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Dave Rand
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Dave@rpnllp.com

April 25, 2023

Joseph Onyebuchi, Associate Planner
City of Burbank
275 East Olive Ave
Burbank, CA 91502

Re: 910 Mariposa Street – SB 35 Application.

Dear Mr. Onyebuchi:

Our firm represents Butterfly Gardens LLC, the applicant of a housing development located at 910 S. Mariposa Street in the City of Burbank (the “City”). The project includes the demolition of all existing structures on the site and the new construction of six three-story residential structures, containing a total of 23 for-sale townhomes ranging from 1,329 to 2,030 square feet in size and a total of 44 enclosed parking spaces and two open parking spaces (the “Project”).

On October 27, 2022, Butterfly Gardens LLC submitted a Notice of Intent (“NOI”) to Submit an SB 35 Streamlined Ministerial Application which was accepted by the City. At the meeting on December 13, 2022, the City Council considered the site eligibility requirements of Government Code Section 65913.4 subsections (a)(2)(A-C) in accordance with the requirements of Burbank Municipal Code Section 10-1-19302(A)(3). City staff confirmed that the Project satisfies all three criteria.

In November 2022, City staff confirmed that they reached out to the California Native American Tribes that are traditionally and culturally affiliated with the geographic area within which the Project site is located (the “Tribes”) to request initiation of the required tribal consultation process. The City entered into an enforceable agreement with two Tribes, the Fernand^o Tataviam Band of Mission Indians on March 29, 2023, and the Gabriele^o Band of Mission Indians - Kitz Nation on April 4, 2023 so the tribal consultation process has been satisfied in accordance with Government Code Section 65913.4(b).

On December 23, 2022, the City issued a letter which provided an SB 35 Eligibility Criteria and Consistency Analysis. In this letter, the City confirmed that the Project meets the SB 35 eligibility criteria per Government Code Section 65913.4, with two exceptions which are addressed below.

“2. AFFORDABILITY. *If more than 10 residential units are proposed, at least 10 percent of the project’s total units must be dedicated as affordable to households making below 80 percent of the area median income. If the project will contain subsidized units, the applicant has recorded or is required by law to record, a land use restriction for the following minimum durations, as applicable:*

2. 55 years for rental units.

ii. 45 years for homeownership units.

Analysis: Not Consistent. *The Project proposes 10 percent of the units to be affordable to low-income households. Section 402 (a)(3)(A) of the Government Code Section 65913.4 states that “If the locality has adopted a local ordinance that requires greater than 10 percent of the units be dedicated to housing affordable to households making below 80 percent of the AMI, that local affordable housing requirement applies.” 80 percent of AMI would qualify as Low-Income Housing. BMC Section 10-1-646 requires a minimum of 15 percent of newly constructed dwelling units in Residential Developments to be developed, offered to and sold or rented to very low, low and moderate-income households at an affordable rent or affordable ownership housing cost.*

As part of an NOI resubmittal, the Project shall note how it complies with the City’s Inclusionary Housing Ordinance for similar for-sale units or provide the CA government code section that allows an exemption from this requirement.”

The Project site is in the M-1 (Limited Industrial) Zone and within the Rancho Commercial General Plan Land Use Designation which permits a base density of 20 dwelling units per acre. The Project site is one acre, which results in a base density of 20 units. The Project includes a request for a 15 percent density bonus, resulting in a total proposed density of 23 units which will be subdivided as for-sale units. To receive the 15 percent density bonus, the Project must set aside 10 percent of the base density, or 2 units, as Low Income. The Project sets aside 2 units as Low Income which satisfies both the density bonus requirements of the State Density Bonus Law (Government Code Section 65915) and BMC 10-1-635.A, as well as the SB 35 requirement to provide 10% of the “total units” for Low Income households, or those households making below 80 percent of the area median income.¹

The City’s Inclusionary Housing Ordinance (BMC Section 10-1-646) requires a minimum of 15 percent of newly constructed dwelling units in Residential Developments to be developed, offered to and sold or rented to very low, low and moderate-income households at an affordable rent or affordable ownership housing cost. The Inclusionary Housing Ordinance states that for-sale projects must include 15 percent of the “total” Residential Development units to be sold to “Low and/or Moderate Income Households.” This section also provides an option to use “Inclusionary Credits” for a credit of two (2) Moderate Income owner units for every one (1) Low Income owner unit. The Project has a “total” of 20 units, which would require 15 percent or 3 units as Low or Moderate Income. As the Project provides two (2) Low Income Owner units, it receives a credit for up to four (4) Moderate Income units and therefore satisfies the requirements of the City’s Inclusionary Housing Ordinance.

