



City of Palo Alto

City Council Staff Report

(ID # 8008)

Report Type: Action Items

Meeting Date: 6/12/2017

Summary Title: 744 San Antonio: Marriot Hotel Project

Title: PUBLIC HEARING / QUASI-JUDICIAL. 744-748 San Antonio Avenue [15PLN-00314]: Review and Certification of a Final Environmental Impact Report (EIR), Adoption of CEQA Findings Including a Statement of Overriding Considerations, Adoption of a Mitigation Monitoring and Reporting Plan, and Consideration of the Applicant's Request for Approval of a Major Architectural Review to Allow the Demolition of Three Existing Buildings at 744 and 748 San Antonio Avenue and Construction of Two, Five-Story Hotels (Courtyard by Marriott with 151 rooms and AC by Marriott with 143 rooms). The Site Will Include Surface and Two Levels of Basement Parking, Requiring Approval of a Parking Reduction. A Draft EIR was Circulated for Public Comment From March 27, 2017 to May 10, 2017 and a Final EIR was Provided to Agencies and Commenters on May 31, 2017. On June 1, 2017, the Architectural Review Board Recommended Approval of the Project.

From: City Manager

Lead Department: Planning and Community Environment

Recommendation

Staff recommends that the City Council take the following actions:

1. Adopt a resolution certifying the Final Environmental Impact Report, adopting CEQA findings, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program (Attachment B)
2. Adopt a Record of Land Use Action Approving an Architectural Review application, including a parking reduction, based on findings and subject to conditions of approval as recommended by the Architectural Review Board on June 1, 2017 (Attachment C)

Executive Summary

The applicant requests Architectural Review approval to construct a new dual brand hotel project with 294 hotel rooms at the subject address. The hotel project includes the construction of two, five-story tall buildings built atop a two-level subterranean garage containing 294 parking spaces. Some of the parking spaces do not meet city requirements and the applicant seeks a parking reduction and use of a valet program to address this discrepancy.

The project includes the demolition of three buildings, one of which is be eligible for listing on the California Register of Historical Resources. The loss of this potential resource cannot be mitigated and required the preparation of an environmental impact report and Statement of Overriding Considerations (SOC). An SOC is a document that identifies the significant environmental impact of the project and project benefits that are seen to outweigh these impacts; the SOC is required for project approval. In accordance with Palo Alto Municipal Code Section 18.31.010, the Director shall refer any project to the City Council for action when such project requires adoption of an SOC.

The proposed project complies with the objective development standards for the subject property's zoning district, with the noted exception of parking. The project is also subject to architectural review findings, context-based design criteria and performance standards, which are more subjectively analyzed. The ARB recommended approval of the Architectural Review application on June 1, 2017.

Background

The application was submitted by T2 Development for an Architectural Review for the demolition of three existing buildings and the construction of two five-story hotels with shared amenity spaces and parking on a podium structure. The proposed hotels would include a 143-room Courtyard by Marriott hotel and a 151-room AC by Marriott hotel, for a total of 294 new hotel rooms. Both buildings are five-stories and nearly 50 feet in height.

The onsite improvements include a single driveway from San Antonio Road that leads to a roundabout serving both lobbies of the hotels. A driveway continues to the rear of the property where 16 surface parking spaces are available. Most of the parking (278 spaces) is available via a ramp that leads to a two-level underground parking garage. The remaining parking spaces are accessed via a valet service, which requires approval of a parking reduction, and is further discussed later in this report. New landscaping, driveways, utilities, and other facilities would be constructed as part of the project.

Three commercial buildings would be demolished as part of the project, including a structure at 744 San Antonio Road, which was constructed in 1961 and is be eligible for listing on the California Register of Historical Resources (California Register) due to its architectural significance and embodiment of the distinctive characteristics of mid-century modern

architecture. Other existing improvements on the site (e.g. parking lots, on-site trees, landscaping) would also be removed prior to construction of the proposed hotel buildings.

Previous Meetings

The project had four previous ARB meetings (Preliminary and three formal meetings). The specific details of these meetings are included as attachments (staff reports without conditions).

Preliminary Meeting (June 4, 2015)

During the preliminary meeting (report:

<https://www.cityofpaloalto.org/civicax/filebank/documents/47600>) and video:

<http://midpenmedia.org/architectural-review-board-22/>, the Board members acknowledged that the project was the first one in the area to have more Floor Area Ratio (FAR) because the PAMC allows a higher FAR for hotels. However, concerns remained regarding the massing of the project compared to the surrounding neighborhood context. In addition, the Board had some concern about the buildings being too similar in design.

Formal Meeting #1 (December 17, 2015)

The project was presented to the ARB (Report:

<https://www.cityofpaloalto.org/civicax/filebank/documents/50284> and video:

<http://midpenmedia.org/architectural-review-board-35/>) and included a revised project that stepped the upper floors back from San Antonio Road, which resulted in the reduction of six rooms. The applicant represented that the first three floors would be at the same height as the multi-family residential development across San Antonio Road. The fourth floor is setback approximately 12 feet and then the fifth floor is set back an additional 12 feet. The project also pushed the mechanical equipment to the center of the building, thus moving the taller elements away from the street.

Concerns from the Board on this iteration of the project included that the project was trying to be too tall; the hotel entrances should consider a centralized space; the landscaping on the borders is light; and the project will need to meet context-based findings.

Formal Meeting #2 (April 6, 2017)

The project was presented to the ARB (Report:

<http://www.cityofpaloalto.org/civicax/filebank/blobdload.aspx?BlobID=56815> and video:

<http://midpenmedia.org/architectural-review-board-60/>) that was very similar to the one that was presented in Formal Meeting #1 with the exception of adding a second level of basement parking and adding curtain glass along the front façade. The ARB had comments on the curtain glass element, the colors of the buildings, the elevations of the buildings not having sufficient depth and interest and adding more trees and vegetation to the site.

Formal Meeting #3 (June 1, 2017)

The applicant presented revised plans to address prior ARB concerns. After hearing testimony from the public, the Board recommended approval of the project with a 3-1 vote. The Board recommended that the project come back to the ARB Subcommittee to address terrace plantings. Additional conditions of approval addressed signage and ensuring that no traffic backs out onto San Antonio from the driveways.

In dissent, the Chair expressed support for a hotel development at this location, but remained concerned that some design and program elements were unsatisfactory, including landscaping along the side yards and use of a central driveway/motor court. While recognizing the municipal code permits up to a 2.0 FAR, the Chair stated that a reduction in size could help improve the transition to adjacent buildings and improve parking conditions.

Public testimony at this hearing related to traffic, construction related impacts, concerns regarding geology and dewatering, context compatibility and general sentiment that resident concerns were not being addressed.

Since the last meeting with the ARB, staff has added two additional conditions of approval related to amenity space and on-site loading activities. These conditions clarify that the amenity space is intended for use by hotel visitors and that the loading operation take place at designated locations.

Discussion & Summary of Key Issues

The City Council is requested to certify the project's Environmental Impact Report (EIR), which identifies a significant impact that cannot be mitigated, along with adoption of CEQA findings including a SOC, and to evaluate the project under the findings set forth in PAMC 18.76.020(d) and adopt a Record of Land Use Action (see Attachment C).

The following discussion addresses issues raised during processing of this project, including neighborhood compatibility and traffic.

Cultural Resources and Neighborhood Setting

The 1.91-acre project site currently is developed with several one-story commercial and light industrial buildings. The structure at 744 San Antonio Road is approximately 20,775 square feet in size and is currently used as a professional office. The structure was originally constructed in 1961 as a mortuary and funeral chapel, with significant additions occurring at the rear of the structure in 1983. The structure is eligible for listing on the California Register of Historical Resources (California Register), due to its age and embodiment of some characteristics of mid-century modern architecture.

Two warehouse-type buildings are located at 748 and 750 San Antonio Road. The structures total approximately 10,800 square feet and were built in 1952. The structures are not eligible for listing in a historic register. The structures are currently occupied by commercial and light-industrial uses, including automotive repair and general business service uses. These existing buildings, associated landscaping, and other improvements would be demolished prior to construction of the proposed hotel project.

The project site is immediately surrounded by one-story structures that include service and light-industrial uses to the north. To the east, in the City of Mountain View, there are one-story office and light-industrial structures. A single-story specialty grocery store is located to the south. Taller structures are located to the west, across San Antonio Road, where there are three-story multifamily residential structures.

The immediate project vicinity is characterized by primarily low-intensity, single-story buildings and associated surface parking lots. These structures have primarily stucco facades with varying setbacks from San Antonio Road. However, existing development at the intersection of San Antonio Road and East Charleston Road (Taube Koret Campus), is similar in mass and height to the proposed project. As evidenced by the Taube Koret Campus, the area is in transition with a mixture of older and contemporary developments.

Residential uses in the vicinity are located approximately 150 feet west of the project site (across San Antonio Road). The three-story multi-family residential complex is separated from the site by four traffic lanes and a landscaped median planted with trees, perennial plants and groundcover. The buildings within the complex are setback from the road by approximately 75 feet. Mature landscaping and trees, a six-foot wall, and a private internal roadway separate the units from San Antonio Road. The exteriors of the residential structures are composed of tan stucco with dark brown trim elements.

Zoning Compliance¹

A detailed review of the proposed project's consistency with applicable zoning standards has been performed. A summary table is provided in Attachment D. The proposed project complies with all applicable development standards, or is seeking through the requested permits permission to deviate from certain code standards, in a manner that is consistent with the Zoning Ordinance (parking reduction—described later).

The project site is located within the Commercial Service (CS) zoning district, which is intended to accommodate service uses that may be inappropriate in neighborhood or pedestrian oriented shopping areas. This commercial zoning district is intended to allow retail, personal services, eating and drinking establishments, hotels and other business uses in a manner that

¹ The Palo Alto Zoning Code is available online: http://www.amlegal.com/codes/client/palo-alto_ca

balances the needs of those uses with the need to minimize impacts to surrounding neighborhoods. Hotels are a permitted use in this district.

In addition to the development standards for height, setbacks, parking, and FAR, the project is also subject to the requirements of PAMC Section 18.23 Performance Criteria for Multiple Family, Commercial, Manufacturing and Planned Community Districts. The goal of these criteria is to balance the needs of proposed projects with the need to minimize impacts to surrounding neighborhoods and businesses. Further, the project is subject to PAMC Section 18.16.090 Context-Based Design Criteria, the goal of which is to achieve compatibility of scale and massing for proposed projects; including linkages with the overall pattern of existing buildings to maintain street unity. The minimum parking and bicycle parking requirements for the site are contained within PAMC Section 18.52 Parking and Loading Requirements and 18.54 Facility Design Standards.

Context-Based Criteria

According to Section 18.16.090 of the PAMC, compatibility is achieved when apparent scale and mass of new buildings is consistent with the pattern of achieving a pedestrian oriented design, and when new construction shares general characteristics and establishes design linkages with the overall pattern of buildings, so that the visual unity of the street is maintained. The site is located on a block that includes primarily low-intensity single-story buildings, which are surrounded by surface parking lots; except for the residential multi-family neighborhood with two to three-story buildings across San Antonio Road to the west. These residences include a garage that is not completely submerged as a basement, so it does count as a story.

Any hotel project in this neighborhood seeking to maximize the zoning code encouraged incentive of a 2.0 FAR is likely to have some challenges meeting all the expectations of the context-based design criteria where adjacent properties can only achieve a maximum 0.4 FAR. Additionally, many of the buildings along the block are currently below 0.4 FAR exacerbating the perception that the new development will be out of scale with the surroundings. The city's interest to have development meet the context-based design criteria must be viewed in light of other stated interests (and zoning regulations) encouraging hotel development. Neighborhood context has been a consistent and ongoing concern regarding this project and the use of meaningful building articulation and modulating the building mass combined with substantial landscaping is critical to help bridge the transition between the project and adjacent and nearby lower profile buildings. While more could be done in this regard, the ARB felt that with the most recent revisions, the project provides sufficient modulation and will meet context based criteria with the provision of additional landscaping at the terraces and ground level with increased vegetation density.

Finally, while not actionable now, it is worth noting that the City Council recently directed staff to explore a program in the Comprehensive Plan update to further increase FAR for hotel development.

Performance Criteria (PAMC 18.23)

The project is located within 150 feet of a Planned Community (PC) district (developed with multi-family condominiums) and is, therefore, subject to PAMC Section 18.23 Performance Criteria for Multiple Family, Commercial, Manufacturing and Planned Community Districts. The purpose of the performance criteria is to provide standards to be used in the design and evaluation of development to balance the need of proposed projects with the need to minimize impacts to surrounding neighborhoods and businesses. The criteria in Section 18.23 include standards for refuse disposal areas, lighting, landscaping, and site access.

Consistent with the requirements of Section 18.23, the project proposes to provide covered refuse disposal areas away from residential uses, limit light-spillover to adjacent uses, plant landscaping to screen on-site uses (albeit not as much on the sides or rear property lines as the front), and provide surface parking away from the street and adjacent uses. More information is provided in Attachment E.

Multi-Modal Access & Parking

Vehicular Access

Vehicle and bicycle access to the site would occur from northbound San Antonio Road. A single driveway access would allow travel through the shared center courtyard within the project site to the proposed surface parking lot and below-grade parking garage. Previously, the ARB has mentioned that this component of the project should be evaluated and centralized elsewhere on site. The plans have not changed in response to this comment.

The driveway configuration would allow only right turns into and out of the property and would loop through the center courtyard to facilitate the pick-up and drop-off guests. This central driveway would also allow access to loading areas within the center of the site and additional parking at the rear of the site. The proposed below-grade parking garage would be accessed via the single driveway leading to a ramp at the center of the project site.

Pedestrian Access

The existing five-foot-wide sidewalk within the public right-of-way along San Antonio Road would be maintained and walkways from the sidewalk into the site would be provided to facilitate a pedestrian connection to the main building entrances. Walkways are also provided within the interior courtyard between the buildings to access parking and hotel facilities.

Bicycle Access

San Antonio Road includes Class III (shared bicycle/vehicular) bikeways, which is marked on the pavement as such. Bicyclists would enter the property at the same driveway as vehicles.

Parking

The project would provide a total of 294 vehicle parking spaces for the proposed hotel uses. 278 spaces (236 self-park spaces and 58 valet spaces) would be provided within a two-level below-grade parking garage. An additional 16 surface parking spaces would be provided within the project's interior courtyard area and at the rear of the site.

The project would provide 30 short-term bicycle parking spaces within two bicycle racks that are proposed to be located within 30 feet of the main entrance of the building. Additionally, the project would provide secure bike storage, showers and clothes lockers for employees. Consistent with the zoning code, the project provides two loading spaces at the rear of the property.

The valet spaces are located within drive aisles, which is inconsistent with the PAMC parking standards and would not count as standard parking spaces meeting the required parking for the project. The applicant requests an adjustment to the required parking, which allows up to a 20% reduction, which is equivalent to 58 spaces or the amount of spaces located within the drive aisles. The applicant provided a summary of how the valet parking program would work, and this valet parking is included as a condition of approval. The applicant also provided a parking study that identified that the peak parking ratio for the hotel based on similar hotels in the area would be an average of 0.70 (Attachment F). Based on this information and analysis, staff believes that the proposed parking will not create undue impact on existing or potential uses adjoining the site or in the general vicinity, and will be sufficient to meet the parking demand created by the development, including demand attributed to visitors and accessory facilities.

Transportation Demand Management Program

The project will implement a Transportation Demand Management (TDM) Program to reduce vehicle trips generated by the employees and guests. The TDM measures proposed by the project applicant are listed in Attachment I. These measures are divided into four categories: hotel TDM infrastructure, guest TDM programs, employee TDM programs, and guest & employee (dual) programs. The implementation of this program will reduce vehicle miles traveled and reduce parking demand as well. Conditions of approval address the implementation of the TDM program.

Traffic Report

A traffic report was prepared by the applicant's consultant, Hexagon, and peer reviewed by city's consultant, TJKM. (For newer applications, the City contracts out the traffic reports,

which are paid for by the applicant, obviating the need for peer reviews. However, this project predated this change in policy.)

The report concludes that the project would generate 88 net new AM peak hour trips and 87 net new PM peak hour trips. These amounts discount the existing uses trip generation, which is common practice to give credit to on-going uses when calculating the net change in trips. This does not account for any trip reduction measures such as implementing a TDM program. The plan includes hotel operated shuttles and subsidized transit passes for employees, among many other measures. The report estimates trip reductions would be 20% for employee trips and 30% for guest trips. These reductions have been evaluated by the peer reviewer and are supported by the City's transportation staff.

Traffic analysis typically focuses on intersections, especially signalized intersections, because intersections act as the chokepoints in the system. Traffic conditions at the intersections along San Antonio Road were evaluated using a concept called "level of service" (LOS). Level of Service is a qualitative description of operating conditions ranging from LOS A, or free-flow conditions with little or no delay, to LOS F, or jammed conditions with excessive delays. Palo Alto city policy seeks to maintain intersection operations at LOS D or better, which is a moderate level of congestion. While most drivers probably would prefer traffic operations better than LOS D, that desire is balanced with efficient use of resources for the overall transportation system. That is why Palo Alto, and most other cities in Santa Clara County and on the Peninsula, target LOS D as the limit of acceptable congestion, although LOS E is the threshold for intersections in the VTA Congestion Management Plan.

The project would increase the average delay (the wait time experienced by drivers using the study intersections) by 0.5 seconds or less. Based on the traffic study as peer reviewed by the City's consultant and supported by the City's transportation staff, there was no change in LOS with the project implemented at any of the study intersections. During circulation of the Draft EIR, the City received a number of comments regarding the transportation analysis, including comments about the timing of the traffic study and the queuing analysis. These comments have been responded to in the Final EIR and did not require additional analysis. While City staff acknowledges the concerns about traffic along San Antonio and connecting streets, the proposed hotels and hotels in general are not significant generators of peak hour trips and when analyzed using standard methods of evaluating traffic impacts the project does not create a significant impact based on standard thresholds.

Vehicle Miles Traveled

Vehicle Miles Traveled (VMT) is one of the alternative metrics considered when analyzing potential traffic impacts and the transportation analysis presents an estimate of average daily VMT for the proposed hotel. The estimated daily VMT would be 27.8 miles per capita (i.e. per employee and hotel guest) without any TDM measures, which would be reduced to 19.8 miles

per capita with the hotel's proposed TDM program. This represents a reduction compared to vehicle miles traveled that are estimated to be generated by the existing buildings, which have an estimated daily VMT of 34.4 miles per capita.

Suggested Routes to School

The project is not located adjacent to a designated Safe Route to School, however, the intersection of Middlefield Road and San Antonio Road is within a designated walking route for Hoover Elementary, Fairmeadow, Greendell and JLS Middle School. Traffic conditions at this intersection are not expected to change in a noticeable way as a result of the project, although a logistics plan will be required to address traffic during the construction period.

Public Comments

Comments regarding the project have been received throughout the EIR process and at ARB meetings. Generally, there has been a negative response to the project from the neighbors (residential and commercial). In particular, there is concern regarding the size of the project (massing and bulk); the amount of traffic generated by the project; concerns about the construction of the basement; and the operation of the hotels using water resources. Many of these comments are addressed in the Final EIR, others were discussed and considered by the ARB. Public comments are included in the Final EIR and in Attachment I. (One of the comments was intended for the EIR, however, it was sent after the close of the comment period and included with public comments in Attachment J. The subjects of this comment are nonetheless addressed in responses to other comments in the Final EIR.)

Policy Implications

The proposed project has been analyzed for conformance with the City's zoning regulations as described above, and has also been analyzed for conformance with the City's Comprehensive Plan. Relevant Comprehensive Plan Policies are identified in the Record of Land Use Action in Attachment C, and while some may find inconsistencies with individual policies, the project complies with the applicable Comprehensive Plan land use designation and on balance, the project is consistent with the Comprehensive Plan as a whole.

Resource Impact

As noted below in the discussion of overriding conditions (the SOC), the proposed project would generate transient occupancy tax (TOT) which would accrue to the City's general fund and could support planned infrastructure projects. The applicant has projected that the project would generate \$3.6 million in TOT after the third year. Based on hotels of a similar category and size, staff believes the estimate is reasonable during normal, non-recessionary economic times. The TOT rate 14%. In keeping with prior Council direction on the Infrastructure Plan that 2% of the TOT percentage should be dedicated to the plan, Staff recommends that at a minimum that same approach be taken if this project is approved. That level would provide

approximately half a million dollars a year that could go towards the Infrastructure Plan funding gap. The Council could by policy or annual budget decision appropriate more towards infrastructure.

Environmental Review

The subject project has been 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. Specifically, the project requires the certification of an Environmental Impact Report (EIR). The EIR was prepared by David J. Powers Associates under contract with the City.

Scoping Meeting

A scoping meeting on the EIR was conducted on March 3, 2016 during a duly noticed Architectural Review Board meeting. The public commented on traffic congestion (use of ride-shares), construction impacts such as noise, and dirt and damage to San Antonio Road. Concerns were also raised about the impacts of the underground garage on ground water. Comments continued with the impacts of diesel fuels and other contaminants on groundwater. The public also commented on shading and parking. Scoping comments were considered during preparation of the Draft EIR.

Public Circulation

The Draft EIR was circulated for public review between March 27, 2017 and May 10, 2017. Public comments on the Draft EIR were included in a Final EIR, which responds to each of the substantive comments received. The Final EIR was provided to commenters on May 31, 2017 and can be found in Attachment J.

Potential Impacts

Environmental impacts are physical impacts on the environment and are separated into either construction (temporary) or operational (longer-term and ongoing) impacts and evaluated based upon established thresholds of significance. If an impact is potentially significant, then mitigation measures are required to reduce that impact to a level of less than significant if feasible. The following were identified as potential significant impacts by topic:

Air Quality

Impact AQ-1: The proposed project could result in a risk for respiratory ailments resulting from exposure during construction. (Less than Significant Impact with Mitigation Incorporated).

Biological Resources

Impact BIO-1: Construction activities associated with the proposed project could result in impacts to nesting birds through the loss of fertile eggs or nest abandonment. (Less than Significant Impact with Mitigation Incorporated)

Cultural Resources

Impact CUL-1: Demolition of the mid-century modern structure at 744 San Antonio Road represents a substantial adverse effect to a historical resource eligible for the California Register. (Significant Impact) While mitigation measures are included, none would alleviate the impact and therefore the impact remains significant and unavoidable. (See the discussion below for more detail on the historic structure.)

Impact CUL-2: Unknown subsurface archaeological or paleontological resources could be present on the site in underlying native soils, and could be disturbed during project construction. (Less than Significant Impact with Mitigation Incorporated)

Hazards and Hazardous Materials

Impact HAZ-1: Localized hazardous materials contamination is present in on-site soils. Construction activities could result in hazards to people or the environment. (Less than Significant Impact with Mitigation Incorporated)

Impact HAZ-2: MtBE and petroleum hydrocarbon contaminated groundwater could be encountered during excavation for and construction of the below-grade parking garage. Exposure to this contaminated water or soil vapors could result in hazards to construction workers, the public or the environment during construction or hotel operation. (Less than Significant Impact with Mitigation Incorporated)

Noise

Impact NOI-1: Noise generated by general construction activity could impact residents to the west of the project site in the short-term. (Less than Significant Impact with Mitigation Incorporated)

Historic Listing Eligible Structure

The structure at 744 San Antonio Road is approximately 20,775 square feet in size and is currently used as a professional office. The structure was originally constructed in 1961 as a mortuary and funeral chapel, with significant rear additions totaling approximately 16,015 square feet occurring at the rear of the structure in 1983. The structure is eligible for listing on the California Register of Historic Places, due to its age and embodiment of some characteristics of mid-century modern architecture.

The structure at 744 San Antonio Road is representative of the mid-century modern style, popularized between 1945 and 1965, and made prominent within south Palo Alto by noted

architect Joseph Eichler who popularized the style for residential architecture. The mid-century modern style emphasizes the concept of indoor-outdoor living through the reduction of divisions between interior and exterior space. The use of design elements, such as overhanging trellises, pergolas, atriums, and integrated planters emphasized this indoor/outdoor connection. The opening of interior spaces, interaction with the natural environment, and straightforward use of materials were important principles that came to characterize the style.

The building at 744 San Antonio Road exhibits an asymmetrical design with right angles and cubic forms. The building façade features a roughhewn stone wall that encloses a courtyard, a trellis system, and a series of exposed rafters. The main body of the building features stucco cladding painted a neutral earth tone. The most prominent feature of the building is the exaggerated, overtly tall hipped roof with wide overhanging eaves. This exaggerated roof form is common to ecclesiastical buildings of this era. Windows along the façade and within the courtyard are wall length and separated by projecting wood mullions.

The 1961 structure at 744 San Antonio Road is considered eligible for listing on the California Register under Criterion 3, embodying the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values. The eligibility determination was made based on the building's distinctive mid-century modern style. Despite an addition to the rear of the building and minor alterations to fenestration, the structure retains its distinctive features and overall integrity. While the building appears eligible for listing on the California Register under Criterion 3, its diminished integrity precludes it from being listed on the National Register of Historic Preservation (NRHP).

This 1983 addition at 744 San Antonio Road is not attached to the original structure and is not a part of the structure potentially eligible for the California Register.

The demolition of the eligible building results in an unavoidable significant impact that would require the City Council to adopt a SOC, since there is no mitigation for a demolished building.

Final EIR

The Final EIR consists of comments received by the Lead Agency on the Draft EIR during the public review period, responses to those comments, and necessary revisions to the text of the Draft EIR (Attachment F).

In conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, the Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR is intended to be used by the City and any Responsible Agencies in making decisions regarding the project. The CEQA Guidelines advise that, while the information in the Final EIR does not control the agency's ultimate discretion on the project,

the agency must respond to each significant effect identified in the Draft EIR by making written findings for each of those significant effects.

According to the State Public Resources Code (Section 21081), no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

(a) The public agency makes one or more of the following findings with respect to each significant effect:

(1) Changes or alterations have been required in, or incorporated into, the project which will mitigate or avoid the significant effect on the environment.

(2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the City finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

Statement of Overriding Considerations (SOC)

The Final EIR indicates that the Project would result in significant and unavoidable impacts which cannot be adequately mitigated through the adoption and implementation of feasible mitigation measures. Those impacts, along with mitigation measures to mitigate them to the extent feasible, are listed below as referenced in the Final EIR.

Demolition of the mid-century modern structure at 744 San Antonio Road represents a substantial adverse effect to a historical resource eligible for the California Register. No mitigation measure will completely reduce the impact of demolition to implement the project and there are no feasible project alternatives that would both completely avoid significant impacts or meet all of the project objectives as stated and discussed in the Final EIR, therefore statements of overriding consideration are necessary.

As stated below and within the attached record of land of use action, statements that the City Council may modify to support adoption of the SOC:

1. The subject site is an under-utilized parcel in an area that is transforming from low-intensity commercial development to higher-intensity commercial development. Hotel projects are encouraged in this zoning district and supported by the City's Comprehensive Plan. Adaptive reuse of the historic structure cannot feasibly accommodate a new contemporary hotel and meet the project objectives.
2. In 2014, the City Council adopted an Infrastructure Plan that includes a list of capital projects that need to be prioritized and funded. The plan is currently underfunded as the cost of construction has increased over time. The plan includes several important capital projects, including a new public safety building, public parking garages, implementation of the city's pedestrian and bicycle plan, replacement of fire stations and several other projects important to the community. This plan relies, in part, on a 2% increase to the transient occupancy tax (TOT) that was approved by voters to support implementation of the Infrastructure Plan. The proposed development of a 294 room, dual branded hotel is expected to bring TOT revenues of \$3.6 million annually, based on an average 79% occupancy rate. If the City Council continues its policy to support funding of the Infrastructure plan with TOT revenue from new hotels, this project would contribute an estimated \$514,000 (2%) annually to support Infrastructure Plan projects. While loss of a historic building will result in a negative impact on the environment, this loss is outweighed by the economic benefit of the project, which will provide ongoing funding to support critical infrastructure improvements throughout the city.

Attachments:

Attachment A: Location Map(PDF)

Attachment B: CEQA Resolution (DOCX)

Attachment C: Draft Record of Land Use Action (DOCX)

Attachment D: CS Zoning Comparison (DOCX)

Attachment E: Performance standards (DOCX)

Attachment F: Parking Study-Valet Operations (PDF)

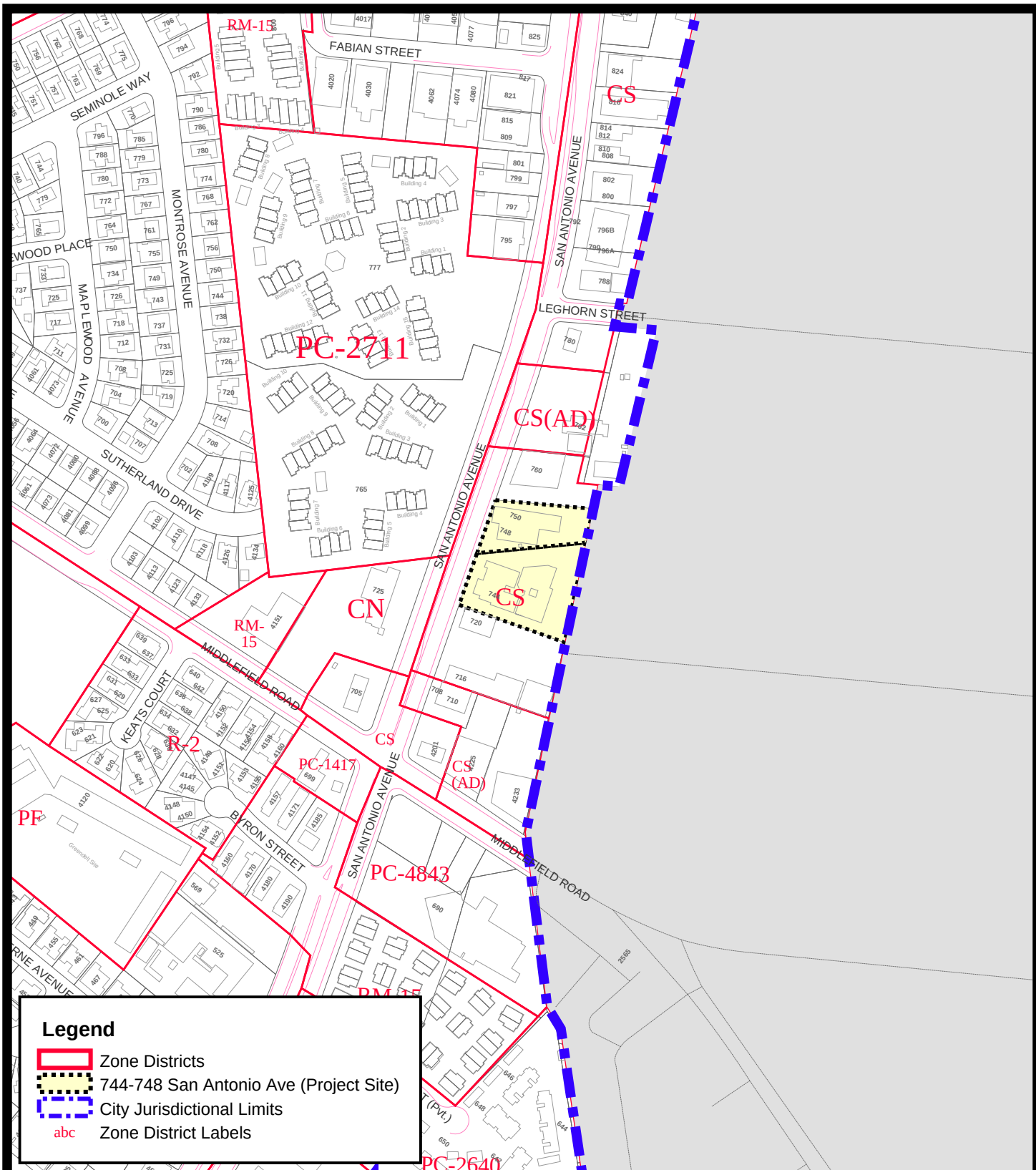
Attachment G: April 6, 2017 Staff Report w/o Attachments (PDF)

Attachment H: Transportation Demand Management Program (DOCX)

Attachment I: Project Plans (DOCX)

Attachment J: Public Letters to Council (PDF)

Attachment K: Environmental Impact Report (DOCX)



The City of
Palo Alto



744-748 San Antonio Avenue with Zoning Districts Area Map

This map is a product of the
City of Palo Alto GIS



Resolution No _____

Resolution of the Council of the City of Palo Alto Certifying the Final Environmental Impact Report, Adopting a Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program in Accordance with the California Environmental Quality Act for the 744-750 San Antonio Road Hotels Project

The Council of the City of Palo Alto RESOLVES as follows:

SECTION 1. Introduction and Certification.

(a) The City Council of the City of Palo Alto ("City Council"), in the exercise of its independent judgment, makes and adopts the following findings to comply with the requirements of the California Environmental Quality Act ("CEQA"; Pub. Resources Code, §§ 21000 et seq.), and Sections 15091, 15092, and 15093 of the CEQA Guidelines (14 Cal. Code Regs., § 15000 et seq.). All statements set forth in this Resolution constitute formal findings of the City Council, including the statements set forth in this paragraph. These findings are made relative to the conclusions of the City of Palo Alto 744-750 San Antonio Road Hotels Project Final Environmental Impact Report (State Clearinghouse No. 2016022065) (the "Final EIR"), which includes the Draft Environmental Impact Report ("Draft EIR"). The Final EIR addresses the environmental impacts of the implementation of the 744-750 San Antonio Road Hotels Project (the "Project", as further defined in Section 2(b) below) and is incorporated herein by reference. These findings are based upon the entire record of proceedings for the Project.

(b) Mitigation measures associated with the potentially significant impacts of the Project will be implemented through the Mitigation Monitoring and Reporting Program described below, which is the responsibility of the City.

(c) The City of Palo Alto is the Lead Agency pursuant to Public Resources Code section 21067 as it has the principal responsibility to approve and regulate the Project. T2 Development is the Project applicant.

(d) The City exercised its independent judgment in accordance with Public Resources Code section 20182.1(c), in retaining the independent consulting firm David J. Powers & Associates, Inc. ("Powers & Associates") to prepare the Final EIR, and Powers & Associates prepared the Final EIR under the supervision and at the direction of the City's Director of Planning and Community Environment.

(e) The City, through Powers & Associates, initially prepared the Draft EIR and circulated it for review by responsible and trustee agencies and the public and submitted it to the State Clearinghouse for review and comment by state agencies, for a comment period that ran from March 27, 2017, through May 10, 2017. Comments were received and revisions were made to the Final EIR.

(f) Based upon review and consideration of the information contained therein, the City Council hereby certifies that the Final EIR was completed in compliance with CEQA, and reflects the City of Palo Alto's independent judgment and analysis. The City Council has considered evidence and arguments presented during consideration of the Project and the Final EIR. In determining whether the Project may have a significant impact on the environment, and in adopting the findings set forth below, the City Council certifies that it has complied with Public Resources Code sections 21081, 21081.5, and 21082.2.

(g) Section 6 of the Final EIR shows all revisions which the Final EIR made to the Draft EIR. All references to the Draft EIR in these findings include references to all revisions to the Draft EIR made in the Final EIR. Having reviewed this section and the Final EIR as a whole, the City Council hereby finds, determines, and declares that no significant new information has been added to the Final EIR so as to warrant recirculation of all or a portion of the Draft EIR. Likewise, the City Council has considered all public comments and other information submitted into the record since publication of the Final EIR, and further finds that none of that additional information constitutes significant new information requiring recirculation of the Final EIR.

SECTION 2. Project Information.

The following Project information is supplied to provide context for the discussion and findings that follow, but is intended as a summary and not a replacement for the information contained in the Draft EIR, Final EIR, or Project approvals.

(a) Project Objectives

The Project Objectives of the Project applicant are set forth in Section 2.4 of the Draft EIR, which is incorporated herein by reference.

(b) Project Description

The project proposes to demolish the existing on-site structures and other improvements

and construct two, five-story hotel buildings with shared amenity facilities and two levels of below-grade parking. The proposed hotels would include a 151-room Courtyard by Marriott hotel (Courtyard Hotel) and a 143-room AC by Marriott hotel (AC Hotel), for a total of 294 new hotel rooms. The project is anticipated to employ up to 50 people with 12 to 15 staff on site at any one time, including front desk, food and beverage, housekeeping, and engineering staff.

