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November 15, 2024

**VIA ELECTRONIC DELIVERY**

City of Hollister Planning Division  
339 Fifth Street  
Hollister, CA 95023

**Re: Submittal of Preliminary Application Pursuant to the Builder's Remedy  
for 851 Sunnyslope Road, Hollister, California  
(APN: 057-070-064-000)**

Dear Sir/Madam:

Our client, ROEM Development, Inc. ("ROEM"), hereby submits a Preliminary Application for its proposed 62-unit "housing development project" in the City of Hollister (the "City") pursuant to Government Code section 65941.1(a), the Housing Accountability Act (Gov. Code § 65589.5; "HAA"), including the "Builder's Remedy" (Gov. Code § 65589.5(d)) and other state laws. This letter, the permit processing fee, and the enclosed information represent the Project's Preliminary Application pursuant to Government Code section 65941.1(a).

**A. Project Description**

As more fully described in the enclosed plan set, the proposed project consists of 62 housing units—36 single-family homes without accessory dwelling units (ADUs) and another 13 single-family homes, each with attached ADUs ("Project") on an approximately 8.3-acre property consisting of one existing legal parcel (Assessor Parcel Number 057-070-064-000) at 851 Sunnyslope Road ("Project Site"). The Project would include deed restrictions for low-income households on all 13 of the ADUs (i.e., 21%) of total units.

The Project Site is currently vacant and is designated in the General Plan as Mixed Use; it is zoned Neighborhood Mixed Use (NMU). As designed, the Project has a density of approximately 5.9 single-family homes per acre and proposes approximately 143,000 square feet of residential construction.

The Project seeks the City's approval of a Vesting Tentative Subdivision Map, pursuant to the Builder's Remedy, and reserves the right to seek and obtain the benefits provided in the state Density Bonus Law, as further discussed below.

## **B. Builder's Remedy and the Housing Accountability Act**

This Project is protected by the Builder's Remedy provisions of the HAA. These provisions prohibit a city that does not have an adopted housing element that is substantially compliant with the Housing Element Law (Gov. Code § 65580 *et seq.*) from disapproving or conditioning in a manner that renders infeasible a housing development project "for very low, low-, or moderate-income households," even where the project is inconsistent with both the City's zoning ordinance and general plan land use designation. (Gov. Code § 65589.5(d)(5)). Projects for very low, low-, or moderate-income households are defined to include projects that provide 20 percent of the units for lower income households as defined in the HAA. (Gov. Code § 65589.5(h)(3)).

Because the City has not yet adopted a substantially compliant 6th Regional Housing Needs Assessment ("RHNA") Cycle Housing Element and the Project is a housing development project that will provide 20 percent of its units for lower income households, the Project is protected by the Builder's Remedy.<sup>1</sup> Therefore, the City cannot deny or condition approval of the Project in a manner that would render it infeasible, notwithstanding any inconsistency of the Project with the zoning ordinance or General Plan land use designation of the Project Site.

## **C. Senate Bill 330**

SB 330 declared a statewide housing emergency and placed restrictions on certain types of development standards, amended the HAA, and made changes to local approval processes and the Permit Streamlining Act (Gov. Code § 65920 *et seq.*). During the housing emergency period, as extended until 2030 by Senate Bill 8, all cities and counties are subject to specified project review requirements and timelines regarding applications for housing developments. These changes include a prohibition on applying new zoning regulations and development standards or listing the project as a local historic landmark after a project's application is submitted, except under certain specified circumstances.