“8. SUBDIVISIONS. *The project does not involve an application to create separately transferable parcels under the Subdivision Map Act. However, a subdivision is permitted if either of the following apply:*

1. The project is financed with low-income housing tax credits (LIHTC) and satisfies the prevailing wage requirements identified in item 9 below.

¹ Government Code Section 65915(o)(8)(a) provides that “Total units” or “total dwelling units” means a calculation of the number of units that:

(i) Excludes a unit added by a density bonus awarded pursuant to this section or any local law granting a greater density bonus.
(ii) Includes a unit designated to satisfy an inclusionary zoning requirement of a city, county, or city and county.

2. The project satisfies the prevailing wage and skilled and trained workforce requirements identified in items 9 and 10 of this Eligibility Checklist.

Analysis: Not Consistent. *The Project site consists of one parcel. The applicant has noted in their NOI submittal that this would be a for-sale housing development but has not provided a proposed subdivision with this application. If the Project site will be subdivided, the applicant must submit a condominium/tentative tract map and would have to notify the city how the Project will comply with the prevailing wage and skilled and trained workforce requirements pursuant to SB 35 and the City's BMC as identified in items 9 and 10 of this Eligibility Checklist."*

The Project includes a Tentative Tract Map which is included with the full application submittal. In accordance with SB 35, the Project, will comply with the requirements of Government Code Section 65913.4(a)(8) satisfying the prevailing wage requirements, as the Project is not in its entirety a public work. Enclosed with this transmittal is a notarized letter which certifies that the Butterfly Gardens LLC will comply with the requirements of Government Code Section 65913.4(a)(8) requiring payment of prevailing wages.

The letter issued by the City on December 23, 2022 indicated that the Project was consistent with all other SB 35 criteria and objective standards.

Enclosed with this letter is the full application for a SB 35 Streamlined Ministerial Review to determine the Project's consistency with all applicable objective standards, as required by State law. This package includes the required application forms, plans and subdivision map, and supplemental information for the Project including a Consistency Matrix which provides additional responses to each of the applicable objective standards. These materials demonstrate that the Project, as fully submitted, is again consistent with all objective standards.

The Project will also include a request for one incentive, as permitted for a project which provides at least 10 percent of the total units for Low Income Households. BMC 10-1-640(A)(6) permits applicants to seek "Other regulatory incentives or concessions proposed by the Developer or the City which result in identifiable, financially sufficient, and actual cost reductions." In accordance with the BMC, the applicant will utilize one incentive to request a waiver of the Art in Public Places (BMC 10-1-1114) which would otherwise require the provision of public artwork, or a combination of public artwork and an in-lieu fee equal to the amounts specified below:

- "1. One percent (1%) of the Total Project Cost for the first 15 million dollars;*
- 2. Three-quarters of one percent (0.75%) of the Total Project Cost, for that portion between 15 million and 25 million dollars, in addition to (1) above; and*
- 3. One-half of one percent (0.50%) of the Total Project Cost for that portion equal to or in excess of 25 million dollars, plus (1) and (2)."*

By relieving the Project of the requirement to commission public art or to pay an equivalent fee, an incentive to waive the Art in Public Places requirement would result in identifiable and actual cost reductions for the project. This cost reduction would allow the Project to provide for affordable housing costs for the sale of the two (2) Low Income units.

April 25, 2023

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With this submittal, we look forward to the City's review of the full SB 35 application and ultimate approval by the City Council.