The two proposed hotel buildings would be differentiated by branding, including interior and exterior colors and material uses. The proposed shared interior courtyard would incorporate amenities for the hotel guests, including a swimming pool, patio areas, and outdoor seating spaces. Associated landscaping, solid waste and recycling enclosures, parking shade-structures/solar panels, and vehicular access ramp to garage would also be constructed as part of the project.

A conceptual site plan of the proposed Project is shown on Figure 2.3-1. Conceptual elevations of the buildings are shown on Figures 2.3-2 through 2.3-4. (All references to figures and tables are to those appearing in the Draft EIR, as modified where applicable in the Final EIR.)

A complete description of the Project as proposed by the Project applicant is set forth in Section 2.3 of the Draft EIR, as modified in the Final EIR.

(c) Required Approvals

The approvals required by the City as lead agency for implementation of the Project include:

- A. Architectural Review
- B. Lot Merger (Certificate of Compliance)
- C. Demolition Permit
- D. Building Permits
- E. Encroachment Permit

SECTION 3. Record of Proceedings.

- (a) For purposes of CEQA, CEQA Guidelines section 15091(e), and these findings, the

Record of Proceedings for the Project includes, but is not limited to, the following documents:

- (1) The Final EIR, which consists of the 744-750 San Antonio Road Hotels Project Draft Environmental Impact Report, published and circulated for public review and comment by the City from March 27, 2017 through May 10, 2017 (the "Draft EIR"), and the 744-750 San Antonio Road Hotels Final Environmental Impact Report, published and made available on May 31, 2017, and all appendices, reports, documents, studies, memoranda, maps, testimony, and other materials related thereto;
- (2) All public notices issued by the City in connection with the Project and the preparation of the Draft EIR and the Final EIR, including but not limited to public notices for all public workshops held to seek public comments and input on the Project and the Notice of Preparation, Notice of Completion, Notice of Availability;
- (3) All written and oral communications submitted by agencies or interested members of the general public during the public review period for the Draft EIR, including oral communications made at public hearings or meetings held on the Project approvals;
- (4) The Mitigation Monitoring and Reporting Program;
- (5) All findings and resolutions adopted by the City Council in connection with the Project, and all documents cited or referred to therein;
- (6) All final reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the City of Palo Alto and consultants with respect to the City of Palo Alto's compliance with the requirements of CEQA, and with respect to the City of Palo Alto's actions on the Project, including all staff reports and attachments to all staff reports for all public meetings held by the City;
- (7) Minutes and/or verbatim transcripts of all public meetings and/or public hearings held by the City of Palo Alto in connection with the Project;
- (8) Matters of common knowledge to the City of Palo Alto, including, but not limited to, federal, state, and local laws and regulations;

- (9) Any documents expressly cited in these findings, in addition to those cited above; and
- (10) Any other materials required to be in the record of proceedings by Public Resources Code section 21167.G(e).

(b) The custodian of the documents comprising the record of proceedings is the Director of Planning and Community Environment, City of Palo Alto, 250 Hamilton Avenue, Palo Alto, California, 94301.

(c) Copies of all of the above-referenced documents, which constitute the record of proceedings upon which the City of Palo Alto's decision on the Project is based, are and have been available upon request at the offices of the Planning and Community Environment Department, City of Palo Alto, 250 Hamilton Avenue, Palo Alto, California, 94301, and other locations in the City of Palo Alto.

(d) The City of Palo Alto has relied upon all of the documents, materials, and evidence listed above in reaching its decision on the Project.

(e) The City Council hereby finds, determines and declares that the above referenced documents, materials, and evidence constitute substantial evidence (as that term is defined by section 15384 of the CEQA Guidelines) to support each of the findings contained herein.

SECTION 4. Mitigation Monitoring and Reporting Program.

(a) CEQA requires the lead agency approving a project to adopt a Mitigation Monitoring and Reporting Program (MMRP) for the changes made to the project that it has adopted in order to mitigate or avoid significant effects on the environment. An MMRP has been prepared and is recommended for adoption by the City Council concurrently with the adoption of these findings to ensure compliance with mitigation measures during Project implementation. As required by Public Resources Code section 21081.6, the MMRP designates responsibility and anticipated timing for the implementation of the mitigation measures recommended in the Final EIR. The MMRP will remain available for public review during the compliance period.

(b) The City Council hereby adopts the MMRP for the Project attached hereto as Exhibit A and incorporated by reference, and finds, determines, and declares that adoption of the MMRP will ensure enforcement and continued imposition of the mitigation measures

recommended in the Final EIR, and set forth in the MMRP, in order to mitigate or avoid significant impacts on the environment.

SECTION 5. Significant Impacts Reduced to Less than Significant.

The Draft EIR and the Final EIR identified a number of significant and potentially significant environmental impacts that the Project will cause or contribute to. All of these significant effects can be fully addressed and reduced to less than significant through the adoption and implementation of standard project requirements incorporated as part of the Project and feasible mitigation measures. Those impacts, along with the standard project requirements and mitigation measures to reduce them to less than significant, are listed below as referenced in the Draft and Final EIR.

3.2 Air Quality

Impact AQ-1: The proposed project could result in an excess cancer risk for a child exposure during construction.

a) Potential Impact. The impact identified above is described and discussed in Section 3.2 of the Draft EIR.

b) Mitigation Measures. Implementation of the following measure would reduce diesel exhaust emissions and concentrations during construction to a level below the significance threshold of 10 in one million:

MM AQ-1.1: Construction equipment shall be selected to minimize emissions. Such equipment selection would include the following requirements:

- All diesel-powered off-road equipment larger than 50 horsepower and operated on the site for more than two days continuously shall, at a minimum, meet United States Environmental Protection Agency particulate matter emissions standards for Tier 2 engines or equivalent, and/or
- Use of alternative powered equipment (e.g., Liquefied Petroleum Gas [LPG]-powered lifts), alternative fuels (e.g., biofuels), added exhaust devices, or a combination of measures listed above; and
- The construction contractor could use other measures to minimize construction period diesel particulate matter Diesel Particulate Matter emissions to reduce the predicted cancer risk below the thresholds. Such

measures may include the use of alternative powered equipment City of Palo Alto 44 Draft Environmental Impact Report 744-750 San Antonio Road March 2017 (e.g., LPG-powered lifts), alternative fuels (e.g., biofuels), added exhaust devices, or a combination of measures, provided that these measures are approved by the City and demonstrated to reduce community risk impacts to a less than significant level.

- Measures to be used shall be approved by the City of Palo Alto Department of Planning & Community Environment prior to issuance of demolition permits, and demonstrated to reduce community risk impacts to less than significant.

c) Findings. Implementation of the BAAQMD BMPs would reduce exhaust emissions by five percent and fugitive dust emissions by over 50 percent. Implementation of MM AQ-1.1 would further reduce onsite diesel exhaust emissions. With implementation of these measures, the increased cancer risk for construction would be 8.4 in one million, which is below the threshold of greater than 10 per one million. Thus, the project would have a less than significant impact with respect to community risk caused by construction activities.

d) Remaining Impact. Implementation of the above standard project requirements and mitigation measures would reduce all potential impacts to less than significant.

3.3 Biological Resources

Impact BIO-1: Construction activities associated with the proposed project could result in impacts to nesting birds through the loss of fertile eggs or nest abandonment.

a) Potential Impact. The impact identified above is described and discussed in Section 3.3 of the Draft EIR.

b) Mitigation Measures. In conformance with the California State Fish and Game Code and the provisions of the Migratory Bird Treaty Act, the project shall implement the following measures to reduce impacts to nesting birds and raptors to a less than significant:

MM BIO-1.1: Construction shall be scheduled to avoid the nesting season to the extent feasible to avoid the nesting season (February 1 to August 31). If it is not feasible to schedule construction between September 1 and January 31, preconstruction nesting bird surveys shall be completed prior to tree removal or construction activities in order to avoid impacts to nesting birds. Surveys shall be completed by a qualified biologist no more than 14 days before demolition or construction activities begin. During this survey, the biologist or ornithologist

shall inspect all trees and other nesting habitats in and immediately adjacent to the construction areas for nests.

MM BIO-1.2: If an active nest is found in an area that will be disturbed by construction, the ornithologist shall designate an adequate buffer zone to be established around the nest, in consultation with the California Department of Fish & Wildlife. The buffer will ensure that nests shall not be disturbed during project construction. The no-disturbance buffer shall remain in place until the biologist determines the nest is no longer active or the nesting season ends. If construction ceases for two days or more and then resumes again during the nesting season, an additional survey will be necessary to avoid impacts on active bird nests that may be present.

MM BIO-1.3: The applicant shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the Director of Planning, and Community Environment, prior to the issuance of a Grading Permit or Demolition Permit.

c) Findings. With the implementation of these mitigation measures to protect nesting birds, the project would result in a less than significant impact.

d) Remaining Impact. Implementation of the above standard project requirements and mitigation measures would reduce all potential impacts to less than significant.

3.4 Cultural Resources

Impact CUL-2: Unknown subsurface archaeological or paleontological resources could be present on the site in underlying native soils, and could be disturbed during project construction.

a) Potential Impact. The impact identified above is described and discussed in Section 3.4 of the Draft EIR.

b) Mitigation Measures. With implementation of the following mitigation measures, potential impacts to subsurface cultural resources would be reduced to a less than significant level:

MM CUL-2.1: In the event any significant cultural materials (including fossils) are encountered during construction grading or excavation, all construction within a radius of 50 feet of the find would be halted, the Director of Planning and Community Environment shall be notified, and a qualified archaeologist shall examine the find and make appropriate recommendations regarding the significance of the find and the appropriate mitigation. Recommendations could include collection, recordation and analysis of any significant cultural materials. A report of findings documenting any data recovered during monitoring

shall be submitted to the Director of Planning and Community Environment.

MM CUL-2.2: Pursuant to Section 7050.5 of the Health and Safety Code, and Section 5097.94 of the Public Resources Code of the State of California in the event of the discovery of human remains during construction, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his authority, he shall notify the Native American Heritage Commission who shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the land owner shall reinter the human remains and items associated with Native American burials on the property in a location not subject to further subsurface disturbance. If the Director of Planning and Community Environment finds that the archaeological find is not a significant resource, work would resume only after the submittal of a preliminary archaeological report and after provisions for reburial and ongoing monitoring are accepted.

c) Findings. With implementation of mitigation measures MM CUL-2.1 and 2.1 the project will have a less than significant impact.

d) Remaining Impact. Implementation of the above standard project requirements and mitigation measures would reduce all potential impacts to less than significant.

3.8 Hazards and Hazardous Materials

Impact HAZ-1: Localized hazardous materials contamination is present in on-site soils. Construction activities could result in hazards to people or the environment.

a) Potential Impact. The impact identified above is described and discussed in Section 3.8 of the Draft EIR.

b) Mitigation Measures. The project shall implement the following mitigation measures as part of a Voluntary Cleanup Program with the oversight of SCCDEH, or other appropriate oversight agency, to reduce impacts associated with redevelopment of the site to a less than significant level:

MM HAZ-1.1: Due to the presence of localized total petroleum hydrocarbons, lead, and possibly residual organochlorine pesticides impacted soil at the project site, the project shall conduct additional focused sampling and analysis under the oversight of the Santa Clara County Department of Environmental Health (SCCDEH), or other appropriate oversight agency, in accordance with a Work Plan prepared by a qualified professional and approved

by the oversight agency. The Work Plan shall be approved prior to building demolition and site clearing or excavation and include appropriate risk-based screening levels for comparison of the sampling results.

At minimum, soils in the upper 18 inches of soil will be analyzed to quantify petroleum, hydrocarbons, volatile organic compounds, and organochlorine pesticides as part of post-demolition soil sampling following site clearing.

Based upon the results of the analysis under the Work Plan and an Remedial Excavation Report, offsite disposal of excavated soil shall occur consistent with sample protocols (as required by the receiving disposal site) and in conformance with current regulatory practices. The excavated soils shall be placed at a regulated landfill appropriate to the soils analysis results. Confirmation sampling shall be conducted at the bottom of the initial excavation depths to verify that contaminated soils have been removed. A letter (or equivalent assurance) from the oversight agency documenting completion of the Work Plan for on-site testing to the satisfaction of the City of Palo Alto 93 Draft Environmental Impact Report 744-750 San Antonio Road March 2017 oversight agency shall be provided to the Department of Planning & Community Environment prior to the issuance of building permits.

MM HAZ-1.2: A Soil and Groundwater Management Plan (SMP) shall be developed to establish management practices for handling contaminated soil, groundwater or other materials encountered during construction activities. The SMP shall identify potential health, safety, and environmental exposure considerations associated with redevelopment activities and shall identify appropriate mitigation measures. The SMP shall be submitted to the City and oversight agency for approval prior to commencing construction activities. The SMP shall include the following:

- Proper mitigation as needed for demolition of existing structures;
- Management of stockpiles, including sampling, disposal, and dust and runoff control including implementation of a stormwater pollution prevention program;
- Management of underground structures encountered, including utilities and/or underground storage tanks;
- Procedures to follow if evidence of an unknown historic release of hazardous materials (e.g., underground storage tanks, polychlorinated biphenyls, other contamination, etc.) is discovered during excavation or demolition activities;
- Traffic control during site improvements;
- Noise, work hours, and other relevant City regulations;
- Mitigation of soil vapors (if required);
- Procedures for proper disposal of contaminated materials (if required); and
- Monitoring, reporting, and regulatory oversight arrangements.

MM HAZ-1.3 A site-specific Health and Safety Plan (HSP) shall be prepared as part of the SMP prior to issuance of grading permits for project construction to address potential health

and safety hazards associated with implementation of the SCCDEH approved work plan and the proposed redevelopment activities (e.g., site preparation, demolition, grading and construction). The HSP shall govern activities of all personnel present during field activities. Any contractor performing a task not covered in the HSP shall be required to develop a job hazard analysis specific to that task prior to performing the task.

c) Findings. Implementation of the mitigation measures listed above would reduce the impacts of soil contaminants to a less than significant level.

d) Remaining Impact. Implementation of the above standard project requirements and mitigation measures would reduce all potential impacts to less than significant.

Impact HAZ-2: MtBE and petroleum hydrocarbon contaminated groundwater could be encountered during excavation for and construction of the below-grade parking garage. Exposure to this contaminated water or soil vapors could result in hazards to construction workers, the general public or the environment during construction or hotel operation.

a) Potential Impact. The impact identified above is described and discussed in Section 3.8 of the Draft EIR.

b) Mitigation Measures. The following mitigation measures are included in the project to reduce hazards associated with contaminated groundwater underlying the project site. The project shall implement the following mitigation measures with the oversight of the SCCDEH or other appropriate oversight agency to reduce impacts associated with development of the site to a less than significant level:

MM HAZ-2.1: Soil Vapor Controls. The potential risks to human health from soil vapors from contaminated groundwater shall be reduced either by remediation of contaminated soils (e.g., excavation and off-site disposal) under MM HAZ- 1.2 and/or implementation of institutional and engineering controls to ensure that any potential added health risks are reduced to acceptable levels. Institutional and engineering controls employed on the site may include passive and active ventilation systems, vapor barriers, and/or adoption of deed restrictions.

Guidelines and measures for health and safety during construction activities, soil management, groundwater management, addressing vapor intrusion issues, and construction activities (unanticipated subsurface conditions) shall be addressed as part of a Soil and Groundwater Management Plan (SMP) under MM HAZ-1.2 and reviewed and approved by SCCDEH or other appropriate oversight agency.

Final approval received from the oversight agency stating that the entire site is suitable for hotel land uses with implementation shall be issued and copied to the Department of Planning & Community Environment, prior to issuance of permits for project construction.

MM HAZ-2.2: Groundwater Handling and Disposal During Construction. Groundwater handling during construction shall be conducted in accordance with an approved Soil and Groundwater Management Plan as outlined in MM HAZ- 1.2.

A dewatering system shall be implemented during construction of the project. Prior to discharge to the public stormwater collection system, contaminants (including petroleum hydrocarbons and MtBE) shall be removed from dewatered groundwater. The system shall include a granulated activated carbon unit, or equivalent treatment device. A discharge plan shall be prepared and permits shall be secured from the appropriate regulatory agencies, including the Regional Water Quality Control Board and the City of Palo Alto.

c) Findings. Implementation of MM HAZ-1.2, MM HAZ-2.1 and MM HAZ-2.2 as part of the project would reduce hazardous materials impacts related to contaminated groundwater to a less than significant level.

d) Remaining Impact. Implementation of the above standard project requirements and mitigation measures would reduce all potential impacts to less than significant.

3.11 Noise and Vibration

Impact NOI-1: Noise generated by general construction activity could impact residents to the west of the project site in the short-term.

a) Potential Impact. The impact identified above is described and discussed in Section 3.11 of the Draft EIR.

b) Mitigation Measures. The project shall implement the following mitigation measure, which would lessen potential construction-related noise impacts to a less than significant level:

MM NOI-1.1: The project applicant shall implement a noise logistics plan which would include, but not be limited to, the following measures to reduce construction noise levels as low as practical:

- Utilize 'quiet' models of air compressors and other stationary noise sources where technology exists.

- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment.
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses.
- Locate staging areas and construction material areas as far away as possible from adjacent land uses.
- Prohibit all unnecessary idling of internal combustion engines.
- The contractor will prepare a detailed construction plan identifying a schedule of major noise generating construction activities. This plan shall identify a noise control disturbance coordinator and procedure for coordination with the adjacent noise sensitive facilities so that construction activities can be scheduled to minimize noise disturbance. This plan shall be made publicly available for interested community members and a public notice will be sent to neighbors within 300 feet within two weeks of the start of any on-site grading or demolition activities.
- The disturbance coordinator will be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g. starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. The telephone number for the disturbance coordinator at the construction site will be posted and included in the notice sent to neighbors regarding the construction schedule.

c) Findings. The project would be constructed consistent with the allowable construction hours, per the Noise Ordinance, and would implement MM NOI-1.1 to reduce short-term noise impacts resulting from construction noise to a less than significant level.

d) Remaining Impact. Implementation of the above standard project requirements and mitigation measures would reduce all potential impacts to less than significant.

SECTION 6. Significant and Unavoidable Impacts.

The Draft EIR and the Final EIR documented that the Project would result in significant and unavoidable impacts which cannot be adequately mitigated through the adoption and implementation of feasible mitigation measures. Those impacts, along with mitigation measures to mitigate them to the extent feasible, are listed below as referenced in the Draft EIR.

3.1 Cultural Resources

Impact CUL-1: Demolition of the mid-century modern structure at 744 San Antonio

Road represents a substantial adverse effect to a historical resource eligible for the California Register.

e) Potential Impact. The impact identified above is described and discussed in Section 3.4 of the Draft EIR.

f) Mitigation Measures. The following mitigation measures will be adopted and will be implemented as provided in the Mitigation Monitoring and Reporting Program, and as further described in the remainder of these findings:

Mitigation Measures CUL-1.1 and CUL-1.2.

MM CUL-1.1: Historic American Buildings Survey (HABS) documentation of the exterior of 744 San Antonio Road and the structure's setting shall be prepared by the project applicant prior to the demolition of the structure. Following the HABS guidelines, this documentation shall include full measured drawings, large-format photography, and an historical overview of the structure. The documentation shall be filed by the applicant with City of Palo Alto Historic Preservation Officer, prior to the start of demolition.

MM CUL-1.2: Prior to demolition, the project proponent shall make the building available for relocation or salvage by qualified salvage companies facilitating the reuse of historic building materials. The structures shall be advertised for relocation or salvage by placing an advertisement in a newspaper of general circulation, posting on a website, and on-site posting for at least 30 days.

g) Findings. The above-noted mitigation measures will reduce the severity of this potentially significant impact by documenting the building and providing the opportunity for salvage and reuse of the building's materials. However, because of the implementation of the project requires the demolition of the building, these measures would not fully mitigate this Impact to a less-than-significant level.

h) Remaining Impacts. There are no other feasible mitigation measures available to mitigate this impact to a less-than-significant level. Implementation of Mitigation Measures CUL-1.1 and 1.2 would lessen the Project's impacts on the described historical resources through documentation and providing the opportunities to reuse the building's materials. However, the implementation of the Project requires the demolition and these mitigation measures would not result in reversing the demolition, and therefore would still result in a significant impact to historic resources.

i) **Overriding Considerations.** The environmental, social, economic and other benefits of the Project override any remaining significant adverse impacts of the Project relating to historical resources as set forth in the Statement of Overriding Considerations discussion below (Section 8).

SECTION 7. Findings Regarding Project Alternatives.

Public Resources Code section 21002 prohibits a public agency from approving a project if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of the project. When a lead agency finds, even after the adoption of all feasible mitigation measures, that a project will still cause one or more significant environmental effects that cannot be substantially lessened or avoided, it must, prior to approving the project as mitigated, first determine whether there are any project alternatives that are feasible and that would substantially lessen or avoid the project's significant impacts. Under CEQA, "feasibility" includes "desirability" to the extent that it is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors, and an alternative may be deemed by the lead agency to be "infeasible" if it fails to adequately promote the project applicant's and/or the lead agency's primary underlying goals and objectives for the project. Thus, a lead agency may reject an alternative, even if it would avoid or substantially lessen one or more significant environmental effects of the project, if it finds that the alternative's failure to adequately achieve the objectives for the project, or other specific and identifiable considerations, make the alternative infeasible.

The City Council certifies that the Final EIR describes a reasonable range of alternatives to the Project, which could feasibly obtain the basic objectives of the Project, and that the City Council has evaluated the comparative merits of the alternatives. As described below, the City Council has decided to approve the Project as proposed, and to reject the remainder of the alternatives, as summarized below.

Section 2.4 of the Draft EIR set forth the Project applicant's objectives for the Project. That list is incorporated herein by reference. In light of the applicant's objectives for the Project, and given that the Project is expected to result in certain significant environmental effects even after the implementation of all feasible mitigation measures, as identified above, the City hereby makes the following findings with respect to whether one or more of the alternatives evaluated in the Draft EIR could feasibly accomplish most of the goals and objectives for the Project and substantially lessen or avoid one or more of its potentially significant effects.

No Project Alternative

The No Project Alternative - Current Conditions Scenario is discussed at Section 5.5.1 of the Draft EIR. The No Project - Current Conditions Scenario is hereby rejected as infeasible because it would not achieve the Project objectives, as explained in Sections 2.4 and 5.3 of the Draft EIR.

Location Alternative

The Location Alternative is discussed in Section 5.4.1 of the Draft EIR. The Location Alternative is hereby rejected as infeasible because there is no suitable site available to achieve the objectives of the project explained in Sections 2.4 and 5.3 of the Draft EIR and it is unknown whether the applicant could reasonably acquire, control or have access to property to implement the project.

No Project-Housing Alternative

The No Project-Housing Alternative is discussed in Section 5.5.2 of the Draft EIR. The No Project-Housing Alternative is hereby rejected as infeasible because while it could potentially avoid the demolition of the California Register-eligible resource, and other significant impacts could also be avoided, this alternative would not achieve the primary Project objectives, as explained in Sections 2.4 and 5.3 of the Draft EIR.

Reduced Intensity (Maintaining the Historic Structure) Hotel Alternative

The Reduce Intensity Alternative is discussed in Section 5.5.3 of the Draft EIR. The Reduce Intensity Alternative is hereby rejected as infeasible because while it would avoid the demolition of the California Register-eligible resource, it would not meet all the Project objectives.

SECTION 8. Statement of Overriding Considerations

Pursuant to Public Resources Code Section 21081 and Section 15093 of the CEQA Guidelines, this City Council adopts and makes the following Statement of Overriding Considerations regarding the remaining significant unavoidable impacts of the Project, as discussed above, and the anticipated economic, social and other benefits of the Project. The City finds that: (i) the majority of the significant impacts of the Project will be reduced to less-than-significant and acceptable levels by the mitigation measures described in the Final

EIR and approved and adopted by these Findings; (ii) the City's approval of the Project will result in certain significant adverse environmental effects that cannot be avoided even with the incorporation of all feasible mitigation measures into the Project; and (iii) there are no other feasible mitigation measures or feasible Project alternatives that would further mitigate or avoid the remaining significant environmental effects. The significant effects that have not been mitigated to a less-than-significant level and are therefore considered significant and unavoidable are identified in Section 6 above. Despite these potentially significant impacts, it is the City's considered judgment that the benefits offered by the Project outweigh the potentially adverse effects of these significant impacts. The substantial evidence supporting the following described benefits of the Project can be found in the preceding findings and in the record of proceedings.

The benefits of the Project which the City Council finds serve as overriding considerations" justifying its approval include the following:

- (1) The subject site is an under-utilized parcel in an area that is transforming from low-intensity commercial development to higher-intensity commercial development. Hotel projects are encouraged in this zoning district and supported by the City's Comprehensive Plan. Adaptive reuse of the historic structure cannot feasibly accommodate a new contemporary hotel and meet the project objectives.
- (2) In 2014, the City Council adopted an Infrastructure Plan that includes a list of capital projects that need to be prioritized and funded. The plan is currently underfunded as the cost of construction has increased over time. The plan includes several important capital projects, including a new public safety building, public parking garages, implementation of the city's pedestrian and bicycle plan, replacement of fire stations and several other projects important to the community. This plan relies, in part, on a 2% increase to the transient occupancy tax (TOT) that was approved by voters to support implementation of the Infrastructure Plan. The proposed development of a 294 room, dual branded hotel is expected to bring TOT revenues of \$3.6 million annually, based on an average 79% occupancy rate. If the City Council continues its policy to support funding of the Infrastructure plan with TOT revenue from new hotels, this project would contribute an estimated \$514,000 (2%) annually to support Infrastructure Plan projects. While loss of a historic building will result in a negative impact on the

environment, this loss is outweighed by the economic benefit of the project, which will provide ongoing funding to support critical infrastructure improvements throughout the city.

INTRODUCED AND PASSED:

AYES:

NOES:

ABSENT:

ABSTENTIONS:

ATTEST:

Mayor

Director of Planning and Community
Environment

Exhibit A

MITIGATION MONITORING OR REPORTING PROGRAM

Mitigation Measures	Mitigation and Monitoring Responsibility	Monitoring Action	Schedule
Air Quality			
MM AQ-1.1: Construction equipment shall be selected to minimize emissions. Such equipment selection would include the following requirements: • All diesel-powered off-road equipment larger than 50 horsepower and operated on the site for more than two days continuously shall, at a minimum, meet United States Environmental Protection Agency particulate matter emissions standards for Tier 2 engines or equivalent, and/or • Use of alternative powered equipment (e.g., Liquefied Petroleum Gas([LPG]-powered lifts), alternative fuels (e.g., biofuels), added exhaust devices, or a combination of measures listed above; and • The construction contractor could use other measures to minimize construction period diesel particulate matter Diesel Particulate Matter emissions to reduce the predicted cancer risk below the thresholds. Such measures may include the use of alternative powered equipment (e.g., LPG-powered lifts), alternative fuels (e.g., biofuels), added exhaust devices, or a combination of measures, provided that these measures are approved by the City and demonstrated to reduce community risk impacts to a less than significant level. • Measures to be used shall be approved by the City of Palo Alto Department of Planning and Community Environment prior to issuance of demolition permits, and demonstrated to reduce community risk impacts to less than significant.	Implementation: Project applicant and contractors Monitoring: City of Palo Alto Department of Planning and Community Environment or designee	Emissions control measures shall be approved by the Director of Planning and Community Environment or designee	Prior to issuance of demolition permits and during construction

Mitigation Measure	Mitigation and Monitoring Responsibility	Monitoring Action	Schedule
Biological Resources			
MM BIO-1.1: Construction shall be scheduled to avoid the nesting season to the extent feasible to avoid the nesting season (February 1 to August 31). If it is not feasible to schedule construction between September 1 and January 31, pre-construction nesting bird surveys shall be completed prior to tree removal or construction activities in order to avoid impacts to nesting birds. Surveys shall be completed by a qualified biologist no more than 14 days before demolition or construction activities begin. During this survey, the biologist or ornithologist shall inspect all trees and other nesting habitats in and immediately adjacent to the construction areas for nests. MM BIO-1.2: If an active nest is found in an area that will be disturbed by construction, the ornithologist shall designate an adequate buffer zone to be established around the nest, in consultation with the California Department of Fish & Wildlife (CDFW). The buffer will ensure that nests shall not be disturbed during project construction. The no-disturbance buffer shall remain in place until the biologist determines the nest is no longer active or the nesting season ends. If construction ceases for two days or more and then resumes again during the nesting season, an additional survey will be necessary to avoid impacts on active bird nests that may be present. MM BIO-1.3: The applicant shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the Director of Planning and Community Environment, prior to the issuance of a Grading Permit or Demolition Permit.	Implementation: Project applicant, contractors, and qualified biologist Monitoring: City of Palo Alto Department of Planning and Community Environment and CDFW (if a nest is found)	Avoidance of nesting season, or completion of pre-construction nesting bird surveys and submittal of a survey report to the Director of Planning and Community Environment Coordination with CDFW to avoid disturbance of active nests during project activities	14 days before demolition or construction activities begin and prior to issuance of a Grading Permit or Demolition Permit
Cultural Resources			
MM CUL-1.1: Historic American Buildings Survey (HABS) documentation of the exterior of 744 San Antonio Road and the structure's setting shall be prepared by the project applicant prior to the demolition of the structure. Following the HABS guidelines, this documentation shall include full	Implementation: Project applicant Monitoring: City of Palo Alto Historic	Submittal of HABS documentation for record-keeping purposes to the	Prior to the start of demolition activities

measured drawings, large-format photography, and an historical overview of the structure. The documentation shall be filed by the applicant with City of Palo Alto Historic Preservation Officer, prior to the start of demolition.	Preservation Officer	City of Palo Alto Historic Preservation Officer	
MM CUL-1.2: Prior to demolition, the project proponent shall make the building available for relocation or salvage by qualified salvage companies facilitating the reuse of historic building materials. The structures shall be advertised for relocation or salvage by placing an advertisement in a newspaper of general circulation, posting on a website, and on-site posting for at least 30 days.	Implementation: Project Applicant Monitoring: City of Palo Alto Historic Preservation Officer	Submittal of proof of newspaper advertisement, posting on a website, and on-site posting to the City's Historic Preservation Officer	Prior to the start of demolition, structures shall be made available for salvage for 30 days after advertisement and on-site posting occurs
MM CUL-2.1: In the event any significant cultural materials (including fossils) are encountered during construction grading or excavation, all construction within a radius of 50 feet of the find would be halted, the Director of Planning and Community Environment shall be notified, and a qualified archaeologist shall examine the find and make appropriate recommendations regarding the significance of the find and the appropriate mitigation. Recommendations could include collection, recordation and analysis of any significant cultural materials. A report of findings documenting any data recovered during monitoring shall be submitted to the Director of Planning and Community Environment.	Implementation: Project applicant and contractors Monitoring: City of Palo Alto Department of Planning and Community Environment	Notification of Director of Planning and Community Environment if cultural materials or fossils are encountered and submittal of a report of findings after data recovery	During grading and excavation activities
MM CUL-2.2: Pursuant to Section 7050.5 of the Health and Safety Code, and Section 5097.94 of the Public Resources Code of the State of California in the event of the discovery of human remains during construction, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his authority, he shall notify the Native American Heritage Commission (NAHC) who shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this state law, then the land owner shall reinter the human remains and items associated with Native American burials on the property in a location not	Implementation: Project applicant and contractors Monitoring: City of Palo Alto Department of Planning and Community Environment, Santa Clara County Coroner, and NAHC	Santa Clara County Coroner shall determine the status of remains, if encountered NAHC shall identify descendants of the deceased, if remains are Native American Submittal and acceptance of	During grading and excavation activities

subject to further subsurface disturbance. If the Director of Planning and Community Environment finds that the archaeological find is not a significant resource, work would resume only after the submittal of a preliminary archaeological report and after provisions for reburial and ongoing monitoring are accepted.		an archaeological report to the Director of Planning and Community Environment	
Hazards and Hazardous Materials			
MM HAZ-1.1: Due to the presence of localized total petroleum hydrocarbons, lead, and possibly residual organochlorine pesticides impacted soil at the project site, the project shall conduct additional focused sampling and analysis under the oversight of the Santa Clara County Department of Environmental Health (SCCDEH), or other appropriate oversight agency, in accordance with a Work Plan prepared by a qualified professional and approved by the oversight agency. The Work Plan shall be approved prior to building demolition and site clearing or excavation and include appropriate risk-based screening levels for comparison of the sampling results. At minimum, soils in the upper 18 inches of soil will be analyzed to quantify petroleum, hydrocarbons, volatile organic compounds, and organochlorine pesticides as part of post-demolition soil sampling following site clearing. Based upon the results of the analysis under the Work Plan and an Remedial Excavation Report, offsite disposal of excavated soil shall occur consistent with sample protocols (as required by the receiving disposal site) and in conformance with current regulatory practices. The excavated soils shall be placed at a regulated landfill appropriate to the soils analysis results. Confirmation sampling shall be conducted at the bottom of the initial excavation depths to verify that contaminated soils have been removed. A letter (or equivalent assurance) from the oversight agency documenting completion of the Work Plan for on-site testing to the satisfaction of the oversight agency shall be provided to the Department of Planning and Community Environment prior to the issuance of building permits.	Implementation: Project applicant and contractors Monitoring: SCCDEH or other appropriate oversight agency, and City of Palo Alto Department of Planning and Community Environment	Review and approval of the Work Plan and Remedial Excavation Report by SCCDEH or other appropriate oversight agency Provision of a letter (or equivalent assurance) from the oversight agency documenting completion of the Work Plan shall be provided to the Director of Planning and Community Environment	Work Plan shall be approved prior to building demolition and site clearing or excavation A letter from the oversight agency documenting completion of Work Plan shall be submitted prior to the issuance of building permits
MM HAZ-1.2: A Soil and Groundwater Management Plan (SMP) shall be developed to establish management practices for handling contaminated soil,	Implementation: Project applicant and contractors	Submittal of the SMP to the Director of	Prior to the start of construction

groundwater or other materials encountered during construction activities. The SMP shall identify potential health, safety, and environmental exposure considerations associated with redevelopment activities and shall identify appropriate mitigation measures. The SMP shall be submitted to the City and oversight agency for approval prior to commencing construction activities. The SMP shall include the following: • Proper mitigation as needed for demolition of existing structures; • Management of stockpiles, including sampling, disposal, and dust and runoff control including implementation of a stormwater pollution prevention program; • Management of underground structures encountered, including utilities and/or underground storage tanks; • Procedures to follow if evidence of an unknown historic release of hazardous materials (e.g., underground storage tanks, polychlorinated biphenyls, other contamination, etc.) is discovered during excavation or demolition activities; • Traffic control during site improvements; • Noise, work hours, and other relevant City regulations; • Mitigation of soil vapors (if required); • Procedures for proper disposal of contaminated materials (if required); and • Monitoring, reporting, and regulatory oversight arrangements.	Monitoring: SCCDEH or other appropriate oversight agency, and City of Palo Alto Department of Planning and Community Environment	Planning and Community Environment and SCCDEH, or other appropriate oversight agency	activities
MM HAZ-1.3: A site-specific Health and Safety Plan (HSP) shall be prepared as part of the SMP prior to issuance of grading permits for project construction to address potential health and safety hazards associated with implementation of the SCCDEH approved work plan and the proposed redevelopment activities (e.g., site preparation, demolition, grading and construction). The HSP shall govern activities of all personnel present during field activities. Any contractor performing a task not covered in the HSP shall be required to develop a job hazard analysis specific to that task prior to performing the task.	Implementation: Project applicant and contractors Monitoring: SCCDEH or other appropriate oversight agency	Submittal of the HSP to the Director of Planning and Community Environment and SCCDEH, or other appropriate oversight agency	Prior to issuance of grading permits

MM HAZ-2.1: <u>Soil Vapor Controls.</u> The potential risks to human health from soil vapors from contaminated groundwater shall be reduced either by remediation of contaminated soils (e.g., excavation and off-site disposal) under MM HAZ-1.2 and/or implementation of institutional and engineering controls to ensure that any potential added health risks are reduced to acceptable levels. Institutional and engineering controls employed on the site may include passive and active ventilation systems, vapor barriers, and/or adoption of deed restrictions. Guidelines and measures for health and safety during construction activities, soil management, groundwater management, addressing vapor intrusion issues, and construction activities (unanticipated subsurface conditions) shall be addressed as part of a Soil and Groundwater Management Plan under MM HAZ-1.2 and reviewed and approved by SCCDEH or other appropriate oversight agency. Final approval received from the oversight agency stating that the entire site is suitable for hotel land uses with implementation shall be issued and copied to the Department of Planning and Community Environment, prior to issuance of permits for project construction. In the event institutional or engineering controls are required for soil vapors, a No Further Action letter (or equivalent assurance) from the oversight agency documenting completion of remediation activities and/or engineering controls shall be provided to the Director of Planning and Community Environment prior to issuance of occupancy permits.	Implementation: Project applicant and contractors Monitoring: SCCDEH or other appropriate oversight agency, and City of Palo Alto Department of Planning and Community Environment	Submittal of the SMP to the Director of Planning and Community Environment and SCCDEH, or other appropriate oversight agency Issuance of final approval for hotel uses or No Further Action letter (or equivalent) by SCCDEH, or other appropriate oversight agency submitted to the Director of Planning and Community Environment	Prior to issuance of permits for project construction Final approval for hotel uses shall be submitted prior to issuance of building permits No Further Action letter (or equivalent) shall be submitted prior to issuance of occupancy permits
MM HAZ-2.2: <u>Groundwater Handling and Disposal During Construction.</u> Groundwater handling during construction shall be conducted in accordance with an approved Soil and Groundwater Management Plan as outlined in MM HAZ-1.2. A dewatering system shall be implemented during construction of the project. Prior to discharge to the public stormwater collection system, contaminants (including petroleum hydrocarbons and MtBE) shall be removed from dewatered groundwater. The system shall include a granulated activated carbon unit, or equivalent treatment device. A discharge plan shall be prepared and permits shall be secured from the appropriate regulatory agencies, including the Regional Water Quality Control Board and the City of	Implementation: Project applicant and contractors Monitoring: San Francisco Bay Regional Water Quality Control Board, City of Palo Alto Department of Planning and Community Environment	Review of discharge plan and issuance of permits for dewatering by the San Francisco Bay Regional Water Quality Control Board, and City of Palo Alto Department of Planning and Community Environment	Removal of contaminants shall occur during dewatering and prior to discharge Permits shall be obtained prior to the start of dewatering

Palo Alto.			
Noise			
MM NOI-1.1: The project applicant shall implement a noise logistics plan which would include, but not be limited to, the following measures to reduce construction noise levels as low as practical: • Utilize ‘quiet’ models of air compressors and other stationary noise sources where technology exists. • Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment. • Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses. • Locate staging areas and construction material areas as far away as possible from adjacent land uses. • Prohibit all unnecessary idling of internal combustion engines. • The contractor will prepare a detailed construction plan identifying a schedule of major noise generating construction activities. This plan shall identify a noise control disturbance coordinator and procedure for coordination with the adjacent noise sensitive facilities so that construction activities can be scheduled to minimize noise disturbance. This plan shall be made publicly available for interested community members and a public notice will be sent to neighbors within 300 feet within two weeks of the start of any on-site grading or demolition activities. • The disturbance coordinator will be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the case of the noise complaint (e.g. starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. The telephone number for the disturbance coordinator at the construction site will be posted and included in the notice sent to neighbors regarding the construction schedule.	Implementation: Project applicant and contractors Monitoring: City of Palo Alto Department of Planning and Community Environment	Submittal of noise logistics plan to the Director of Planning and Community Environment	Plan submittal shall occur prior to the start of construction activities Implementation of measures shall occur during demolition and construction

ACTION NO. 2017-____

**RECORD OF THE COUNCIL OF THE CITY OF PALO ALTO LAND USE
ACTION FOR 744-750 SAN ANTONIO ROAD: ARCHITECTURAL REVIEW
(15PLN-00314)**

On _____, 2017, the Council of the City of Palo Alto approved the Architectural Review application and Parking Adjustment (20%) for construction of two five-story hotel buildings with a total of 294 guestrooms located on a 1.91-acre site at 744-750 San Antonio Road in the Commercial Service (CS) Zone District, making the following findings, determination and declarations:

SECTION 1. Background. The City Council of the City of Palo Alto ("City Council") finds, determines, and declares as follows:

A. Rashik Patel of M10 Dev., LLC, property owner, has requested the City's approval to allow construction of a hotel project, and other site improvements. ("The Project").