### **1. Preliminary Application**

SB 330 allows an applicant to submit a Preliminary Application for any "housing development project," meaning a project that is at least two-thirds residential by square footage. (Gov. Code § 65941.1). A Preliminary Application is separate and distinct from, and does not require as much detail as, a traditional development application—i.e., a "Formal Application." SB 330 precludes local agency input into

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<sup>1</sup> The City submitted multiple versions of its Draft Housing Element to the California Department of Housing and Community Development, to which HCD responded each time that while the Draft addresses many statutory requirements, revisions will be necessary to substantially comply with state Housing Element Law. The City submitted its latest Draft on March 13, 2024, which HCD determined not to be in substantial compliance with Housing Element Law on June 11, 2024.

the required contents of a Preliminary Application. For example, the local agency may not add to the 17-item checklist.<sup>2</sup> In addition, the applicant may elect to use a city's Preliminary Application checklist, a checklist created by the California Department of Housing and Community Development, the applicant's own checklist, or no checklist at all. (Gov. Code § 65941.1(b)). Finally, the local agency has no role in determining the completeness of a Preliminary Application.<sup>3</sup> Thus, if the applicant complies with the checklist prescribed by state law, then the Preliminary Application is complete at the moment of filing-and vested rights accrue at that moment—without any affirmative action by the city required or allowed.

If an applicant submits a Formal Application within 180 days of submitting a Preliminary Application, then the zoning, design, subdivision, and fee requirements in effect at the time the Preliminary Application was submitted shall remain in effect for the remainder of the entitlement and permitting process, with certain limited exceptions,<sup>4</sup> plus two and one-half years following the date of final approval.

This is the earliest form of vested rights provided in the state Planning and Zoning Law and it is completely applicant controlled.

## 2. Consistency with General Plan and Zoning

SB 330 provides that a housing development project “shall be deemed consistent, compliant, and in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision if there is substantial evidence that would allow a reasonable person to conclude that the housing development project is consistent, compliant, or in conformity.” (Gov. Code § 65905.5(c)(1)). It also provides that a proposed housing development project “is not inconsistent with the applicable zoning standards and criteria, and shall not require a rezoning, if the housing development project is consistent with the objective general plan standards and criteria, but the zoning for the project site is inconsistent with the general plan.” (Gov. Code § 65905.5(c)(2)).

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<sup>2</sup> Gov. Code § 65941.1(b)(3) (“A checklist or form shall not require or request any information beyond that expressly identified in subdivision (a).”).

<sup>3</sup> Gov. Code § 65941.1(d)(3) (“This section shall not require an affirmative determination by a town, county, or town and county regarding the completeness of a preliminary application or a development application for purposes of compliance with this section.”).

<sup>4</sup> Exceptions to this rule include: (1) development impact fees, application and permit processing fees, capacity or connection fees, or other charges may be annually adjusted based on a published cost index (Gov. Code § 65589.5(o)(2)(A)); (2) where the requirement is necessary to avoid an adverse impact to public health or safety as defined in state law (Gov. Code § 65589.5(o)(2)(B)); (3) where the requirement is necessary to avoid or lessen an impact under CEQA (Gov. Code § 65589.5(o)(2)(C)); (4) where the project does not commence construction within three and one-half years of the project's site permit being issued (Gov. Code § 65589.5(o)(2)(D)); and (5) where the project increases by more than 20 percent in the number of units or total square footage beyond the preliminary application, except as the project may be revised using a density bonus (Gov. Code § 65589.5(o)(2)(E)).

3. Early Statutory Vested Rights

As noted above, the filing of a Preliminary Application provides the earliest form of vested rights established in California law. Subject to certain limited exceptions, SB 330 provides that a housing development project shall be subject only to the ordinances, policies, and standards adopted and in effect when a Preliminary Application was submitted. (Gov. Code § 65589.5(o)). An applicant for a housing development project may bring legal action to enforce the HAA if a local agency requires or attempts to require a housing development project to comply with an ordinance, policy, and standards (which includes those relating to development impact fees, capacity or connection fees, or permit processing fees), not adopted and in effect when a Preliminary Application was submitted. (See Gov. Code § 65589.5(k)(1)(a)(i)(III) and § 65589.5(o)(4)).

4. Limited Public Hearings

Under SB 330, housing development projects that comply with applicable objective general plan and zoning standards are subject to a maximum of five public hearings<sup>5</sup> prior to final action by the City. (Gov. Code § 65905.5(a)). The City must consider and either approve or disapprove the project at one of these five hearings, after which no further hearings may be held in connection with project approval. (*Id.*).