Sincerely,

Dave Rand

Dave Rand
Partner
of RAND PASTER & NELSON, LLP

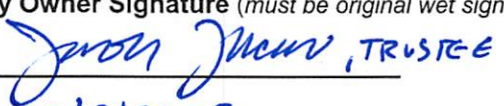
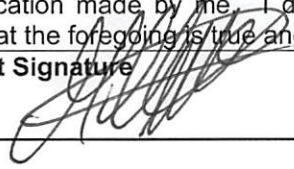
DR

cc: Fred Ramirez, Assistant Community Development Director
Scott Plambaek, Planning Manager
Joseph McDougall, City Attorney



City of Burbank – Planning Division
**SB 35 RESIDENTIAL STREAMLINED MINISTERIAL
 APPROVAL PROCESS APPLICATION**

150 North Third Street
 Burbank, California 91502
 www.burbankca.gov
 T: 818-238-5250
 F: 818-238-5150
 E: planning@burbankca.gov

Project Address and APN(s):	
Application Type (check all that apply): <input checked="" type="checkbox"/> SB 35 <input checked="" type="checkbox"/> Subdivision SEE ATTACHED <input type="checkbox"/> Other Permits _____	Items to be Submitted: <input checked="" type="checkbox"/> Notice of Intent - Completeness Letter from the City with all Attachments <input checked="" type="checkbox"/> Project Plans - 1 Electronic Set (see Standard Plan Details & General Requirements) <input type="checkbox"/> Table Showing Compliance with City of Burbank Objective Standard Requirements <input checked="" type="checkbox"/> Application fee – Payment is required at the time of submittal by credit card or check. <i>Please make all checks payable to "City of Burbank." The initial submittal fee for the application is \$6595.60 plus time and material.</i>
Property Owner Name The Richard E Lucas Family Trust - Jason Lucas, Trustee	Applicant Name (if different from owner) Butterfly Gardens LLC
Mailing Address 1107 HUNTINGTON DR. S. PASADENA, CA	Mailing Address 1812 W. Burbank Blvd #7350, 91506
Telephone 626-590-1887 91030	Telephone 818-416-8064
Email JASONLUCAS84@GMAIL.COM	Email info@butterflygardensburbank.com
I hereby certify that I am the legally authorized owner of the property involved in this application or have been empowered to sign as the owner on behalf of a corporation, partnership, or business as evidenced by the documents attached hereto. I hereby grant to the applicant of this form full power to sign all documents related to this application, including any conditions or mitigation measures as may be deemed necessary. I declare under penalty of perjury that the foregoing is true and correct.	I hereby certify that the information furnished in this application and the attached materials are true and correct to the best of my knowledge and belief. Further, should the stated information be found false or insufficient, I agree to revise the information as appropriate. I understand that the City of Burbank cannot process this application until all required information is provided. I understand there is no guarantee, expressed or implied, that any permit or application will be granted. I understand that each matter must be carefully investigated and the resulting recommendation or decision may be contrary to a position taken or implied in any preliminary discussions. I understand that I have the burden of proof in the matter arising under this application made by me. I declare under penalty of perjury that the foregoing is true and correct.
The Planning Division cannot accept an application without property owner signature.	
Property Owner Signature <i>(must be original wet signature)</i>  Date 2/3/2023	Applicant Signature  Date 4/25/23
For Planning Division Use: PL #: _____ Enforceable Agreement # _____ Dated: _____ Notes: _____	SB 35 Application Date Submitted: _____



City of Burbank
 Planning and Transportation Division
GENERAL COMMERCIAL AND INDUSTRIAL DEVELOPMENT PERMIT
 Application

150 North Third Street
 Burbank, California 91502
 www.burbankusa.com
 T: 818-238-5250
 F: 818-238-5150

A General Commercial and Industrial development permit application form, along with all applicable specific application forms and other required materials must be completed and submitted to the Planning and Transportation Division for all projects that are subject to review and/or approval by the City of Burbank. Please complete each section. If certain items do not apply to this project, please indicate with a "N/A." Incomplete application forms may result in processing delays.

NOTE: Unless exempt, all project applications are subject to the requirements and guidelines of the California Environmental Quality Act (CEQA). Should you have any questions please call the Planning Division at 818-238-5250.