B. The project site includes two parcels (APNs 147-05-088 & 147-05-089) of 1.91 acres in size. The site is developed, containing buildings and utilities. The site is designated on the Comprehensive Plan land use map as Commercial Service and is located within the Commercial Service (CS) zoning district.

The project proposes to construct a new dual brand hotel project with a total of 294 hotel rooms at the subject address. The hotel includes the construction of two, five-story tall buildings built atop a two-level subterranean garage containing 294 parking spaces. Some of the parking spaces do not meet city requirements and the applicant seeks a parking adjustment (20%) and use of a valet program to address this discrepancy.

The project includes the demolition of three buildings, one of which is be eligible for listing on the California Register of Historical Resources. The loss of this potential resource cannot be mitigated and required the preparation of a draft environmental impact report (DEIR).

C. The Architectural Review Board (Board) reviewed the Project and recommended certification of the environmental impact report and approval on June 1, 2017, based on findings and conditions of approval provided below.

SECTION 2. Parking Adjustment Granted. The Project includes a request for a twenty percent (20%) parking adjustment in accordance with PAMC Section 18.52.050. The Council finds that this request will not create an undue impact on existing or potential uses adjoining the site or in the general vicinity, and will be commensurate with the reduced parking demand created by the development, including for visitors and accessory facilities. Specifically, the applicant is required to have a Transportation Demand Management (TDM) plan reviewed and approved by the Director of Planning

and Community Development to reduce vehicle trips and, therefore, parking demand onsite. The TDM will include performance standards, enforcement provisions and penalties for not meeting TDM goals. The Project also includes valet operations for additional parking spaces that are provided onsite, but that do not meet specific parking standards; the valet parking spaces achieve the total amount of parking spaces required by the development. Moreover, a condition has been added that prohibits vehicles from queuing on San Antonio Road or obstruction to the free movement of pedestrians, cyclists, or motor vehicles.

SECTION 3. Environmental Review. The City as lead agency for the Project has determined that the project is subject to environmental review under provisions of the California Environmental Quality Act (CEQA) under Guideline section 15081, Decision to Prepare an EIR. An Historic Resource Evaluation was completed for the project because of the age of a certain existing building on-site and it was determined that the building is eligible for listing on the California Register of Historical Resources. The loss of the potential resource through demolition cannot be mitigated and required the preparation of a EIR. Statements of Overriding Considerations are proposed. All other potential significant impacts can be mitigated to a level of less than significant with the implementation of mitigation measures. A Final EIR was prepared for the project that includes responses to comments made during the public draft circulation period (ending on May 10, 2017) and revisions to the draft EIR.

SECTION 4. Architectural Review

Finding #1: The design is consistent with applicable provisions of the Palo Alto Comprehensive Plan, Zoning Code, coordinated area plans (including compatibility requirements), and any relevant design guides.

The project is consistent with Finding #1 because:

The proposed project complies with the zoning code, or is seeking modification to standards, or conditioned for approval to comply with applicable zoning regulations and project related findings. The project is not located within a coordinated area plan and not subject to any relevant design guidelines. There are several comprehensive plan policies that relate to this project which are summarized below:

<i>Comp Plan Goals and Policies</i>	<i>How project adheres or does not adhere to Comp Plan</i>
The Comprehensive Plan land use designation for the site is Service Commercial.	The project continues the Service Commercial land uses.
<i>Land Use and Community Design Element</i>	
Goal L-1: A well-designed, compact city, providing residents and visitors with attractive neighborhoods, work places, shopping district, public facilities and open spaces.	The project provides a compact high-intensity hospitality development on a site. The zoning code allows up to a 2.0:1 Floor Area Ratio for hotels, which is more than the typical commercial development allowance. The buildings provide

Policy L-4: Maintain Palo Alto's varied residential neighborhoods while sustaining the vitality of its commercial areas and public facilities. Use the Zoning Ordinance as a tool to enhance Palo Alto's desirable qualities.	step-backs from the street to minimize mass. The project includes some surface area parking; however, most the parking is placed underground, which frees up some space above ground for on-site amenities. The proposed hotel project is consistent with the Comprehensive Plan designation and zoning for the site and would add diversity to the San Antonio Road/Bayshore Corridor, per Policy L-46. Per Policies L-5 and L-48, the project includes step backs as a part of the design to reduce visual scale of the building when viewed from public vantage points.
Policy L-5: Maintain the scale and character of the City. Avoid land uses that are overwhelming and unacceptable due their size and scale.	
Policy L-46: Maintain the East Bayshore and San Antonio Road/Bayshore Corridor areas as diverse business and light industrial districts.	
Policy L-48: Promote high quality, creative design and site planning that is compatible with surrounding development and public spaces.	
Transportation Element	
Goal T-3: Facilities, services and programs that encourage and promote walking and bicycling.	Goal T-3 is met because the project will implement Transportation Demand Management measures reducing vehicle use. These measures include promoting on-site or nearby car-share programs, bicycle storage for employees and guests, provide pre-loaded transit fare cards for guests, provide a free hotel shuttle to and from the San Jose Airport, and subsidized transit passes for employees.
Policy T-23: Encourage pedestrian-friendly design features such as sidewalks, street trees, on-site parking, public spaces, gardens, outdoor furniture, art, and interesting architectural details.	The project consolidates existing driveway curb cuts to reduce potential conflicts with cyclists and pedestrians. The on-site pedestrian areas include different color and texture pavement areas to enhance safety. The project also includes extensive landscaping and outdoor furniture.
Natural Environment Element	
Goal N-4: Water Resources that are Prudently Managed to Sustain Plant and Animal Life, Support Urban Activities, and Protect Public Health and Safety.	The project is required to comply with the NPDES Stormwater Permit and includes bio-retention areas for stormwater management.
Policy N-21: Reduce non-point source pollution in urban runoff from residential, commercial, industrial, municipal, and transportation land uses and activities.	

The proposed hotel project is consistent with the Comprehensive Plan designation and zoning for the site and would add diversity to the San Antonio Road/Bayshore Corridor, per Policy L-46.

Additionally, the project will be required to meet the requirements of PAMC Section 18.16.090 and Section 18.23 as part of the Architectural Review and Planning Department review, as discussed in Policy L-4, L-5, and L-48. Per Policies L-5 and L-48, the project includes step backs as a part of the design to reduce visual scale of the building when viewed from public vantage points. Although, it could be argued that this does not go far enough.

The project is consistent with the City's Zoning Code development standards except for the request to reduce the amount of required parking by 20%. The project includes Transportation Demand Management measures that reduce vehicle miles traveled and the project also includes a valet parking program. Both aim to make parking efficient as possible and is consistent with the hotel use. The requisite number of parking spaces would be provided on site, though some of those spaces will be accessible through a valet service.

Finding #2: The project has a unified and coherent design, that:

- a) creates an internal sense of order and desirable environment for occupants, visitors, and the general community,*
- b) preserves, respects and integrates existing natural features that contribute positively to the site and the historic character including historic resources of the area when relevant,*
- c) is consistent with the context-based design criteria of the applicable zone district,*
- d) provides harmonious transitions in scale, mass and character to adjacent land uses and land use designations,*
- e) enhances living conditions on the site (if it includes residential uses) and in adjacent residential areas.*

The project is consistent with Finding #2 because:

The area is comprised of various commercial buildings of differing heights and size. Generally, the buildings range between one and three stories. The project proposes to construct a building that is taller than the immediate surrounding, although a block away, there are buildings of similar mass and height.

One of the existing on-site buildings is eligible for listing on the California Historic Register because of its age and quality of architecture in keeping with the mid-century modern style. The project seeks to demolish this structure and in doing so in accordance with the California Environmental Quality Act (CEQA). Documentation of the resource will be conducted in accordance with CEQA.

Internally, the project is consistent in design, in that it provides high quality materials and finishes and the color palette is muted and appropriate for the area. The structure is one of the taller buildings in the area, which has not seen a significant amount of redevelopment. While surrounding properties have a maximum floor area ratio of .4, hotels are permitted to have a floor area ratio of 2.0. This difference in permitted floor areas necessarily creates a challenge when designing a project to be consistent with the neighborhood character and achieve context design solutions. However, this project addresses these challenges with building articulation and upper level setbacks as well as landscaping where visible from San Antonio Road.

The project provided a shadow study and demonstrated that no public open space areas would be shaded by the project. Other adjacent areas would experience some shading; however, those are in landscaping or parking areas.

The project is consistent with the context-based design criteria for the applicable zone district:

- (1) **Pedestrian and Bicycle Environment.** The design of new projects shall promote pedestrian walkability, a bicycle friendly environment, and connectivity through design elements. This finding can be made in the affirmative in that the project provides bike racks near the front of the buildings as well bike lockers in the garage to support the bicycle environment. The project has a single driveway on San Antonio Road, thus reducing conflicts with pedestrians and cyclists. Color and texture pavement is used internally to help with slowing vehicles down and enhancing safety for pedestrians.
- (2) **Street Building Facades.** Street facades shall be designed to provide a strong relationship with the sidewalk and the street(s), to create an environment that supports and encourages pedestrian activity through design elements. This finding can be made in the affirmative in that project maintains the streetscape by maintaining the 24-foot special setback, provides bicycle parking at the front and provides step-backs for the buildings along San Antonio Road to reduce its mass.
- (3) **Massing and Setbacks.** Buildings shall be designed to minimize massing and conform to proper setbacks. This finding can be made in the affirmative in that the proposed project complies with the CS zoning development standards. In addition, massing is reduced in the front because the project steps back the upper floors and the sides of the buildings includes some variation in the facades.
- (4) **Low-Density Residential Transitions.** Where new projects are built abutting existing lower scale residential development, care shall be taken to respect the scale and privacy of neighboring properties. This finding is not applicable to the project since there is no low-density residential development abutting the site.
- (5) **Project Open Space.** Private and public open space shall be provided so that it is usable for residents, visitors, and/or employees of the site. This finding can be made in the affirmative in that the project provides on-site amenities areas and outdoor plaza areas for patrons.
- (6) **Parking Design.** Parking needs shall be accommodated but shall not be allowed to overwhelm the character of the project or detract from the pedestrian environment. This finding can be made in the affirmative in that the project provides some surface parking and most the parking below grade. Adequate areas are included for on-site circulation for those with disabilities, services including solid waste pick-up, emergency equipment and the project provides adequate areas for loading. The site includes one driveway from San Antonio Road to serve the site.
- (7) **Large (Multi-Acre) Sites.** Large sites (over one acre) shall be designed so that street, block, and building patterns are consistent with those of the surrounding neighborhood. Much of the immediately adjacent structures are lower profile in design. A residential development across the street reaches two to three stories in height, with significant setbacks from San Antonio. In addition, there is a large development nearby at the corner of San Antonio Road and East Charleston Road,

which is similar in height and massing. In addition, the project conforms to the development standards for the area, which is in transition.

(8) Sustainability and Green Building Design. Project design and materials to achieve sustainability and green building design should be incorporated into the project. This finding can be made in the affirmative in that the project is subject to the California Green Building Code (CalGreen, Tier 2). These measures include some of the following:

- Building orientation to optimization to provide daylight to hotel interiors
- High performance, low-emissivity glazing
- A cool, solar-ready roof, and roof insulation beyond building code minimums
- Use of energy-efficient LED lighting
- Low-flow plumbing and shower fixtures
- Harvesting of collected rainwater for irrigation
- Dual-plumbing systems for future use of greywater in toilets and other areas (in anticipation of future availability of greywater in the project vicinity)

Finding #3: The design is of high aesthetic quality, using high quality, integrated materials and appropriate construction techniques, and incorporating textures, colors, and other details that are compatible with and enhance the surrounding area.

The project is consistent with Finding #3 because:

The project proposes a contemporary style that is compatible with recent development within the vicinity, however, not particularly with the existing development adjacent to the project site. The project does use materials such as wood laminate, stucco plaster surfaces, and metal paneling. As conditioned, the stucco surfaces will be a smooth finish texture. The proposed colors are muted and are compatible with surrounding color schemes.

Finding #4: The design is functional, allowing for ease and safety of pedestrian and bicycle traffic and providing for elements that support the building's necessary operations (e.g. convenient vehicle access to property and utilities, appropriate arrangement and amount of open space and integrated signage, if applicable, etc.).

The project is consistent with Finding #4 because:

The design of the new buildings will provide connectivity throughout the property and will result in fewer driveway cuts, which will reduce the amount of potential conflicts with pedestrians and cyclists.

The project provides most of its parking below grade with a single ramp down. The project provides different colors and textures for the pedestrian areas and this alerts those in vehicles to slow down in the presence of pedestrians.

Finding #5: The landscape design complements and enhances the building design and its surroundings, is appropriate to the site's functions, and utilizes to the extent practical, regional indigenous drought resistant plant material capable of providing desirable habitat that can be appropriately maintained.

The project is consistent with Finding #5 because:

The project will provide a variety of drought-tolerant planting. The plantings were selected from a California native palette. The selected varieties of trees would provide appropriate habitat for wildlife as a part of a bigger neighborhood and community wide system. Additional landscaping is provided on the terraces of the buildings along the front elevation. Additional density of trees is located along the San Antonio Road frontage providing a larger buffer. Not all of the plant selections reflect regionally indigenous drought resistant plant material, but this can be achieved. A condition has been added to the project to require Architectural Review Board subcommittee review of the plant varieties to ensure compliance with this finding.

Finding #6: The project incorporates design principles that achieve sustainability in areas related to energy efficiency, water conservation, building materials, landscaping, and site planning.

The project is consistent with Finding #6 because:

In accordance with the City's Green Building Regulations, the building will satisfy the requirements for CALGreen Mandatory + Tier 2. Several green building measures are included in the design and construction including:

- Building orientation to optimization to provide daylight to hotel interiors
- High performance, low-emissivity glazing
- A cool, solar-ready roof, and roof insulation beyond building code minimums
- Use of energy-efficient LED lighting
- Low-flow plumbing and shower fixtures
- Harvesting of collected rainwater for irrigation
- Dual-plumbing systems for future use of greywater in toilets and other areas (in

anticipation of future availability of greywater in the project vicinity)

SECTION 5. Architectural Review Granted.

Architectural Review Approval is granted by the City Council under Palo Alto Municipal Code Section 18.77.070 for application 15PLN-00314, subject to the conditions of approval in Section 5 of the Record.

SECTION 6. Conditions of Approval.

PLANNING DIVISION

1. CONFORMANCE WITH PLANS. Construction and development shall conform to the approved plans entitled, "Courtyard by Marriott & AC by Marriott," stamped as received by the City on May 19, 2017 on file with the Planning Department, 250 Hamilton Avenue, Palo Alto, California except as modified by these conditions of approval.
2. BUILDING PERMIT. Apply for a building permit and meet any and all conditions of the Planning, Fire, Public Works, and Building Departments.
3. BUILDING PERMIT PLAN SET. The ARB approval letter including all Department conditions of approval for the project shall be printed on the plans submitted for building permit.
4. PROJECT MODIFICATIONS: All modifications to the approved project shall be submitted for review and approval prior to construction. If during the Building Permit review and construction phase, the project is modified by the applicant, it is the responsibility of the

applicant to contact the Planning Division/project planner directly to obtain approval of the project modification. It is the applicant's responsibility to highlight any proposed changes to the project and to bring it to the project planner's attention.

5. INDEMNITY: To the extent permitted by law, the Applicant shall indemnify and hold harmless the City, its City Council, its officers, employees and agents (the "indemnified parties") from and against any claim, action, or proceeding brought by a third party against the indemnified parties and the applicant to attack, set aside or void, any permit or approval authorized hereby for the Project, including (without limitation) reimbursing the City for its actual attorneys' fees and costs incurred in defense of the litigation. The City may, in its sole discretion, elect to defend any such action with attorneys of its own choice.
6. IMPACT FEES: All Development Impact Fees (currently estimated in the amount of \$4,173,945.20 plus the applicable public art fee, per PAMC 16.61.040) shall be paid prior to the issuance of the related building permit.
7. TERRACES: The applicant shall return to the Architectural Review Board subcommittee for approval of terraces landscaping. Any additional screening structures on the terraces shall return to the Architectural Review Board.
8. AMENITY AREA. The hotel's amenity uses (such as eating facilities or fitness, etc.) are only for employees, hotel guests and their visitors. No signs shall be allowed on the exterior of the building that advertises the amenity uses.
9. QUEUEING ON SAN ANTONIO ROAD. Vehicle queueing on San Antonio Road is prohibited at all times. Applicant shall ensure on-site vehicle circulation and pick up or drop off operations do not block or impede the free movement of pedestrians, bicyclists or vehicular travel on the sidewalk or roadway on San Antonio Road. For any violation of this condition, the Director of Planning and Community Environment may impose additional conditions related to drop-off or pick-up restrictions, valet operations, Transportation Demand Management plan, site improvements, or other operational changes to ensure compliance with this condition.
10. SIGNS: Exterior signs shall return to the Architectural Review Board under a separate Architectural Review application.
11. ARCHITECTURAL PLANS: The parking note on Sheet A-2.0 titled 'Parking at 0.8' shall be deleted from the ARB recommended plan set.
12. LOADING/UNLOADING: All loading or unloading of deliveries for the hotels shall take place at the rear of the property within the loading parking spaces.

MITIGATION MEASURES

13. MM AQ-1.1: Construction equipment shall be selected to minimize emissions. Such equipment selection would include the following requirements:
 - All diesel-powered off-road equipment larger than 50 horsepower and operated on

the site for more than two days continuously shall, at a minimum, meet United States Environmental Protection Agency particulate matter emissions standards for Tier 2 engines or equivalent, and/or

- Use of alternative powered equipment (e.g., Liquefied Petroleum Gas [LPG-powered lifts), alternative fuels (e.g., biofuels), added exhaust devices, or a combination of measures listed above; and
- The construction contractor could use other measures to minimize construction period diesel particulate matter Diesel Particulate Matter emissions to reduce the predicted cancer risk below the thresholds. Such measures may include the use of alternative powered equipment (e.g., LPG-powered lifts), alternative fuels (e.g., biofuels), added exhaust devices, or a combination of measures, provided that these measures are approved by the City and demonstrated to reduce community risk impacts to a less than significant level.
- Measures to be used shall be approved by the City of Palo Alto Department of Planning & Community Environment prior to issuance of demolition permits, and demonstrated to reduce community risk impacts to less than significant.

14. MM BIO-1.1: Construction shall be scheduled to avoid the nesting season to the extent feasible to avoid the nesting season (February 1 to August 31). If it is not feasible to schedule construction between September 1 and January 31, preconstruction nesting bird surveys shall be completed prior to tree removal or construction activities in order to avoid impacts to nesting birds. Surveys shall be completed by a qualified biologist no more than 14 days before demolition or construction activities begin. During this survey, the biologist or ornithologist shall inspect all trees and other nesting habitats in and immediately adjacent to the construction areas for nests.

15. MM BIO-1.2: If an active nest is found in an area that will be disturbed by construction, the ornithologist shall designate an adequate buffer zone to be established around the nest, in consultation with the California Department of Fish & Wildlife. The buffer will ensure that nests shall not be disturbed during project construction.

The no-disturbance buffer shall remain in place until the biologist determines the nest is no longer active or the nesting season ends. If construction ceases for two days or more and then resumes again during the nesting season, an additional survey will be necessary to avoid impacts on active bird nests that may be present.

16. MM BIO-1.3: The applicant shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the Director of Planning, and Community Environment, prior to the issuance of a Grading Permit or Demolition Permit.

17. MM CUL-1.1: Historic American Buildings Survey (HABS) documentation of the exterior of 744 San Antonio Road and the structure's setting shall be prepared by the project applicant prior to the demolition of the structure. Following the HABS guidelines, this documentation shall include full measured drawings, large-format photography, and an historical overview of the structure. The documentation shall be filed by the applicant with City of Palo Alto Historic

Preservation Officer, prior to the start of demolition.

18. MM CUL-1.2: Prior to demolition, the project proponent shall make the building available for relocation or salvage by qualified salvage companies facilitating the reuse of historic building materials. The structures shall be advertised for relocation or salvage by placing an advertisement in a newspaper of general circulation, posting on a website, and on-site posting for at least 30 days.
19. MM CUL-2.1: In the event any significant cultural materials (including fossils) are encountered during construction grading or excavation, all construction within a radius of 50 feet of the find would be halted, the Director of Planning and Community Environment shall be notified, and a qualified archaeologist shall examine the find and make appropriate recommendations regarding the significance of the find and the appropriate mitigation. Recommendations could include collection, recordation and analysis of any significant cultural materials. A report of findings documenting any data recovered during monitoring shall be submitted to the Director of Planning and Community Environment.
20. MM CUL-2.2: Pursuant to Section 7050.5 of the Health and Safety Code, and Section 5097.94 of the Public Resources Code of the State of California in the event of the discovery of human remains during construction, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his authority, he shall notify the Native American Heritage Commission who shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the land owner shall reinter the human remains and items associated with Native American burials on the property in a location not subject to further subsurface disturbance. If the Director of Planning and Community Environment finds that the archaeological find is not a significant resource, work would resume only after the submittal of a preliminary archaeological report and after provisions for reburial and ongoing monitoring are accepted.
21. MM HAZ-1.1: Due to the presence of localized total petroleum hydrocarbons, lead, and possibly residual organochlorine pesticides impacted soil at the project site, the project shall conduct additional focused sampling and analysis under the oversight of the Santa Clara County Department of Environmental Health (SCDEH), or other appropriate oversight agency, in accordance with a Work Plan prepared by a qualified professional and approved by the oversight agency. The Work Plan shall be approved prior to building demolition and site clearing or excavation and include appropriate risk-based screening levels for comparison of the sampling results.

At minimum, soils in the upper 18 inches of soil will be analyzed to quantify petroleum, hydrocarbons, volatile organic compounds, and organochlorine pesticides as part of post-demolition soil sampling following site clearing. Based upon the results of the analysis under the Work Plan and an Remedial Excavation Report, offsite disposal of excavated soil shall occur consistent with sample protocols (as required by the receiving disposal site) and in conformance with current regulatory practices. The excavated soils shall be placed at a regulated landfill appropriate to the soils analysis results. Confirmation sampling shall be

conducted at the bottom of the initial excavation depths to verify that contaminated soils have been removed.

A letter (or equivalent assurance) from the oversight agency documenting completion of the Work Plan for on-site testing to the satisfaction of the oversight agency shall be provided to the Department of Planning & Community Environment prior to the issuance of building permits.

22. MM HAZ-1.2: A Soil and Groundwater Management Plan (SMP) shall be developed to establish management practices for handling contaminated soil, groundwater or other materials encountered during construction activities. The SMP shall identify potential health, safety, and environmental exposure considerations associated with redevelopment activities and shall identify appropriate mitigation measures. The SMP shall be submitted to the City and oversight agency for approval prior to commencing construction activities. The SMP shall include the following:

- Proper mitigation as needed for demolition of existing structures;
- Management of stockpiles, including sampling, disposal, and dust and runoff control including implementation of a stormwater pollution prevention program;
- Management of underground structures encountered, including utilities and/or underground storage tanks;
- Procedures to follow if evidence of an unknown historic release of hazardous materials (e.g., underground storage tanks, polychlorinated biphenyls, other contamination, etc.) is discovered during excavation or demolition activities;
- Traffic control during site improvements;
- Noise, work hours, and other relevant City regulations;
- Mitigation of soil vapors (if required);
- Procedures for proper disposal of contaminated materials (if required); and
- Monitoring, reporting, and regulatory oversight arrangements.

23. MM HAZ-1.3 A site-specific Health and Safety Plan (HSP) shall be prepared as part of the SMP prior to issuance of grading permits for project construction to address potential health and safety hazards associated with implementation of the SCCDEH approved work plan and the proposed redevelopment activities (e.g., site preparation, demolition, grading and construction). The HSP shall govern activities of all personnel present during field activities. Any contractor performing a task not covered in the HSP shall be required to develop a job hazard analysis specific to that task prior to performing the task.

24. MM HAZ-2.1: Soil Vapor Controls. The potential risks to human health from soil vapors from contaminated groundwater shall be reduced either by remediation of contaminated soils (e.g., excavation and off-site disposal) under MM HAZ-1.2 and/or implementation of institutional and engineering controls to ensure that any potential added health risks are reduced to acceptable levels. Institutional and engineering controls employed on the site may include passive and active ventilation systems, vapor barriers, and/or adoption of deed restrictions.

Guidelines and measures for health and safety during construction activities, soil management, groundwater management, addressing vapor intrusion issues, and construction

activities (unanticipated subsurface conditions) shall be addressed as part of a Soil and Groundwater Management Plan under MM HAZ-1.2 and reviewed and approved by SCCDEH or other appropriate oversight agency.

Final approval received from the oversight agency stating that the entire site is suitable for hotel land uses with implementation shall be issued and copied to the Department of Planning & Community Environment, prior to issuance of permits for project construction.

In the event institutional or engineering controls are required for soil vapors, A No Further Action letter (or equivalent assurance) from the oversight agency documenting completion of remediation activities and/or engineering controls shall be provided to the Director of Planning & Community Environment prior to issuance of occupancy permits.

25. MM HAZ-2.2: Groundwater Handling and Disposal During Construction. Groundwater handling during construction shall be conducted in accordance with an approved Soil and Groundwater Management Plan as outlined in MM HAZ-1.2.

A dewatering system shall be implemented during construction of the project. Prior to discharge to the public stormwater collection system, contaminants (including petroleum hydrocarbons and MtBE) shall be removed from dewatered groundwater. The system shall include a granulated activated carbon unit, or equivalent treatment device. A discharge plan shall be prepared and permits shall be secured from the appropriate regulatory agencies, including the Regional Water Quality Control Board and the City of Palo Alto.

26. MM NOI-1.1: The project applicant shall implement a noise logistics plan which would include, but not be limited to, the following measures to reduce construction noise levels as low as practical:

- Utilize 'quiet' models of air compressors and other stationary noise sources where technology exists.
- Equip all internal combustion engine driven equipment with mufflers, which are in good condition and appropriate for the equipment.
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses.
- Locate staging areas and construction material areas as far away as possible from adjacent land uses.
- Prohibit all unnecessary idling of internal combustion engines.
- The contractor will prepare a detailed construction plan identifying a schedule of major noise generating construction activities. This plan shall identify a noise control disturbance coordinator and procedure for coordination with the adjacent noise sensitive facilities so that construction activities can be scheduled to minimize noise disturbance. This plan shall be made publicly available for interested community members and a public notice will be sent to neighbors within 300 feet within two weeks of the start of any on-site grading or demolition activities.
- The disturbance coordinator will be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g. starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be

implemented. The telephone number for the disturbance coordinator at the construction site will be posted and included in the notice sent to neighbors regarding the construction schedule.

PUBLIC WORKS ENGINEERING

PRIOR TO BUILDING PERMIT AND GRADING AND EXCAVATION PERMIT SUBMITTAL

27. **CERTIFICATE OF COMPLIANCE:** Since the project site is located within two parcels 145-05-089 and 145-05-088 a certificate of compliance for a lot merger is required. Applicant shall apply for a certificate of compliance and provide the necessary documents. As shown on the attached link: <http://www.cityofpaloalto.org/civicax/filebank/documents/2273> Certificate of Compliance shall be recorded prior to issuance of a building or grading and excavation permit.
28. **MAPPING:** If the applicant intends to sell portions of the project then a Minor or Major Subdivision Application will be required. Public Works' Tentative Maps and Preliminary Parcel Maps checklist must accompany the completed application. All existing and proposed dedications and easements must be shown on the submitted map. The map process can also merge the two existing lots and therefore eliminating the certificate of compliance process. The map would trigger further requirements from Public Works, see Palo Alto Municipal Code section 21.12 for Preliminary Parcel Map requirements and section 21.16 for Parcel Map requirements. The applicant shall be aware that they may not be able to do a condo conversion after the structure is built.
29. **GEOTECHNICAL REPORT:** Shall clearly identify the highest projected groundwater level to be encountered in the area of the proposed basement in the future will be _____ feet below existing grade. Provide the following note on the Rough Grading and Final Grading Plans. "In my professional judgement, the highest projected groundwater level to be encountered in the area of the proposed basement in the future will be _____ feet below existing grade. As a result, the proposed drainage system for the basement retaining wall will not encounter and pump groundwater during the life of this wall."
30. **GRADING PERMIT:** An Excavation and Grading Permit is required for grading activities on private property that fill, excavate, store or dispose of 100 cubic yards or more based on PAMC Section 16.28.060. Applicant shall prepare and submit an excavation and grading permit to Public Works separately from the building permit set. The permit application and instructions are available at the Development Center and on our website. http://www.cityofpaloalto.org/gov/depts/pwd/forms_and_permits.asp
31. **ROUGH GRADING:** provide a Rough Grading Plan for the work associated with the Grading and Excavation Permit application. The Rough Grading Plans shall including the following: pad elevation, basement elevation, elevator pit elevation, ground monitoring wells, shoring for the proposed basement, limits of over excavation, stockpile area of material, overall earthwork volumes (cut and fill), temporary shoring for any existing facilities, ramps for the basement access, crane locations (if any), etc. Plans submitted for the Grading and Excavation Permit, shall be stand-alone, and therefore the plans shall include any conditions from other divisions that pertain to items encountered during rough grading for example if contaminated groundwater is encountered and dewatering is expected, provide notes on the plans based

Water Quality's conditions of approval. Provide a note on the plans to direct the contractor to the approve City of Palo Alto Truck Route Map, which is available on the City's website.

32. BASEMENT SHORING: Provide shoring plans for excavation. If shoring soldier piles are required they shall be located completely within the private property, clearly including tiebacks (if any). Tieback shall not extend onto adjacent private property or into the City's right-of -way without having first obtained written permission from the private property owners and/or an encroachment permit from Public Works. The shoring plans shall clearly show the property line and the dimension between the outside edge of the soldier piles and the property line for City records.
33. DEWATERING: DEWATERING: Proposed underground garage excavation may require dewatering during construction. Public Works only allows groundwater drawdown well dewatering. Open pit groundwater dewatering is disallowed. Dewatering is only allowed from April 1 through October 31 due to inadequate capacity in our storm drain system. The geotechnical report for this site must list the highest anticipated groundwater level; if the proposed project will encounter groundwater, the applicant must provide all required dewatering submittals for Public Works review and approval prior to grading permit issuance. Public Works has dewatering submittal requirements and guidelines available at the Development Center and on our website:
http://www.cityofpaloalto.org/gov/depts/pwd/forms_and_permits.asp
34. Public Works reviews and approves dewatering plans as part of a Street Work Permit. The applicant can include a dewatering plan in the building permit plan set in order to obtain approval of the plan during the building permit review, but the contractor will still be required to obtain a street work permit prior to dewatering. Alternatively, the applicant must include the above dewatering requirements in a note on the site plan. The street work permit to dewater must be obtained in August to allow ample to time to dewater and complete the dewatering by October 31st. Public Works has a sample dewatering plan sheet and dewatering guidelines available at the Development Center and on our website.
http://www.cityofpaloalto.org/gov/depts/pwd/forms_and_permits.asp

The following links are included to assist the applicant with dewatering requirements.

<http://www.cityofpaloalto.org/civicax/filebank/documents/30978>

<http://www.cityofpaloalto.org/civicax/filebank/documents/51366>

<http://www.cityofpaloalto.org/civicax/filebank/documents/47388>.

35. WATER FILLING STATION: Applicant shall install a water station for the non-potable reuse of the dewatering water. This water station shall be constructed within private property, next to the right-of -way, (typically, behind the sidewalk). The station shall be accessible 24 hours a day for the filling of water carrying vehicles (i.e. street sweepers, etc.). The water station may also be used for onsite dust control. Before a discharge permit can be issued, the water supply station shall be installed, ready for operational and inspected by Public Works. The groundwater will also need to be tested for contaminants and chemical properties for the non-potable use. The discharge permit cannot be issued until the test results are received. Additional information regarding the station will be made available on the City's website under Public Works.