5. Formal Application

After filing of a preliminary application for a project, SB 330 requires an applicant to submit a Formal Application within 180 days. (Gov. Code § 65941.1(d)(1)). ROEM will file the Formal Application for the Project within 180 days.

**D. Density Bonus Law**

1. Eligibility for State Density Bonus Law Benefits

Pursuant to the Builder's Remedy, the City cannot deny the Project based on inconsistency with the zoning ordinance or General Plan land use designation. In addition, because the Project would restrict 20 percent of dwelling units in the Project to lower income households, the Project is eligible for a density bonus, incentives/concessions, waivers or reductions of development standards, and specified parking standards pursuant to the State Density Bonus Law. (See Gov. Code § 65915(b)(1)(B), (f)(2), (p)). To the extent the City attempts to impose on the Project any requirements that are not precluded by the HAA (including Builder's Remedy), ROEM will invoke the benefits of the Density Bonus Law. ROEM reserves the right to identify specific requests for incentives or concessions, waivers or reductions of development standards, parking reductions, or other benefits pursuant

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<sup>5</sup> The term "hearing" is broadly defined to include informational hearings, hearings at which the project is continued to another date, sub-committee hearings, and appeal hearings. (Gov. Code § 65905.5(b)(2)).

to the state Density Bonus Law as the Project application progresses.

## 2. Waivers Under the Density Bonus Law

The Density Bonus Law provides that “an applicant may submit to a city . . . a proposal for a waiver or reduction of development standards that will have the effect of physically precluding the construction of a development” that is entitled to the benefits of the Density Bonus Law. (Gov. Code § 65915(e)(1)). A “development standard” is defined broadly as “a site or construction condition, including, but not limited to, a height limitation, a setback requirement, a floor area ratio, an onsite open-space requirement, or a parking ratio that applies to a residential development pursuant to any ordinance, general plan element, specific plan, charter, or other local condition, law, policy, resolution, or regulation.” (Gov. Code § 65915(o)(1)). An applicant is not limited in the number of waivers that may be requested and granted. (Gov. Code § 65915(e)(1)). Waivers can be requested for “any development standard that will have the effect of physically precluding the construction of a development” that meets the Density Bonus Law’s minimum affordable requirements “at the densities or with the concessions or incentives permitted by [the Density Bonus Law].” (*Id.*).

A local government may deny a requested waiver only in specified circumstances. Specifically, a local government may deny a requested waiver only if granting the waiver “would have a specific, adverse impact . . . upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact” or “would have an adverse impact on any real property that is listed in the California Register of Historical Resources or that would be contrary to state or federal law. (*Id.*). A “specific, adverse impact” means “a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” (Gov. Code § 65589.5(d)(2)). Conditions that would have a specific, adverse impact upon the public health and safety “arise infrequently.” (Gov. Code § 65589.5(a)(3)).

A local government can require “an applicant to provide reasonable documentation to establish eligibility” for a requested waiver or reduction of a development standard. (Gov. Code § 65915(a)(2)). According to HCD, the “showing or ‘reasonable documentation’ required by the applicant is that the project qualifies for a density bonus.” HCD also has concluded that “[a] project that meets the requirements of the [Density Bonus Law] is entitled to waivers if they are needed, ‘period.’” (*Id.*, quoting *Wollmer v. Town of Berkeley*, 193 Cal.App.4th 1329, 1346-47 (2011)).

A recent California Court of Appeal case has further confirmed that a local government cannot deny a requested waiver based on whether a developer could have designed its project in a way that minimizes the need for requested waivers. (*Bankers Hill 150 v. Town of San Diego*, 74 Cal.App.5th 755 (2022)). In *Bankers Hill 150*, project opponents claimed that the project could be redesigned to be more consistent with the city’s development standards and therefore the city should have

denied the requested waivers. The Court rejected that argument, holding that the city could not demand the developer to redesign its building to better meet the city's development standards even if a design existed that would allow fewer variations of local development standards than the proposed project. (*Id.* at 775).

The Project meets the requirements for a density bonus and therefore is eligible for waivers should it need or desire to seek them.