Application Types

- | | | |
|--|---|--|
| <input type="checkbox"/> Administrative Use Permit | <input type="checkbox"/> General Plan Amendment | <input type="checkbox"/> Sign Variance |
| <input type="checkbox"/> Conditional Use Permit | <input type="checkbox"/> Lot Line Adjustment | <input type="checkbox"/> Variance |
| <input type="checkbox"/> Covenant Agreement | <input checked="" type="checkbox"/> Map (Tentative Tract Map, Parcel Map) | <input type="checkbox"/> Zone Map Amendment |
| <input type="checkbox"/> Development Agreement | <input type="checkbox"/> Planned Development | <input type="checkbox"/> Zone Text Amendment |
| <input type="checkbox"/> Development Review | <input type="checkbox"/> Parking Agreement | <input type="checkbox"/> Other _____ |

Project Information

Project Address: 910 S Mariposa St. Burbank CA	Zoning: Burbank M-1
Current use of site: Commercial Horse Boarding	Existing Covenants: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. If yes, attach copies
Lot Area: 43,690 sq ft, per survey	Year(s) structure(s) built: 1970 (per assessor's records)
APN: 2443-004-017	Legal Description: See Survey on file
Number of existing on-site parking spaces: 0	Existing square footage: 240 sq ft (per assessor's records)

Current Site Description: Describe the project site as it currently exists, including information about topography, soil stability, plants (including mature trees) and animals, and any cultural historical or scenic attributes. Describe any existing structure(s) on the site and the use of the structure(s). Attach photographs of the site. (Prepare/attach separate exhibit(s) as necessary)

The project site is a flat lot within an urban infill area. The lot is currently being used for a commercial horse boarding operation. The horses are kept in modular pipe corrals, which are the property of the operator and are not affixed to the land. The only structure on the property is a 240 sq ft shack at the front of the property which is used for office/admin purposes. Refer to the Tree Inventory Report for a list and description of current trees and landscaping on site. Refer to the soils analysis report for soil conditions. There are no cultural, historical, or scenic attributes pertaining to the site.

- Project Description/Applicant Request:** (You may need to prepare and attach separate exhibits)
1. If the project involves demolition and new construction, describe total project. e.g. demolition, age of building to be demolished, grading, excavation, construction, etc.
 2. If commercial, indicate the type, whether neighborhood, city, or regionally oriented, square footage of sales area, square footage of office area, loading facilities, and number of employees.
 3. If industrial, indicate type, estimated employment per shift, number of shifts and loading facilities.
 4. If institutional, indicate the major function, estimated employment per shift, number of shifts, estimated occupancy, loading facilities, and community benefits to be derived from the project.
 5. Will project be owner-occupied or will it be leased to tenants not currently identified? If tenants are known, please list them.


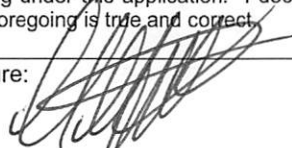
The project will entail the demolition of a 240 sq ft structure and the new construction of 23 three-story townhomes ranging from 1,329 - 2,030 sq ft (gross) in size. Each home will have a garage with direct, private access into the home. There are a total of 46 parking spaces provided throughout the project. The townhomes will have private open space in the form of patios and/or upper level decks. Common open space is also provided on the site for recreation and passive outdoor space.

Project No. _____ Address: _____ Date: _____

Applicant	
Name/Firm:	Butterfly Gardens LLC
Address:	1812 W. Burbank Blvd. #7350, Burbank 91506
Primary phone number	818-416-8064
Alternate phone number	747-271-3545
E-mail address:	info@butterflygardensburbank.com
Primary contact for this application:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Property Owner of Record	
Name/Firm:	The Richard E Lucas Family Trust - Jason Lucas, Trustee
Address:	1107 HUNTINGTON DRIVE, S.PASADENA, CA 91030
Primary phone number	626-590-1887
Alternate phone number	
E-mail address:	JASONLUCAS04@GMAIL.COM
Primary contact for this application:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Contact Person (If different from above)	
Name/Firm:	
Address:	
Primary phone number	
Alternate phone number	
E-mail address:	
Primary contact for this application:	<input type="checkbox"/> Yes <input type="checkbox"/> No