36. **GROUNDWATER USE PLAN:** A Groundwater Use Plan (GWUP) shall be submitted for review for any project which requires dewatering. The GWUP, a narrative that shall be included in or accompany the Dewatering Plan, must demonstrate the highest beneficial use practicable of the pumped groundwater. The GWUP shall also state that all onsite, non-potable water needs such as dust control shall be met by using the pumped groundwater. Delays in submitting the GWUP can result in delays in the issuance of your discharge permit as Public Works requires sufficient review time which shall be expected by the applicant.
37. **STAIRWELLS AND LIGHTWELLS:** Due to high groundwater throughout much of the City and Public Works prohibiting the pumping and discharging of groundwater, perforated pipe drainage systems at the exterior of the basement walls or under the slab are not allowed for this site. A drainage system is, however, required for all exterior basement-level spaces, such as lightwells, patios or stairwells. This system consists of a sump, a sump pump, a backflow preventer, and a closed pipe from the pump to a dissipation device onsite at least 10 feet from the property line, such as a bubbler box in a landscaped area, so that water can percolate into the soil and/or sheet flow across the site. The device must not allow stagnant water that could become mosquito habitat. Additionally, the plans must show that exterior basement-level spaces are at least 7-3/4" below any adjacent windowsills or doorsills to minimize the potential for flooding the basement. Public Works recommends a waterproofing consultant be retained to design and inspect the vapor barrier and waterproofing systems for the basement.
38. **NOTICE OF INTENT:** If the proposed development disturbs more than one acre of land, the applicant will be required to comply with the State of California's General Permit for Storm Water Discharges Associated with Construction Activity. This entails filing a Notice of Intent to Comply (NOI), paying a filing fee, and preparing and implementing a site specific storm water pollution prevention plan (SWPPP) that addresses both construction-stage and post construction Best Management Practices (BMP) for storm water quality protection. The applicant is required to submit two copies of the NOI and the draft SWPPP to Public Works Engineering for review and approval prior to issuance of the building permit.
39. **TREE PROTECTION MEASURES:** Install tree protection measures and place the following note adjacent to an affected tree on the Site Plan and Demolition Plan: "Excavation activities associated with the proposed scope of work shall occur no closer than 10-feet from the existing street tree, or as approved by the Urban Forestry Division contact 650-496-5953. Any changes shall be approved by the same".
40. **LOGISTICS PLAN:** The applicant and contractor shall submit a construction logistics plan to the Public Works Department that addresses all impacts to the public road right-of -way, including, but not limited to: pedestrian control, traffic control, truck routes, material deliveries, contractor's parking, on-site staging and storage areas, concrete pours, crane lifts, work hours, noise control, dust control, storm water pollution prevention, contractor's contact. The plan shall be prepared and submitted along the Rough Grading and Excavation Permit. It shall include notes as indicated on the approved Truck Route Map for construction traffic to and from the site. If the project site is proposing to have access through the neighboring property located within Mountain View, provide a letter from the neighbor property owner that allows the access through the site along with the agreed upon schedule.

The plan may need to be modified through the course of the construction to address unanticipated issues.

41. **STORM WATER TREATMENT:** This project shall comply with the storm water regulations contained in provision C.3 of the NPDES municipal storm water discharge permit issued by the San Francisco Bay Regional Water Quality Control Board (and incorporated into Palo Alto Municipal Code Chapter 16.11). These regulations apply to land development projects that create or replace 10,000 square feet or more of impervious surface. In order to address the potential permanent impacts of the project on storm water quality, the applicant shall incorporate into the project a set of permanent site design measures, source controls, and treatment controls that serve to protect storm water quality, subject to the approval of the Public Works Department. The applicant shall identify, size, design and incorporate permanent storm water pollution prevention measures (preferably landscape-based treatment controls such as bioswales, filter strips, and permeable pavement rather than mechanical devices that require long-term maintenance) to treat the runoff from a “water quality storm” specified in PAMC Chapter 16.11 prior to discharge to the municipal storm drain system. Effective February 10, 2011, regulated projects, must contract with a qualified third-party reviewer during the building permit review process to certify that the proposed permanent storm water pollution prevention measures comply with the requirements of Palo Alto Municipal Code Chapter 16.11. The certification form, 2 copies of approved storm water treatment plan, and a description of Maintenance Task and Schedule must be received by the City from the third-party reviewer prior to approval of the building permit by the Public Works department. Within 45 days of the installation of the required storm water treatment measures and prior to the issuance of an occupancy permit for the building, third-party reviewer shall also submit to the City a certification for approval that the project’s permanent measures were constructed and installed in accordance to the approved permit drawings.

PRIOR TO DEMOLITION BUILDING PERMIT ISSUANCE

42. **PERIMETER DRAIN:** Perimeter drainage systems at the exterior of the basement walls or under the slab are not allowed for sites on the bay side of Foothill Expressway. The foundation shall be designed to not require a perimeter drain.
43. **GRADING AND DRAINAGE PLAN:** Provide additional grading and drainage details on the plans: include the volume of earthwork (import or export), location of stockpile material and in conformance with PAMC 16.28 Grading, Erosion and Sediment Control. Plan shall also include the drainage system required for all exterior basement-level spaces such as lightwell, patios or stairwells. This system consists of a sump, sump pump, a backflow preventer, and a closed pipe from the pump to a dissipation device onsite at least 10-feet from back of sidewalk and 3 feet from side and rear property lines, such as a bubbler box in the landscaped area. Note: Applicant shall clearly indicate if they will apply for Grading and Excavation Permit prior to issuance of a Building Permit.
44. **STORM WATER HYDRAULICS AND HYDROLOGY:** Plans provided do not show if the existing site drainage has a direct discharge into the existing storm drain line within the site. Provide an analysis that compares the existing and proposed runoff calculations from the site for the 10-year storm event, 6 hour duration. The proposed project shall not increase runoff to the public storm drain system.

45. IMPERVIOUS SURFACE AREA: The project will be creating or replacing 500 square feet or more of impervious surface. Accordingly, the applicant shall provide calculations of the existing and proposed impervious surface areas with the building permit application. The Impervious Area Worksheet for Land Developments form and instructions are available at the Development Center or on our website.
46. SIDEWALK, CURB & GUTTER: As part of this project, the applicant shall replace the existing sidewalk, curb, gutter and driveway approaches in the public right-of -way along the project frontages. The site plan submitted with the building permit plan set must show the extent of the replacement work.
47. Any existing driveway to be abandoned may need to be replaced with rolled curb & gutter. This work must be included within a Permit for Construction in the Public Street from the Public Works Department. A note of this requirement shall be placed on the plans adjacent to the area on the Site Plan.
48. PAVEMENT: This section of San Antonio Road was resurfaced in 2011, and is under a moratorium. Add the following note to the Site Plan: "Applicant and contractor may be responsible for resurfacing portions of San Antonio Road after project is completed." In addition the plans submitted shall show that pavement resurfacing will be required along the entire project frontage, possibly across the median due to utility Connections. The limits of pavement resurfacing will be determined at a later date in the field, after the project is completed.
49. WORK IN THE RIGHT-OF-WAY: The plan must note that any work in the right-of -way, including utility lateral replacement, must be done per Public Works' standards by a licensed contractor who must first obtain a Street Work Permit from Public Works at the Development Center. In addition the following note shall be shown on the plans adjacent to the area on the Site Plan: "Any construction within the city right-of -way must have an approved Permit for Construction in the Public Street prior to commencement of this work. THE PERFORMANCE OF THIS WORK IS NOT AUTHORIZED BY THE BUILDING PERMIT ISSUANCE BUT SHOWN ON THE BUILDING PERMIT FOR INFORMATION ONLY.
50. Provide the following note on the Grading and Drainage Plan and/or Site Plan: "Contractor shall contact Public Works Engineering (PWE) Inspectors to inspect and approve the storm drain system (pipes, area drains, inlets, bubblers, dry wells, etc.) associated with the project prior to backfill. Contractor shall schedule an inspection, at a minimum 48-hours in advance by calling (650)496-6929".
51. Logistics Plan may need to be revised to reflect the project construction phasing.

PRIOR TO BUILDING PERMIT FINAL

52. STORMWATER MAINTENANCE AGREEMENT: The applicant shall designate a party to maintain the control measures for the life of the improvements and must enter into a maintenance agreement with the City to guarantee the ongoing maintenance of the permanent C.3 storm water discharge compliance measures. The maintenance agreement shall be executed prior to the first building occupancy sign-off. The City will inspect the treatment measures yearly

and charge an inspection fee. There is currently a \$381 (FY 2015) C.3 plan check fee that will be collected upon submittal for a grading or building permit.

GREEN BUILDING

53. CALGreen Checklist: If the project is a new nonresidential construction project greater than 1,000 square feet, then the must comply with California Green Building Standards Code Mandatory plus Tier 2 requirements, as applicable to the scope of work. PAMC 16.14.080 (Ord. 5393 § 1 (part), 2016). The project applicant shall indicate the requirements on the Permit Plans. The submittal requirements are outlined here: http://www.cityofpaloalto.org/gov/depts/ds/green_building/compliance.asp.
54. Commissioning: If the project is a new building over 10,000 square feet, then the project must meet the commissioning requirements outlined in the California Building Code section 5.410.2 for Planning Approval. The project team shall re-submit the Owner's Project Requirements (OPR) in accordance with section 5.410.2.1 with an updated Basis of Design (BOD) in accordance with 5.410.2.2 that reflects the design elements finalized between Planning Approval and Permit Submittal. The project shall also submit a Commissioning Plan in accordance with 5.410.2.3.
55. Energy Benchmarking: If the project is a nonresidential projects exceeding \$100,000 valuation, then the project must acquire an Energy STAR Portfolio Manager Rating and submit the rating to the City of Palo Alto once the project has been occupied after 12 months. PAMC 16.14.380 (Ord. 5393 § 1 (part), 2016). The Energy Star Project Profile shall be submitted to the Building Department prior to permit issuance. Submittal info can be found at: https://www.cityofpaloalto.org/gov/depts/utl/business/benchmarking_your_building.asp.
56. Recycled Water Infrastructure: If the project is greater than 100,000 square feet and is not within the boundaries of a recycled water project area, then the project must install dual plumbing for use of recycled water for toilet and urinal flushing. PAMC 16.14.300 (Ord. 5393 § 1 (part), 2016). The project applicant shall indicate the requirements on the Permit Plans.
57. Recycled Water Infrastructure: If the project is proposing 100 or more toilets and is not within the boundaries of a recycled water project area, then the project must install dual plumbing for use of recycled water for toilet and urinal flushing. PAMC 16.14.300 (Ord. 5393 § 1 (part), 2016). The project applicant shall indicate the requirements on the Permit Plans.
58. Recycled Water Infrastructure for Landscape: If the project is outside the boundaries of the recycled water project area and is greater than 1,000 square feet, then the project must install recycled water infrastructure for irrigation systems. PAMC 16.14.230 (Ord. 5393 § 1 (part), 2016). The project applicant shall indicate the requirements on the Permit Plans.
59. Recycled Water Infrastructure for Landscape: If the project is either a new construction or a rehabilitated landscape and is greater than 1,000 square feet, then the project must install a dedicated irrigation meter related to the recycled water infrastructure. PAMC 16.14.230 (Ord. 5393 § 1 (part), 2016). The project applicant shall indicate the requirements on the Permit Plans.

60. Model Water Efficient Landscape Ordinance: If the new non-residential development project has an aggregate (combined) landscape area equal to or greater than 500 square feet, the project is subject to the Model Water Efficient Landscape Ordinance (MWELO). See MWELO Submittal Guidelines.
61. Construction & Demolition: If the project is a nonresidential new construction or renovation project and has a value exceeding \$25,000, then the project must meet the Enhanced Construction Waste Reduction Tier 2. PAMC 16.14.240 (Ord. 5393 § 1 (part), 2016). The project shall use the Green Halo System to document the requirements.
62. Construction & Demolition: If the project includes non-residential demolition, then the project must meet the Enhanced Construction Waste Reduction- Tier 2 Mandatory for all nonresidential construction include new construction, additions, and alteration, as long as the construction has a valuation exceeding \$25,000. PAMC 16.14.370 (Ord. 5393 § 1 (part), 2016). The project shall use the Green Halo System to document the requirements.
<https://www.greenhalosystems.com>
63. Electric Vehicle Supply Equipment: If the project is a new hotel structure, then the project must comply with the City of Palo Alto Electric Vehicle Charging Ordinance 5324. The project shall provide Conduit Only, EVSE-Ready Outlet, or EVSE Installed for at least 30% of parking spaces, among which at least 10% (and no fewer than one) shall be EVSE Installed. The requirements shall be applied separately to accessible parking spaces. See ordinance 5263 for EVSE definitions, minimum circuit capacity, and design detail requirements. PAMC 16.14.430 (Ord. 5393 § 1 (part), 2016). See <http://www.cityofpaloalto.org/civicax/filebank/documents/54976> for additional details.
64. Energy Benchmarking: If the project is a nonresidential projects exceeding \$100,000 valuation, then the project must acquire an Energy STAR Portfolio Manager Rating and submit the rating to the City of Palo Alto once the project has been occupied after 12 months. PAMC 16.14.250 (Ord. 5393 § 1 (part), 2016). Submittal info can be found at: https://www.cityofpaloalto.org/gov/depts/utl/business/benchmarking_your_building.asp.

TRANSPORTATION

65. PARKING FACILITY DESIGN: An aisle and several parking stalls on parking level P2 do not meet the city's parking facility design standards. Specifically, the drive aisle below the ramp from the ground level dead-ends without providing a turn-around area, and one parallel parking stall is less than 20-feet between structural columns/vertical obstructions. These design issues shall be resolved prior to building permit issuance.
66. VALET PARKING PLAN: Prior to building permit issuance, the applicant shall submit and receive approval of a valet parking plan. At minimum, the plan shall include a written operations plan and scaled site plan demonstrating adequate space is available to store the required number of vehicles and maintain efficient access. The written plan should include operating hours and estimated number of staff required to efficiently operate the service to prevent queuing into the public right of way. The scaled site plan shall show the quantity and location of all valet parking spaces. Assuming vehicles are parked parallel, the minimum dimensions of a valet parking stall within a drive aisle are 8-feet by 20-feet. No more than

20% of the required off-street parking may be provided with a valet program. The Director of Planning and Community Development may require modifications to the valet plan and operation as necessary to improve efficiency and impacts to the general welfare.

67. TRANSPORTATION DEMAND MANAGEMENT (TDM): The owner or designee shall submit a TDM plan to the City's Transportation for review and approval. The plan shall include the following as initially committed by the owner:

a. Hotel TDM Infrastructure:

- Free on-site bicycle program (hotel bikes for employee and guest use).
- On-site/nearby car-share program (Zipcar/WeCar).
- On-site amenities and vending services.
- Ground floor facades, entrances, and pathways that will encourage pedestrian and bicycle movement.
- Transportation kiosk and/or mount a real-time transportation information screen in lobby.
- Passenger loading zone.
- Bicycle parking/storage for employees and guests.
- Add transit resources to the hotel's website (e.g., free Palo Alto and Marguerite shuttles, the Bike Station, Caltrain, VTA, etc.)

b. Guest TDM Programs:

- Pre-loaded Clipper Cards available for purchase for guests' transit travel.
- Train reservation staff to provide transit connection information for VTA and Caltrain and transfer to Airport via Millbrae BART Station.
- Include hotel confirmation email with information about reaching the hotel without a vehicle.
- Place a "Getting Around Palo Alto" map/brochure in each guest room.
- Free hotel-operated shuttle to the San Jose Airport.
- Hotel-operated shuttle to the North Bayshore area.

c. Employee TDM Programs:

- 100% subsidized transit passes (Caltrain and VTA).
- Cash incentive/allowance for carpooling, biking and walking to work.
- Ridematching assistance.
- Free, preferential carpool/vanpool parking.
- Commuter bike program (provide commuter bikes for employees).
- Secure bike storage, showers and clothes lockers.
- Commuter rewards – fuel cards, movie tickets, gift card.
- Emergency ride-home program.
- Hotel-funded annual car-share membership.
- New employee orientation training by a designated commute coordinator.
- Annual employee TDM survey.

- Free employee overnight accommodation (subject to room availability) for employees who are scheduled
- to work a late evening shift (ending at 11:00 p.m. or later) and a morning shift the following day.

d. Guest & Employee (Dual) TDM Programs:

- Free hotel-operated San Antonio Caltrain Station shuttle. The shuttle will open to neighborhood for free.
- Hotel membership in Palo Alto Transportation Management Association (TMA).
- Access to on-site exercise facilities.
- Annual contribution to the Palo Alto Shuttle Program to extend route of the Crosstown shuttle to the project site.

68. TDM Pre-Occupancy Site Visit/Inspection: Prior to issuance of the first certificate of occupancy, the owner or designee shall call for an inspection by the Planning Division designee to verify that all physical measures (bicycle parking, signage, etc.) have been included as planned.
69. TDM On-Going Monitoring and Reporting Statement. The owner or designee shall once the building is occupied submit an On-Going Monitoring and Reporting Statement to the Transportation Division for review compliance with the approved TDM plan. Enforcement steps will be taken, if needed, to attain compliance status.
70. TDM Plan Update. The owner or designee may during operation of the site request changes to the approved TDM plan. The Transportation Division shall review the request to ensure commensurate measures are included or maintained.

UTILITIES: WASTE-GAS-WATER

PRIOR TO ISSUANCE OF DEMOLITION PERMIT

71. The applicant shall submit a request to disconnect all utility services and/or meters including a signed affidavit of vacancy. Utilities will be disconnected or removed within 10 working days after receipt of request. The demolition permit will be issued by the building inspection division after all utility services and/or meters have been disconnected and removed.

FOR BUILDING PERMIT

72. The applicant shall submit a completed water-gas-wastewater service connection application -load sheet per parcel/lot for City of Palo Alto Utilities. The applicant must provide all the information requested for utility service demands (water in fixture units/g.p.m., gas in b.t.u.p.h, and sewer in fixture units/g.p.d.). The applicant shall provide the existing (prior) loads, the new loads, and the combined/total loads (the new loads plus any existing loads to remain).
73. The applicant shall submit improvement plans for utility construction. The plans must show the size and location of all underground utilities within the development and the public right of way including meters, backflow preventers, fire service requirements, sewer mains, sewer

cleanouts, sewer lift stations and any other required utilities. Plans for new wastewater laterals and mains need to include new wastewater pipe profiles showing existing potentially conflicting utilities especially storm drain pipes, electric and communication duct banks. Existing duct banks need to be daylighted by potholing to the bottom of the ductbank to verify cross section prior to plan approval and starting lateral installation. Plans for new storm drain mains and laterals need to include profiles showing existing potential conflicts with sewer, water and gas.

74. The site plan (A1.1) only includes gas utility (gas meters) only. The gas main on Grant Ave. is only a 2" PE main (total gas demands is required to calculate connections capacity). 6. The applicant must show on the site plan the existence of any auxiliary water supply, (i.e. water well, gray water, recycled water, rain catchment, water storage tank, etc).
75. The applicant shall be responsible for installing and upgrading the existing utility mains and/or services as necessary to handle anticipated peak loads. This responsibility includes all costs associated with the design and construction for the installation/upgrade of the utility mains and/or services.
76. For contractor installed water and wastewater mains or services, the applicant shall submit to the WGW engineering section of the Utilities Department four copies of the installation of water and wastewater utilities off-site improvement plans in accordance with the utilities department design criteria. All utility work within the public right-of-way shall be clearly shown on the plans that are prepared, signed and stamped by a registered civil engineer. The contractor shall also submit a complete schedule of work, method of construction and the manufacturer's literature on the materials to be used for approval by the utilities engineering section. The applicant's contractor will not be allowed to begin work until the improvement plan and other submittals have been approved by the water, gas and wastewater engineering section. After the work is complete but prior to sign off, the applicant shall provide record drawings (as-builts) of the contractor installed water and wastewater mains and services per City of Palo Alto Utilities record drawing procedures. For contractor installed services the contractor shall install 3M marker balls at each water or wastewater service tap to the main and at the City clean out for wastewater laterals.
77. An approved reduced pressure principle assembly (RPPA backflow preventer device) is required for all existing and new water connections from Palo Alto Utilities to comply with requirements of California administrative code, title 17, sections 7583 through 7605 inclusive. The RPPA shall be installed on the owner's property and directly behind the water meter within 5 feet of the property line. RPPA's for domestic service shall be lead free. Show the location of the RPPA on the plans.
78. An approved reduced pressure detector assembly is required for the existing or new water connection for the fire system to comply with requirements of California administrative code, title 17, sections 7583 through 7605 inclusive (a double detector assembly may be allowed for existing fire sprinkler systems upon the CPAU's approval). Reduced pressure detector assemblies shall be installed on the owner's property adjacent to the property line, within 5' of the property line. Show the location of the reduced pressure detector assembly on the plans.

79. All backflow preventer devices shall be approved by the WGW engineering division. Inspection by the utilities cross connection inspector is required for the supply pipe between the meter and the assembly.
80. Existing wastewater laterals that are not plastic (ABS, PVC, or PE) shall be replaced at the applicant's expense.
81. The applicant shall pay the capacity fees and connection fees associated with new utility service/s or added demand on existing services. The approved relocation of services, meters, hydrants, or other facilities will be performed at the cost of the person/entity requesting the relocation.
82. Each unit or place of business shall have its own water and gas meter shown on the plans. Each parcel shall have its own water service, gas service and sewer lateral connection shown on the plans.
83. A new water service line installation for domestic usage is required. For service connections of 4-inch through 8-inch sizes, the applicant's contractor must provide and install a concrete vault with meter reading lid covers for water meter and other required control equipment in accordance with the utilities standard detail. Show the location of the new water service and meter on the plans.
84. A new water service line installation for fire system usage may require. Show the location of the new water service on the plans. The applicant shall provide to the engineering department a copy of the plans for fire system including all fire department's requirements.
85. A new gas service line installation is required. Show the new gas meter location on the plans. The gas meter location must conform to utilities standard details.
86. A new sewer lateral installation per lot is required. Show the location of the new sewer lateral on the plans 19. The applicant shall secure a public utilities easement for facilities installed in private property.
87. The applicant's engineer shall obtain, prepare, record with the county of Santa Clara, and provide the utilities engineering section with copies of the public utilities easement across the adjacent parcels as is necessary to serve the development.
88. Where public mains are installed in private streets/PUEs for condominium and town home projects the CC&Rs and final map shall include the statement: "Public Utility Easements: If the City's reasonable use of the Public Utility Easements, which are shown as P.U.E on the Map, results in any damage to the Common Area, then it shall be the responsibility of the Association, and not of the City, to Restore the affected portion(s) of the Common Area. This Section may not be amended without the prior written consent of the City".
89. All existing water and wastewater services that will not be reused shall be abandoned at the main per WGW utilities procedures.
90. Utility vaults, transformers, utility cabinets, concrete bases, or other structures cannot be

placed over existing water, gas or wastewater mains/services. Maintain 1' horizontal clear separation from the vault/cabinet/concrete base to existing utilities as found in the field. If there is a conflict with existing utilities, Cabinets/vaults/bases shall be relocated from the plan location as needed to meet field conditions. Trees may not be planted within 10 feet of existing water, gas or wastewater mains/services or meters. New water, gas or wastewater services/meters may not be installed within 10' of existing trees. Maintain 10' between new trees and new water, gas and wastewater services/mains/meters.

91. To install new gas service by directional boring, the applicant is required to have a sewer cleanout at the front of the building. This cleanout is required so the sewer lateral can be videoed for verification of no damage after the gas service is installed by directional boring.
92. All utility installations shall be in accordance with the City of Palo Alto current utility standards for water, gas & wastewater.
93. Due to high demands outside City's control, a three to six-month wait time for some water and gas meters are expected. The applicant is strongly encouraged to provide the application load sheet demands as early in the design process as possible to the WGW utilities engineering department. Once payment is made, anticipate service installations completed within said time frame (3 – 6 months).

PUBLIC WORKS: URBAN FORESTRY

PRIOR TO DEMOLITION, BUILDING OR GRADING PERMIT ISSUANCE

94. BUILDING PERMIT SUBMITTAL- PROJECT ARBORIST CERTIFICATION LETTER. Prior to submittal for staff review, attach a Project Arborist Certification Letter that he/she has; (a) reviewed the entire building permit plan set submittal and, (b)* verified all his/her updated TPR mitigation measures and changes are incorporated in the plan set, (c) affirm that ongoing Contractor/Project Arborist site monitoring inspections and reporting have been arranged with the contractor or owner (see Sheet T-1) and, (d) understands that design revisions (site or plan changes) within a TPZ will be routed to Project Arborist/Contractor for review prior to approval from City. The Building Permit submittal set shall be accompanied by the project site arborist's certification letter that the plans have incorporated said design changes and are consistent with City Tree Technical Manual Standards, Regulations and information:
 - a. Provide a project arborist's Updated Tree Protection Report (TPR) with building permit level mitigation measures, (e.g., resolve grading proximity issues with Public trees; exact TPZ scaled in feet). Provide plan revision directions to minimize root cutting conflicts that are obvious in the civil, basement, sidewalk improvement sheets. See TPR below.
 - b. Palo Alto [Tree Technical Manual](#) Construction Standards, Section 2.00 and PAMC 8.10.080.
95. PLAN SET REQUIREMENTS. The final Plans submitted for building permit shall include the following information and notes on relevant plan sheets:
 - c. SHEET T-1, BUILDING PERMIT. The building permit plan set will include the City's full-sized, Sheet T-1 ([Tree Protection-it's Part of the Plan!](#)), available on the Development Center website at <http://www.cityofpaloalto.org/civicax/filebank/documents/31783>. The Applicant shall **complete and sign the [Tree Disclosure Statement](#)** and recognize the Project Arborist Tree Activity Inspection Schedule. Monthly reporting to Urban Forestry/Contractor

is mandatory. (Insp. #1: applies to all projects; with tree preservation report: Insp. #1-7 applies)

- d. The Tree Preservation Report (TPR). All sheets of the Applicant's construction level TPR approved by the City for full implementation by Contractor, (*list the Project Arborist here, enter date here, 20__*) shall be printed on numbered Sheet T-1 (T-2, T-3, etc) and added to the sheet index.
- e. Plans to show protective tree fencing. The Plan Set (esp. site, demolition, grading & drainage, foundation, irrigation, tree disposition, utility sheets, etc.) must delineate/show the correct configuration of Type I, Type II or Type III fencing around each Regulated Tree, using a bold dashed line enclosing the Tree Protection Zone (Standard Dwg. #605, Sheet T-1; City Tree Technical Manual, Section 6.35-Site Plans); **or by using the Project Arborist's unique diagram for each Tree Protection Zone enclosure.**

96. SITE PLAN REQUIREMENTS: In addition to showing TPZ fencing, add the following Notes on the specified Plan Sheets.

- f. Note #1. Apply to the site plan stating, *"All tree protection and inspection schedule measures, design recommendations, watering and construction scheduling shall be implemented in full by owner and contractor, as stated on Sheet T-1, in the Tree Protection Report and the approved plans"*.
- g. Note #2. All civil plans, grading plans, irrigation plans, site plans and utility plans and relevant sheets shall add a note applying to the trees to be protected, including neighboring trees stating: *"Regulated Tree--before working in this area contact the Project Site Arborist at 650-321-0202"*;
- h. Note #3. Utility (sanitary sewer/gas/water/backflow/electric/storm drain) plan sheets shall include the following note: *"Utility trenching shall not occur within the TPZ of the protected tree. Contractor shall be responsible for ensuring that no trenching occurs within the TPZ of the protected tree by contractors, City crews or final landscape workers. See sheet T-1 for instructions."*
- i. Note #4. *"Basement or foundation plan. Soils Report and Excavation for basement construction within the TPZ of a protected tree shall specify a vertical cut (stitch piers may be necessary) in order to avoid over-excavating into the tree root zone. Any variance from this procedure requires Urban Forestry approval, please call (650) 496-5953."*
- j. Note #5. *"Pruning Restrictions. No pruning or clearance cutting of branches is permitted on City trees. Contractor shall obtain a Public Tree Permit from Urban Forestry (650-496-5953) for any work on Public Trees"*

97. TREE REMOVAL—PROTECTED & RIGHT-OF-WAY TREES. Existing trees (Publicly-owned or Protected) to be removed as shown accurately located on all site plans, require approval by the [Urban Forestry Tree Care Permit](#) prior to issuance of any building, demolition or grading permit. Must also be referenced in the required Street Work Permit from Public Works Engineering.

- k. Add plan note for each tree to be removed, *"Tree Removal. Contractor shall obtain a completed Urban Forestry Tree Care Permit # _____ (contractor to complete)"*

separate from the Building or Street Work Permit. Permit notice hanger and conditions apply. Contact (650-496-5953)."

- I. Copy the approval. The completed [Tree Care Permit](http://www.cityofpaloalto.org/gov/depts/pwd/trees/default.asp) shall be printed on Sheet T-2, or specific approval communication from staff clearly copied directly on the relevant plan sheet. The same Form is used for public or private Protected tree removal requests available from the Urban Forestry webpage: <http://www.cityofpaloalto.org/gov/depts/pwd/trees/default.asp>

98. NEW RIGHT-OF-WAY TREES--PLAN REQUIREMENTS. New trees shall be shown on all relevant plans: site, utility, irrigation, landscape, etc. in a location 10' clear radius from any (new or existing) underground utility or curb cut (see Note #4 above).

- a. Add note on the Planting Plan that states, *"Tree Planting. Prior to in-ground installation, Urban Forestry inspection/approval required for tree stock, planting conditions and irrigation adequacy. Contact (650-496-5953)."*
- b. Landscape Plans shall state the Urban Forestry approved species, size and include relevant Standard Planting Dwg. #603, #603a or #604 (reference which), and shall note the tree pit dug at least twice the diameter of the root ball.
- c. Landscape plan shall include planting preparation details for trees specifying digging the soil to at least 30-inches deep, backfilled with a quality topsoil and dressing with 2-inches of wood or bark mulch on top of the root ball keeping clear of the trunk by 1-inch.
- d. Add note on the Planting & Irrigation Plan that states, "Irrigation and tree planting in the right-of-way requires a street work permit per CPA Public Works standards."
- e. Automatic irrigation shall be provided for each tree. Standard Dwg. #513 shall be included on the irrigation plans and show two bubbler heads mounted on flexible tubing placed at the edge of the root ball. Bubblers mounted inside an aeration tube are prohibited. The tree irrigation system shall be connected to a separate valve from other shrubbery and ground cover, pursuant to the City's Landscape Water Efficiency Standards.

99. NEW TREES—SOIL VOLUME. Unless otherwise approved, four new right-of-way trees each new tree shall be provided with 800 cubic feet of rootable soil area, utilizing Standard Dwg. #604/513. [Rootable soil](#) shall mean compaction less than 90% over the area, not including sidewalk base areas except when mitigated. Sidewalk or asphalt base underlayment [in lieu of compacted base rock] shall use an *Alternative Base Material* method such as structural grid ([Silva Cell](#)). Design and manufacturer details shall be added to relevant civil and landscape sheets. Each parking lot tree in small islands and all public trees shall be provided adequate rootable soil commensurate to mature tree size. Note: this expectation requires coordination with the engineer, arborist and landscape architect.

- m. Minimum soil volume for tree size growth performance (in cubic feet): Large: 1,200 cu.ft. Medium: 800 cu.ft. Small: 400 cu.ft.
- n. Landscape Plan. When qualifying for parking area shade ordinance compliance (PAMC 18.40.130) trees shall be labeled (as S, M or L).
- o. Engineered Soil Mix (ESM). When approved, Engineered Soil Mix base material shall be utilized in specified areas, such as a sidewalk base or channeling to a landscape area, to achieve expected shade tree rooting potential and maximum service life of the sidewalk, curb, parking surfaces and compacted areas. Plans and Civil Drawings shall use CPA Public Works Engineering ESM Specifications, Section 30 and Standard Dwg. #603a. Designated areas will be identified by cross-hatch or other symbol, and specify a minimum of 24" depth. The technology may be counted toward any credits awarded for LEED or Sustainable Sites certification ratings.

LANDSCAPE PLANS

- 100. Include all changes recommended from civil engineer, architect and staff, including planting specifications if called for by the project arborist.
- 101. Provide a detailed landscape and irrigation plan encompassing on-and off-site plantable areas out to the curb as approved by the Architectural Review Board. A Landscape Water Use statement, water use calculations and a statement of design intent shall be submitted for the project. A licensed landscape architect and qualified irrigation consultant will prepare these plans, to include:
 - i. All existing trees identified both to be retained and removed including street trees.
 - ii. Complete plant list indicating tree and plant species, quantity, size, and locations.
 - iii. Irrigation schedule and plan.
 - iv. Fence locations.
 - v. Lighting plan with photometric data.
 - vi. Landscape Plan shall ensure the backflow device is adequately obscured with the appropriate screening to minimize visibility (planted shrubbery is preferred, painted dark green, decorative boulder covering acceptable; wire cages are discouraged).
 - vii. All new trees planted within the public right-of-way shall be installed per Public Works (PW) Standard Planting Diagram #603 or 604 (include on plans), and shall have a tree pit dug at least twice the diameter of the root ball.
 - viii. Landscape plan shall include planting preparation details for trees specifying digging the soil to at least 30-inches deep, backfilled with a quality topsoil and dressing with 2-inches of wood or bark mulch on top of the root ball keeping clear of the trunk by 1-inch.
 - ix. Automatic irrigation shall be provided to all trees. For trees, Standard Dwg. #513 shall be included on the irrigation plans and show two bubbler heads mounted on flexible tubing placed at the edge of the root ball. Bubblers shall not be mounted inside an aeration tube. The tree irrigation system shall be connected to a separate valve from other shrubbery and ground cover, pursuant to the City's Landscape Water Efficiency Standards. Irrigation in the right-of-way requires a street work permit per CPA Public Works standards.
- p. Add Planting notes to include the following mandatory criteria:

- i. *Prior to any planting, all plantable areas shall be tilled to 12" depth, and all construction rubble and stones over 1" or larger shall be removed from the site.*
 - ii. *A turf-free zone around trees 36" diameter (18" radius) required for best tree performance.*
- q. *Add note: "Mandatory Landscape Architect (LA) Inspections and Verification to the City. The LA shall verify the performance measurements are achieved with a letter of verification to City Planning staff, in addition to owner's representative for the following:*
- i. *All the above landscape plan and tree requirements are in the Building Permit set of plans.*
 - ii. *Percolation & drainage checks have been performed and are acceptable.*
 - iii. *Fine grading inspection of all plantable areas has been personally inspected for tilling depth, rubble removal, soil test amendments are mixed and irrigation trenching will not cut through any tree roots.*
 - iv. *Tree and Shrub Planting Specifications, including delivered stock, meets Standards in the CPA Tree Technical Manual, Section 3.30-3.50. Girdling roots and previously topped trees are subject to rejection.*

DURING CONSTRUCTION

102. TREE PROTECTION VERIFICATION. Prior to any site work a written verification from the contractor that the required protective fencing is in place shall be submitted to the Urban Forestry Section (derek.sproat@cityofpaloalto.org). The fencing shall contain required warning sign and remain in place until final inspection of the project.
103. EXCAVATION RESTRICTIONS APPLY (TTM, Sec. 2.20 C & D). Any approved grading, digging or trenching beneath a tree canopy shall be performed using 'air-spade' method as a preference, with manual hand shovel as a backup. For utility trenching, including sewer line, roots exposed with diameter of 1.5 inches and greater shall remain intact and not be damaged. If directional boring method is used to tunnel beneath roots, then Table 2-1, Trenching and Tunneling Distance, shall be printed on the final plans to be implemented by Contractor.
104. PLAN CHANGES. Revisions and/or **changes to plans before or during construction** shall be reviewed and responded to by the (a) project site arborist, (*name of certified arborist of record and phone #*), or (b) landscape architect with written letter of acceptance before submitting the revision to the Building Department for review by Planning, PW or Urban Forestry.
105. CONDITIONS. All Planning Department conditions of approval for the project shall be printed on the plans submitted for building permit.
106. TREE PROTECTION COMPLIANCE. The owner and contractor shall implement all protection and inspection schedule measures, design recommendations and construction scheduling as stated in the TPR & Sheet T-1, and is subject to code compliance action pursuant to PAMC 8.10.080. The required protective fencing shall remain in place until final landscaping and inspection of the project. Project arborist approval must be obtained and documented in the monthly activity report sent to the City. The mandatory Contractor and Arborist Monthly Tree Activity Report shall be sent monthly to the City (pwps@cityofpaloalto.org) beginning

with the initial verification approval, using the template in the Tree Technical Manual, Addendum 11.