**E. Conclusion**

We would be happy to discuss the Project or this Preliminary Application with you at any time. As noted above, we will file the Formal Application within 180 days, as required by Government Code section 65941.1(d)(1)).

Very truly yours,

MILLER STARR REGALIA

*Dana Kennedy*

Dana Kennedy

DCK/kli

cc: Brett Granum [bgranum@roemcorp.com]  
Stephen Emami [semami@roemcorp.com]  
Jim Campbell [jcampbell@roemcorp.com]  
Niles Tanakatsubo [ntanakatsubo@roemcorp.com]

## HOUSING CRISIS ACT of 2019 – SB 330

### PRELIMINARY APPLICATION FORM - TEMPLATE

#### PURPOSE

This form serves as a template for the preliminary application for housing development projects seeking vesting rights pursuant to SB 330, the Housing Crisis Act of 2019.

Although this Preliminary Application is not required for housing development projects, an agency must accept it if submitted. Agencies may customize this application; however, any revised form must include only the 17 provisions as required by the Housing Crisis Act. The Preliminary Application must be made available in print and on the agency's website.

#### GENERAL INFORMATION

An applicant for a housing development project that includes (1) residential units (2) a mix of commercial and residential uses with two-thirds of the project's square footage used for residential purposes; or (3) transitional or supportive housing, shall be deemed to have submitted a preliminary application upon provision of all of the information listed in this Preliminary Application form and payment of the permit processing fee to the agency from which approval for the project is being sought.

After submitting this Preliminary Application to the local agency, an applicant has 180 days to submit a full application or the Preliminary Application will expire.

#### Submittal Date Stamp<sup>\*1,2</sup>:

<sup>\*1</sup>Submittal of all the information listed and payment of the permit processing fee freezes fees and development standards as of this date, unless exceptions per Government Code § 65889.5(o) are triggered.

<sup>\*2</sup>Note: Record keeping pertaining to which standards and fees apply at date of submittal is imperative, as **penalties may apply for imposing incorrect standards**

#### Notes:

1. California Environmental Quality Act (CEQA) and Coastal Act standards apply.
2. After submittal of all of the information required, if the development proponent revises the project to change the number of residential units or square footage of construction changes by 20 percent or more, excluding any increase resulting from Density Bonus Law, the development proponent must resubmit the required information so that it reflects the revisions.

## SITE INFORMATION

1. **PROJECT LOCATION** - The specific location, including parcel numbers, a legal description, and site address, if applicable.

Street Address \_\_\_\_ 851 Sunnyslope Road \_\_\_\_\_ Unit/Space Number \_\_\_\_

Legal Description (Lot, Block, Tract)

Attached? YES ☒ NO ☐

Please see the attached preliminary title report.

Assessor Parcel Number(s) 570-70-064

2. **EXISTING USES** - The existing uses on the project site and identification of major physical alterations to the property on which the project is to be located.

The site is currently vacant.

3. **SITE PLAN** - A site plan showing the building(s) location on the property and approximate square footage of each building that is to be occupied.

Attached? YES ☒ NO ☐

4. **ELEVATIONS** - Elevations showing design, color, material, and the massing and height of each building that is to be occupied.

Attached? YES ☒ NO ☐

5. **PROPOSED USES** - The proposed land uses by number of units and square feet of residential and nonresidential development using the categories in the applicable zoning ordinance.

The project proposes 62 total units on the site. (36 single family units and 13 single family homes with 13 Attached ADUs). The total square foot is 143,400 SF. The proposed project is not proposing any non-residential uses on the site.



a. **RESIDENTIAL DWELLING UNIT COUNT:**

Please indicate the number of dwelling units proposed, including a breakdown of levels by affordability, set by each income category.

	Number of Units
Market Rate	49
Managers Unit(s) – Market Rate	0
Extremely Low Income	0
Very Low Income	0
Low Income	13
Moderate Income	0
Total No. of Units	62
Total No. of Affordable Units	13
Total No. of Density Bonus Units	

Other notes on units:

The 13 BMR units are proposed as attached ADU units to the 13 Single-Family homes.