Property Owner's Affidavit	Applicant's Affidavit
<p>I hereby certify that I am the legally authorized owner of the property involved in this application or have been empowered to sign as the owner on behalf of a corporation, partnership, or business as evidenced by the documents attached hereto. I hereby grant to the applicant of this form permission to submit this application. I declare under penalty of perjury that the foregoing is true and correct.</p>	<p>I hereby certify that the information furnished in this application and the attached materials are true and correct to the best of my knowledge and belief. Further, should the stated information be found false or insufficient, I agree to revise the information as appropriate. I understand that the City of Burbank cannot process this application until all required information is provided. I understand there is no guarantee, expressed or implied, that any permit or application will be granted. I understand that each matter must be carefully investigated and the resulting recommendation or decision may be contrary to a position taken or implied in any preliminary discussions. I understand that I have the burden of proof in the matter arising under this application. I declare under penalty of perjury that the foregoing is true and correct.</p>
<p>Property owner's signature:  JASON LUCAS TRUSTEE</p>	<p>Applicant signature: </p>
<p>Date: 2/3/2023</p>	<p>Date: 4/25/23</p>

Staff Comments (For City Use Only)			
Filing fee:	Date received:		
Project No.:	Received by:		
<input type="checkbox"/> Plans	<input type="checkbox"/> Labels	<input type="checkbox"/> Radius Map	
Notes:			

Project No. _____ Address: _____ Date: _____

ENVIRONMENTAL INFORMATION

1. List and describe all other related permits and other public approvals required for the project, including those required by City, Regional, State and Federal agencies.

The project will utilize SB 35 for the streamlined ministerial review of a density bonus request with one incentive and a tentative tract map. The project will apply for the associated building, grading, and utility permits from the relevant departments of City of Burbank and Burbank Water and Power. As an SB 35 project, the project does not require any other public approvals and it is not subject to review under the California Environmental Quality Act (CEQA).

Are the following items applicable to the project or its effects? Discuss below all items checked yes. (Attach additional sheets as necessary.)

2. Are Federal, State and/or County funds involved in this project? If yes, please specify:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
3. Will paints, solvents, asbestos, pressurized gas, cleaning fluids, acids or other chemicals be used in the business? If yes, please specify:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
4. Do you have a hazardous materials list on file with the Burbank Fire Department?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
5. Change in existing features of any hills or substantial alteration of topography	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
6. Change in scenic views or vistas from existing residential areas, public lands or roads	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
7. Change in pattern, scale or character of general area of project	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
8. Significant amounts of solid waste or litter	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
9. Change in dust, ash, smoke, fumes or odors in vicinity	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
10. Change in ground water quality or quantity, or alteration of existing drainage patterns	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
11. Substantial change in existing noise or vibration levels in the vicinity	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
12. Site on filled land or on slope of 10% or more	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
13. Use or disposal of potentially hazardous materials, such as toxic substances, flammable or explosives	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
14. Substantial change in demand for municipal services (police, fire, water, electricity, sewage, etc.)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
15. Substantial increase in fossil fuel consumption (electricity, oil, natural gas, etc.)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
16. Is there a relationship to a larger project or series of projects? If new construction or expansion of present facilities will take place after demolition, the action is part of a larger project.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

17. Describe the surrounding properties, including information on plants (including mature trees) and animals and any cultural, historical or scenic aspects. Indicate the type of land use (residential, commercial, etc.), intensity of land use (single-family, apartment houses, commercial, industrial, etc...). Photographs may accompany written description (Prepare/attach separate exhibit(s) as necessary.)

The site is zone M-1 for light industrial and related uses. The property to the North of the site is also zoned M-1 and is currently being utilized for light industrial activities. The property to the East is the Los Angeles Equestrian Center. The property to the South is zoned M-1, upon which a commercial horse rental business is actively operated. The properties to the West are single family homes contained in Burbank's R-1H residential zoning. There are commercial operations that involve the keeping of horses at the properties to the East and South. Refer to the Tree Inventory Report for plant and tree details.

18. Describe how the project will affect existing patterns of land use. If new construction alters land use from existing patterns, requires a variance or conditional use permit, or increases size or bulk of existing uses please describe. (Prepare/attach separate exhibit(s) as necessary.)