107. TREE DAMAGE. Tree Damage, Injury Mitigation and Inspections apply to Contractor. Reporting, injury mitigation measures and arborist inspection schedule (1-5) apply pursuant to TTM, Section 2.20-2.30. Contractor shall be responsible for the repair or replacement of any publicly owned or protected trees that are damaged during the course of construction, pursuant to Title 8 of the Palo Alto Municipal Code, and city Tree Technical Manual, Section 2.25.
108. GENERAL. The following general tree preservation measures apply to all trees to be retained: No storage of material, topsoil, vehicles or equipment shall be permitted within the tree enclosure area. The ground under and around the tree canopy area shall not be altered. Trees to be retained shall be irrigated, aerated and maintained as necessary to ensure survival.

PRIOR TO OCCUPANCY

109. URBAN FORESTRY DIGITAL FILE & INSPECTION. The applicant or architect shall provide a digital file of the landscape plan, including new off-site trees in the publicly owned right-of-way. A USB Flash Drive, with CAD or other files that show species, size and exact scaled location of each tree on public property, shall be delivered to Urban Forestry at a tree and landscape inspection scheduled by Urban Forestry (650-496-5953).
110. LANDSCAPE CERTIFICATION LETTER. The Planning Department shall be in receipt of a verification letter that the Landscape Architect has inspected all trees, shrubs, planting and irrigation and that they are installed and functioning as specified in the approved plans.
111. PROJECT ARBORIST CERTIFICATION LETTER. Prior to written request for temporary or final occupancy, the contractor shall provide to the Planning Department and property owner a final inspection letter by the Project Arborist. The inspection shall evaluate the success or needs of Regulated tree protection, including new landscape trees, as indicated on the approved plans. The written acceptance of successful tree preservation shall include a photograph record and/or recommendations for the health, welfare, mitigation remedies for injuries (if any). The final report may be used to navigate any outstanding issues, concerns or security guarantee return process, when applicable.
112. PLANNING INSPECTION. Prior to final sign off, contractor or owner shall contact the city planner (650-329-2441) to inspect and verify Special Conditions relating to the conditions for structures, fixtures, colors and site plan accessories.

POST CONSTRUCTION

113. MAINTENANCE. All landscape and trees shall be maintained, watered, fertilized, and pruned according to Best Management Practices-Pruning (ANSI A300-2008 or current version) and the City Tree Technical Manual, Section 5.00. Any vegetation that dies shall be replaced or failed automatic irrigation repaired by the current property owner within 30 days of discovery.

SECTION 7. Term of Approval.

Architectural Review Approval. In the event actual construction of the project is not commenced within one year of the date of council approval, the approval shall expire and be of no further force or effect, pursuant to Palo Alto Municipal Code Section 18.77.090.

PASSED:

AYES:

NOES:

ABSENT:

ABSTENTIONS:

ATTEST:

APPROVED:

City Clerk

Director of Planning and Community Environment

APPROVED AS TO FORM:

Senior Asst. City Attorney

PLANS AND DRAWINGS REFERENCED:

1. Those plans prepared by T2 Development entitled "ARB Major Submittal: Courtyard by Marriott & AC by Marriott", consisting of 54 pages, dated May 19, 2017, and received on May 19, 2017.

ATTACHMENT D
ZONING COMPARISON TABLE
744-748 San Antonio Road, 15PLN-00314

Table 1: COMPARISON WITH CHAPTER 18.16 (CS DISTRICT)
Non-residential Development Standards

Regulation	Required	Existing	Proposed
Minimum Site Area, width and depth	None	1.91 acres (83,440.93 sf)	1.91 acres (83,440.93 sf)
Minimum Front Yard	10-12 feet to create an 8-10 foot effective sidewalk width ^{(1), (2), (8)}	744 San Antonio: 24 ft 748 San Antonio: 4 ft	24 Feet
Rear Yard	None	744 San Antonio: 70 ft 748 San Antonio: 84 ft	10 feet
Interior Side Yard (if abutting residential zone district)	None (not abutting residential)	20 feet	10 feet
Street Side Yard	None	Not Applicable	Not Applicable
Build-to-lines	50% of frontage built to setback on El Camino Real 33% of side street built to setback ⁽⁷⁾	141 feet (50%) No Street side yard	186 feet (77%)
Special Setback	24 feet – see Chapter 20.08 & zoning maps	744 San Antonio: 24 ft 748 San Antonio: 4 ft	24 feet
Max. Site Coverage	None	36% (30,200 sf)	39.63% (33,075 sf)
Max. Building Height	50 feet While not applicable for this project, height is limited to 35 feet within 150 feet of a residential district (other than an RM-40 or PC zone) abutting or located within 50 feet of the site	35 feet	49'-4"
Max. Floor Area Ratio (FAR)	Hotel: 2.0:1(166,882 sf)	37.84% (31,575 sf)	1.99:1 (166,020 sf)

(1) No parking or loading space, whether required or optional, shall be located in the first 10 feet adjoining the street property line of any required yard.

(2) Any minimum front, street side, or interior yard shall be planted and maintained as a landscaped screen excluding areas required for access to the site. A solid wall or fence between 5 and 8 feet in height shall be constructed along any common interior lot line..

(7) 25 foot driveway access permitted regardless of frontage, build-to requirement does not apply to CC district.

(8) A 12 foot sidewalk width is required along El Camino Real frontage

18.16.080 Performance Standards. All development in the CS district shall comply with the performance criteria outlined in [Chapter 18.23](#) of the Zoning Ordinance, including all mixed use development

18.16.090 Context-Based Design Criteria. As further described in a separate attachment, development in a commercial district shall be responsible to its context and compatible with adjacent development, and shall promote the establishment of pedestrian oriented design.

Table 2: CONFORMANCE WITH CHAPTER 18.52 (Off-Street Parking and Loading) for Hotels*			
Type	Required	Existing	Proposed
Vehicle Parking	1 space per guestroom	75 spaces	294 spaces, includes 58 valet spaces
Bicycle Parking	1 space per 10 guestrooms (100% LT)		30 spaces
Loading Space	2 loading spaces for 30,000 - 69,999 sf		2 spaces

* On-site employee amenity space is exempted from the parking requirements

ATTACHMENT E
Performance Criteria 18.23
744 San Antonio Road
15PLN-00314

These performance criteria are intended to provide additional standards to be used in the design and evaluation of developments in the multi-family, commercial, and industrial zones. The purpose is to balance the needs of the uses within these zones with the need to minimize impacts to surrounding neighborhoods and businesses. The criteria are intended to make new developments and major architectural review projects compatible with nearby residential and business areas, and to enhance the desirability of the proposed developments for the site residents and users, and for abutting neighbors and businesses.

18.23.020 Trash Disposal and Recycling

Assure that development provides adequate and accessible interior areas or exterior enclosures for the storage of trash and recyclable materials in appropriate containers, and that trash disposal and recycling areas are located as far from abutting residences as is reasonably possible.

Project Consistency

The trash enclosures are in the rear of the property, opposite from the residential areas across San Antonio Road. Noise associated with the servicing of the solid waste facilities would be shielded by the new buildings.

18.23.030 Lighting

To minimize the visual impacts of lighting on abutting or nearby residential sites and from adjacent roadways.

The proposed exterior lighting is sufficient to provide safe circulation and is directed downward to reduce glare and impacts to the neighboring residents.

Outside lighting on the proposed building would be limited, focused at the ground floor level, and comparable in brightness to the ambient lighting in the surrounding area. Landscape or architectural accent lighting that is aimed upward, would contain glare control, louvers or be shielded from direct vertical uplight, consistent with this PAMC Section.

18.23.040 Late Night Uses and Activities

The purpose is to restrict retail or service commercial businesses abutting (either directly or across the street) or within 50 feet of residentially zoned properties or properties with existing residential uses located within nonresidential zones, with operations or activities between the hours of 10:00 p.m. and 6:00 a.m. Operations subject to this code may include, but are not limited to, deliveries, parking lot and sidewalk cleaning, and/or clean up or set up operations, but does not include garbage pick up.

The hotel includes ancillary uses that are associated with guest services and not open to the public.

Any loading would occur in the rear of the property opposite the residents across from San Antonio Road.

18.23.050 Visual, Screening and Landscaping

Privacy of abutting residential properties or properties with existing residential uses located within nonresidential zones (residential properties) should be protected by screening from public view all mechanical equipment and service areas. Landscaping should be used to integrate a project design into the surrounding neighborhood, and to provide privacy screening between properties where appropriate.

The project provides the required setback and includes vegetation and tree plantings within the setback and open spaces. Mechanical equipment areas are screened appropriately.

18.23.060 Noise and Vibration	Project Consistency
The requirements and guidelines regarding noise and vibration impacts are intended to protect residentially zoned properties or properties with existing residential uses located within nonresidential zones (residential properties) from excessive and unnecessary noises and/or vibrations from any sources in abutting industrial or commercially zoned properties. Design of new projects should reduce noise from parking, loading, and refuse storage areas and from heating, ventilation, air conditioning apparatus, and other machinery on nearby residential properties. New equipment, whether mounted on the exterior of the building or located interior to a building, which requires only a building permit, shall also be subject to these requirements.	The project will comply with the City's noise ordinance. The trash enclosures are in the rear of the property.
18.23.070 Parking	
The visual impact of parking shall be minimized on adjacent residentially zoned properties or properties with existing residential uses located within nonresidential zones.	The project provides most of its parking below grade. The parking that is located at-grade is shielded by the new buildings and not visible from San Antonio Road.
18.23.080 Vehicular, Pedestrian and Bicycle Site Access	
The guidelines regarding site access impacts are intended to minimize conflicts between residential vehicular, pedestrian, and bicycle uses and more intensive traffic associated with commercial and industrial districts, and to facilitate pedestrian and bicycle connections through and adjacent to the project site.	The site circulation facilitates access for all modes of transportation. The project includes short-term and long-term bike parking. On-site vehicular parking is valet and most of the parking is below ground. Pedestrian areas include colored and textured pavement that would enhance safety.
18.23.090 Air Quality	
The requirements for air quality are intended to buffer residential uses from potential sources of odor and/or toxic air contaminants.	No proposed uses on the project site would produce odor or toxic air.
18.23.100 Hazardous Materials	
In accordance with Titles 15 and 17 of the Palo Alto Municipal Code, minimize the potential hazards of any use on a development site that will entail the storage, use or handling of hazardous materials (including hazardous wastes) on-site in excess of the exempt quantities prescribed in Health and Safety Code Division 20, Chapter 6.95, and Title 15 of this code.	This is not applicable to the proposed uses associated with the project.



HEXAGON TRANSPORTATION CONSULTANTS, INC.

November 11, 2016

Mr. Mont Williamson
T/2 Hospitality
620 Newport Center Drive, 14th Floor
Newport Beach CA 92660

Re: Parking Study for Hotels

Dear Mr. Williamson:

This letter describes research that Hexagon has conducted regarding the number of parking spaces required for hotels in Santa Clara County. Hexagon conducted counts of the parking demand at one hotel in 2014 and two hotels in 2015 (see Table 1). The 2014 count was conducted at the Aloft Hotel located at 10165 North De Anza Boulevard in Cupertino. The Aloft Hotel in Cupertino includes meeting space, a snack bar, a lounge and bar, and free underground parking. The two hotels counted in 2015 include the Hilton Garden Inn (located at 840 East El Camino Real, Mountain View) and the Courtyard by Marriott (located at 660 West El Camino Real, Sunnyvale). Each hotel is located on a major arterial and has a mix of meeting/conference space, a restaurant and bar/lounge area, and free parking. The restaurant and bar/lounge space is owned and operated by the hotel and primarily serves customers who are hotel guests.

Survey Results

Table 2 shows that the overall peak parking demand was observed at midnight, after the hotel restaurant had closed. The peak parking ratios for the hotels on weekdays were observed to range from 0.61 to 0.74 with an average of 0.68 occupied parking spaces per occupied room. The peak parking ratios observed on Saturdays ranged from 0.56 to 0.80 with an average of 0.70 occupied spaces per occupied room.



Table 1
Hotel Size and Features

	Hilton Garden Inn Mt. View	Courtyard Marriott Sunnyvale	Aloft Hotel Cupertino
Rooms	160	145	123
Employees (maximum per shift)	38	19	n/a
Restaurant Size	3,842 s.f.	9,715 s.f.	n/a ^a
Meeting/Conference Space	2,112 s.f.	550 s.f.	1,100 s.f.
Parking Spaces Provided	162	127	n/a
Parking Spaces/Room	1.01	0.88	n/a
TDM Measures	None	Bike parking, showers, lockers, changing rooms, transit subsidies for employees, guaranteed ride home program	Guest shuttle service ^b
^a The Aloft Hotel in Cupertino does not include a full-service restaurant. On-site dining options available at the hotel include a snack bar and bar/lounge space. ^b Unknown if this site has implemented additional TDM measures.			

Table 2
Observed Hotel Parking Usage

Survey Date	Hilton Garden Inn Mt. View		Courtyard Marriott Sunnyvale		Aloft Hotel Cupertino ^a	
	Thurs. 4/30/15	Sat. 5/2/15	Thurs. 4/30/15	Sat. 5/2/15	Wed. 6/11/14	Sat. 6/14/14
	Total	Total	Total	Total	Total	Total
6:00 PM	69	64	26	55	31	36
6:30 PM	66	69	22	53	30	34
7:00 PM	62	65	20	50	35	33
7:30 PM	60	67	23	57	31	39
8:00 PM	75	72	21	58	33	40
8:30 PM	76	74	24	57	32	42
9:00 PM	87	77	26	61	42	43
9:30 PM	102	82	34	72	56	47
10:00 PM	109	91	44	78	68	49
10:30 PM	112	117	48	80	71	57
11:00 PM	113	117	52	92	73	61
11:30 PM	114	122	53	100	74	64
12:00 AM	115	125	55	107	76	67
Total Rooms	160	160	145	145	123	123
Occupied Rooms	155	156	82	144	123	121
Restaurant Size	3,842 s.f.		9,715 s.f.		n/a ^b	
Total Parking Spaces	162	162	127	127		
Peak Parking Demand (spaces)	115	125	55	107	76	67
Parking Ratio (occupied parking spaces/occupied rooms for hotel at 12:00 AM midnight; restaurant is closed)						
Hotel Only	0.74	0.80	0.67	0.74	0.61	0.56

^a The survey at this site ended at 10 PM. Parking occupancy after this hour was projected based on the time-of-day variation in parking demand observed at the other hotels.

^b The site does not include a full-service restaurant. On-site dining options available at the hotel include a snack bar and bar/lounge space.



Mr. Mont Williamson
November 11, 2016
Page 4 of 4

Thank you for the opportunity to provide the results of these parking counts. If you have any questions, please do not hesitate to call.

Sincerely,
HEXAGON TRANSPORTATION CONSULTANTS, INC.

A handwritten signature in black ink, appearing to read "Gary K. Black", with a long horizontal flourish extending to the right.

Gary K. Black
President

17 January 2017

Mr. Sheldon Ah Sing
City of Palo Alto Planning Division
250 Hamilton Ave.
Palo Alto, CA 94301

Re: 744-750 San Antonio Road Application 15PLN-00314
Valet Parking Program

Mr. Ah Sing:

Regarding your request for clarification of the Valet Parking Program:

The Hotel Operator will implement and maintain an on-site valet program which will render the property 100% valet parked. The program will consist of 24-hour coverage by hotel staff and will be consistent across both hotels. This parking approach is included as one of the amenities for the property, intended to increase the overall guest experience and serve as an indication of service level.

In practice, the guest would be greeted by the valet team right after departure from San Antonio, and entry to our site. The circular drive with entrances to the hotels will serve as the transition and staging area. Guests may call for their car from their room prior to departure so the valet team can have it delivered to the lobby entry for efficient departure.

The total number of spaces provided is defined on the Drawing A-2.0. This quantity and arrangement is substantiated in the "Parking Study for Palo Alto Hotels" document provided by Hexagon Transportation Consultants, Inc, dated November 11, 2016. Based on our experience and the documentation we have submitted, we are confident the parking program we have defined, including the efficiency produced by a valet team, will yield a comfortable and manageable parking situation for the project.

Thank you,



Randy B. Popp, Architect



Architectural Review Board

Staff Report (ID # 7846)

Report Type: Action Items **Meeting Date:** 4/6/2017

Summary Title: 744 San Antonio: Marriot Hotel Project

Title: PUBLIC HEARING / QUASI-JUDICIAL. 744-748 San Antonio Avenue [15PLN-00314]: Recommendation on Applicant's Request for Approval of a Major Architectural Review to Allow the Demolition of Two Existing Commercial/Office Buildings at 744 and 748 San Antonio Avenue and Construction of Two, Five-Story Hotels (Courtyard by Marriott with 151 rooms and AC by Marriott with 143 rooms). The Site Will Include Surface and Two Levels of Basement Parking. Environmental Assessment: A Draft Environmental Impact Report (DEIR) has Been Prepared Pursuant to the California Environmental Quality Act (CEQA). The Public Comment Period for the DEIR is From March 27, 2017 to May 10, 2017. Zoning District: CS. For More Information, Contact Sheldon Ah Sing at sahsing@m-group.us

From: Hillary Gitelman

Recommendation

Staff recommends the Architectural Review Board (ARB) take the following action(s):

1. Review and comment on the draft environmental impact report and continue the project to a date uncertain for redesign.

Report Summary

The applicant requests Architectural Review approval to construct a new dual brand hotel project with a total of 294 hotel rooms at the subject address. The hotel includes the construction of two, five-story tall buildings built atop a two-level subterranean garage containing 294 parking spaces. Several of the parking spaces do not meet city requirements and the applicant is seeking a parking reduction and use of a valet program to address this discrepancy.

The project includes the demolition of three buildings, one of which is be eligible for listing on the California Register of Historical Resources. The loss of this potential resource cannot be mitigated and required the preparation of a draft environmental impact report (DEIR), which was released to the public for review and comment in late March.

The proposed project complies with the objective development standards for the subject property's zoning district (with the noted exception of parking). The project is also subject to architectural review findings, context-based design criteria and performance standards, which are more subjectively analyzed. When the ARB last considered this project, it identified a variety of concerns related to the overall mass of the buildings and its relationship to the neighborhood context. The Board identified opportunities to modify the design to better address these concerns. However, the revised plans show only subtle changes from the plans previously reviewed by the ARB.

As many of the previously stated concerns have not been adequately addressed, staff recommends the Board continue the project and provide specific direction to the applicant in order to meet required findings.

Background

Project Information

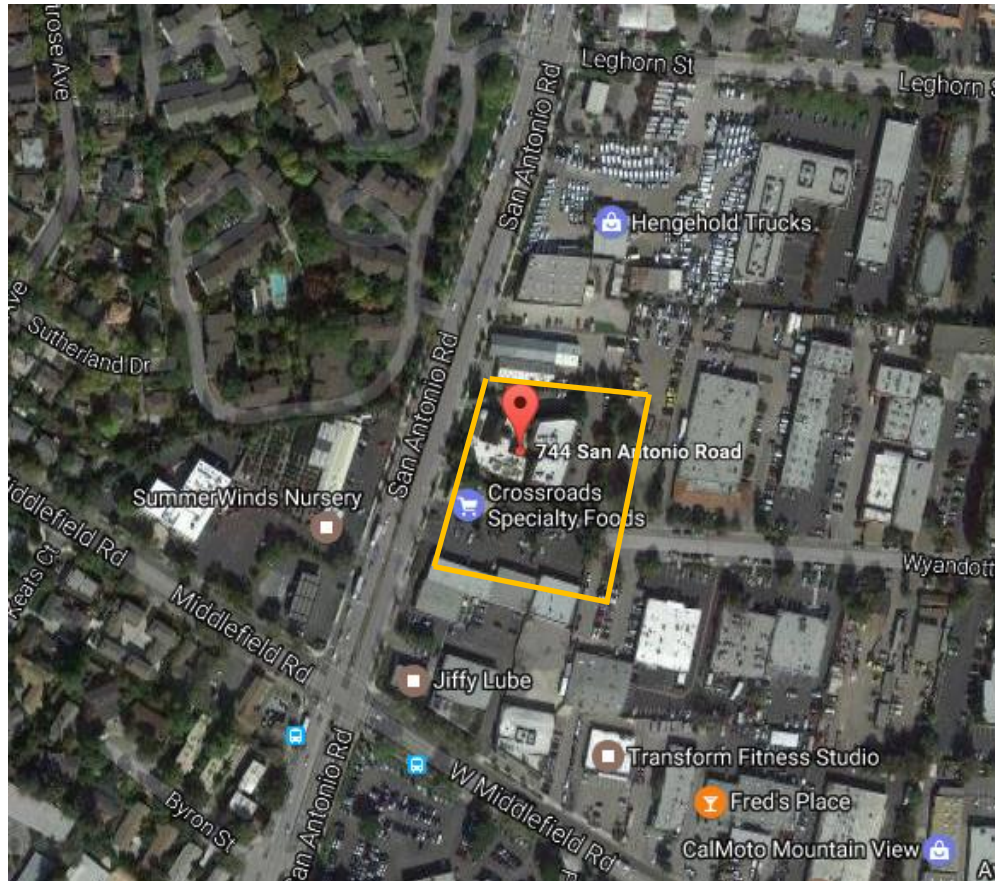
Owner:	T2 Development, 620 Newport Center Dr., 14 th floor, Newport Beach CA
Architect:	Gene Fong Associates
Representative:	Randy Popp
Legal Counsel:	Not Applicable

Property Information

Address:	744-750 San Antonio Road
Neighborhood:	Charleston Gardens
Lot Dimensions & Area:	284'-4" along San Antonio, Rear: 345'-5" and north side is 250'-2" and south side is 287'-1"
Housing Inventory Site:	Yes
Located w/in a Plume:	Yes
Protected/Heritage Trees:	None. However, there are six street trees adjacent to the site, which would be retained.
Historic Resource(s):	Yes, 744 San Antonio is eligible for listing on the California Register
Existing Improvement(s):	744 San Antonio: 20,775 square foot, two-story building built in 1961 748 San Antonio: 10,800 square foot, one story building built in 1952
Existing Land Use(s):	744 San Antonio: Office building

	748 San Antonio: Automobile repair/window center
Adjacent Land Uses & Zoning:	North: CS (Educational supply store—BACH Company) West: PC-2711 & CN (Multi-family residential and nursery) East: Industrial (City of Mountain View) South: CS (Commercial—Crossroads Foods)

Aerial View of Property:



Source: DigitaGlobe, US Geological Survey, USDA Farm Service Agency, Google

Land Use Designation & Applicable Plans

Zoning Designation:	CS (Service Commercial)
Comp. Plan Designation:	CS (Service Commercial)
Context-Based Design Criteria:	Yes
Downtown Urban Design Guide:	Not Applicable
South of Forest Avenue Coordinated Area Plan:	Not Applicable
Baylands Master Plan:	Not Applicable
El Camino Real Design Guidelines (1976 / 2002):	Not Applicable

Proximity to Residential
Uses or Districts (150'):

Yes

Located w/in the Airport
Influence Area:

Not Applicable

Prior City Reviews & Action

City Council:

None

PTC:

None

HRB:

None

ARB:

Preliminary: June 4, 2015 Item Packet:

<https://www.cityofpaloalto.org/civicax/filebank/documents/47600>

Formal #1: December 17, 2015 Item Packet:

<https://www.cityofpaloalto.org/civicax/filebank/documents/50284>

Meeting Video: <http://midpenmedia.org/architectural-review-board-35/>

Scoping Meeting: March 3, 2016 Item Packet:

<https://www.cityofpaloalto.org/civicax/filebank/blobdload.aspx?BlobID=51265>, Meeting Video: <http://midpenmedia.org/architectural-review-board-39/>

Meeting Minutes: <http://www.cityofpaloalto.org/civicax/filebank/blobdload.aspx?BlobID=51509>

Project Description

The project proposes the construction of two five-story hotels with shared amenity spaces and parking on a podium structure. The proposed hotels would include a 143-room Courtyard by Marriott hotel and a 151-room AC by Marriott hotel, for a total of 294 new hotel rooms. Both buildings are five-stories and nearly 50 feet in height.

The onsite improvements include a single driveway from San Antonio Road that leads to a roundabout serving both lobbies of the hotels. A driveway continues to the rear of the property where 16 surface parking spaces are available. Most the parking (278 spaces) is available via a ramp that leads to a two-level underground parking garage. The remaining parking spaces are accessed via a valet service, which requires approval of a parking reduction, and is further discussed later in this report. New landscaping, driveways, utilities, and other facilities would be constructed as part of the project.

Three commercial buildings would be demolished as part of the project, including a structure at 744 San Antonio Road, which was constructed in 1961 and is be eligible for listing on the California Register of Historical Resources (California Register) due to its architectural significance and embodiment of the distinctive characteristics of mid-century modern

architecture. Other existing improvements on the site (e.g. parking lots, on-site trees, landscaping) would also be removed prior to construction of the proposed hotel buildings.



View from San Antonio Road



Courtyard Hotel



AC Hotel

Requested Entitlements, Findings and Purview:

The following discretionary applications are being requested:

- Architectural Review – Major (AR): The process for evaluating this type of application is set forth in Palo Alto Municipal Code (PAMC) Section 18.77.070. AR applications are reviewed by the ARB and recommendations are typically forwarded to the Planning & Community Environment Director for action within five business days of the Board's recommendation. Action by the Director is appealable to the City Council if filed within 14 days of the decision. However, since this project includes an Environmental Impact Report (EIR) and requires adoption of a statement of overriding considerations, the ARB will make a recommendation to the City Council for final consideration of the project. AR projects are evaluated against specific findings. All findings must be made in the affirmative to approve the project. Failure to make any one finding requires project redesign or denial. The findings to approve an AR application are provided in **Attachment B**.
- Parking Adjustment: The process for evaluating this request is set forth in PAMC 18.52.050, which allows for up to a 20% reduction where effective alternatives to automobile access are provided. Ultimately, the City Council will consider this request to determine if the reduction should be granted.

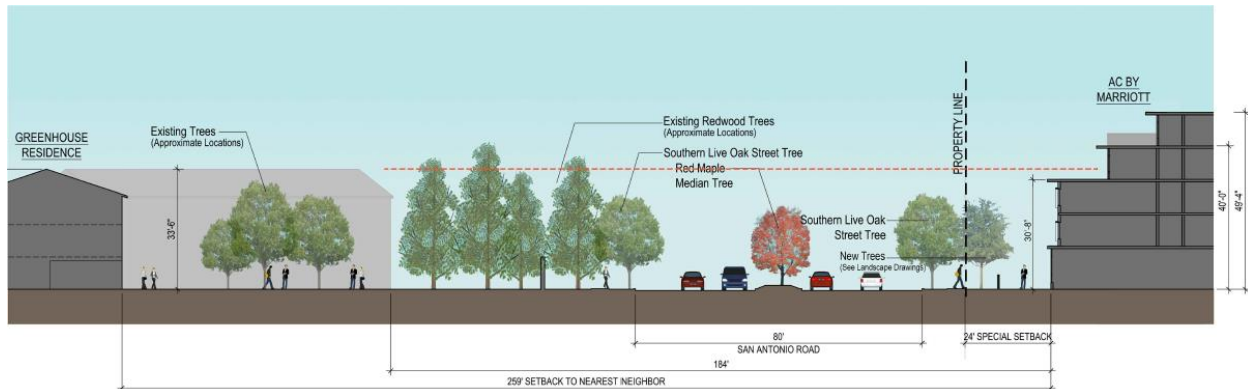
Responses to Previous ARB Comments

Preliminary Meeting

During the preliminary meeting on June 4, 2015, the Board members acknowledged that the project was the first one in the area to have more Floor Area Ratio (FAR) because the PAMC allows a higher FAR for hotels. However, concerns remained regarding the massing of the project compared to the surrounding neighborhood context. In addition, the Board had some concern about the buildings being too similar in design.

Formal Meeting #1

The project presented a revised project that stepped the upper floors back from San Antonio Road, which resulted in the reduction of six rooms. The applicant represented that the first three floors would be at the same height as the multi-family residential development across San Antonio Road. The fourth floor is setback approximately 12 feet and then the fifth floor is set back an additional 12 feet. The project also pushed the mechanical equipment to the center of the building, thus moving the taller elements away from the street.



Concerns from the Board on this iteration of the project included that the project was trying to be too tall; the hotel entrances should consider a centralized space; the landscaping on the borders is light; and the project will need to meet context-based findings.

The project proposed and described in this report has not changed substantially to address these Board comments.

Analysis¹

Neighborhood Setting and Character

Project Site

The 1.91-acre project site currently is developed with several one-story commercial and light industrial buildings. The structure at 744 San Antonio Road is approximately 20,775 square feet in size and is currently used as a professional office. The structure was originally constructed in 1961 as a mortuary and funeral chapel, with significant additions occurring at the rear of the structure in 1983. The structure is eligible for listing on the California Register of Historical Resources (California Register), due to its age and embodiment of some characteristics of mid-century modern architecture.

¹ The information provided in this section is based on analysis prepared by the report author prior to the public hearing. The Architectural Review Board in its review of the administrative record and based on public testimony may reach a different conclusion from that presented in this report and may choose to make alternative findings. A change to the findings may result in a final action that is different from the staff recommended action in this report.

Two warehouse-type buildings are located at 748 and 750 San Antonio Road. The structures total approximately 10,800 square feet and were built in 1952. The structures are not eligible for listing in a historic register. The structures are currently occupied by commercial and light-industrial uses, including automotive repair and general business service uses. These existing buildings, associated landscaping, and other improvements would be demolished prior to construction of the proposed hotel project.

Adjacent Areas

The project site is immediately surrounded by one-story structures that include service and light-industrial uses to the north. To the east, in the City of Mountain View, there are one-story office and light-industrial structures. A single-story specialty grocery store is located to the south. Taller structures are located to the west, across San Antonio Road, where there are three-story multifamily residential structures.

The project vicinity is characterized by primarily low-intensity, single-story buildings and associated surface parking lots. These structures have primarily stucco facades with varying setbacks from San Antonio Road. These low-rise structures and parking lots dominate the view corridor. The most similar development in mass and height as the proposed project is at the intersection of San Antonio Road and East Charleston Road (Taube Koret Campus), about a quarter of a mile away.

Residential uses in the vicinity are located approximately 150 feet west of the project site (across San Antonio Road). The three-story multi-family residential complex is separated from the site by four traffic lanes and a landscaped median planted with trees, perennial plants and groundcover. The buildings within the complex are setback from the road by approximately 75 feet. Mature landscaping and trees, a six-foot wall, and a private internal roadway separate the units from San Antonio Road. The exteriors of the residential structures are composed of tan stucco with dark brown trim elements.

Zoning Compliance²

A detailed review of the proposed project's consistency with applicable zoning standards has been performed. A summary table is provided in **Attachment C**. The proposed project complies with all applicable development codes, or is seeking through the requested permits permission to deviate from certain code standards, in a manner that is consistent with the Zoning Ordinance (parking reduction—described later).

The project site is located within the Commercial Service (CS) zoning district, which is intended to accommodate service uses that may be inappropriate in neighborhood or pedestrian oriented shopping areas. This commercial zoning district is intended to allow retail, personal services, eating and drinking establishments, hotels and other business uses in a manner that balances the needs of those uses with the need to minimize impacts to surrounding neighborhoods. Hotels are a permitted use in this district.

² The Palo Alto Zoning Code is available online: http://www.amlegal.com/codes/client/palo-alto_ca

In addition to the development standards for height, setbacks, parking, and FAR, the project is also subject to the requirements of PAMC Section 18.23 Performance Criteria for Multiple Family, Commercial, Manufacturing and Planned Community Districts. The goal of these criteria is to balance the needs of proposed projects with the need to minimize impacts to surrounding neighborhoods and businesses. Further, the project is subject to PAMC Section 18.16.090 Context-Based Design Criteria, the goal of which is to achieve compatibility of scale and massing for proposed projects; including linkages with the overall pattern of existing buildings to maintain street unity. The minimum parking and bicycle parking requirements for the site are contained within PAMC Section 18.52 Parking and Loading Requirements and 18.54 Facility Design Standards.

Context-Based Criteria

According to Section 18.16.090 of the PAMC, compatibility is achieved when apparent scale and mass of new buildings is consistent with the pattern of achieving a pedestrian oriented design, and when new construction shares general characteristics and establishes design linkages with the overall pattern of buildings, so that the visual unity of the street is maintained. The site is located on a block that includes primarily low-intensity single-story buildings, which are surrounded by surface parking lots; except for the residential multi-family neighborhood with three-story buildings across San Antonio Road to the west. Any hotel project in this neighborhood seeking to maximize the zoning code encouraged incentive of a 2.0 FAR is likely to have some challenges meeting all the expectations of the context-based design criteria where adjacent properties can only achieve a maximum 0.4 FAR. The city's interest to have development meet the context-based design criteria needs to be balanced with other stated interests encouraging hotel development. With regard to the specific project, however, staff concludes this balance has not been achieved and encourages the Board to further review the upper level setbacks along the front and side elevations as well as the use of landscaping. If approved, a hotel development at this location will be seen at great distances along San Antonio Boulevard and the use of meaningful building articulation and modulating the building mass combined with substantial landscaping can will help bridge the transition between adjacent and nearby lower profile buildings. Neighborhood context has been a consistent and ongoing concern regarding this project and the limited design changes from the last ARB meeting fall well short of addressing this concerns.

Finally, while not actionable at this time, it is worth noting that the City Council recently directed staff to explore a program in the Comprehensive Plan update to further increase FAR for hotel development.



South-side Elevation



North-side Elevation

Performance Criteria (PAMC 18.23)

The project is located within 150 feet of a Planned Community (PC) district (developed with multi-family condominiums) and is, therefore, subject to PAMC Section 18.23 Performance Criteria for Multiple Family, Commercial, Manufacturing and Planned Community Districts. The purpose of the performance criteria is to provide standards to be used in the design and evaluation of development to balance the need of proposed projects with the need to minimize impacts to surrounding neighborhoods and businesses. The criteria in Section 18.23 include standards for refuse disposal areas, lighting, landscaping, and site access.

Consistent with the requirements of Section 18.23, the project proposes to provide covered refuse disposal areas away from residential uses, limit light-spillover to adjacent uses, plant landscaping to screen on-site uses (albeit not as much on the sides or rear property lines as the front), and provide surface parking away from the street and adjacent uses. More information is provided in **Attachment D**.

Consistency with the Comprehensive Plan, Area Plans and Guidelines³

There are a number of Comprehensive Plan policies that relate to the proposed development. **Attachment E** includes a list of policies that are relevant to this project.

Housing Element

The Housing Element of the City's Comprehensive Plan has identified the project site as a housing inventory site. The property addressed 744 San Antonio Road has a realistic capacity of 25 units and 748-750 San Antonio Road has with a realistic capacity of 13 units for a total of 38 potential housing units. In preparation of the last housing element, the City anticipated some housing sites may be redeveloped for non-housing purposes. Additional housing sites, beyond the city's regional housing obligation have been identified so the loss of a housing opportunity at this property can be accommodated. Moreover, the City Council has signaled its interest in removing the potential housing sites on San Antonio from the Housing Element and focusing additional housing near more transit rich neighborhoods.

³ The Palo Alto Comprehensive Plan is available online:
<http://www.cityofpaloalto.org/gov/topics/projects/landuse/compplan.asp>

Multi-Modal Access & Parking

Vehicular Access

Vehicle and bicycle access to the site would occur from northbound San Antonio Road. A single driveway access would allow travel through the shared center courtyard within the project site to the proposed surface parking lot and below-grade parking garage. Previously, the ARB has mentioned that this component of the project should be evaluated and centralized elsewhere on site. The plans have not changed in response to this comment.

The driveway configuration would allow only right turns into and out of the property and would loop through the center courtyard to facilitate the pick-up and drop-off guests. This central driveway would also allow access to loading areas within the center of the site and additional parking at the rear of the site. The proposed below-grade parking garage would be accessed via the single driveway leading to a ramp at the center of the project site.

Pedestrian Access

The existing five-foot-wide sidewalk within the public right-of-way along San Antonio Road would be maintained and walkways from the sidewalk into the site would be provided to facilitate a pedestrian connection to the main building entrances. Walkways are also provided within the interior courtyard between the buildings to access parking and hotel facilities.

Bicycle Access

San Antonio Road includes Class III (shared bicycle/vehicular) bikeways, which is marked on the pavement as such. Bicyclists would enter the property at the same driveway as vehicles.