6. **FLOOR AREA** - Provide the proposed floor area and square footage of residential and nonresidential development, by building (attach relevant information by building and totals here):

	Residential	Nonresidential	Total
<b>Floor Area (Zoning)</b>	143,400 sf	0	143,400 sf
<b>Square Footage of Construction</b>	143,400 sf	0	143,400 sf

7. **PARKING** - The proposed number of parking spaces:

98 covered spaces, and a minimum of 13 spaces on the driveway ( for the ADUs).

8. **AFFORDABLE HOUSING INCENTIVES, WAIVERS, CONCESSIONS and PARKING REDUCTIONS** - Will the project proponent seek Density Bonus incentives, waivers, concessions, or parking reductions pursuant to California Government Code Section 65915?

YES ☐ NO ☐

If "YES," please describe:

Not at the moment but reserves the right to do so at a future development application stage.

9. **SUBDIVISION** – Will the project proponent seek any approvals under the Subdivision Map Act, including, but not limited to, a parcel map, a vesting or tentative map, or a condominium map?

YES ☒ NO ☐

If “YES,” please describe:

Yes, a vesting tentative map.

10. **POLLUTANTS** – Are there any proposed point sources of air or water pollutants?

YES ☐ NO ☒

If “YES,” please describe:

11. **EXISTING SITE CONDITIONS** – Provide the number of existing residential units on the project site that will be demolished and whether each existing unit is occupied or unoccupied. Provide attachment, if needed.

	Occupied Residential Units	Unoccupied Residential Units	Total Residential Units
Existing	0	0	0
To Be Demolished	0	0	0

12. **ADDITIONAL SITE CONDITIONS** –

- a. Whether a portion of the property is located within any of the following:

- i. A very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection, pursuant to Section 51178?

YES ☐ NO ☒

- ii. Wetlands, as defined in the United States Fish and Wildlife Service Manual, Part 660 FW 2 (June 21, 1993)?

YES ☐ NO ☒

- iii. A hazardous waste site that is listed pursuant to Section 65962.5, or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code?

YES ☐ NO ☒

- iv. A special flood hazard area subject to inundation by the 1 percent annual chance flood (100-year flood) as determined by any official maps published by the Federal Emergency Management Agency?

YES ☒ NO ☐

- v. A delineated earthquake fault zone as determined by the State Geologist in any official maps published by the State Geologist, unless the development complies with applicable seismic protection building code standards adopted by the California Building Standards Commission under the California Building Standards Law (Part 2.5 (commencing with Section 18901) of Division 13 of the Health and Safety Code), and by any local building department under Chapter 12.2 (commencing with Section 8875) of Division 1 of Title 2?

YES ☐ NO ☒

- vi. A stream or other resource that may be subject to a streambed alteration agreement pursuant to Chapter 6 (commencing with Section 1600) of Division 2 of the Fish and Game Code?

YES ☐ NO ☒

If "YES" to any, please describe:

A portion of the site is located in an area defined by FEMA as "0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile"

- b. Does the project site contain historic and/or cultural resources?

YES ☐ NO ☒

If "YES," please describe:

- c. Does the project site contain any species of special concern?

YES ☐ NO ☒

If "YES," please describe:

Name (if different from applicant) **ROEM Development, Inc., a California Corporation**  
Address **1650 Lafayette Street** \_\_\_\_\_ Unit/Space Number \_\_\_\_\_  
City **Santa Clara** \_\_\_\_\_ State **CA** \_\_\_\_\_ Zip Code **95050** \_\_\_\_\_  
Telephone **408-984-5600** \_\_\_\_\_ Email **jcampbell@roemcorp.com** \_\_\_\_\_

**Optional: Agent/Representative Name** **Dana Kennedy** \_\_\_\_\_  
Company/Firm **Miller Starr Regalia** \_\_\_\_\_  
Address **1331 North California Boulevard** Unit/Space Number **Suite 600** \_\_\_\_\_  
City **Walnut Creek** \_\_\_\_\_ State **CA** \_\_\_\_\_ Zip Code **94596** \_\_\_\_\_  
Telephone **925-935-9400** \_\_\_\_\_ Email **dana.kennedy@msrlegal.com** \_\_\_\_\_

