan. The application requires initial review by the Planning and Transportation Commission, followed by review by the

Architectural Review Board (ARB). Upon recommendation from the ARB, the draft ordinance for the project is presented along with the development plan to the Planning and Transportation Commission for recommendation to the City Council for final action.

ANALYSIS

Neighborhood Setting and Character

Adjacent zoning and uses include The Avant Independent Living facility on the same parcel, and multifamily residential use (RM-20) to the (approximate) west, single-family (R-1) residential uses to the north, and the Goodwill store (CN) to the east. Across El Camino Way, West Meadow Drive, and El Camino Real there are other multi-family and commercial uses. Heights in the area range from one to three stories and the buildings reflect a variety of architectural styles.

Consistency with the Comprehensive Plan, Area Plans and Guidelines^[1]

The Comprehensive Plan designation includes both Multiple-Family Residential, for a portion of the site adjacent to single-family, and Neighborhood Commercial for the portion towards El Camino Way.

Multiple-Family Residential is described as: *The permitted number of housing units will vary by area, depending on existing land use, proximity to major streets and public transit, distance to shopping and environmental problems. Net densities will range from 8 to 40 units and 8 to 90 persons per acre. Density should be on the lower end of the scale next to single-family residential areas. Densities higher than what is permitted may be allowed where measurable community benefits will be derived, services and facilities are available, and the net effect will be consistent with the Comprehensive Plan. Population densities will range up to 2.25 persons per unit by 2030.*

Neighborhood Commercial is described as: *Includes shopping centers with off-street parking or a cluster of street-front stores that serve the immediate neighborhood. Examples include Charleston Center, Edgewood Center and Midtown. Typical uses include supermarkets, bakeries, drugstores, variety stores, barber shops, restaurants, self-service laundries, dry cleaners and hardware stores. In locations along El Camino Real and Alma Street, residential and mixed-use projects may also locate in this category. Nonresidential FARs will range up to 0.4. Consistent with the Comprehensive Plan's encouragement of housing near transit centers, higher density multi-family housing may be allowed in specific locations.*

As no changes to land use are proposed, this project would not substantially deviate from the existing degree of conformance with the Comprehensive Plan Land Use Designations.

This project would also support the following 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-1.6 Encourage land uses that address the needs of the community and manage change and development to benefit the community
- Policy L-2.8 When considering infill redevelopment, work to minimize displacement of existing residents.
- Policy L-2.9 Facilitate reuse of existing buildings

Shadow Study

Comprehensive Plan Policy L-6.8 states: Support existing regulations that preserve exposure to natural light for single-family residences.

Single-family residences in an R-1 zone are the closest buildings to the proposed additions and the homeowners have expressed concerns regarding the project. The plan set (Sheets A5.9-A5.15), includes a shadow study comparing the typical length of shadows expected throughout the day for the existing building and the proposed building. Neighbors would expect to see slightly increased shadows in their backyards from approximately fall to spring. At the height of the winter, increased shadows would begin as early as noon, whereas at other times of the spring or fall, the shadows would occur later in the afternoon. Minimal increases in backyard shadows would occur during the summer.

Below is a diagram showing the worst case scenario on Dec 21st at 4:00pm



Zoning Compliance^[2]

A detailed review of the proposed project's consistency with applicable zoning standards is provided in Attachment B. The proposed changes would need to be considered as new development standards under the Planned Community amendment.

In summary:

- The density and provided units would increase by 18 units
- The allowed lot coverage and floor area would increase to accommodate the approximately 6,800 sf addition
- The minimum setback would decrease from 8 ft to 6 ft for the property line adjacent to Goodwill

- The building would encroach up to 1'8" into the daylight plane adjacent to single-family homes
- The parking ratio provided would reduce from .47 spaces per unit to .41 spaces per unit, as no additional spaces are being provided. However, this is consistent with the Code requirement for 1 space per 2.5 beds for Convalescent Facilities.

No changes are proposed to the maximum height

Multi-Modal Access & Parking

Based on the feedback from City Council and the neighbors, a parking study is being prepared to analyze the efficacy of the existing parking spaces and any potential needed increase from the proposed units.

The applicant clarified that of the 55 spaces on site, 41 are dedicated to onsite staff, and 14 are for visitors. This applies only to the Palo Alto Commons portion of the site. The Avant is a separate PC zone and has its own parking.

This project is located on the VTA 22 bus line but is not within walking distance of a CalTrain station or other public transportation. The applicant has been asked to provide additional information regarding existing and proposed bike parking. It does not appear that there was a requirement for bike parking at the time of original development.

^[1] The Palo Alto Comprehensive Plan is available online: bit.ly/PACompPlan2030

^[2] The Palo Alto Zoning Code is available online: bit.ly/PAZoningCode

STAKEHOLDER ENGAGEMENT

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 February 16, 2024, which is 12 days in advance of the meeting. Postcard mailing occurred on February 15, 2024, which is 13 days in advance of the meeting.

Public Comments

There were four public comment speakers during the August 7, 2023 Council Prescreening, as reflected in the attached meeting minutes (Attachment E).

Additionally, the applicant hosted an outreach meeting on October 11, 2023 at the project site and invited all adjacent neighbors. Approximately 10 people attended, including City staff and Mayor (at the time) Kou. The neighbor's comments were focused on the following:

- Concern about the increase in height, opinion that adding one story was better than adding multiple, i.e., the parts of the building going from one to two, or two to three, is more appropriate than parts going from one story to three stories
- Concern about existing noise from the Caltrain “bouncing” off the building and if this would increase as a result of the addition
- Concern about over-pruning or removing screening trees
- Concern about shadows cast by the addition further shading their backyards
- Concern about staff and visitors parking on local streets, rather than on-site
- Desire for the applicant to more strongly consider additions to the other sides of the building that do not face single-family neighbors

There was also a complaint regarding noise from existing rooftop equipment, this neighbor was encouraged work with the site operator and to follow up with Code Enforcement, as this is outside the scope of this project.

After the outreach meeting, the applicant placed story poles to demonstrate the approximate addition. These were removed to address a neighbor’s request in January.

Two additional public comments were received regarding the current version of the project and are included as Attachment D.

ENVIRONMENTAL REVIEW

The subject project is being 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. While a noise report is being prepared, no new significant environmental impacts are currently anticipated as a part of this project.

ALTERNATIVE ACTIONS

In addition to the recommended action, the PTC may:

1. Continue the item to a date uncertain, to enable additional PTC review before moving the project forward to the Architectural Review Board.

ATTACHMENTS

- A. Location Map
- B. Zoning Comparison Table
- C. Applicant’s Response to Prescreening Comments
- D. Neighbor’s Comments
- E. August 7, 2023 Prescreening Excerpt Minutes
- F. Project Plans

AUTHOR/TITLE:

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^[1] Emails may be sent directly to the PTC using the following address: planning.commission@cityofpaloalto.org