Parking

The project would provide a total of 294 vehicle parking spaces for the proposed hotel uses. There will be 278 spaces (236 self-park spaces and 58 valet spaces) would be provided within a two-level below-grade parking garage. An additional 16 surface parking spaces would be provided within the project's interior courtyard area and at the rear of the site.

The project would provide 30 short-term bicycle parking spaces within two bicycle racks that are proposed to be located within 30 feet of the main entrance of the building. Additionally, the project would provide secure bike storage, showers and clothes lockers for employees. Consistent with the zoning code, the project provides two loading spaces at the rear of the property.

The valet spaces are located within drive aisles, which is inconsistent with the PAMC parking standards and would not count as standard parking spaces meeting the required parking for the project. The applicant requests an adjustment to the required parking, which allows up to a 20% reduction, which is equivalent to 58 spaces or the amount of spaces located within the drive aisles. The applicant provided a summary of how the valet parking program would work and in addition provided information contained within a parking study that identified that the

peak parking ratio for the hotel based on similar hotels in the area would be an average of 0.70 (Attachment G).

Transportation Demand Management Program

The project will implement a Transportation Demand Management (TDM) Program to reduce vehicle trips generated by the employees and guests. The TDM measures proposed by the project applicant are listed in Attachment H. These measures are divided into four categories: hotel TDM infrastructure, guest TDM programs, employee TDM programs, and guest & employee (dual) programs. The implementation of this program will reduce vehicle miles traveled and reduce parking demand as well. Staff continues to evaluate the TDM and may suggest further refinements to this plan.

Traffic Report

A traffic report was prepared by Hexagon and peer reviewed by TJKM. The report concludes that the project would generate 88 net new AM peak hour trips and 87 net new PM peak hour trips. These amounts discount the existing uses trip generation, which is common practice to give credit to on-going uses when calculating the net change in trips. This does not account for any trip reduction measures such as implementing a TDM program. The plan includes hotel operated shuttles and subsidized transit passes for employees, among many other measures. The estimated trip reductions are 20% for employee trips and 30% for guest trips.

Intersection Level of Service

Traffic analysis typically focuses on intersections, especially signalized intersections, because intersections act as the chokepoints in the system. Traffic conditions at the intersections along San Antonio Road were evaluated using a concept called “level of service” (LOS). Level of Service is a qualitative description of operating conditions ranging from LOS A, or free-flow conditions with little or no delay, to LOS F, or jammed conditions with excessive delays. Palo Alto city policy seeks to maintain intersection operations at LOS D or better, which is a moderate level of congestion. While most drivers probably would prefer traffic operations better than LOS D, that desire must be balanced with efficient use of resources for the overall transportation system. That is why Palo Alto, and most other cities in Santa Clara County and on the Peninsula, target LOS D as the limit of acceptable congestion.

The project would increase the average delay (the wait time experienced by drivers using the intersections) by 0.5 seconds or less. Based on the traffic study, there was no change in LOS with the project implemented at any of the project intersections.

Vehicle Miles Traveled

Vehicle Miles Traveled (VMT) is one of the alternative metrics considered, this report presents an estimate of average daily VMT for the proposed hotel. The estimated daily VMT would be 27.8 miles per capita (per employee or per hotel guest) without any TDM measures, which would be reduced to 19.8 miles per capita with the hotel’s proposed TDM program. This represents a notable reduction compared to vehicle miles traveled that are estimated to be

generated by the existing buildings, which have an estimated daily VMT of 34.4 miles per capita.

Suggested Routes to School

The project is not located adjacent to a designated Safe Route to School, however, the intersection of Middlefield Road and San Antonio Road is within a designated walking route for Hoover Elementary.

Environmental Review

The subject project has been 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. Specifically, the project requires the certification of an Environmental Impact Report (EIR). The EIR was prepared by David J. Powers Associates under contract with the City.

Scoping Meeting

A scoping meeting on the EIR was conducted on March 3, 2016 during a duly noticed Architectural Review Board meeting. The purpose of the scoping meeting was to describe the EIR process and obtain comments on the contents of the EIR.

The public commented on traffic congestion (use of ride-shares), construction impacts on noise, and dirt and damage to San Antonio Road. Concerns were also raised about the impacts of the underground garage on ground water. Comments continued with the impacts of diesel fuels and other contaminants on groundwater. The public also commented on shading and parking.

Public Circulation

The EIR will be circulated between March 27, 2017 and May 10, 2017. The City Council will consider certifying the EIR at a later public hearing. The contents and detail of the EIR can be found in **Attachment F**.

Potential Impacts

Environmental impacts are considered physical impacts on the environment and are separated into either construction (temporary) or operational (longer-term and ongoing) impacts based upon established thresholds of significance. If an impact is identified, then mitigation measures are required to reduce that impact to a level of less than significant.

The following were identified as potential significant impacts by topic:

Air Quality

Impact AQ-1: The proposed project could result in an excess cancer risk for a child exposure during construction. (Less than Significant Impact with Mitigation Incorporated).

Biological Resources

Impact BIO-1: Construction activities associated with the proposed project could result in impacts to nesting birds through the loss of fertile eggs or nest abandonment. (Less than Significant Impact with Mitigation Incorporated)

Cultural Resources

Impact CUL-1: Demolition of the mid-century modern structure at 744 San Antonio Road represents a substantial adverse effect to a historical resource eligible for the California Register. (Significant Impact) No mitigation is proposed, since none would alleviate the impact.

Impact CUL-2: Unknown subsurface archaeological or paleontological resources could be present on the site in underlying native soils, and could be disturbed during project construction. (Less than Significant Impact with Mitigation Incorporated)

Hazards and Hazardous Materials

Impact HAZ-1: Localized hazardous materials contamination is present in on-site soils. Construction activities could result in hazards to people or the environment. (Less than Significant Impact with Mitigation Incorporated)

Impact HAZ-2: MtBE and petroleum hydrocarbon contaminated groundwater could be encountered during excavation for and construction of the below-grade parking garage. Exposure to this contaminated water or soil vapors could result in hazards to construction workers, the general public or the environment during construction or hotel operation. (Less than Significant Impact with Mitigation Incorporated)

Noise

Impact NOI-1: Noise generated by general construction activity could impact residents to the west of the project site in the short-term. (Less than Significant Impact with Mitigation Incorporated)

Historic Listing Eligible Structure

The structure at 744 San Antonio Road is approximately 20,775 square feet in size and is currently used as a professional office. The structure was originally constructed in 1961 as a mortuary and funeral chapel, with significant rear additions totaling approximately 16,015 square feet occurring at the rear of the structure in 1983. The structure is eligible for listing on the California Register of Historic Places, due to its age and embodiment of some characteristics of mid-century modern architecture.

The structure at 744 San Antonio Road is representative of the mid-century modern style, popularized between 1945 and 1965, and made prominent within south Palo Alto by noted architect Joseph Eichler who popularized the style for residential architecture. The mid-century modern style emphasizes the concept of indoor-outdoor living through the reduction of divisions between interior and exterior space. The use of design elements, such as overhanging trellises, pergolas, atriums, and integrated planters emphasized this indoor/outdoor

connection. The opening of interior spaces, interaction with the natural environment, and straightforward use of materials were important principles that came to characterize the style.

The building at 744 San Antonio Road exhibits an asymmetrical design with right angles and cubic forms. The building façade features a roughhewn stone wall that encloses a courtyard, a trellis system, and a series of exposed rafters. The main body of the building features stucco cladding painted a neutral earth tone. The most prominent feature of the building is the exaggerated, overtly tall hipped roof with wide overhanging eaves. This exaggerated roof form is common to ecclesiastical buildings of this era. Windows along the façade and within the courtyard are wall length and separated by projecting wood mullions.

The 1961 structure at 744 San Antonio Road is considered eligible for listing on the California Register under Criterion 3, embodying the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values. The eligibility determination was made based on the building's distinctive mid-century modern style. Despite an addition to the rear of the building and minor alterations to fenestration, the structure retains its distinctive features and overall integrity. While the building appears eligible for listing on the California Register under Criterion 3, its diminished integrity precludes it from being listed on the National Register of Historic Preservation (NRHP).

This 1983 addition at 744 San Antonio Road is not attached to the original structure and is not a part of the structure potentially eligible for the California Register.

The demolition of the eligible building results in an unavoidable significant impact that would require the City Council to make a statement of overriding considerations, since there is no mitigation for a demolished building.

Public Notification, Outreach & Comments

The Palo Alto Municipal Code requires notice of this public hearing be published in a local paper and mailed to owners and occupants of property within 600 feet of the subject property at least ten days in advance. Notice of a public hearing for this project was published in the *Palo Alto Weekly* on March 24, 2017, which is 12 days in advance of the meeting. Postcard mailing occurred on March 27, 2017, which is 10 days in advance of the meeting.

Public Comments

Comments regarding the project have been received in the past. Generally, there has been a negative response to the project from the neighbors (residential and commercial). In particular, there is concern regarding the size of the project (massing and bulk); the amount of traffic generated by the project; concerns about the construction of the basement; and the operation of the hotels using water resources. Some of these comments are addressed through the EIR, others are discussed in the analysis of this report.

Alternative Actions

In addition to the recommended action, the Architectural Review Board may:

1. Direct staff to prepare approval findings and conditions of approval;
2. Direct staff to prepare denial findings; or
3. Continue the project to a date certain.

Report Author & Contact Information

Sheldon S. Ah Sing, AICP, Contract Planner
(408) 340-5642
sahsing@m-group.us

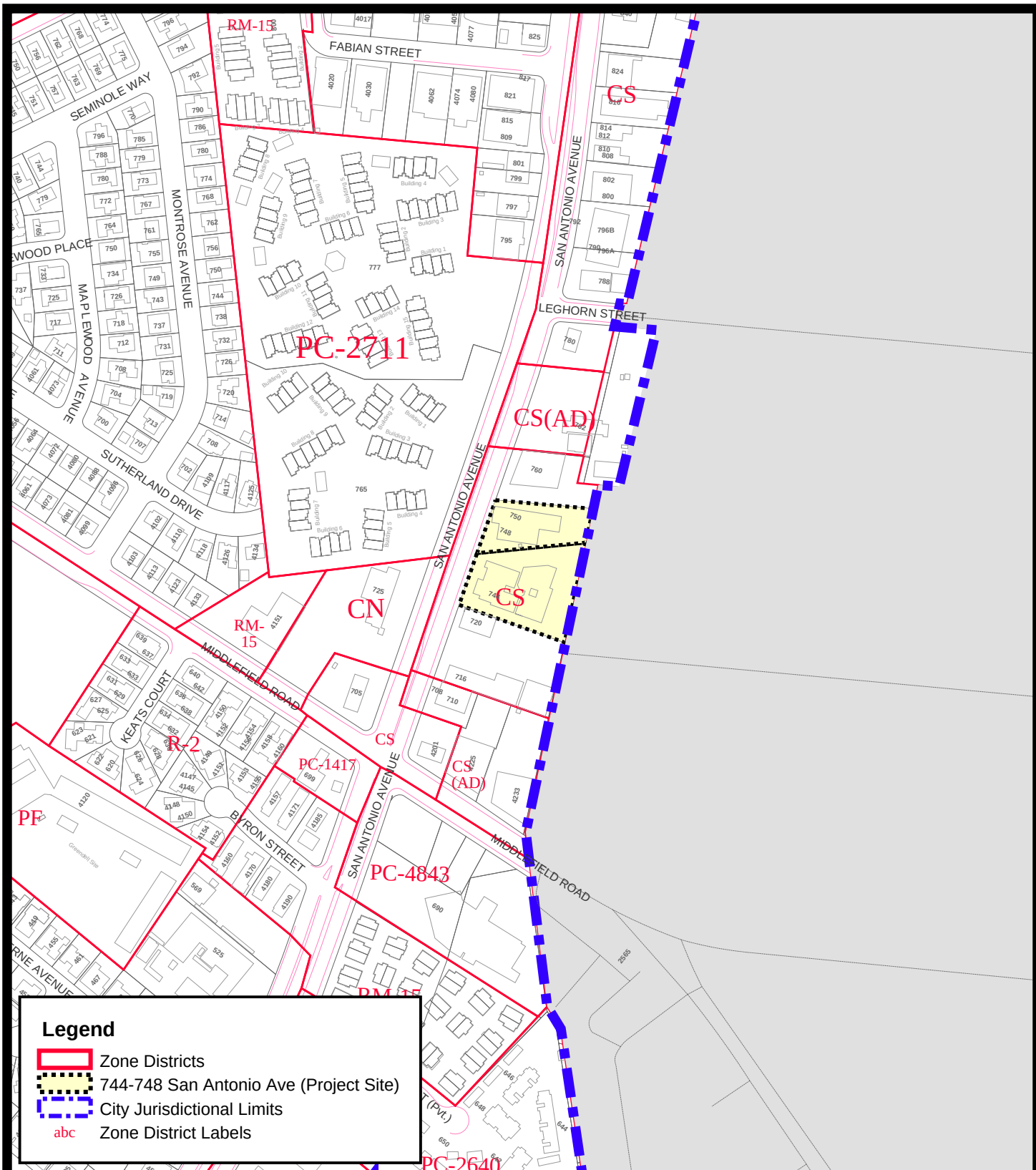
ARB⁴ Liaison & Contact Information

Jodie Gerhardt, AICP, Planning Manager
(650) 329-2575
jodie.gerhardt@cityofpaloalto.org

Attachments:

- Attachment A: Location Map (PDF)
- Attachment B: ARB Findings (DOCX)
- Attachment C: CS Zoning Comparison (DOCX)
- Attachment D: Performance Standards (DOCX)
- Attachment I: Project Plans (DOCX)
- Attachment F: CEQA Document (DOCX)
- Attachment G: Parking Study-Valet Operations (PDF)
- Attachment H: Transportation Demand Management Program (DOCX)
- Attachment E: Comprehensive Plan Comparison (DOCX)

⁴ Emails may be sent directly to the ARB using the following address: arb@cityofpaloalto.org



The City of
Palo Alto



744-748 San Antonio Avenue with Zoning Districts Area Map

This map is a product of the
City of Palo Alto GIS



ATTACHMENT B
ARB FINDINGS FOR APPROVAL

744-748 San Antonio
15PLN-00314

A. Architectural Review Findings

The design and architecture of the proposed improvements, as conditioned, complies with the Findings for Architectural Review as required in Chapter 18.76 of the PAMC.

Finding #1: The design is consistent with applicable provisions of the Palo Alto Comprehensive Plan, Zoning Code, coordinated area plans (including compatibility requirements), and any relevant design guides.

Finding #2: The project has a unified and coherent design, that:

- a. creates an internal sense of order and desirable environment for occupants, visitors, and the general community,
- b. preserves, respects and integrates existing natural features that contribute positively to the site and the historic character including historic resources of the area when relevant,
- c. is consistent with the context-based design criteria of the applicable zone district,
- d. provides harmonious transitions in scale, mass and character to adjacent land uses and land use designations,
- e. enhances living conditions on the site (if it includes residential uses) and in adjacent residential areas.

Context-Based Findings:

- (1) **Pedestrian and Bicycle Environment.** *The design of new projects shall promote pedestrian walkability, a bicycle friendly environment, and connectivity through design elements.*
- (2) **Street Building Facades.** *Street facades shall be designed to provide a strong relationship with the sidewalk and the street(s), to create an environment that supports and encourages pedestrian activity through design elements.*
- (3) **Massing and Setbacks.** *Buildings shall be designed to minimize massing and conform to proper setbacks.*

- (4) **Low-Density Residential Transitions.** *Where new projects are built abutting existing lower scale residential development, care shall be taken to respect the scale and privacy of neighboring properties.*
- (5) **Project Open Space.** *Private and public open space shall be provided so that it is usable for residents, visitors, and/or employees of the site.*
- (6) **Parking Design.** *Parking needs shall be accommodated but shall not be allowed to overwhelm the character of the project or detract from the pedestrian environment.*
- (7) **Large (Multi-Acre) Sites.** *Large sites (over one acre) shall be designed so that street, block, and building patterns are consistent with those of the surrounding neighborhood.*

Sustainability and Green Building Design. *Project design and materials to achieve sustainability and green building design should be incorporated into the project.*

Finding #3: The design is of high aesthetic quality, using high quality, integrated materials and appropriate construction techniques, and incorporating textures, colors, and other details that are compatible with and enhance the surrounding area.

Finding #4: The design is functional, allowing for ease and safety of pedestrian and bicycle traffic and providing for elements that support the building's necessary operations (e.g. convenient vehicle access to property and utilities, appropriate arrangement and amount of open space and integrated signage, if applicable, etc.).

Finding #5: The landscape design complements and enhances the building design and its surroundings, is appropriate to the site's functions, and utilizes to the extent practical, regional indigenous drought resistant plant material capable of providing desirable habitat that can be appropriately maintained.

Finding #6: The project incorporates design principles that achieve sustainability in areas related to energy efficiency, water conservation, building materials, landscaping, and site planning.

ATTACHMENT C
ZONING COMPARISON TABLE
744-748 San Antonio Road, 15PLN-00314

Table 1: COMPARISON WITH CHAPTER 18.16 (CS DISTRICT) Non-residential Development Standards			
Regulation	Required	Existing	Proposed
Minimum Site Area, width and depth	None	1.91 acres (83,440.93 sf)	1.91 acres (83,440.93 sf)
Minimum Front Yard	10-12 feet to create an effective sidewalk ^{(1), (2), (8)}	744 San Antonio: 24 ft. 748 San Antonio: 4 ft.	Not Applicable
Rear Yard	None	744 San Antonio: 70 ft. 748 San Antonio: 84 ft.	10 feet
Interior Side Yard (if abutting residential zone district)	None	20 feet	10 feet
Street Side Yard	None	Not Applicable	Not Applicable
Build-to-lines	50% of frontage built to setback on El Camino Real 33% of side street built to setback ⁽⁷⁾	141 feet (50%) No Street side yard	186 feet (77%)
Special Setback	24 feet – see Chapter 20.08 & zoning maps	744 San Antonio: 24 ft. 748 San Antonio: 4 ft.	24 feet
Max. Site Coverage	None	36% (30,200 sf)	39.63% (33,075 sf)
Max. Building Height	50 ft or 35 ft within 150 ft. of a residential district (other than an RM-40 or PC zone) abutting or located within 50 feet of the site	35 feet	49'-4"
Max. Floor Area Ratio (FAR)	Hotel: 2.0:1(166,882 sf)	37.84% (31,575 sf)	166,020 (1.99:1)

(1) No parking or loading space, whether required or optional, shall be located in the first 10 feet adjoining the street property line of any required yard.

(2) Any minimum front, street side, or interior yard shall be planted and maintained as a landscaped screen excluding areas required for access to the site. A solid wall or fence between 5 and 8 feet in height shall be constructed along any common interior lot line..

(7) 25 foot driveway access permitted regardless of frontage, build-to requirement does not apply to CC district.

(8) A 12 foot sidewalk width is required along El Camino Real frontage

18.16.080 Performance Standards. All development in the CS district shall comply with the performance criteria outlined in [Chapter 18.23](#) of the Zoning Ordinance, including all mixed use development

18.16.090 Context-Based Design Criteria. As further described in a separate attachment, development in a commercial district shall be responsible to its context and compatible with adjacent development, and shall promote the establishment of pedestrian oriented design.

Table 2: CONFORMANCE WITH CHAPTER 18.52 (Off-Street Parking and Loading) for Hotels*			
Type	Required	Existing	Proposed
Vehicle Parking	1 space per guestroom	75 spaces	294 spaces, includes 58 valet spaces
Bicycle Parking	1 space per 10 guestrooms (100% LT)		30 spaces
Loading Space	2 loading spaces for 30,000 - 69,999 sf		2 spaces

* On-site employee amenity space is exempted from the parking requirements

Performance Criteria 18.23
744 San Antonio Road
15PLN-00314

These performance criteria are intended to provide additional standards to be used in the design and evaluation of developments in the multi-family, commercial, and industrial zones. The purpose is to balance the needs of the uses within these zones with the need to minimize impacts to surrounding neighborhoods and businesses. The criteria are intended to make new developments and major architectural review projects compatible with nearby residential and business areas, and to enhance the desirability of the proposed developments for the site residents and users, and for abutting neighbors and businesses.

18.23.020 Trash Disposal and Recycling

Assure that development provides adequate and accessible interior areas or exterior enclosures for the storage of trash and recyclable materials in appropriate containers, and that trash disposal and recycling areas are located as far from abutting residences as is reasonably possible.

Project Consistency

The trash enclosures are in the rear of the property, opposite from the residential areas across San Antonio Road. Noise associated with the servicing of the solid waste facilities would be shielded by the new buildings.

18.23.030 Lighting

To minimize the visual impacts of lighting on abutting or nearby residential sites and from adjacent roadways.

The proposed exterior lighting is sufficient to provide safe circulation and is directed downward to reduce glare and impacts to the neighboring residents.

Outside lighting on the proposed building would be limited, focused at the ground floor level, and comparable in brightness to the ambient lighting in the surrounding area. Landscape or architectural accent lighting that is aimed upward, would contain glare control, louvers or be shielded from direct vertical uplight, consistent with this PAMC Section.

18.23.040 Late Night Uses and Activities

The purpose is to restrict retail or service commercial businesses abutting (either directly or across the street) or associated with guest services and not open within 50 feet of residentially zoned properties or properties to the public. The hotel includes ancillary uses that are with existing residential uses located within nonresidential zones, with operations or activities between the hours of 10:00 p.m. and 6:00 a.m. Operations subject to this code may include, but are not limited to, deliveries, parking lot and sidewalk cleaning, and/or clean up or set up operations, but does not include garbage pick up. Any loading would occur in the rear of the property opposite the residents across from San Antonio Road.

18.23.050 Visual, Screening and Landscaping

Privacy of abutting residential properties or properties with existing residential uses located within

nonresidential zones (residential properties) should be protected by screening from public view all mechanical equipment and service areas. Landscaping should be used to integrate a project design into the surrounding neighborhood, and to provide privacy screening between properties where appropriate.

The project provides the required setback and includes vegetation and tree plantings within the setback and open spaces. Mechanical equipment areas are screened appropriately.

18.23.060 Noise and Vibration	Project Consistency
The requirements and guidelines regarding noise and vibration impacts are intended to protect residentially zoned properties or properties with existing residential uses located within nonresidential zones (residential properties) from excessive and unnecessary noises and/or vibrations from any sources in abutting industrial or commercially zoned properties. Design of new projects should reduce noise from parking, loading, and refuse storage areas and from heating, ventilation, air conditioning apparatus, and other machinery on nearby residential properties. New equipment, whether mounted on the exterior of the building or located interior to a building, which requires only a building permit, shall also be subject to these requirements.	The project will comply with the City's noise ordinance. The trash enclosures are in the rear of the property.
18.23.070 Parking	
The visual impact of parking shall be minimized on adjacent residentially zoned properties or properties with existing residential uses located within nonresidential zones.	The project provides most of its parking below grade. The parking that is located at-grade is shielded by the new buildings and not visible from San Antonio Road.
18.23.080 Vehicular, Pedestrian and Bicycle Site Access	
The guidelines regarding site access impacts are intended to minimize conflicts between residential vehicular, pedestrian, and bicycle uses and more intensive traffic associated with commercial and industrial districts, and to facilitate pedestrian and bicycle connections through and adjacent to the project site.	The site circulation facilitates access for all modes of transportation. The project includes short-term and long-term bike parking. On-site vehicular parking is valet and most of the parking is below ground. Pedestrian areas include colored and textured pavement that would enhance safety.
18.23.090 Air Quality	
The requirements for air quality are intended to buffer residential uses from potential sources of odor and/or toxic air contaminants.	No proposed uses on the project site would produce odor or toxic air.
18.23.100 Hazardous Materials	
In accordance with Titles 15 and 17 of the Palo Alto Municipal Code, minimize the potential hazards of any use on a development site that will entail the storage, use or handling of hazardous materials (including hazardous wastes) on-site in excess of the exempt quantities prescribed in Health and Safety Code Division 20, Chapter 6.95, and Title 15 of this code.	This is not applicable to the proposed uses associated with the project.

Attachment I

Project Plans

Hardcopies of project plans are provided to ARB Members. These plans are available to the public by visiting the Planning and Community Environmental Department on the 5th floor of City Hall at 250 Hamilton Avenue.

Directions to review Project plans online:

1. Go to: <https://palalto.buildingeye.com/planning>
2. Search for "744 San Antonio Road" and open record by clicking on the green dot
3. Review the record details and open the "more details" option
4. Use the "Records Info" drop down menu and select "Attachments"
5. Open the attachment named **"CYM & AC Palo Alto – ARB Major Resubmittal 170105"**

Attachment F

CEQA

A printed copy of the Draft Environmental Impact Report is available to the public by visiting the Planning and Community Environmental Department on the 5th floor of City Hall at 250 Hamilton Avenue.

These documents may also be reviewed on online:

1. Go to: <http://www.cityofpaloalto.org/planningprojects>
2. Go to the "Commercial and Mix Use projects" webpage
3. Search for "744 San Antonio"
4. Review the record details and click on the address for more details

A direct link to the project page is also provided here:

<http://www.cityofpaloalto.org/news/displaynews.asp?NewsID=3133>

A hard copy of the document was provided to the ARB



HEXAGON TRANSPORTATION CONSULTANTS, INC.

November 11, 2016

Mr. Mont Williamson
T/2 Hospitality
620 Newport Center Drive, 14th Floor
Newport Beach CA 92660

Re: Parking Study for Hotels

Dear Mr. Williamson:

This letter describes research that Hexagon has conducted regarding the number of parking spaces required for hotels in Santa Clara County. Hexagon conducted counts of the parking demand at one hotel in 2014 and two hotels in 2015 (see Table 1). The 2014 count was conducted at the Aloft Hotel located at 10165 North De Anza Boulevard in Cupertino. The Aloft Hotel in Cupertino includes meeting space, a snack bar, a lounge and bar, and free underground parking. The two hotels counted in 2015 include the Hilton Garden Inn (located at 840 East El Camino Real, Mountain View) and the Courtyard by Marriott (located at 660 West El Camino Real, Sunnyvale). Each hotel is located on a major arterial and has a mix of meeting/conference space, a restaurant and bar/lounge area, and free parking. The restaurant and bar/lounge space is owned and operated by the hotel and primarily serves customers who are hotel guests.

Survey Results

Table 2 shows that the overall peak parking demand was observed at midnight, after the hotel restaurant had closed. The peak parking ratios for the hotels on weekdays were observed to range from 0.61 to 0.74 with an average of 0.68 occupied parking spaces per occupied room. The peak parking ratios observed on Saturdays ranged from 0.56 to 0.80 with an average of 0.70 occupied spaces per occupied room.



Table 1
Hotel Size and Features

	Hilton Garden Inn Mt. View	Courtyard Marriott Sunnyvale	Aloft Hotel Cupertino
Rooms	160	145	123
Employees (maximum per shift)	38	19	n/a
Restaurant Size	3,842 s.f.	9,715 s.f.	n/a ^a
Meeting/Conference Space	2,112 s.f.	550 s.f.	1,100 s.f.
Parking Spaces Provided	162	127	n/a
Parking Spaces/Room	1.01	0.88	n/a
TDM Measures	None	Bike parking, showers, lockers, changing rooms, transit subsidies for employees, guaranteed ride home program	Guest shuttle service ^b
^a The Aloft Hotel in Cupertino does not include a full-service restaurant. On-site dining options available at the hotel include a snack bar and bar/lounge space. ^b Unknown if this site has implemented additional TDM measures.			

Table 2
Observed Hotel Parking Usage

Survey Date	Hilton Garden Inn Mt. View		Courtyard Marriott Sunnyvale		Aloft Hotel Cupertino ^a	
	Thurs. 4/30/15	Sat. 5/2/15	Thurs. 4/30/15	Sat. 5/2/15	Wed. 6/11/14	Sat. 6/14/14
	Total	Total	Total	Total	Total	Total
6:00 PM	69	64	26	55	31	36
6:30 PM	66	69	22	53	30	34
7:00 PM	62	65	20	50	35	33
7:30 PM	60	67	23	57	31	39
8:00 PM	75	72	21	58	33	40
8:30 PM	76	74	24	57	32	42
9:00 PM	87	77	26	61	42	43
9:30 PM	102	82	34	72	56	47
10:00 PM	109	91	44	78	68	49
10:30 PM	112	117	48	80	71	57
11:00 PM	113	117	52	92	73	61
11:30 PM	114	122	53	100	74	64
12:00 AM	115	125	55	107	76	67
Total Rooms	160	160	145	145	123	123
Occupied Rooms	155	156	82	144	123	121
Restaurant Size	3,842 s.f.		9,715 s.f.		n/a ^b	
Total Parking Spaces	162	162	127	127		
Peak Parking Demand (spaces)	115	125	55	107	76	67
Parking Ratio (occupied parking spaces/occupied rooms for hotel at 12:00 AM midnight; restaurant is closed)						
Hotel Only	0.74	0.80	0.67	0.74	0.61	0.56

^a The survey at this site ended at 10 PM. Parking occupancy after this hour was projected based on the time-of-day variation in parking demand observed at the other hotels.

^b The site does not include a full-service restaurant. On-site dining options available at the hotel include a snack bar and bar/lounge space.



Mr. Mont Williamson
November 11, 2016
Page 4 of 4

Thank you for the opportunity to provide the results of these parking counts. If you have any questions, please do not hesitate to call.

Sincerely,
HEXAGON TRANSPORTATION CONSULTANTS, INC.

A handwritten signature in black ink, appearing to read "Gary K. Black", followed by a long horizontal flourish.

Gary K. Black
President

17 January 2017

Mr. Sheldon Ah Sing
City of Palo Alto Planning Division
250 Hamilton Ave.
Palo Alto, CA 94301

Re: 744-750 San Antonio Road Application 15PLN-00314
Valet Parking Program

Mr. Ah Sing:

Regarding your request for clarification of the Valet Parking Program:

The Hotel Operator will implement and maintain an on-site valet program which will render the property 100% valet parked. The program will consist of 24-hour coverage by hotel staff and will be consistent across both hotels. This parking approach is included as one of the amenities for the property, intended to increase the overall guest experience and serve as an indication of service level.

In practice, the guest would be greeted by the valet team right after departure from San Antonio, and entry to our site. The circular drive with entrances to the hotels will serve as the transition and staging area. Guests may call for their car from their room prior to departure so the valet team can have it delivered to the lobby entry for efficient departure.

The total number of spaces provided is defined on the Drawing A-2.0. This quantity and arrangement is substantiated in the "Parking Study for Palo Alto Hotels" document provided by Hexagon Transportation Consultants, Inc, dated November 11, 2016. Based on our experience and the documentation we have submitted, we are confident the parking program we have defined, including the efficiency produced by a valet team, will yield a comfortable and manageable parking situation for the project.

Thank you,



Randy B. Popp, Architect

Attachment H

Transportation Demand Management Program

The project will implement a Transportation Demand Management (TDM) Program to reduce vehicle trips generated by the employees and guests. The TDM measures proposed by the project applicant are listed below. These measures are divided into four categories: hotel TDM infrastructure, guest TDM programs, employee TDM programs, and guest & employee (dual) programs.

Hotel TDM Infrastructure:

- Free on-site bicycle program (hotel bikes for employee and guest use)
- On-site/nearby car-share program (Zipcar/WeCar)
- On-site amenities and vending services.
- Ground floor facades, entrances, and pathways that will encourage pedestrian and bicycle movement
- Transportation kiosk and/or mount a real-time transportation information screen in lobby
- Passenger loading zone
- Bicycle parking/storage for employees and guests
- Add transit resources to the hotel's website (e.g., free Palo Alto and Marguerite shuttles, the Bike Station, Caltrain, Santa Clara Valley Transportation Authority [VTA], etc.)

Guest TDM Programs:

- Pre-loaded Clipper Cards available for purchase for guests transit travel
- Train reservation staff to provide transit connection information for VTA and Caltrain and transfers to the San Francisco International Airport via the Millbrae BART Station
- Include hotel confirmation email with information about reaching the hotel without a vehicle
- Place a getting around Palo Alto map/brochure in each guest room
- Free hotel-operated shuttle to the San Jose International Airport
- Hotel-operated shuttle to the North Bayshore area

Employee TDM Programs:

- One-hundred (100) percent subsidized transit passes (Caltrain and VTA)
- Cash incentive/allowance for carpooling, biking and walking to work
- Ridematching assistance
- Free, preferential carpool/vanpool parking
- Commuter bike program (provide commuter bikes for employees).
- Secure bike storage, showers and clothes lockers
- Commuter rewards – fuel cards, movie tickets, gift card
- Emergency ride-home program
- Hotel-funded annual car-share membership
- New employee orientation training by a designated commute coordinator
- Annual employee TDM survey

- Free employee overnight accommodation (subject to room availability) for employees who are scheduled to work a late evening shift (ending at 11:00 p.m. or later) and a morning shift the following day

Guest & Employee (Dual) TDM Programs:

- Free hotel-operated San Antonio Caltrain Station shuttle (the shuttle will also be open to neighborhood free of charge)
- Hotel membership in Palo Alto Transportation Management Association
- Access to on-site exercise facilities
- Annual contribution to the Palo Alto Shuttle Program to extend route of the Crosstown shuttle to the project site

ATTACHMENT E
COMPREHENSIVE PLAN TABLE
744 San Antonio Road / File No. 15PLN-00314

Comp Plan Goals and Policies	How project adheres or does not adhere to Comp Plan
The Comprehensive Plan land use designation for the site is Service Commercial.	The project continues the Service Commercial land uses.
Land Use and Community Design Element	
Goal L-1: A well-designed, compact city, providing residents and visitors with attractive neighborhoods, work places, shopping district, public facilities and open spaces.	
Policy L-4: Maintain Palo Alto’s varied residential neighborhoods while sustaining the vitality of its commercial areas and public facilities. Use the Zoning Ordinance as a tool to enhance Palo Alto’s desirable qualities.	
Policy L-5: Maintain the scale and character of the City. Avoid land uses that are overwhelming and unacceptable due their size and scale.	
Policy L-46: Maintain the East Bayshore and San Antonio Road/Bayshore Corridor areas as diverse business and light industrial districts.	
Policy L-48: Promote high quality, creative design and site planning that is compatible with surrounding development and public spaces.	
Transportation Element	
Goal T-3: Facilities, services and programs that encourage and promote walking and bicycling.	
Policy T-23: Encourage pedestrian-friendly design features such as sidewalks, street trees, on-site parking, public spaces, gardens, outdoor furniture, art, and interesting architectural details.	
Natural Environment Element	

Goal N-4: Water Resources that are Prudently Managed to Sustain Plant and Animal Life, Support Urban Activities, and Protect Public Health and Safety.

Policy N-21: Reduce non-point source pollution in urban runoff from residential, commercial, industrial, municipal, and transportation land uses and activities.

Transportation Demand Management Program

The project will implement a Transportation Demand Management (TDM) Program to reduce vehicle trips generated by the employees and guests. The TDM measures proposed by the project applicant are listed below. These measures are divided into four categories: hotel TDM infrastructure, guest TDM programs, employee TDM programs, and guest & employee (dual) programs.

Hotel TDM Infrastructure:

- Free on-site bicycle program (hotel bikes for employee and guest use)
- On-site/nearby car-share program (Zipcar/WeCar)
- On-site amenities and vending services.
- Ground floor facades, entrances, and pathways that will encourage pedestrian and bicycle movement
- Transportation kiosk and/or mount a real-time transportation information screen in lobby
- Passenger loading zone
- Bicycle parking/storage for employees and guests
- Add transit resources to the hotel's website (e.g., free Palo Alto and Marguerite shuttles, the Bike Station, Caltrain, Santa Clara Valley Transportation Authority [VTA], etc.)

Guest TDM Programs:

- Pre-loaded Clipper Cards available for purchase for guests transit travel
- Train reservation staff to provide transit connection information for VTA and Caltrain and transfers to the San Francisco International Airport via the Millbrae BART Station
- Include hotel confirmation email with information about reaching the hotel without a vehicle
- Place a getting around Palo Alto map/brochure in each guest room
- Free hotel-operated shuttle to the San Jose International Airport
- Hotel-operated shuttle to the North Bayshore area

Employee TDM Programs:

- One-hundred (100) percent subsidized transit passes (Caltrain and VTA)
- Cash incentive/allowance for carpooling, biking and walking to work
- Ridematching assistance
- Free, preferential carpool/vanpool parking
- Commuter bike program (provide commuter bikes for employees).
- Secure bike storage, showers and clothes lockers
- Commuter rewards – fuel cards, movie tickets, gift card
- Emergency ride-home program
- Hotel-funded annual car-share membership
- New employee orientation training by a designated commute coordinator
- Annual employee TDM survey

- Free employee overnight accommodation (subject to room availability) for employees who are scheduled to work a late evening shift (ending at 11:00 p.m. or later) and a morning shift the following day

Guest & Employee (Dual) TDM Programs:

- Free hotel-operated San Antonio Caltrain Station shuttle (the shuttle will also be open to neighborhood free of charge)
- Hotel membership in Palo Alto Transportation Management Association
- Access to on-site exercise facilities
- Annual contribution to the Palo Alto Shuttle Program to extend route of the Crosstown shuttle to the project site

Attachment I

Project Plans

Hardcopies of project plans are provided to ARB Members. These plans are available to the public by visiting the Planning and Community Environmental Department on the 5th floor of City Hall at 250 Hamilton Avenue.

Directions to review Project plans online:

1. Go to: <https://palalto.buildingeye.com/planning>
2. Search for **“744 San Antonio Road”** and open record by clicking on the green dot
3. Review the record details and open the “more details” option
4. Use the “Records Info” drop down menu and select “Attachments”
5. Open the attachment named **“ARB Major Re-submittal 744 San Antonio 171905”**

3.1.2.2 Impacts to Existing Visual Character

The 24-foot setback is too small for a large complex that starts at a three-story height and rapidly rises to a five-story height on that part of San Antonio Road. Across from the proposed site, the Greenhouse residential buildings are only 3-story, setback from San Antonio by at minimum of 75 feet, and shielded by a sound wall from San Antonio. The proposed Marriott buildings at five-stories and close proximity to the road would dominate all the buildings in that section of San Antonio and negatively impact the area.

At minimum the plan should be modified to increase the setbacks for the three-story section to match that of the Greenhouse and to remove or to setback the higher stories even farther.

3.4.2.3 Archaeological or Paleontological Resource Impacts

The EIR failed to mention the nearby historically important 'Castro Mound' that was located at the current site of Google offices at San Antonio Road and Central Expressway (the former Mayfield Mall). As I understand, it was one of the largest burial sites for the Ohlone people in the area. The EIR should be amended to accurately reflect this fact and the possibility that the project site could contain artifacts or remains of importance.

3.6.1.2 Existing Conditions

Geological Setting and Topography: San Antonio Road roughly follows the original path of the San Antonio Creek, as can be seen on very old maps of the area. Even though the creek was paved over, it seems likely that the topography still favors channeling water along this route toward the bay. As evidence of this, several years ago a neighbor of mine on San Antonio Drive had significant problems capping an overflowing groundwater well.

3.9.1.2 Existing Conditions

Groundwater: The groundwater measurements cited in the EIR were taken in 2015 during the drought. I am concerned that the estimated levels were not representative and the dewatering part of the project might require draining a significant amount of groundwater from the San Antonio 'creek'. I am also uncertain on the effect the dewatering will have on the groundwater and how this might affect the city-owned and city-protected Oak trees along San Antonio Drive. The project plan should include steps by the city to monitor the groundwater levels and mitigate any problems, such as watering the oaks if the water table drops.

3.11.3 Noise Impacts

The EIR claims that "vehicular traffic generated is not anticipated to increase noise levels substantially" citing the Hexagon's Traffic Impact Analysis report of October 11, 2016.

Hexagon's Traffic Impact Analysis report only analyzes traffic volumes and flows. Their report does not discuss noise levels anywhere. There is no information in their report that attempts to analyze noise levels or noise level changes due to changes in the traffic level.

The EIR makes a claim that is unsupported regarding the noise levels.

The EIR states that the current levels of noise for the project site “range from 60 dBA to 70 dBA primarily as a result of traffic along San Antonio Road” and “The ‘normally acceptable’ outdoor noise level standard for the nearby residences would be 55 dBA Ldn, and existing ambient levels exceed this threshold.” The noise levels from San Antonio Road to my nearby single family house on San Antonio Drive are already high (about 70 dBA according to the Noise Contour map of the Comprehensive Report). Unlike that of most other Palo Alto roads, San Antonio Road traffic includes heavy commercial vehicles because this road is the primary commercial route from 101 for Palo Alto, Stanford University, Mountain View’s retail stores along San Antonio Road, and downtown Los Altos.

Any increase in traffic will raise the approximately 70 dBA outdoor noise to even more unpleasant levels.

For these reasons, I cannot support the project until a proper noise impact study is undertaken and steps are taken to mitigate the high level of noise along the single family residences of San Antonio Drive.

Comment: The recent (decades)-long-awaited repair of San Antonio Road improved some things.

- When the city removed stone pine trees whose roots uplifted parts of the roadway and repaved the street, the vibrations and banging from bouncing of cargo semi-trucks and construction trucks improved.
- When the city raised the medians and planted it with trees and plants, the change deterred the reckless jaywalkers who would dart across San Antonio Road between the onrushing traffic.

Unfortunately, the repair did little to address the continuing high of outdoor noise.

- The plants in the median provide little, if any, reduction in the noise. There are sizeable gaps between plants and it is unclear if they would attenuate noise levels even if the gaps were filled by plants.
- During a community meeting on the San Antonio Road repair, I and several other neighbors requested a medium height (4’ to 6’) sound wall to be built in the median, but to no avail.

The outdoor noise level along San Antonio Drive remains well above ‘normally acceptable levels’. Years ago, when Palo Alto designated San Antonio Road as Palo Alto’s principal and primary commercial truck route the noise levels worsened. When the residential complexes and Hauser School on the southeast side of San Antonio were built, sound walls were approved by the city, but these same sound walls reflect noise back across San Antonio Road toward the single family residences on San Antonio Drive.

Goal N-8 of the Comprehensive Plan is to provide an environment that minimizes adverse impacts of noise. Can the city study the noise problem along San Antonio Drive and provide reasonable options for the single family residents to mitigate the high level of outdoor noise?

PALO ALTO GREENHOUSE II

BOARD OF DIRECTORS

To: Architectural Review Board
arb@cityofpaloalto.org

April 25, 2017

RE: P.A. City Staff Report # 7846 / Marriott Hotel Project

We, the 88 homeowners at 765 San Antonio Road, Greenhouse II, are writing in regard to the two Marriott hotels proposed for San Antonio Road. We are strongly opposed to the project for several reasons:

*** TRAFFIC IMPACT: Trucks, Buses, Autos and Signal Lights**

San Antonio Road already suffers from heavy traffic due to it being an exit road from 101. All truck traffic into Palo Alto comes via San Antonio Road because large trucks are not allowed to use Embarcadero from 101. Google and other corporate buses use San Antonio Road daily at various hours. Additionally, there are 288 homeowners on the same, single block as the proposed hotels. Homeowner traffic plus significant traffic to & from Costco at the Palo Alto/Mt. View border use San Antonio and Leghorn; there is also traffic to the JCC and the 6 schools in the area (Hoover, Fairmeadow, Greendell, JLS, and two private schools). There are 3 signal lights on this one block: at Middlefield, Leghorn, and Charleston. The signal lights cause traffic backup & congestion daily. Adding traffic from two hotels would have a significant impact on the block.

*** PARKING**

Looking at the proposed plan, there is NO designated parking for hotel employees. The parking spaces designated for hotel guests "do not meet city requirements", page 1 of report. It is unrealistic to think that 3 shifts of workers per day, 7 days a week will all use bikes, walk, or take CalTrain. Parking?

*** LIGHTING**

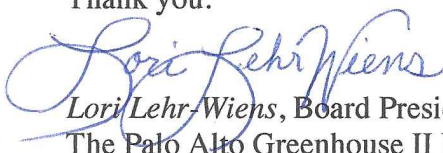
The diagrams on p. 5 & 6 show the "Courtyard Marriott" and "AC Hotel" lights to be at the 3rd floor level. These large lights will shine into our homes across the street. The tall trees depicted on the p.7 diagram are no longer on the median strip. The p.7 diagram is very outdated, as the city removed all of those trees and most on the sidewalk strip a few years ago. There are NO tall trees to block the bright lights.

*** COMPATIBILITY**

The proposal of two very dense, 5 story hotels is not compatible with our neighborhood. No buildings on the block are above 2 stories. In fact, all of the small businesses are 1 story. The report cites Greenhouse I and II as 3 stories. This is incorrect. Greenhouse I has 140 units: 70 first floor and 70 second floor.

Greenhouse II has 88 units: 44 first floor and 44 second floor. We, the 88 homeowners of Greenhouse II, are requesting the Architectural Review Board to **deny** the proposal for 2 Marriott hotels on San Antonio Road.

Thank you.



Lori Lehr-Wiens, Board President,
The Palo Alto Greenhouse II Homeowners Association

From: BOBBIE ARNOLD
To: [Architectural Review Board](#)
Subject: Concerns About Construction -744-748 San Antonio Road
Date: Wednesday, April 5, 2017 6:59:02 PM

Sheldon S. Ah Sing/ARB Members,

I am the original owner of one Condo located at 765-1 San Antonio Road, PA -GreenHouse II. As a homeowner, I need to express my unhappiness with your decisions to allow Marriott to build two five story building across the street from our homes. I have lived on San Antonio Road for 39 years, during that time I have endured dust, sand, gravel, wind storms, fallen trees, re-modeling of the middle divider and the building of the new shopping center at San Antonio Rd. and El Camino real. Keep in mind this has been a 2 year project that brought dust, sand, 15-20 large trucks hauling everything all day long to this project. Along with the trucks there was traffic back ups all day long. Please don't forget the JCC & Muslim bldg. that took 2 yrs. to complete, same issues as stated above that we had to endure....

I am sending a copy of my concerns and complaints to my Lawyer. My reasons are: 1) None of the City Council members live in Greenhouses 1 & II therefore, you have no idea of the issues we have to and have had to contend with. 2) Many of the owners are ill, elderly, some have children who needs to play in a safe area, which they will not have in the future; nor will their parents feel safe in allowing their children to ride on the side walk.

3) Environmental Issues: Greenhouse I & II stated the following last year-there be no Sun, no shade in the summer and no protection for pollen and etc.

4) Many of the Owners have sinus problems, and in some cases their illnesses the fire and ambulance have to enter the area....this doesn't matter to the ARB!!!

5) ARB folks, your actions in completely ignoring the Homeowners wishes is offensive and are similar to that of your Pres. who does whatever he wants to people. We are not going to stand for it we are home owners with integrity, we love our selves, neighbors and their children and wish that you all for one day would come and visit me and see for yourself what we are going through and what the future holds for any additional building on San Antonio Road..

A Concerned 39 year Owner--BA

From: Joan Larrabee
To: [Sheldon Ah Sing](#)
Cc: [Council, City; Architectural Review Board](#)
Subject: Comments on 744-750 San Antonio Road DEIR
Date: Tuesday, May 9, 2017 3:42:20 PM

Dear Mr. Sheldon Ah Sing,

The Environmental Impact Report Draft for the proposed Marriotts Hotels is incomplete, inadequate and may be challenged on several key points.

SOILS AND WATER, APPENDIX H, SECTION 3

The soils and water studies were only conducted at 744 San Antonio Road. None were made at the adjoining parcel 748-750 where the Courtyard by Marriott is planned. This parcel, almost an acre, is even closer to the San Francisco Bay and has a lower elevation,

The study was completed two years ago, in 2015, prior to one of the wettest rainy seasons on record. Palo Alto received almost 30 inches of rain in the 2016-2017 winter, almost 200% of normal. Even so, during the drought, water was observed during the survey at only 7.5 feet below grade. In historically wet years, water would be found only 4.5 feet below grade, according to the engineers doing the survey.

The soils and water studies need to be redone.

The excavation and dewatering of such a magnitude, as to provide two levels of underground parking, would affect the lateral support of the adjoining properties.

The work could also affect the lateral support of San Antonio Road itself. San Antonio Road has storm and sanitary sewers, phone and computer lines, electrical and gas lines underground, for South Palo Alto and communities to the west. During the heavy rains this winter, these utilities were affected.

None of this was reported in the DEIR and needs to be addressed.

TRAFFIC ANALYSIS, APPENDIX I

Table 3, titled "Existing Level of Service," shows that the intersections of San Antonio/Charleston and San Antonio/Middlefield near the proposed hotels to be level of service D during the evening peak traffic. And these Levels of Service (LOS) were determined in September, 2012, almost FIVE years ago. More traffic congestion now!

The engineers observed traffic conditions and saw that it often took two cycles of the signals to clear the intersections, that traffic overflowed the left turn pockets.

"Level of Service represents an average of all movements at an intersection. Thus, if one movement is congested, but other movements do not experience lengthy delays, the average level of service can be acceptable."

So, in other words, the heaviest movements might actually be as low as E or F now, "unacceptable by most drivers." As the proposed hotels are mid-block, turning movements at the above intersections will be required for access and egress.

The authors of the DEIR ignored the City of Palo Alto's Engineering and Traffic Surveys for San Antonio Road, from the East City Limit Line to Alma Street. In all three sections, the primary land use is residential, schools, churches and small businesses. And the section from Charleston to the East City Limit has twice the accident rate of similar streets in California.

ALTERNATE USES FOR THE PROPERTY

The land use along San Antonio Road is primarily residences: single-family homes, condominiums, townhouses, apartments and senior housing at Oshman Family Jewish Community Center. There are schools, a church, and

businesses. We prefer to see the primary land use, residential, continue.

Incorrectly, the DEIR states that there is no transit service near the property and therefore housing should be located near the California Avenue and University Avenue Caltrain Stations, not at 744-750 San Antonio Road. 3.10.2.8 HOWEVER, the Caltrain Station at San Antonio and Alma is listed as traffic mitigation for the hotels. It is pointed out that during the weekdays, there are "20-30 minute head ways during the AM and PM commute hours and 60-minute headways midday, at nights, and on weekends." So, yes, there is transit.

OSHMANN FAMILY JEWISH COMMUNITY CENTER

3921 Fabian Way, Palo Alto, 0.3 miles away, is mentioned several times as a reason to allow the two five-story hotels. Oshman provides senior residences, cultural activities and services to the community and is called "six stories tall."

Access to the Center is on Fabian Way, north of the Center, not on San Antonio Road. The main egress is also on Fabian Way, not on San Antonio. There is a little-used exit onto San Antonio. It has its own acceleration lane and does not in any way impede traffic. The Center is an excellent neighbor to all of Palo Alto and does not cause any concerns.

All construction activities for the Center came in from Fabian Way, not from San Antonio Road.

CONSTRUCTION HOURS

2.3.3.3

The DEIR states it would be acceptable to close one lane of the four-lane San Antonio Road from 9:00 am to 4:00 pm, Mondays through Saturdays. This is totally unacceptable to anyone traveling on San Antonio Road.

CONCLUSION

The Environmental Impact Report for the two hotels proposed for 744-750 San Antonio Road is incomplete, unacceptable and often inaccurate. It should not be certified.

Joan Larrabee
777 San Antonio Road,
Palo Alto, CA 94303

From: Kyle
To: [Council, City; Sheldon Ah Sing; Architectural Review Board](#)
Subject: Comments on EIR for 744 San Antonio Road proposal
Date: Sunday, May 14, 2017 8:44:50 PM
Attachments: [744SanAntonioEIRComment.docx](#)

May 14, 2017

Dear City Council, City Planner Ah Sing, and ARB members,

I quite recently learned about the Marriott hotel building project proposed for 744-750 San Antonio Road. Although it is a few days past the deadline, thought I would submit my comments regarding the Environmental Impact Report anyway.

Summary of my points:

- The proposed setback is much too small for the three to five story buildings in that local area. The proposed buildings' height and size greatly exceed that of neighboring structure in that mixed-use block of San Antonio Road.
- The EIR fails to mention the nearby 'Castro mound', a significant archaeological and cultural site of the Ohlone people.
- The EIR makes a claim that the noise impact from the increase in traffic is "not anticipated to increase substantially." The document cited as support contains no analysis of noise levels, so the claim is at best unsupported, at worst, fabricated.
- Existing outdoor noise levels at single family residences adjacent to San Antonio Road on San Antonio Drive are about 70 dB, according to the noise contour map of the Comprehensive Plan. (70 dB is over 31 times louder than 55 dB, the 'normally acceptable' outdoor noise level.) San Antonio Drive is one of the few single family residence area along the primary commercial route from 101 into Palo Alto and neighboring areas. Can the city study of this noise problem and provide a reasonable mitigation for the single family residences?

I have attached a Word document containing my comments.

Best regards,
Kyle Kashima
San Antonio Drive

From: Esther Nigenda
Cc: [Architectural Review Board](#)
Subject: Comments on EIR for 744-750 San Antonio: Marriott Hotel Project
Date: Monday, May 8, 2017 7:53:39 PM

Dear Mr. Ah Sing,

I am puzzled by the 744 -750 San Antonio Road DEIR (03-21-17). Page 7 says, "The project proposes to . . . construct two, five-story hotel buildings with shared amenity facilities and **two** levels of below-grade parking. Page 15 of the same document states: "The proposed project would require excavation to approximately 20 feet below grade to construct **one** level of below-grade parking. So which is it? One level or two levels?

Meanwhile, the Geotechnical Report (Appendix E of the DEIR) refers to one-level underground construction (see Appendix E Project Description, page 1 and all other references to underground construction) throughout.

The current DEIR does **NOT** support a 2-level garage as it explicitly says, Appendix E, p. 15, "Please note there are some significantly thick, relatively clean sand layers below a depth of about 20 feet that will generate a significant volume of water. If possible not penetrating into those layers with the dewatering wells is desirable . . . Provided that draw down of groundwater is limited to a maximum depth of 18 feet below existing site grades (i.e. about 10 feet below current ground water levels), settlement [of adjacent improvements and structures] due to dewatering should be low."

Additionally Appendix E, page 4 says, "Historic high groundwater is mapped at about 5 feet below the existing ground surface in the site area." The DEIR/Geotechnical Report does not address the impacts of sea level [and groundwater level rise](#) due to climate change. In view of the high water table at this location, I believe these impacts should be addressed in this project's EIR.

[Current dewatering regulations \(5-4-17\)](#) state that when dewatering is needed, applicants are now required to verify the anticipated drawdown curve with a pump test using actual wells and that the pumping rate and total amount of water to be pumped out is limited to that determined during the verification. The DEIR needs to be updated to incorporate these requirements.

In summary, this DEIR does not support the currently proposed project with a 2-level garage, does not address the impacts of climate change to this project, does not meet the new dewatering regulations and it does not address the environmental impacts of the scale of dewatering needed at this

location.

Thank you for considering my comments,
Esther Nigenda, Ph.D.

From: Joan Beitzuri
To: [Council, City; Sheldon Ah Sing; Architectural Review Board; Planning Commission](#)
Subject: Correction/Rooms - Fwd: EIR Responses - 744-750 San Antonio Road
Date: Tuesday, May 2, 2017 10:45:22 AM

Please correct the number of hotel rooms from 194 to 294.

Thank you.

Begin forwarded message:

From: Joan Beitzuri <joan.beitzuri@comcast.net>
Date: May 2, 2017 at 8:50:46 AM PDT
To: city.council@cityofpaloalto.org, SAhsing@m-group.us,
Arb@cityofpaloalto.org, Planning.Commission@CityofPaloAlto.org
Subject: EIR Responses - 744-750 San Antonio Road

Our group questions and does not agree with the conclusions arrived at by this EIR that this massive, dense, architecturally disjointed 2 - Five Stories, 294 room commercial Hotels will have "No Significant Impact" on our neighborhood. Those conclusions are based on wishful thinking but not current facts or reality.

Following are the major categories in question.

1. Regarding Visual Character Degradation

The EIR's own comparison pictures absurdly conclude that "The visual character degradation would be less than significant" as shown in their "Existing view" and "Proposed Hotels" pictures below.

That EIR conclusion is absurd! Having to look at those disturbing, massive, dense, unpleasantly designed 5 story buildings, rather than beautiful, pleasant surroundings is absolute visual degradation!



2. Traffic

We submit that the EIR traffic conclusions are not based on current data or appropriate data analysis. (See email addressing those specifics from our traffic analyst Lu Lu dated April 5, 2017).

The only Entrance/Exit to these 2 commercial Hotels is on San Antonio Road! With business people occupying 294 rooms requiring car rentals, taxis, Ubers, delivery trucks, garbage trucks, etc., of course this will add more traffic on an

already congested 4-lane San Antonio Road!

In addition, cars already have to wait ~ 2 minute cycle to make a left turn off San Antonio Road at Leghorn, and only 2 cars go thru before the light changes. This is done in order to favor traffic on San Antonio Rd. With the added hotel traffic needing to make U-Turns, this will certainly cause a tremendous backup of traffic at this light.

These facts therefore negate EIR's conclusion, and prove these Hotels will in fact have a significant increased impact on traffic on San Antonio Road.

3. Dewatering

Two story underground garage to be build requiring major dewatering. Per EIR, drilling was done in 2014, THREE YEARS AGO! Water was encountered at 7 feet below grade. However, the EIR stated that historically during very wet years, water would rise to 4 feet below grade. Last winter has been very wet. So the water could be as high as only 4 feet below grade!!!

4. Aesthetics and Noise

The architecture is unpleasant to look at.
It is massive, dense, obtrusive, undefined, bland, disjointed architecture. The 24/7 long hours of commercial hotel operation is an intrusion to a currently quiet residential/small businesses neighborhood.
Result: A significant impact on our neighborhood.

5. Historic Resource

EIR Point 3.4.3: 744 Designated as a historic resource. "...Demolition would result in the loss of a California Register eligible structure...".
We agree with this point.

This massive, dense, architecturally disjointed commercial hotel project is not a fit in our neighborhood. We hope you will listen to and positively react to our substantiated facts, and do the right thing by acknowledging that these two commercial hotels will have a significant detrimental, negative impact on our neighborhoods and that you will deny approval of this project.

Joan Beit-Zuri
Greenhouse 1

Sent from my iPhone

From: Joan Beitzuri
To: [Council, City; Sheldon Ah Sing; Architectural Review Board; Planning Commission](#)
Subject: EIR Responses - 744-750 San Antonio Road
Date: Tuesday, May 2, 2017 8:51:04 AM

Our group questions and does not agree with the conclusions arrived at by this EIR that this massive, dense, architecturally disjointed 2 - Five Stories, 194 room commercial Hotels will have "No Significant Impact" on our neighborhood. Those conclusions are based on wishful thinking but not current facts or reality.

Following are the major categories in question.

1. Regarding Visual Character Degradation

The EIR's own comparison pictures absurdly conclude that "The visual character degradation would be less than significant" as shown in their "Existing view" and "Proposed Hotels" pictures below.

That EIR conclusion is absurd! Having to look at those disturbing, massive, dense, unpleasantly designed 5 story buildings, rather than beautiful, pleasant surroundings is absolute visual degradation!



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Joan Beit-Zuri
Greenhouse 1

Sent from my iPhone

From: Esther Nigenda
To: [Sheldon Ah Sing](#)
Cc: arb@cityofpalo.org; [Council, City](#)
Subject: Comments on EIR for 744-750 San Antonio: Marriott Hotel Project
Date: Monday, May 8, 2017 7:02:31 PM

Dear Mr. Ah Sing,

I am puzzled by the 744 -750 San Antonio Road DEIR (03-21-17). Page 7 says, “The project proposes to . . . construct two, five-story hotel buildings with shared amenity facilities and **two** levels of below-grade parking. Page 15 of the same document states: “The proposed project would require excavation to approximately 20 feet below grade to construct **one** level of below-grade parking. So which is it? One level or two levels?

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[Current dewatering regulations \(5-4-17\)](#) state that when dewatering is needed, applicants are now required to verify the anticipated drawdown curve with a pump test using actual wells and that the pumping rate and total amount of water to be pumped out is limited to that determined during the verification. The DEIR needs to be updated to incorporate these requirements.

In summary, this DEIR does not support the currently proposed project with a 2-level garage, does not address the impacts of climate change to this project, does not meet the new dewatering regulations and it does not address the environmental impacts of the scale of dewatering needed at this location.

Thank you for considering my comments,
Esther Nigenda, Ph.D.

From: Architectural Review Board
To: [Lew, Alex](#); [Kim, Kyu](#); [Baltay, Peter](#); [Gooyer, Robert](#); [Furth, Wynne](#)
Cc: [Sheldon Ah Sing](#)
Subject: FW: Comments on EIR for 744 San Antonio Road proposal
Date: Monday, May 15, 2017 5:58:59 AM
Attachments: [744SanAntonioEIRComment.docx](#)

From: Kyle [mailto:pikapika2@att.net]
Sent: Sunday, May 14, 2017 8:44 PM
To: Council, City; SAhsing@m-group.us; Architectural Review Board
Subject: Comments on EIR for 744 San Antonio Road proposal

May 14, 2017

Dear City Council, City Planner Ah Sing, and ARB members,

I quite recently learned about the Marriott hotel building project proposed for 744-750 San Antonio Road. Although it is a few days past the deadline, thought I would submit my comments regarding the Environmental Impact Report anyway.

Summary of my points:

- The proposed setback is much too small for the three to five story buildings in that local area. The proposed buildings' height and size greatly exceed that of neighboring structure in that mixed-use block of San Antonio Road.
- The EIR fails to mention the nearby 'Castro mound', a significant archaeological and cultural site of the Ohlone people.
- The EIR makes a claim that the noise impact from the increase in traffic is "not anticipated to increase substantially." The document cited as support contains no analysis of noise levels, so the claim is at best unsupported, at worst, fabricated.
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I have attached a Word document containing my comments.

Best regards,
Kyle Kashima
San Antonio Drive

From: Gitelman, Hillary
To: [Sheldon Ah Sing](#)
Subject: FW: HOTEL NO / HOUSING YES
Date: Monday, May 8, 2017 10:17:52 AM

For your file



Hillary Gitelman | Planning Director | P&CE Department
250 Hamilton Avenue | Palo Alto, CA 94301
T: 650.329.2321 | E: hillary.gitelman@cityofpaloalto.org

Please think of the environment before printing this email – Thank you!

From: Ralph Cahn [<mailto:ralphgc66@gmail.com>]
Sent: Thursday, May 04, 2017 4:36 PM
To: Council, City
Subject: HOTEL NO / HOUSING YES

Dear Palo Alto City Council Membersl,
My wife and I are homeowners and live in our home at The Greenhouse on San Antonio Road.
Please do not approve the 2 hotels Marriott wants to build here.
Designate the space for badly needed housing. It's one area in Palo Alto where more housing is welcome.
Please don't add 294 (already-awful traffic) hotel rooms on this busy street.
The commute time traffic statistics Marriott provided are fake news.
There are already hotels going up like crazy in Palo Alto.
Please!

thank you,
Ralph Cahn
777-119 San Antonio Road
(Treasurer, PAGHOA)
ralphgc66@gmail.com
phone: 650 858.1012

From: thomas irpan
To: city.council@cityofpaloalto.org; [Sheldon Ah Sing](#); arb@cityofpaloalto.org
Cc: [Joan Larrabee](#)
Subject: Fwd: Greenhouse II & huge hotels
Date: Monday, May 15, 2017 12:32:09 PM

To: Mayor, City Council, City Planner, Architectural Review Board.

We agree with our neighbor Joan that the proposed hotels have negative impact to our living environment. Boutique small hotel might work best for our neighborhood.

Thomas Irpan
Resident of Greenhouse II unit #7

Sent from my iPhone

From: thomas irpan
To: [Council, City](#); [Sheldon Ah Sing](#); [Architectural Review Board](#)
Cc: [Joan Larrabee](#)
Subject: Fwd: Greenhouse II & huge hotels
Date: Monday, May 15, 2017 12:32:46 PM

To: Mayor, City Council, City Planner, Architectural Review Board.

We agree with our neighbor Joan that the proposed hotels have negative impact to our living environment. Boutique small hotel might work best for our neighborhood.

Thomas Irpan
Resident of Greenhouse II unit #7

Sent from my iPhone

From: A Hilton
To: [Sheldon Ah Sing](#)
Subject: Fwd: Marriott Hotels on San Antonio Rd.
Date: Tuesday, May 9, 2017 4:52:18 PM

This email came back to me as not delivered. I'm attempting to send it again.

----- Forwarded message -----

From: **A Hilton** <annettehilton99@gmail.com>
Date: Sun, May 7, 2017 at 1:19 PM
Subject: Marriott Hotels on San Antonio Rd.
To: sahsing@mgroup.us
Cc: sahsing@m-group.us

May 7, 2017

I am writing to be on record as **opposing** the proposal for two Marriott Hotels on San Antonio Road in Palo Alto. The DEIR for this project is outdated and therefore not correct.

* The drawings on p 7 of the April 6, 2017 handout show tall trees on the median strip. The city removed all of those trees a few years ago, and put in small plants, so there is nothing to lessen the view of two 5-story hotels or the noise associated with them.

* The traffic report is also incorrect as we now have many Google commute buses using San Antonio Road in addition to all truck traffic off 101. Trucks cannot use the other Palo Alto off-ramps from 101. There are over 200 residential units on the ONE San Antonio block between Middlefield and Leghorn. The signal lights at both Middlefield & Leghorn/San Antonio are already backed up on a regular basis.

* Greenhouse I and II condominiums are two-stories, not three as stated in the April 6 staff report. Was that misprint given to indicate that two 5-story hotels would not be that much taller than what is already on the block?

* On p.13 of the April 6 report, it states that the intersection of San Antonio & Middlefield is "within a designated walking route for Hoover Elementary" school. In fact, the intersection is also within the walking route of Fairmeadow, Greendell, JLS Middle School, and two private schools in the area.

I have other concerns about this dense project; however, the traffic issue alone should disqualify the two proposed hotels from being built.

Thank you,
A. Hilton
765 San Antonio Road
Palo Alto

From: Joan Larrabee
To: [Sheldon Ah Sing](#)
Cc: [Council, City; Architectural Review Board](#)
Subject: Comments on 744-750 San Antonio Road DEIR
Date: Tuesday, May 9, 2017 3:42:24 PM

Dear Mr. Sheldon Ah Sing,

The Environmental Impact Report Draft for the proposed Marriotts Hotels is incomplete, inadequate and may be challenged on several key points.

SOILS AND WATER, APPENDIX H, SECTION 3

The soils and water studies were only conducted at 744 San Antonio Road. None were made at the adjoining parcel 748-750 where the Courtyard by Marriott is planned. This parcel, almost an acre, is even closer to the San Francisco Bay and has a lower elevation,

The study was completed two years ago, in 2015, prior to one of the wettest rainy seasons on record. Palo Alto received almost 30 inches of rain in the 2016-2017 winter, almost 200% of normal. Even so, during the drought, water was observed during the survey at only 7.5 feet below grade. In historically wet years, water would be found only 4.5 feet below grade, according to the engineers doing the survey.

The soils and water studies need to be redone.

The excavation and dewatering of such a magnitude, as to provide two levels of underground parking, would affect the lateral support of the adjoining properties.

The work could also affect the lateral support of San Antonio Road itself. San Antonio Road has storm and sanitary sewers, phone and computer lines, electrical and gas lines underground, for South Palo Alto and communities to the west. During the heavy rains this winter, these utilities were affected.

None of this was reported in the DEIR and needs to be addressed.

TRAFFIC ANALYSIS, APPENDIX I

Table 3, titled "Existing Level of Service," shows that the intersections of San Antonio/Charleston and San Antonio/Middlefield near the proposed hotels to be level of service D during the evening peak traffic. And these Levels of Service (LOS) were determined in September, 2012, almost FIVE years ago. More traffic congestion now!

The engineers observed traffic conditions and saw that it often took two cycles of the signals to clear the intersections, that traffic overflowed the left turn pockets.

"Level of Service represents an average of all movements at an intersection. Thus, if one movement is congested, but other movements do not experience lengthy delays, the average level of service can be acceptable."

So, in other words, the heaviest movements might actually be as low as E or F now, "unacceptable by most drivers." As the proposed hotels are mid-block, turning movements at the above intersections will be required for access and egress.

The authors of the DEIR ignored the City of Palo Alto's Engineering and Traffic Surveys for San Antonio Road, from the East City Limit Line to Alma Street. In all three sections, the primary land use is residential, schools, churches and small businesses. And the section from Charleston to the East City Limit has twice the accident rate of similar streets in California.

ALTERNATE USES FOR THE PROPERTY

The land use along San Antonio Road is primarily residences: single-family homes, condominiums, townhouses, apartments and senior housing at Oshman Family Jewish Community Center. There are schools, a church, and

businesses. We prefer to see the primary land use, residential, continue.

Incorrectly, the DEIR states that there is no transit service near the property and therefore housing should be located near the California Avenue and University Avenue Caltrain Stations, not at 744-750 San Antonio Road. 3.10.2.8 HOWEVER, the Caltrain Station at San Antonio and Alma is listed as traffic mitigation for the hotels. It is pointed out that during the weekdays, there are "20-30 minute head ways during the AM and PM commute hours and 60-minute headways midday, at nights, and on weekends." So, yes, there is transit.

OSHMANN FAMILY JEWISH COMMUNITY CENTER

3921 Fabian Way, Palo Alto, 0.3 miles away, is mentioned several times as a reason to allow the two five-story hotels. Oshman provides senior residences, cultural activities and services to the community and is called "six stories tall."

Access to the Center is on Fabian Way, north of the Center, not on San Antonio Road. The main egress is also on Fabian Way, not on San Antonio. There is a little-used exit onto San Antonio. It has its own acceleration lane and does not in any way impede traffic. The Center is an excellent neighbor to all of Palo Alto and does not cause any concerns.

All construction activities for the Center came in from Fabian Way, not from San Antonio Road.

CONSTRUCTION HOURS

2.3.3.3

The DEIR states it would be acceptable to close one lane of the four-lane San Antonio Road from 9:00 am to 4:00 pm, Mondays through Saturdays. This is totally unacceptable to anyone traveling on San Antonio Road.

CONCLUSION

The Environmental Impact Report for the two hotels proposed for 744-750 San Antonio Road is incomplete, unacceptable and often inaccurate. It should not be certified.

Joan Larrabee
777 San Antonio Road,
Palo Alto, CA 94303

From: Lu Lu
To: [Architectural Review Board; citycouncil@cityofpaloalto.org](mailto:citycouncil@cityofpaloalto.org)
Subject: Comments on EIR on Marriotts / AC Hotels project
Date: Wednesday, April 5, 2017 1:43:21 PM

Dear ARB / City Council members,

My name is Lu Lu and I'm a resident in Greenhouse II. I have some questions/concerns regarding the Traffic Impact Analysis in the EIR on Marriotts / AC hotels project:

1. In the report, on page 16, in the "project trip generation under existing conditions" table, it estimates that there will be 1672 trips generated by the hotel per day. In which 1522 trips are generated by guests. However, among these 1522 trips, only 107+108=215 trips are considered to be morning peak + evening peak trips, which is <15% of all the trips. This number sounds too small to me. Palo Alto is not a tourists destination, I would expect most of the guests are business travelers coming to visit the companies nearby and most of them will follow the regular commuting travel patterns and leave / return during peak hours.

The trip estimation is the foundation of the analysis, all of the conclusions are based on the assumption that only 215 peak hour trips will be made by the guests in a day, which IMHO is far from the reality. The trip patterns in other hotels in Palo Alto / Mountain View area should be used to estimate the morning / evening peak trips instead of the generalized trip rate estimation guidelines.

2. The report mentioned in multiple places that the Intersection Levels of Service analysis shows that all study intersections would continue to operate at acceptable levels during both AM and PM peak hours. I understand that this refers to some "standard" manuals and tables. However, these manuals are simplified for convenience and generalization purposes. IMHO we should not just blindly refer to these hard numbers/methodologies and pretend to not see the reality. For example, all residents in this area know how bad the traffic is during peak hours in the San Antonio & Middlefield road intersection. The numbers show that there is a 50/37 sec delay in the intersection during peak hours (with 2015 data for morning peak and 2012 data for evening peak, I believe the number is much worse today). Note that this is the average delay across all directions / lanes. The delay on the more crowded direction / lanes are much worse. This is something else I feel too simplified in the standard: we use the average delay to decide the service level rather than the maximum delay. Based on this standard, drivers in the most crowded direction have to bear with huge delay just because the other lanes have much less car and we use average number to tell them it's "acceptable".

Need further research, but friends in relevant areas told me there have been studies about these Intersection Levels of Service methods not being to reflect the reality and these methods have already been phased out in many places.

In summary, the report is based on very questionable fundamental trip estimations and the standard the report is referring to is so low that makes me sad. We can't make Palo Alto a better place if our rules and standards believe the traffic condition in one of the most congested area in the city is acceptable and it's OK to be worse.

Thanks,

--

Lu Lu

From: patricia markee
To: [Joan Larrabee](#); [Architectoral Review Board](#); [Sheldon Ah Sing](#)
Subject: Re: Marriott Hotels" Proposed Site, San Antonio Road, Before & After
Date: Tuesday, April 4, 2017 4:47:36 PM

Dear arb, Joan and Sheldon,

I have written many departments in the city about this proposed construction. All to no avail, as the paperwork process has continued by leaps and bounds without my being notified; in fact, I wasn't notified this time but Greenhouse II was; now I think I understand why the paperwork has made such leaps and bounds: the first picture below is a lie; it resembles nothing that I see on the other side of my street, 777 San Antonio. I have walked that block many times and it's all business construction. I have not seen so many trees on that side of the street for at least 30, if not, 40 years.

What worries me is why have they disguised this street? What do they hope to gain? I figured they must be smarter than that to expedite the paperwork in a way that none of us in this condo were notified. I guess they are not so smart, so my conclusion is--I hate to say it--that they are carefully insinuating money into the city.

I browsed the environmental report, which states that there would be no noticeable impact on traffic. Huh? Two large 5-story hotels have no noticeable impact on traffic?

The traffic on San Antonio has increased considerably since the construction of apartment houses and businesses where Sears used to be: San Antonio and El Camino Real. To get into my condominium complex I usually have to wait two light cycles now: one to get into the left turn lane and the 2nd to turn left, sometimes even three. With this construction, I'll bet that I'll have to wait three light cycles regularly to make that left.

Unless the city extends the left turn lane. Anybody want to take that bet???

Sincerely,

Patricia M. Markee

From: Joan Larrabee <joan.larrabee@att.net>

Sent: Tuesday, April 4, 2017 9:02 PM

To: thomas irpan; penny proctor; patstarrett; janet kahle; Thomas Shou; Susie Mitchell; Sheldon Ah Sing; Sandra Chinoporos; Richard & Barbara; Ralph Cahn; Phyllis The'; Patricia Markee; Matt Hengehold; Lu Lu; John F Petrilla; Joan Beitzuri; Edith Large; Dixie Storkman; Carole Steger; A P Wegner; simucom@earthlink.net; robhsiang@yahoo.com; ritavrhel@sbcglobal.net; ncmartin@comcast.net; mbauriedel@ursu.com; lbach@edtg.com; jlee1@dailynewsgroup.com; dtottingham@gmail.com; alex@pavineyard.org; kirk miller; brenthan01@gmail.com;

huijuan.lu@hotmail.com; Pete Gradowski; cbrosnan@yahoo.com

Subject: Marriott Hotels' Proposed Site, San Antonio Road, Before & After



Looking northeast to 744-750 San Antonio Road. Top photo is existing condition. Bottom photo is the developer's conception of the two Courtyard by Marriott and AC by Marriott Hotels. They say that the "Visual character degradation would be less than significant."

Do you believe that? Is that what you see? What do you think?

Please express your concerns and views about the proposals to the Mayor and City Council, the Architectural Review Board, and Contract City Planner Sheldon Ah Sing:

Citycouncil@cityofpaloalto.org

arb@cityofpaloalto.org

Sheldon Ah Sing (408) 340.5642 SAhsing@m-group.us

Attend the ARB Meeting Thursday morning, April 6, in the Palo Alto City Council Chambers.

Thank you!

Joan Larrabee

Greenhouse One

Sent from my iPad

From: patricia markee
To: [Council City](#); [Sheldon Ah Sing](#); [Architectural Review Board](#); joan.larrabee@att.net; [Michelle Hogan](#)
Subject: Marriott hotels on San Antonio
Date: Wednesday, May 10, 2017 9:35:39 AM

I am deeply concerned about the Marriott proposal for two hotels on San Antonio in South Palo Alto.

These 5-story hotels might be an eyesore in our neighborhood. Directly across the street, the Greenhouses are hidden behind walls and trees. The rest of the neighborhood consists of one to two-story businesses, condos, single family homes, schools, community centers, a park, and a daycare center. The Jewish Community Center, a multi-storied residence and community center, is on the edge of the community, next to 101.

Marriott's report on future traffic states: no impact. I guess their 294+ guests plus employees, including valets, are going to walk.

This proposal would bring at least 294 transients into our neighborhood on a daily basis, placing our safety and that of our possessions in jeopardy.

Residences would create a more appropriate growth of our neighborhood and help to meet Palo Alto's housing needs, Marriott could place its hotels in the commercial area on the corner of San Antonio and El Camino Real.

Sincerely,
Patricia Markee
The Greenhouse
Palo Alto

From: Ralph Cahn
To: [Sheldon Ah Sing](#)
Cc: [Council, City; Architectural Review Board](#)
Subject: Marriott Report Draft
Date: Wednesday, May 10, 2017 11:57:38 AM

Dear Mr. Ah Sing,

The Marriott hotels application and EIR for ARB is deceptive, misinterpreting or omitting vital information; the project does not meet needs of the local community or appropriate goals of the City. It should be disapproved.

The Primary Issue -- Housing

Regardless of zoning, the overwhelming use of the affected area is Residential. San Antonio Road in the Palo Alto City area from 101 to Alma includes the longstanding PC Planned Residential Communities Palo Alto Greenhouses I and II (228 homes), as well as the recently built JCC/Oshman complex (hundreds of condo/apartment homes), and condo property south of Middlefield. In addition, there are numerous single-family homes just off of Middlefield. The residential nature of the area is further evident given the two schools (Hauser K-8 and Athena Accademy), a religious institution, local garden center, Cubberly and local grocery stores and public transportation on, or within easy walking distance from San Antonio.

The imposition of overwhelming, 5 story 294 room hotels (squeezed onto less than 2 acres of land) in the midst of the area where no such imposing development exists, will change the nature of the surroundings for the worse and forever! It will presage further traffic-drawing development of the same ilk and will not meet the more important housing needs of the City. San Antonio Road is residential – permanent residential housing is what should occur here.

Traffic impacts Residents on San Antonio far more than the EIR indicates. The Charleston/San Antonio intersection, with heavy traffic from west and east; the Middlefield intersection, always challenging, and the steady stream of cars exiting 101 all flow on San Antonio in both directions, day and night. The studies showing otherwise are out of date and therefore misleading.

The location of the proposed hotels is such that San Antonio – Leghorn U turns would be necessary for those wishing to go from the hotels to El Camino locations, and U turns at Middlefield for those driving south on San Antonio to reach the hotel from 101, thus many of the individual trips would include travel on both sides of San Antonio. Adding >1200 trips per day in and out; significantly more by contractors, employees and service providers onto an overcrowded road exaggerates the problem.

Conclusion. The proposal should be denied. Future development should continue the existing

residential nature of the area: single-family homes, town houses, condominiums.

Ralph Cahn

777 – 119 San Antonio Road

Palo Alto, CA

650.858.1012

--

From: R C
To: city.council@cityofpaloalto.org; [Sheldon Ah Sing](#); arb@cityofpaloalto.org
Subject: Note: Support the Proposed Marriott Hotels on San Antonio Road
Date: Tuesday, May 9, 2017 8:55:51 PM

I am a resident and a business owner in Palo Alto and I fully support the construction of two Marriott hotels on San Antonio Road. I own a commercial building and a condo close to the proposed site. I believe that the hotels would bring in more job opportunities further strengthening the financial position of the City of Palo Alto (producing income/funds which can be used to create a sustainable neighborhood). The proposal would also establish a more attractive developed area, much better than its current state. I welcome responsible development of the site and hope that the proposal will be considered for approval.

Rachelle Cagampan

From: Molly Kawahata
To: [Sheldon Ah Sing](#)
Subject: Opposition to Proposed Hotels on Middlefield and Leghorn in Palo Alto
Date: Friday, May 12, 2017 4:08:14 PM

Dear Mr. Sheldon Ah Sing:

I am writing to express my opposition to the two proposed hotels on San Antonio Road between Leghorn and Middlefield Road. This is something that will not be good for the neighborhood or community feel of Palo Alto, and will be particularly harmful to the environment, which is something many of us are very passionate about conserving and protecting. Please do the right thing for the community and environment.

Thank you,
Molly Kawahata

384 Calcaterra Place
Palo Alto, CA 94306
(650) 387-6088

From: Chris Brosnan
To: ncmartin@comcast.net; [Larrabee, Joan](#)
Cc: [thomas irpan](#); [penny proctor](#); [patstarrett](#); [Kahle, Janet](#); [Thomas Shou](#); [Mitchell, Susie](#); [Sheldon Ah Sing](#); [Sandra Chinoporos](#); [Richard & Barbara](#); [Ralph Cahn](#); [The", Phyllis](#); [Patricia Markee](#); [Lu Lu](#); [John F Petrilla](#); [Beitzuri, Joan](#); [Edith Large](#); [Dixie Storkman](#); [Carole Steger](#); [A P Wegner](#); [simucom@earthlink.net](#); [robhsiang@yahoo.com](#); [ritavrhel@sbcglobal.net](#); [mbauriedel@ursu.com](#); [jlee1@dailynewsgroup.com](#); [Tottingham, Dean](#); [alex@pavineyard.org](#); [kirk miller](#); [brenthan01@gmail.com](#); [huijuan lu](#); [Gradowski, Pete](#)
Subject: Re: Marriott Hotels" Proposed Site, San Antonio Road, Before & After
Date: Monday, April 17, 2017 2:51:27 PM

Ugh, I'm upset I missed the meeting. Can anyone please fill me in on what happened there?

On Tuesday, April 4, 2017 6:12 PM, "ncmartin@comcast.net" <ncmartin@comcast.net> wrote:

Hi All-

I have been out canvassing the businesses in the area to get support for no hotels and representation at the ARB meeting. Dave from Hengehold will be there Thurs.

Unfortunately Larry Bach is on vacation in Europe. I spoke with his assistant and suggested that she ask him to send an email. He would be greatly negatively affected by the hotels and supports a NO on hotels. I got the name and phone number of the owner of the buildings where the market, PA Plumbing, etc are located.

He refused to sell to the developers back when this deal was being put together because his tenants had been with him for 30+/- years. I called him and left a message. I talked with tenants in his buildings and asked them to send emails as business owners. Sherman still owns the building where The Car Doctors are located. Gary will call him to get him to send emails or come to the meeting.

Summer Winds is own by investors in Idaho and is up for sale. If it is sold, Summer Winds will have a 20 year lease. Info for email or protest will be passed on to the owners. I talked with several employees of businesses where the owner was not on site; but they will pass the info onto the property owners. Many other business owners who don't own their buildings will contact their property owners; several of whom are big corporations. Bad news is that the 2 buildings next to Mechanica on the corner were bought by Google. Larry's Autoworks also sold to Google...a major future problem. Everyone on Leghorn complained about the traffic there and the parking problems due to people parking all day for the Genentech bus. And on and on and on.

I think our best approach is to push for housing as opposed to the hotels. All the business in the buildings affected have closed and/or moved. Seems to me building something is pretty much a done deal. We can fight the EIR; but compromise would be for housing.

Let's go for them. Nancy

From: "Joan Larrabee" <joan.larrabee@att.net>
To: "thomas irpan" <thomasirpan@gmail.com>, "penny proctor" <pennyproctor@comcast.net>, "patstarrett" <patstarrett765@comcast.net>, "janet

kahle" <JNTKL77@yahoo.com>, "Thomas Shou" <thomasshou@yahoo.com>, "Susie Mitchell" <s_mitchell07@comcast.net>, "Sheldon Ah Sing" <SAhsing@m-group.us>, "Sandra Chinoporos" <grecoiberian@gmail.com>, "Richard & Barbara" <urandab@sbcglobal.net>, "Ralph Cahn" <ralphc66@sbcglobal.net>, "Phyllis The" <pst54@comcast.net>, "Patricia Markee" <pmmarkee@hotmail.com>, "Matt Hengehold" <matt@htrucks.com>, "Lu Lu" <apollu07@gmail.com>, "John F Petrilla" <john.petrilla@foit-foxconn.com>, "Joan Beitzuri" <joan.beitzuri@comcast.net>, "Edith Large" <edielarge@gmail.com>, "Dixie Storkman" <DStorkman@aol.com>, "Carole Steger" <carolesteger@gmail.com>, "A P Wegner" <apwegner@aol.com>, simucom@earthlink.net, robhsiang@yahoo.com, ritavrhel@sbcglobal.net, ncmartin@comcast.net, mbauriedel@ursu.com, lbach@edtg.com, jlee1@dailynewsgroup.com, dtottingham@gmail.com, alex@pavineyard.org, "kirk miller" <captkirk@sfbaysail.com>, brenthan01@gmail.com, "huijuan lu" <huijuan.lu@hotmail.com>, "Pete Gradowski" <pgradowski@gocompass.com>, cbrosnan@yahoo.com

Sent: Tuesday, April 4, 2017 2:02:20 PM

Subject: Marriott Hotels' Proposed Site, San Antonio Road, Before & After

[image/jpeg:FullSizeRender.jpg]

Looking northeast to 744-750 San Antonio Road. Top photo is existing condition. Bottom photo is the developer's conception of the two Courtyard by Marriott and AC by Marriott Hotels. They say that the "Visual character degradation would be less than significant." Do you believe that? Is that what you see? What do you think?

Please express your concerns and views about the proposals to the Mayor and City Council, the Architectural Review Board, and Contract City Planner Sheldon Ah Sing:

Citycouncil@cityofpaloalto.org
arb@cityofpaloalto.org
Sheldon Ah Sing (408) 340.5642 SAhsing@m-group.us

Attend the ARB Meeting Thursday morning, April 6, in the Palo Alto City Council Chambers.

Thank you!
Joan Larrabee
Greenhouse One

Sent from my iPad

From: Jiniko Martinez
To: [Christina McCandless](#)
Cc: [Architectural Review Board](#); [Lori Lehr-Wiens](#); [eugene.vinsky@live.com](#); [Anupam Joshi anupamjo@gmail.com](#); [Pat Wegner](#); [Jana Jenkins](#)
Subject: Re: P.A. City Staff Report # 7846 / Marriott Hotel Project - AGAINST
Date: Thursday, April 27, 2017 1:16:17 PM

Wow, a LOVELY letter!



Jiniko~

On Thu, Apr 27, 2017 at 10:14 AM, Christina McCandless <cmccandless@principleam.com> wrote:

Please find attached a letter regarding the Marriott Hotel Project on behalf of the 88 homeowners located at 765 San Antonio Rd, Palo Alto, all of whom would be affected by this inappropriate hotel.

Please take our letter into consideration as you make a decision about this hotel on our behalf.

Thank you

Christina McCandless, CCAM, CMCA

President/CEO

Principle Association Management, Inc.

East Bay Office

39 California Ave., Suite 108

Pleasanton, CA 94566

San Francisco Office

888 7th Street

San Francisco, CA 94107

Direct. [925.401.7037 Ext. 700](tel:925.401.7037)

Toll Free. [888.747.5548](tel:888.747.5548)

www.PrincipleAM.com

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From: Dennis Clark
To: [Council, City](#)
Subject: San Antonio Road hotels
Date: Tuesday, May 16, 2017 10:18:33 AM

Please do not allow hotels to be built on San Antonio at Middlefield. Traffic is already horrible on San Antonio ALL DAY LONG. I have lived nearby for over 30 years and have watched traffic just get worse and worse. These however many hundred room Marriotts will produce gridlock. I understand the need for housing which has made Palo Alto's traffic bad, but we don't need more hotels.

Dennis Clark
4077 Ben Lomond Dr
Palo Alto

From: Josette Lin
To: [Council, City](#)
Subject: Two New Hotels on San Antonio Rd
Date: Tuesday, May 16, 2017 7:51:33 AM

Mr. Mayor & City Council Members,

We are writing to protest the building of 2 new hotels on San Antonio Rd between Leghorn and Middlefield. Apparently you do not travel frequently on this stretch of San Antonio Rd. The whole area is already so congested. Having two 5 story hotels will make traffic even worse. There are already a Hilton and a Marriott close by on El Camino Real. How many hotels does Palo Alto need in this part of the city?

We urge you to consider VERY carefully and prudently. Please focus on the impact of such an addition.

Thank you for your attention.

Josette Lin
4223 Briarwood Way
Theresa Chin
4288 Briarwood Way

Sent from my iPad

From: Filippo Radicati
To: [Council, City](#)
Subject: Proposed Plan for 2 Marriott Hotels on San Antonio Road
Date: Sunday, May 28, 2017 5:30:42 AM

I am writing to voice my strong opposition to the proposed construction of TWO hotels on San Antonio Road at 744 and 748. I am a resident of The Greenhouse complex, just across the road from the proposed site. I know first hand the existing traffic conditions, which the presence of two large hotel structures can only make worse. San Antonio Road is currently at maximum capacity during peak traffic hours and in the middle of the day. Please DO NOT approve the above projects to go further and make life for residents worse than it is now. I am a concerned resident and I vote.

Respectfully,
Filippo Radicati
777 San Antonio Road, Apt. 20

From: Joan Beitzuri
To: [Sheldon Ah Sing](#)
Cc: city.council@cityofpaloalto.org; Arb@cityofpaloalto.org; Planning.Commission@CityofPaloAlto.org
Subject: What happened to our EIR Inputs?
Date: Monday, May 29, 2017 7:29:02 PM

RE: 744 - 750 San Antonio Road - Marriott Hotels

Hi Sheldon,

What happened to all the EIR reply emails we sent in to the ARB, City Council, Planning Commission and you within the specified submission deadline?

We have not heard back from anyone. We only got an automatic reply that the City received our emails.

Is it part of the process when we submit responses to the EIR to at least receive acknowledgment from the City that they either agree or disagree with our specific inputs? If so, why?

In our email replies, we presented the City with factual and legitimate data that contradicts the EIR's findings that this massive project will pose "no significant impact" to our neighborhood.

As an example, LuLu's April 5th email analyzes the traffic and the data that the EIR used for their traffic report. As a result of this analysis, it questions the validity of the EIR's findings that traffic poses "no significant impact" if this project is approved. Did the City/Staff review this important information? Did they then question whether in fact this EIR Traffic conclusion is valid?

We should be given this information.

The decisive June 1st ARB meeting is coming up this week. It is our understanding that at this meeting the ARB can make the decision whether or not to grant permission for the demolition of 744 and 748 San Antonio Road as well as construction of these 2 hotels.

Not getting any feedback from the City, we the residents of Palo Alto, have no idea if we are being represented here. If in fact the EIR has not been finalized and approved by the City, how can the City allow the ARB to make any decisions related to this project?

We hope the City is not ignoring the legitimate concerns of Palo Alto residents that this massive hotel is not a fit in our neighborhood, because they favor the hotels as a high yielding revenue source for the City?

We would appreciate a reply before the [June 1st](#) ARB meeting.

Thank you,
Joan Beit-Zuri
Greenhouse I

From: Keith Bennett
To: [Sheldon Ah Sing; arb@cityofpalo.org](mailto:arb@cityofpalo.org)
Cc: [Esther Nigenda; ritavrhel@sbcglobal.net](mailto:ritavrhel@sbcglobal.net); [Joan Larrabee](#)
Subject: Re: Save Palo Alto's Groundwater Comments on the Marriott Hotel EIR
Date: Monday, May 29, 2017 10:52:21 AM

Sheldon,

Thank you.

I looked through the Staff Report for the meeting, and found discussion of the standard City requirements for dewatering, which primarily relate to disposal of the water. It's been shown in Palo Alto that use of groundwater from dewatering is negligible..

<https://www.cityofpaloalto.org/civicax/filebank/documents/58033>.

Did I overlook the response to our comments on the analysis of the likely quantity and impacts of dewatering in the DEIR? Or, will additional documents be provided?

The DEIR analysis appears to be based on a single-level underground garage, when the project is now 2-levels. In addition, the DEIR lacks any substantiation of the assumptions. Measurements of single family residential projects with single-level underground construction have shown significant effects hundreds of feet away. This project is far larger and deeper.

Best regards,
Keith Bennett

On 5/28/2017 11:19 PM, Sheldon Ah Sing wrote:

Hi Mr. Bennett,

Thank you for your inquiry.

We did receive many comments on both the project and the Draft Environmental Impact Report. We separated comments that were directed towards the EIR and those that were directed towards the project but not necessarily towards the EIR. The letter from Save Palo Alto's Groundwater was included in the Final EIR and responded to. There are duplicates in comments in the ARB packet attachments as you have noted. We will include this letter in the batch of general comments as well. The Board will review all of the comments that were submitted as part of their review of the project (general comments and EIR comments).

SHELDON S. AH SING, AICP | PRINCIPAL PLANNER

M-GROUP A NEW DESIGN ON URBAN PLANNING

POLICY • DESIGN • ENVIRONMENTAL • HISTORIC • ENGAGEMENT • STAFFING

CAMPBELL | SANTA ROSA | NAPA | HAYWARD

307 ORCHARD CITY DR. SUITE 100 | CAMPBELL | CA | 95008 | 408.340.5642 ext. 109

M-LAB: A THINK TANK FOR CITIES: [JOIN THE CONVERSATION!](#)

From: Keith Bennett [<mailto:pagroundwater@luxsci.net>]

Sent: Saturday, May 27, 2017 2:11 PM

To: Sheldon Ah Sing <SAhsing@m-group.us>; arb@cityofpalo.org

Cc: Esther Nigenda <enigenda@yahoo.com>; ritavrhel@sbcglobal.net; Joan Larrabee <joan.larrabee@att.net>

Subject: Fwd: Save Palo Alto's Groundwater Comments on the Marriott Hotel EIR

Correction:

The Responses are in Appendix F.

The Public Comments are in Appendix J (our letter is not included, but should be).

Dear Mr. Sing and the Architectural Review Board,

Save Palo Alto's Groundwater sent the e-mail below regarding the Marriott hotel DEIR (744 - 748 San Antonio) on May 5.

1) Is the letter below included in Appendix F of the materials for the upcoming June 1 discussion of this project?? If so, could you provide the page number? I not, is there a reason this letter is not included in the materials?

2) Several others commented on groundwater preservation issues, and the significant deficiency in the current DEIR, which is based upon a single story underground parking, not the 2-story underground parking currently planned. Simply put, there is no way the current DEIR is accurate as the assumptions are changed.

3) Can you kindly direct us to the City's response to this issue? I received an automated response from the ARB e-mail system acknowledging receipt.

Thank you for your consideration.

Keith Bennett, Ph.D.

----- Forwarded Message -----

Subject: Save Palo Alto's Groundwater Comments on the Marriott Hotel EIR

Date: Fri, 05 May 2017 18:48:32 +0000

From: Save Palo Alto's Groundwater <PAgroundwater@luxsci.net>

Reply-To: PAgroundwater@luxsci.net

To: sahsing@m-group.us, arb@cityofpalo.org,
city.council@cityofpaloalto.org

CC: enigenda@yahoo.com, ritavrhel@sbcglobal.net

Comments regarding inadequacy / inaccuracies in the EIR for the construction of the Marriott Hotels on San Antonio Road in Palo Alto.

The following are the comments of Save Palo Alto's Groundwater on the EIR for the Marriott Hotel proposed for San Antonio Ave. in Palo Alto. There are several major deficiencies.

- 1) If the garage is 2 stories below ground, the conclusions of the report need to be redone, as the groundwater will almost certainly be pumped to below 18 feet below ground surface.
- 2) the claim that "if the groundwater is pumped to 18 feet below ground surface, nearby settling should be low" is not substantiated, and in fact, given the 2 - 4% elasticity of the soils mentioned in the report, settling could be 1" or more on nearby properties. If Broad Area Dewatering is used, groundwater will be lowered significantly over a distance of ~1,000 feet from the boundary of the subject property.
- 3) Using secant (cutoff walls) should significantly reduce the amount of groundwater pumped and discarded, and also reduce the risks of settling / subsidence. However, cutoff walls exacerbate blockage of groundwater flows after construction (unless specific and sufficient measures to protect flows and water storage are taken).
- 4) The large basement significantly reduces the volume of soil available to absorb stormwater runoff (as required for the project). The applicant should provide a method to capture, store and slowly release on-site runoff on their own property. Bioswales (or similar) are required for the project, however, the project is not required to provide its own storage.
- 5) the large impervious cross-section blocks groundwater flows, increasing flood risks and raising groundwater levels during storms.
- 6) Buoyancy requirements should be made considering sea level rise and groundwater inundation. The current requirement of 5 feet below ground surface is inadequate.
- 7) Greenhouse gas emissions for the structural mass (concrete to prevent the structure from floating in high groundwater) are not considered.
- 8) The impacts of climate change and sea level rise are not considered. This property is in a low-lying area at high risk of flooding with sea level rise.

Sincerely,
Keith Bennett, Ph.D.

--

Save Palo Alto's Groundwater
PAgroundwater@luxsci.net

--

Keith Bennett

<http://savepalaltosgroundwater.org>

From: Keith Bennett
To: [Sheldon Ah Sing; arb@cityofpalo.org](mailto:arb@cityofpalo.org)
Cc: [Esther Nigenda](mailto:Esther.Nigenda@ritavrhel@sbcglobal.net); ritavrhel@sbcglobal.net; [Joan Larrabee](mailto:Joan.Larrabee@cityofpalo.org)
Subject: Fwd: Save Palo Alto's Groundwater Comments on the Marriott Hotel EIR
Date: Saturday, May 27, 2017 12:04:16 PM

Dear Mr. Sing and the Architectural Review Board,

Save Palo Alto's Groundwater sent the e-mail below regarding the Marriott hotel DEIR (744 - 748 San Antonio) on May 5.

1) Is the letter below included in Appendix F of the materials for the upcoming June 1 discussion of this project?? If so, could you provide the page number? I not, is there a reason this letter is not included in the materials?

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Reply-To: PAgroundwater@luxsci.net
To: sahsing@m-group.us, arb@cityofpalo.org, city.council@cityofpaloalto.org
CC: enigenda@yahoo.com, ritavrhel@sbcglobal.net

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- 8) The impacts of climate change and sea level rise are not considered. This property is in a low-lying area at high risk of flooding with sea level rise.

Sincerely,
Keith Bennett, Ph.D.

--

Save Palo Alto's Groundwater
PAgroundwater@luxsci.net

From: Maria Kossenko
To: city.council@cityofpaloalto.org; [Sheldon Ah Sing](#)
Subject: Two Proposed Marriott Hotels
Date: Monday, May 29, 2017 1:57:08 PM

Hello,

My name is Maria Kossenko, and my mother and I have been Palo Alto residents for 14 years.

We live in the Greenhouse Apartments, and are entirely and strongly opposed to the construction of the two hotels on San Antonio RD at 744, 748, and 750 San Antonio Rd.

San Antonio is a narrow street, which does not manage the current flow of traffic, with terrible traffic jams every day for extended periods of time.

Adding these 294-room hotels would:

- increase the flow, which will cause further delays
- increase noise levels
- increase pollution, which has already increased since the extraction of the giant pine trees on San Antonio

Traffic and noise have already gotten worse since the construction of the Google Campus on San Antonio, toward Los Altos.

The construction and utilization of these hotels would have a detrimentally adverse affect on our quality of livelihood.

We hope that our opinion, and the opinions of thousands of other Palo Alto residents will not fall on deaf ears.

Respectfully,
Maria Kossenko

From: Merridee Taylor
To: [Sheldon Ah Sing](#)
Subject: !!! NO HOTEL(s) @ 744, 748, 750 San Antonio Road !!! HELP !!!
Date: Thursday, May 25, 2017 1:43:57 PM

May 25, 2017 Attn: Mayor, City Council, Architectural Review Board and City Planning

Dear Sheldon Ah Sing,

Proposed development of 2 hotels at **740~750 San Antonio Road - MASSIVE 5-story buildings** completely **out of context** in a residential neighborhood and low density/light industry community.

TOO MUCH ! TRAFFIC CONGESTION - NOISE - 24/7 - TIME wasted in DELAYS - blocking long VIEW

The developers refer to OUR area as the “fringe” of Palo Alto and the Greenhouse as a “project”.

I am a resident of Palo Alto and have lived at the Greenhouse at 777 San Antonio Road since Autumn 1974.

I came to Palo Alto when my parents moved here in 1955 and I knew this area when it really was a greenhouse.

I need to highlight the UNTENABLE nature of their proposal:

Car/Vehicular **traffic** along San Antonio Road, has become and is already “bumper-to-bumper”, increasing in **congestion** at most hours of the day from the overpass at Alma Street all the way to 101/Bayshore Freeway.

— SUVs are backing up NE bound traffic at the Hauser School at 450 San Antonio Road, SW of Middlefield Road.

Is it not at traffic **violation to block** the “flow” of traffic ?

— Access/Exit at the proposed hotel would force:

a “U-turn” at Leghorn, increasing waiting/back-ups at the traffic light

a “U-turn” at Middlefield would increase west-bound traffic on San Antonio Rd

The developers have mentioned “Valet Parking” - this would be even slower movement than individual parking spaces (for which there is no room) and more back-up of waiting cars to enter and exit the “Court”.

Would the Front Desk have to tell the waiting guest that it will take an extra 10 to 20 to 30 minutes for them to exit the hotel’s front drive? Once their car got onto San Antonio Road it would come to a standstill.

Service vehicles - what about space for their entering, parking and exiting ?

WATER

— REMOVAL: CONTAMINATED water and possible land SUBSIDENCE !!!???

— consumption and usage - the developers say they would (re)use “rain-water” etc - is it not apparent it has **NOT RAINED** here is 4 years ? “Gray water” use by the public, at this time, is NOT an option.

Our City of Palo Alto representatives need to consider LIVING here. We need to maintain our Suburban community with maximum 2-story apartments/condo/homes, some light industry within and around more park and/or open spaces.

We need **LESS** density/congestion NOT MORE.

Sincerely,

Merridee Taylor

From: Marlene Kawahata
To: [Sheldon Ah Sing](#)
Subject: Re:
Date: Wednesday, May 24, 2017 4:28:50 PM

> On May 24, 2017, at 4:27 PM, Marlene Kawahata <marlkawahata@hotmail.com> wrote:

>

> Hello

>

> I live in Palo Alto at 384 Calcaterra Pl, Palo Alto. I live a few blocks from San Antonio rd. I am currently effected greatly by the building going on on San Antonio.

> I am amazed that Palo Alto wants to build 2 more apartments on the same road. Where will the cars go?

> San Antonio is now a problem during rush hour. What will happen if Palo Alto adds to this congestion?

> Where is the benefit to the current residences?

>

> I ask you to please reconsider the use for that property. Can't you use the property to benefit the current residences.?

>

> Thank you

>

> Marlene Kawahata

From: Architectural Review Board
To: [Lew, Alex](#); [Kim, Kyu](#); [Baltay, Peter](#); [Gooyer, Robert](#); [Furth, Wynne](#)
Cc: [Sheldon Ah Sing](#)
Subject: FW: 744-750 San Antonio proposed development
Date: Friday, May 26, 2017 10:11:10 AM

From: Michelle Hogan [mailto:myhogan@comcast.net]
Sent: Friday, May 26, 2017 10:06 AM
To: Architectural Review Board; Council, City; SAhsing@m-group.org
Cc: joan.larrabee@att.net
Subject: 744-750 San Antonio proposed development

May 26, 2017

To: Architectural Review Board, City of Palo Alto: arb@cityofpaloalto.org
City Council: city.council@cityofpaloalto.org
City Planner: SAhsing@m-group.us
Greenhouse friends and neighbors: joan.larrabee@att.net

From: Michelle Hogan, Homeowner, Greenhouse II, Unit 37, 765 San Antonio

Re: Development of 744-750 San Antonio [15PLN-00314]

I have attended several hearings regarding the developer request to build two hotel buildings on San Antonio across the street from me. I am appalled at the thought of having two five-story, 294-room hotels across the street, for the following reasons:

1. Every building on San Antonio in Palo Alto is 1 or 2 stories—including 14 single-family homes, 2 townhome complexes totaling 80 units, 2 condominium complexes totaling 232 units, and 5 school buildings. (The Jewish Community Center is on Charleston, not San Antonio.) A 5-story commercial complex of almost 154,000 square feet seems grossly out of proportion to the rest of the street.
2. Traffic is already a nightmare on San Antonio, exacerbated by the fact that this street is the truck entrance to Palo Alto. As you know, Mountain View is in the final stages of building a 2000-seat movie complex at San Antonio Center, which is only going to add to the nightmare. We really don't need more traffic; the street is already clogged many hours of the day.
3. In the packet distributed at the first hearing from Randy Popp, Architect, he says he has 14 support letters from businesses for the Marriott project (actually one letter and 13 pre-printed forms). There are a total of 44 small businesses on San Antonio (besides the homes and schools), and only 6 of these 44 businesses filled out the form he distributed asking for support (the rest were businesses on other streets). That's just 13.6% of the businesses on San Antonio—not exactly resounding support, even from the business community.

Most of the 326 families who live on San Antonio in Palo Alto work during the day, so aren't able to attend the various hearings about this proposal. But I know my neighbors and I are not at all happy about the prospect of a 154,000-square-foot five-story development across the street. At the first Architectural Review Board hearing last July, I heard board members asking the developer to go back to the drawing board and tone down the size of this project. Almost a year later, it really hasn't been done, and I hope you will continue to insist on something more in harmony with the rest of the neighborhood (no more than 2 stories high!).

Carnahan, David

From: Joan Beitzuri <joan.beitzuri@comcast.net>
Sent: Monday, May 29, 2017 7:29 PM
To: SAhsing@m-group.us
Cc: Council, City; Architectural Review Board; Planning Commission
Subject: What happened to our EIR Inputs?

RE: 744 - 750 San Antonio Road - Marriott Hotels

Hi Sheldon,

What happened to all the EIR reply emails we sent in to the ARB, City Council, Planning Commission and you within the specified submission deadline?

We have not heard back from anyone. We only got an automatic reply that the City received our emails.

Is it part of the process when we submit responses to the EIR to at least receive acknowledgment from the City that they either agree or disagree with our specific inputs? If so, why?

In our email replies, we presented the City with factual and legitimate data that contradicts the EIR's findings that this massive project will pose "no significant impact" to our neighborhood.

As an example, LuLu's April 5th email analyzes the traffic and the data that the EIR used for their traffic report. As a result of this analysis, it questions the validity of the EIR's findings that traffic poses "no significant impact" if this project is approved. Did the City/Staff review this important information? Did they then question whether in fact this EIR Traffic conclusion is valid?
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We would appreciate a reply before the [June 1st](#) ARB meeting.

Thank you,
Joan Beit-Zuri
Greenhouse I

Carnahan, David

From: Maria Kossenko <mariavkossenko@gmail.com>
Sent: Monday, May 29, 2017 1:56 PM
To: Council, City; sahsing@m-group.us
Subject: Two Proposed Marriott Hotels

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We hope that our opinion, and the opinions of thousands of other Palo Alto residents will not fall on deaf ears.

Respectfully,
Maria Kossenko

Carnahan, David

From: Filippo Radicati <filipporadicati@gmail.com>
Sent: Sunday, May 28, 2017 5:31 AM
To: Council, City
Subject: Proposed Plan for 2 Marriott Hotels on San Antonio Road

I am writing to voice my strong opposition to the proposed construction of TWO hotels on San Antonio Road at 744 and 748. I am a resident of The Greenhouse complex, just across the road from the proposed site. I know first hand the existing traffic conditions, which the presence of two large hotel structures can only make worse. San Antonio Road is currently at maximum capacity during peak traffic hours and in the middle of the day. Please DO NOT approve the above projects to go further and make life for residents worse than it is now. I am a concerned resident and I vote.

Respectfully,
Filippo Radicati
777 San Antonio Road, Apt. 20

Carnahan, David

From: Michelle Hogan <myhogan@comcast.net>
Sent: Friday, May 26, 2017 10:06 AM
To: Architectural Review Board; Council, City; SAhsing@m-group.org
Cc: joan.larrabee@att.net
Subject: 744-750 San Antonio proposed development

May 26, 2017

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Thank you

Marlene Kawahata

Attachment K

Environmental Impact Report

The project Environmental Impact Report is available on-line at the following address, which includes the Appendices.

<http://www.cityofpaloalto.org/news/displaynews.asp?NewsID=3133>