**Optional: Other** (Specify Architect, Engineer, CEQA Consultant, etc.) \_\_\_\_\_  
Name \_\_\_\_\_  
Company/Firm \_\_\_\_\_  
Address \_\_\_\_\_ Unit/Space Number \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
Telephone \_\_\_\_\_ Email \_\_\_\_\_

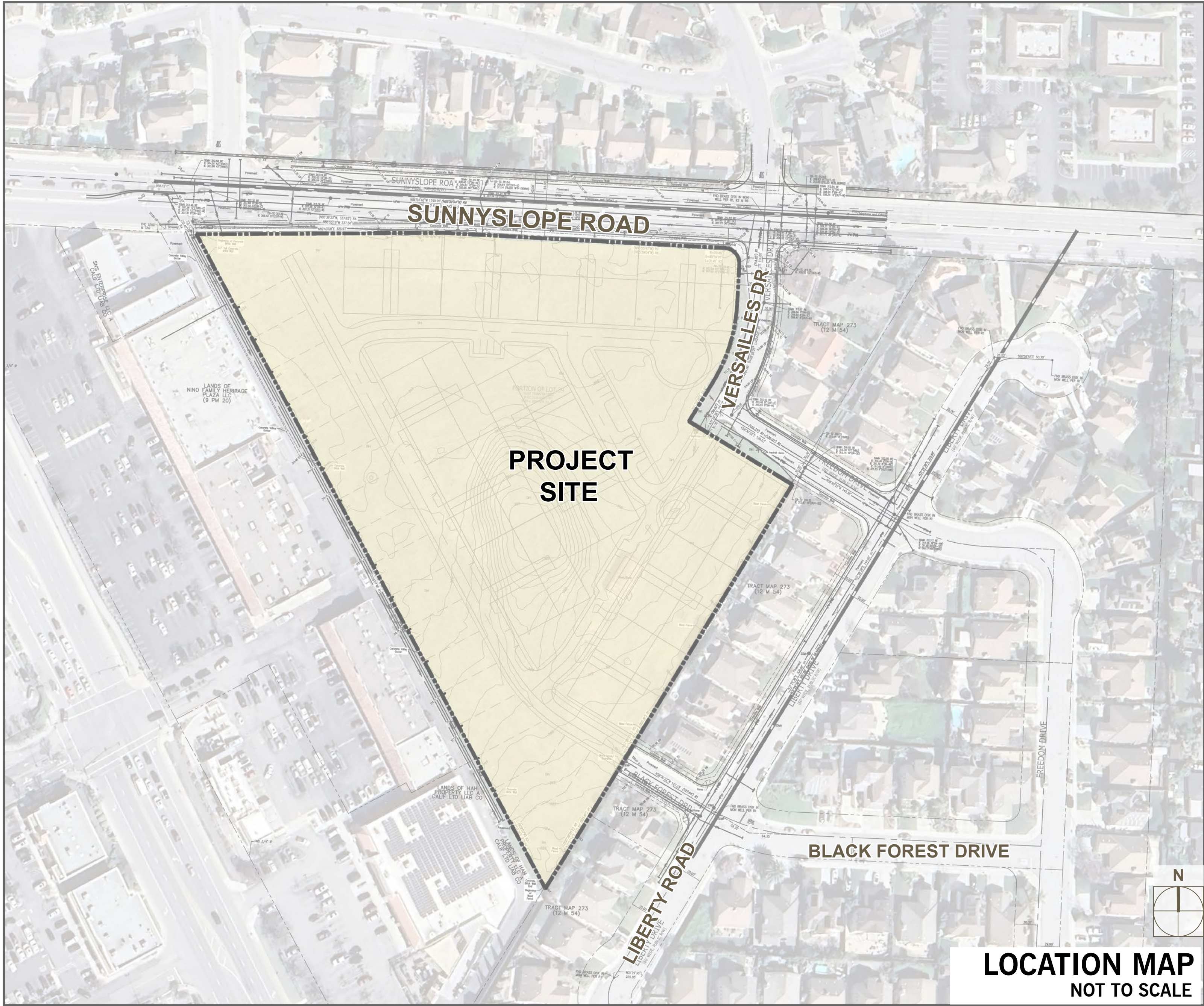
Primary Contact for Project: ☐ Owner ☒ Applicant ☒ Agent/Representative ☐ Other