Using SB 35 streamlined ministerial review in conjunction with a density bonus request with one incentive and a tentative tract map, the project will permit the development of 23 new for-sale townhome units, measuring 3-stories in height. The project will include associated on-site parking within private garages, landscaping, and other improvements ancillary to residential use. Per SB 35, the project will comply with all applicable objective zoning standards and does not require a variance or conditional use permit to permit the project.

Project No. _____ .Address: _____ Date: _____



NEW CONSTRUCTION AND CONVERSION CONDOMINIUM SUBDIVISION APPLICATION

Pursuant to Chapter 27 of the Burbank Municipal Code

Tentative Tract Map No.: _____

1. Site Address: _____ 2. Zip Code _____

2. Total Area: _____ square feet _____ acres

3. Number of Lots: _____ 4. Number of Buildings Proposed: _____

5.

<u>Proposed Unit Type</u>	<u>No. of Units</u>	<u>Floor Area Per Unit in Sq. Ft.</u>	<u>Balcony/Patio Area Per Unit in Sq. Ft.</u>
Efficiency	_____	_____	_____
One-Bedroom	_____	_____	_____
Two-Bedroom	_____	_____	_____
Three-Bedroom	_____	_____	_____
> Three-Bedroom	_____	_____	_____

Total number of units: _____

6. Parking Provided: compact _____ standard _____ guest _____ Total _____

7. Number of existing buildings to be removed: _____

8. Type of existing buildings to be removed (single family, duplex, etc.): _____

9. Are there deed restrictions now in effect that regulate the number of dwelling units or the use of the land? Yes _____ No _____ (If "yes", attach copy of said restrictions.)

PLEASE PROVIDE THE FOLLOWING:

1. A General application, environmental information form, radius map and labels (in accordance with City of Burbank requirements) must be completed and submitted with this and all other land use/development applications.
2. Thirteen (13) copies of tentative tract map, subject to requirements noted on page 2.

CITY OF BURBANK
 COMMUNITY DEVELOPMENT DEPARTMENT
Planning Division (818) 238-5250
 275 E. Olive Avenue, Burbank, CA 91502
 P.O. Box 6459, Burbank, CA 91510-6459

CDD

TENTATIVE TRACT MAP REQUIREMENTS

1. Each tentative map shall have a minimum dimension of not less than 18 inches by 26 inches. The scale of the map shall be large enough to show clearly all details thereof, but in no case is to be smaller than 1" = 100'.
2. The tentative map shall show the following:
 - A. The tract number as secured from the county engineer displayed in numerals being a minimum height of 3/4 inch.

NOTE: If this application is for a vesting tentative map then this map must be titled "VESTING TENTATIVE MAP" in **BOLD LETTERS** being a minimum height of 3/4 inch located directly above the tentative tract number.

- B. The dimensions of the boundaries of the property to be subdivided and the relation of said boundaries to other recorded subdivisions or recognized property lines.
- C. Name and address of the subdivider.
- D. Name, address, registration number, certificate, or other acceptable evidence of professional certification of the tract engineer or surveyor.
- E. Location, size and character of all existing public utility facilities (water, power, gas, phone, sewage) within or adjacent to the proposed subdivision.
- F. The locations, existing names, right-of-way widths, roadway widths, grades, and curve radii of all existing streets and freeways and all proposed streets in or adjacent to the subdivision.
- G. The width and location of all existing and proposed easements, whether public or private, for streets, drainage, sewerage and public utilities, private purposes, etc.
- H. Lot layout, lot numbering, dimensions of each lot and area of each lot in the subdivision.
- I. Statement of present use zone and proposed use or uses of property.
- J. Proposed public areas to be dedicated.
- K. Location, size and species of all trees or stands of trees over six (6) inches in diameter in or adjacent to the area proposed for subdivision, including all trees in the parkway.
- L. Reserve strips, wall or other devices for controlling access to adjacent property.
- M. A vicinity map showing all adjacent and abutting property and streets together with the zoning symbol thereon at a scale no smaller than 1" = 1000'.
- N. Date, north arrow, and scale.
- O. Where the subdivision covers an area having local relief greater than 20 feet, the tentative tract map shall show contours of the entire area (before project implementation and after project development) at an interval of five (5) feet.

Staff Comments: