Resolution No. 9818
Resolution of the Council of the City of Palo Alto Certifying the Adequacy of the Final Environmental Impact Report for the Downtown Parking Garage Project at 375 Hamilton Avenue, Making Certain Findings Concerning Significant Environmental Impacts and Mitigation Measures, and Adopting a Mitigation Monitoring and Reporting Program, All Pursuant to the California Environmental Quality Act

RECITALS

A. The City of Palo Alto ("City") has proposed the Downtown Parking Garage Project, comprised of a multi-level parking garage with ground floor retail space, on a City surface parking lot at 375 Hamilton Avenue in the Downtown commercial area in Palo Alto (the "Project").

B. Approval of the Project would constitute a project under the provisions of the California Environmental Quality Act of 1970, together with related state and local implementation guidelines promulgated thereunder ("CEQA").

C. The City is the Lead Agency pursuant to Public Resources Code section 21067 as it has the principal responsibility to approve and regulate the Project.

D. The City, in compliance with CEQA, prepared an Environmental Impact Report (EIR) to provide an assessment of the potential environmental consequences of approving and constructing the Project and approving associated zoning code amendments.

E. A Draft Environmental Impact Report ("Draft EIR") was circulated for public review from May 18, 2018, through July 2, 2018, during which time the City held a public hearing to receive comments on the Draft EIR by the City's Architectural Review Board (ARB) on June 21, 2018.

F. The City considered the comments received during the Draft EIR public review period and prepared a Final Environmental Impact Report ("Final EIR"). The Final Environmental Impact Report is comprised of the Draft EIR, together with the Final Environmental Impact Report (Addendum) published on August 10, 2018 (collectively, all of said documents are referred to herein as the "EIR").

G. The Council is the decision-making body for approval of the proposed Project.

H. CEQA requires that in connection with approval of a project for which an environmental impact report has been prepared that identifies one or more significant environmental effects of the project, the decision-making body of a public agency make certain findings regarding those effects.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF PALO ALTO AS FOLLOWS:

SECTION 1. Certification and General Findings

The City Council, in the exercise of its independent judgment, makes and adopts the following findings to comply with the requirements of CEQA, including Sections 15091, 15092, and 15093 of the CEQA Guidelines, based upon the entire record of proceedings for the Project. All statements set forth in this Resolution constitute formal findings of the City Council, including the statements set forth in this paragraph and in the recitals above.

1. The City Council was presented with, and has independently reviewed and analyzed the EIR and other information in the record and has considered the information contained therein prior to acting upon and approving the Project, and bases the findings stated below on such review.
2. The EIR provides an adequate basis for considering and acting upon the Project. The City Council has considered all of the evidence and arguments presented during consideration of the Project and the EIR. In determining whether the Project may have a significant impact on the environment, and in adopting the findings set forth herein, the City Council certifies that it has complied with Public Resources Code Sections 21081, 21081.5, and 21082.2.
3. The City Council agrees with the characterization of the EIR with respect to all impacts initially identified as "less than significant" and finds that those impacts have been described accurately and are less than significant as so described in the EIR. This finding does not apply to impacts identified as significant or potentially significant that are reduced to a less than significant level by mitigation measures included in the EIR. The disposition of each of those impacts and the mitigation measures adopted to reduce them are addressed specifically in the findings below.
4. Mitigation measures associated with the potentially significant impacts of the Project will be implemented through the Mitigation Monitoring and Reporting Program (MMRP) described below, which is the responsibility of the City.
5. The EIR considers a reasonable range of potentially feasible alternatives, sufficient to foster informed decision making, public participation and a reasoned choice, in accordance with CEQA.
6. The Final EIR contains responses to comments received on the Draft EIR. The Final EIR also contains corrections and clarifications to the text and analysis of the Draft EIR where warranted. The City Council does hereby find that such changes and additional information are not significant new information under CEQA because such changes and additional information do not indicate that any of the following would result from approval and implementation of the Project: (i) any new significant environmental impact or substantially more severe environmental impact (not already disclosed and evaluated in the DEIR), (ii) any feasible mitigation measure considerably different from

those analyzed in the Draft EIR that would lessen a significant environmental impact of the Project has been proposed and would not be implemented, or (iii) any feasible alternative considerably different from those analyzed in the DEIR that would lessen a significant environmental impact of the Project has been proposed and would not be implemented. The City Council does find and determine that recirculation of the Final EIR for further public review and comment is not warranted or required under the provisions of CEQA.

7. The City Council does hereby find and certify that the EIR has been prepared and completed in compliance with CEQA and reflects the City of Palo Alto's independent judgment and analysis.
8. The City Council does hereby make the following findings with respect to significant effects on the environment of the Project, as identified in the EIR, with the understanding that all of the information in this Resolution is intended as a summary of the full administrative record supporting the EIR, which full administrative record should be consulted for the full details supporting these findings.

SECTION 2. Findings on Significant Impacts and Mitigation Measures

Pursuant to Public Resources Code Section 21081 and CEQA Guidelines Section 15091, the City Council hereby makes these findings with respect to the potential for significant environmental impacts from approval and implementation of the Project and the means for mitigating those impacts.

These findings do not attempt to describe the full analysis of each environmental impact contained in the EIR. Instead, the findings provide a summary description of each impact, describe the applicable mitigation measures identified in the EIR and adopted by the City, and state the findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the EIR. These findings hereby incorporate by reference the discussion and analysis in the EIR that support the EIR's determinations regarding significant project impacts and mitigation measures designed to address those impacts. The facts supporting these findings are found in the record as a whole for the Project.

In making these findings, the City ratifies, adopts, and incorporates into these findings the analysis and explanation in the EIR, and ratifies, adopts, and incorporates into these findings the determinations and conclusions of the EIR relating to environmental impacts and mitigation measures, except to the extent that any such determinations and conclusions are specifically and expressly modified by these findings.

The EIR identified a number of significant and potentially significant environmental impacts that the Project will cause or to which the Project would contribute. 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 EIR.

Biological Resources

Impact BIO-d: Potential Impacts on Nesting Birds. The project could interfere substantially with the movement of a native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

a) Potential Impact. The impact identified above is described and discussed in Section 3.3.3.2.d of the Draft EIR.

b) Mitigation Measures. The following mitigation measure will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings:

MM BIO-1 Nesting Bird Surveys and Avoidance. Construction of the project and any other site disturbing activities that would involve vegetation or tree removal, shall be prohibited during the general avian nesting season (February 1 to August 31), if feasible. If nesting season avoidance is not feasible, the applicant shall retain a qualified biologist, as approved by the City of Palo Alto, to conduct a preconstruction nesting bird survey to determine the presence/absence, location, and activity status of any active nests on or adjacent to the project site. The extent of the survey buffer area surrounding the site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided. To avoid the destruction of active nests and to protect the reproductive success of birds protected by the MBTA and CFGC, nesting bird surveys shall be performed not more than 14 days prior to scheduled vegetation clearance and structure demolition. In the event that active nests are discovered, a suitable buffer (typically a minimum buffer of 50 feet for passerines and a minimum buffer of 250 feet for raptors) shall be established around such active nests and no construction shall be allowed within the buffer areas until a qualified biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). No ground disturbing activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Nesting bird surveys are not required for construction activities occurring between August 31 and February 1.

c) Finding and Rationale. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. The only wildlife that is anticipated to be present within the project area is wildlife associated with the built urban environment such as rodents, other small animals, and native and migratory birds. These small animals are not restricted by the type of developments in the project area. Tree removal activities have the potential to

disturb resident and migratory birds resulting in a short-term reduction in potential nesting and foraging habitat as well as directly destroying active nests; however, it is anticipated that resident and migratory bird species would resume nesting and foraging behavior once the construction is complete, and would utilize existing nearby nesting and foraging habitat during construction. With implementation of MM BIO-1, the project would have a less than significant impact on these wildlife species and their movements in the area.

d) Remaining Impact. Mitigation Measure BIO-1 specified above would reduce all potential impacts to less than significant.

Impact BIO-e: Conflict with Tree Preservation Policy/Protected Trees. One of the existing trees, of the species Coast Live Oak (Quercus agrifolia), is protected under the City of Palo Alto's Tree Regulations. Although it is designated as a protected tree, this tree will be removed from the site due to previous imprecise pruning leaving it in poor condition and with the potential for breakage. Thus the project could conflict with a local policy or ordinance protecting biological resources, such as the tree preservation policy or ordinance, if the protected tree is not replaced.

a) Potential Impact. The impact identified above is described and discussed in Section 3.3.3.2.e of the Draft EIR.

b) Mitigation Measures. The following mitigation measures will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings.

MM BIO-2 Tree Preservation and Protection Plan. To avoid disturbance and injury to onsite trees, the recommendations for tree preservation in the Arborist Report dated May 2017 shall be implemented. These recommendations include, but are not limited to, tree protection fencing to enclose as much of the TPZ as feasible around City trees on the sidewalks, no grading encroachments closer than 6 inches to the tree trunk diameter, and periodic inspections by the Site Arborist during construction activities.

MM BIO-3 Tree Replacement. The removal of protected Coast Live Oak tree (Tree #8 in the Arborist Report prepared for the project) is subject to the City of Palo Alto's tree removal ordinance in Palo Alto Municipal Code Chapter 8.10. Trees removed will be replaced according to replacement tree mitigation measures using the Tree Canopy Replacement Standard in the City's Tree Technical Manual, Section 3.00. The replacement standards outlined in the Tree Technical Manual will be utilized to achieve no net loss of canopy per Policy 1.G of the Urban Forest Master Plan; specifically, three native oaks will be planted in the Hamilton Avenue right of way at the project site. Site preparation and soil volume requirements shall apply so that newly planted trees have the potential to mature to desired size and thrive.

c) Finding and Rationale. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. Implementation of MM BIO-2 and MM BIO-3 to protect, preserve, and replace trees, the project would not contribute to cumulative adverse impacts. Therefore, impacts under this criterion would be less than significant with mitigation incorporated. As a replacement, three new trees will be planted on site. The City's Urban Forester has determined that the planting of three native oaks in the Hamilton Avenue right of way at the project site is appropriate as mitigation to replace the loss of the one Coast Live Oak on site, subject to the standard requirement to provide adequate soil conditions to ensure the replacement trees will thrive. A total of nine trees would be planted on the project site as part of the landscaping plan. There will be no net loss of trees.

d) Remaining Impact. Mitigation measure BIO-2 and BIO-3 specified above would reduce all potential impacts to less than significant.

Cultural, Paleontological, and Tribal Cultural Resources

Impact CTR-c: Eliminate Important Examples of California History or Prehistory.
Impact CTR-d: Adverse Change in the Significance of an Archeological Resource.
Impact CTR-e: Disturb Human Remains.
Impact CTR-f: Destroy Paleontological Resource.
Due to excavation of a significant depth being a necessity to construct the basement of the project, there is a potential to disrupt, alter, or eliminate undiscovered archeological resources including those of human remains.

a) Potential Impact. The impacts identified above are described and discussed in Section 3.4.3.2.c, d, e, and f of the Draft EIR.

b) Mitigation Measures. The following mitigation measures will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings.

MM CTR-1 Resource Recovery Procedures. In the event that archaeological or paleontological resources are unearthed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist or paleontologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. A Native American representative shall be retained to monitor any mitigation work associated with Native American cultural material.

MM CTR-2 Human Remains Recovery Procedures. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and

disposition pursuant to the Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission. Additional surveys will be required if the project changes to include unsurveyed areas.

c) Finding and Rationale: Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. Mitigation Measures CTR-1 and CTR-2 would reduce impacts to less than significant regarding disrupting intact archaeological resources, paleontological resources, and human remains to a less than significant level.

d) Remaining Impact: Mitigation Measures CTR-1 and CTR-2 specified above would reduce all potential impacts to less than significant.

Impact CTR-g: Tribal Resources. Although no tribal cultural resources are expected to be present on-site, new ground disturbance would be below the level of past disturbance. As a result, there is the possibility of encountering undisturbed subsurface tribal cultural resources. The proposed excavation of the project site could potentially result in adverse effects on unanticipated tribal cultural resources.

a) Potential Impact. The impact identified above is described and discussed in Section 3.4.3.2.g of the Draft EIR.

b) Mitigation Measures. The following mitigation measures will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings.

MM CTR-3 Unanticipated Discovery of Tribal Cultural Resources. If cultural resources of Native American origin are identified during construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the City determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archeologist and the appropriate Native American tribal representative.

c) Finding and Rationale: Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. Mitigation Measure CTR-3 would be would reduce impacts from the unanticipated discovery of tribal cultural resources during construction to less than significant with MM CTR-3.

d) Remaining Impact: Mitigation Measure CTR-3 specified above would reduce all potential impacts to less than significant.

Geology and Soils

Impact GEO-b: Seismic Ground Shaking, Seismic-Related Ground Failure, including Liquefaction. Development of the proposed project would involve the construction and occupancy of a new building in a location where strong seismic ground shaking can be expected to occur over the life of the project. In addition, the northern part of the project site is located within a State designated Liquefaction Hazard Zone as well as Santa Clara County Liquefaction Hazard Zone. The project would thus expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking or seismic-related ground failure, including liquefaction.

a) Potential Impact. The impact identified above is described and discussed in Section 3.5.3.2.b of the Draft EIR.

b) Mitigation Measures. The following mitigation measures will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings.

MM GEO-1 Geotechnical Investigation for Basement Structure. Building foundations shall be designed to tolerate total and differential settlements due to static loads and liquefaction-induced settlement in accordance with the recommendations of the geotechnical report. The current geotechnical report includes recommendation for a no-basement building only. The project sponsor shall retain the service of a qualified state licensed engineering and geology specialist to include site-specific recommendations to mitigate the potential for risks associated with seismic ground shaking, seismic-related ground failure and liquefaction for the foundation of a building with basement. The updated report shall include design requirements for the construction of the foundation for the basement option.

c) Finding and Rationale. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. With implementation of MM GEO-1, the construction of the proposed project would not expose people or structures to adverse effects involving strong seismic ground shaking. Therefore, the impacts would be less than significant with mitigation incorporated.

d) Remaining Impact. Mitigation Measure GEO-1 specified above would reduce all potential impacts to less than significant.

Impact GEO-c: Landslides. The construction of the proposed project would require excavation and fill placement, there would be some potential for constructed (cut and fill) slopes to fail if they are improperly designed or constructed. The excavation of the project site for the basement level of the building would increase the exposure of onsite construction workers to hazards associated with slope failure.

a) Potential Impact. The impact identified above is described and discussed in Section 3.5.3.2.c of the Draft EIR.

b) Mitigation Measures. The following mitigation measures will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings.

MM GEO-2 Temporary Shoring, Slopes and Cut. The project sponsor's contractor is responsible for maintaining all temporary slopes and providing temporary shoring where required. Temporary shoring, bracing and cuts/fills shall be performed in accordance with the strictest government safety standards. Excavation during site demolition and fill removal should be sloped at 3:1 (horizontal: vertical) within the upper 5 feet. For excavation extending more than 5 feet below building subgrade, excavations shall be sloped in accordance with the OSHA soil classification. The contractor is responsible for selecting the shoring method according to their judgment and experience considering adjacent improvements such as foundation loads, utilities and pavement. The qualified state licensed engineering and geology specialist in charge of the geotechnical report shall review the shoring design prior to implementation. Recommendations of the geotechnical report for temporary shoring are soldier beams and tie-backs, braced excavation, or other potential methods. The contractor is responsible or using best management practices to maintain all temporary slopes and providing temporary shoring where required.

c) Finding and Rationale. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. With implementation of the Mitigation Measure GEO-2, the construction of the proposed project would not expose people or structures to adverse effects involving strong seismic ground shaking. The geotechnical report prepared for the project includes site-specific design requirements to mitigate the potential for risks associated with landslide during construction. Therefore, the impacts would be less than significant with mitigation incorporated.

d) Remaining Impact. Mitigation Measure GEO-2 specified above would reduce all potential impacts to less than significant.

Hazardous Waste and Materials

Impact HAZ-d: Hazardous Materials Contamination. There is possibility that some construction activities such as ground disturbance from excavation may come into contact with contamination that has migrated from other sites.

a) Potential Impact. The impact identified above is described and discussed in Section 3.7.3.2.d of the Draft EIR.

b) Mitigation Measures. The following mitigation measures will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings.

MM HAZ-1 Health and Safety Plan. The City as project sponsor will implement the following standard measures to avoid and minimize impacts from hazardous material to construction workers and the general public during construction: 1) In the event of exposing hazardous material during construction, the City will implement standard measures required by the federal, state, and local regulations for the collection, transport, and disposal of the material to prevent the exposure of workers and the public to such material; 2) The City will require the contractor to prepare and implement a Health and Safety Plan that includes a Hazardous Materials Management and Spill Prevention and Control Plan prior to commencement of construction. The plan will include the project-specific related hazardous materials and waste operations.

c) Finding and Rationale. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. With implementation of MM HAZ-1, the proposed project would not create a significant hazard to the public or the environment from existing hazardous materials contamination. Because any contaminated soil or groundwater, if encountered, would be properly disposed of, there would be no impact to future users of the site. Therefore, impacts would be less than significant with mitigation incorporated.

d) Remaining Impact. Mitigation Measure HAZ-1 specified above would reduce all potential impacts to less than significant.

Transportation

Impact TRA-a: Conflict with Plan, Ordinance, Policy – Circulation. Implementation of the project could conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Construction activities would generate construction-related truck and employee trips that could create a temporary increase in localized traffic. Also, if the City implements paid parking at the parking structure, gates

would be required which could slow the flow of the traffic resulting in vehicle queuing on to Hamilton Avenue.

a) Potential Impact. The impact identified above is described and discussed in Section 3.12.4.2.a of the Draft EIR.

b) Mitigation Measures. The following mitigation measures will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings.

MM TR-1 Construction Traffic Control Plan. Prior to the excavation, the construction contractor shall develop the traffic control plan in accordance with City's policies, coordinate with VTA and submit for City approval. The plan shall be implemented throughout the course of the project construction and shall include, but not limited to, the following elements:

- Limit truck access to the project site during peak commute times (7:00 A.M. to 9:00 A.M. and 4:00 P.M. to 6:00 P.M.)
- Restrict construction truck routes to truck routes designated by the City
- Contractor will provide adequate parking or carpool strategy for construction employees near the construction site, as approved by the City
- Require traffic control in the project entrance driveway, including flag persons wearing bright orange or red vests and using "Stop/Slow" Paddle to control oncoming traffic
- Coordinate with VTA to temporarily relocate the bus stop to ensure minimal impacts during sidewalk closure, if needed
- Maintain bicycle and pedestrian access and circulation during project construction. If construction encroaches on a sidewalk, a safe detour will be provided for pedestrian at the nearest crosswalk
- Repair or restore the road right-of-way to its original condition or better upon completion of the work
- Provide access for emergency vehicles at all time

MM TR-2 Vehicle Queuing Analysis. In the event the project includes a paid parking component and, therefore, includes a parking gate, the project sponsor must prepare and submit a queuing study that shows, to the satisfaction of the Transportation Division, that queuing into Hamilton Avenue would be avoided. Queuing includes a line of two or more vehicles waiting to enter the structure, which could block traffic on Hamilton. The study will consider the configuration and the anticipated volume of vehicles accessing the parking garage during the peak hour. The provisional gates must process vehicles efficiently such that vehicles do not have to wait to turn into the parking facility.

c) Finding and Rationale. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. Incorporation of Mitigation Measures TR-1 and TR-2 would ensure that the project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Implementation of MM TR-1 Traffic Control Plan would reduce the potential of traffic disruption to less than significant. During the operation of the parking structure, several measures would be implemented to optimize the operation of the parking structure and avoid vehicles queuing on Hamilton Avenue. At this time, the City has not decided whether the parking structure would be a paid parking structure; if paid parking is implemented, gates would be required and could slow the flow of the traffic into the garage. Implementation of MM TR-2 would ensure that queues from the parking garage do not back up onto Hamilton Avenue. For these reasons, the project would have a less than significant impact with mitigation incorporated.

d) Remaining Impact. Mitigation Measures TR-1 and TR-2 specified above would reduce all potential impacts to less than significant.

Impact TRA-e: Emergency Access Impact. There could be a temporary impact to emergency access at the project site during construction.

a) Potential Impact. The impact identified above is described and discussed in Section 3.12.4.2.e of the Draft EIR.

b) Mitigation Measures. The following mitigation measure will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings.

MM TR-1 Construction Traffic Control Plan. Prior to the excavation, the construction contractor shall develop the traffic control plan in accordance with City's policies, coordinate with VTA and submit for City approval. The plan shall be implemented throughout the course of the project construction and shall include, but not limited to, the following elements:

- Limit truck access to the project site during peak commute times (7:00 A.M. to 9:00 A.M. and 4:00 P.M. to 6:00 P.M.)
- Restrict construction truck routes to truck routes designated by the City
- Contractor will provide adequate parking or carpool strategy for construction employees near the construction site, as approved by the City
- Require traffic control in the project entrance driveway, including flag persons wearing bright orange or red vests and using "Stop/Slow" Paddle to control oncoming traffic
- Coordinate with VTA to temporarily relocate the bus stop to ensure minimal impacts during sidewalk closure, if needed

- Maintain bicycle and pedestrian access and circulation during project construction. If construction encroaches on a sidewalk, a safe detour will be provided for pedestrian at the nearest crosswalk
- Repair or restore the road right-of-way to its original condition or better upon completion of the work
- Provide access for emergency vehicles at all time

c) Finding and Rationale. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. Incorporation of Mitigation Measures TR-1 would ensure that the project would not result in inadequate emergency access. Therefore, the project would have a less than significant impact with mitigation incorporated.

d) Remaining Impact. Mitigation Measures TR-1 specified above would reduce all potential impacts to less than significant.