851 SUNNYSLOPE ROAD

SB 330 PRELIMINARY APPLICATION

HOLLISTER, CA



PROJECT TEAM INFO:

**Developer**  
**ROEM Development**  
1650 Lafayette Street,  
Santa Clara, CA 95050  
Contact: Jim Campbell  
Tel: (408) -984-5600  
jcampbell@roemcorp.com

**Attorney**  
**Miller Starr Regalia**  
1331 North California Boulevard,  
Suite 600, Walnut Creek, CA 94596  
Tel: 925.935.9400  
Contact: Dana Kennedy  
dana.kennedy@mrsrlegal.com

**Architect**  
**Dahlin Group**  
5865 Owens Drive  
Pleasanton, CA 94588  
Tel: (925) 251-7200  
Contact: Ritu Raj Sharma  
rituraj.sharma@dahlingroup.com

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ELEVATIONS, COLOR & MATERIALS

SITE DATA

SITE AREA: +/- 8.3 AC  
APN: 570-70-064  
GENERAL PLAN LAND USE:  
Mixed-Use (100%)  
ZONING:  
NMU Neighborhood Mixed-Use  
(100%)

PROPOSED PROJECT

TOTAL UNITS:	62 UNITS
	@ 7.5 du/ac
SINGLE FAMILY	36 (58%)
SINGLE FAMILY	13 (21%)
ATTACHED ADU	13 (21%)
TOTAL RESIDENTIAL AREA:	143,400 SF

PROJECT DESCRIPTION

The overall project site is approximately 8.3 acres and consists of one parcel (APN 570-70-064). The project is located in Hollister, CA within San Benito County and is zoned as NMU (100%) and the General Plan Land use designation is Mixed-Use (100%). The site is bounded by Sunnyslope Road to the north, commercial and retail uses to the west/southwest, and existing residential development to the east/southeast. Freedom road forms a portion of the site's eastern boundary.

The project is a carefully planned to fit into the existing context. The project proposes extending Versailles Dr. and Black Forest Dr. into the project to integrate with the existing street grid. The extension of the existing city grid allows the project to seamlessly blend with the existing urban fabric.

The project proposes small lot single family that is attainable by design. A total of 49 single family homes and 13 ADUs are proposed for a a total of 62 homes. The single family homes will have two car garages and full driveways. The ADU will park on the driveway. The ADU units are interspersed withn the community to provide a mix of unit types in all neighborhoods.

The mix and types of housing proposed, and the seamless integration of vehicular and pedestrian network to the existing context makes this project a wonderful new addition to the existing community.

COVER SHEET

851 SUNNYSLOPE ROAD

ROEM DEVELOPMENT



DATE11-03-2024

JOB NO.1080.004

5865 Owens Drive  
Pleasanton, CA 94588  
925-251-7200

A.1





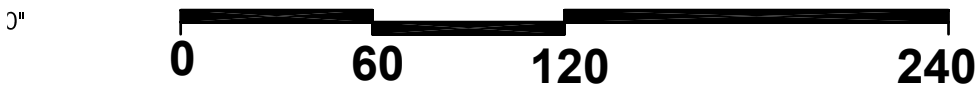




<div></div>	Single Family Lots:	36 units (58%)
<div></div>	Single Family Lots with ADU:	13+13 units (42%)
Total:		62 units (100%)

851 SUNNYSLOPE ROAD

ROEM DEVELOPMENT



DATE 11-03-2024  
JOB NO. 1080.004

5865 Owens Drive  
Pleasanton, CA 94588  
925-251-7200

SITE PLAN