Impact TRA-f: Conflict With Policies, Plans, Programs or Decrease Performance Or Safety for Public Transit, Bicycle, and Pedestrians. The project could conflict with adopted policies, plans, or program regarding public transit, bicycle or pedestrian facilities or decrease their performance. The project could involve a temporary closure of the sidewalk on Hamilton Avenue or Waverley Street and a bus stop on Hamilton Avenue in front of the project site. Furthermore, entries and exits of trucks and heavy constructions vehicles from the project site in the downtown area could impact the bicyclists and the pedestrians.

a) Potential Impact. The impact identified above is described and discussed in Section 3.12.4.2.f of the Draft EIR.

b) Mitigation Measures. The following mitigation measures will be adopted and will be implemented as provided in the MMRP, and as further described in the remainder of these findings.

MM TR-1 Construction Traffic Control Plan. See above.

MM TR-3 Parking Structure Access and Exit Safety Improvement. The following improvement shall be implemented to improve safety in accessing and exiting the proposed parking structure: The City will install a stop sign at the intersection of Lane 21 and Bryant Street.

c) Finding and Rationale. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect identified in the EIR. With the implementation of MM TR-1 and MM TR-3, the proposed project would not conflict with adopted policies, plans, or program regarding public transit, bicycle or pedestrian facilities or decrease their performance. Therefore, the project would have less than significant impact with mitigation incorporated.

d) Remaining Impact. Mitigation Measures TR-1 and TR-3 specified above would reduce all potential impacts to less than significant.

SECTION 3. 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.

Because all of the Project's impacts are being mitigated through the adoption of mitigation measures described above, and because the Project will thus not result in any significant environmental effects, the City Council finds that there is no need to further consider the feasibility of any of the alternatives identified in the Final EIR.

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 standard project requirements incorporated as part of the project and 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 the 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.

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SECTION 5. Location and Custodian of Records

The documents and other materials that constitute the record of proceedings on which the City Council based the foregoing findings and approval of the Project are located at the Department of Planning and Community Environment, 250 Hamilton Avenue, Palo Alto, CA 94301. The official custodian of the record is the Planning Director at the same address.

PASSED: February 11, 2019

AYES: CORMACK, DUBOIS, FILSETH, FINE, KNISS, KOU, TANAKA

NOES:

ABSENT:

ABSTENTIONS:

ATTEST:

DocuSigned by:
Beth Minor
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City Clerk

APPROVED:

DocuSigned by:
Eric Filseth
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Mayor

APPROVED AS TO FORM:

DocuSigned by:
Sandra Lee
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Assistant City Attorney

APPROVED:

DocuSigned by:
Ed Shikada
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City Manager

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Brad Eggleston
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Director of Public Works

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Director of Planning and Community Environment

EXHIBIT A

DOWNTOWN PARKING GARAGE (375 Hamilton Avenue)

MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

The environmental mitigation measures listed in column two below have been incorporated into the conditions of approval for the Palo Alto Public Safety Building and California Avenue Parking Garage in order to mitigate identified environmental impacts. A completed and signed chart will indicate that each mitigation requirement has been complied with, and that City and state monitoring requirements have been fulfilled with respect to Public Resources Code section 21081.6.

Environmental Impact	Mitigation Measure	Responsible for Implementation	Responsible for Monitoring and Verification	Timing Requirements	Verification Signature	Verification Date
Topic 3 – Biological Resources						
BIO-d: Potential Impacts on Nesting Birds The project could interfere substantially with the movement of a native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	**MM BIO-1 Nesting Bird Surveys and Avoidance** Construction of the project and any other site disturbing activities that would involve vegetation or tree removal, shall be prohibited during the general avian nesting season (February 1 to August 31), if feasible. If nesting season avoidance is not feasible, the City of Palo Alto, as the project sponsor, shall retain a qualified biologist, to conduct a preconstruction nesting bird survey to determine the presence/absence, location, and activity status of any active nests on or adjacent to the project site. The extent of the survey buffer area surrounding the site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided. To avoid the destruction of active nests and to protect the reproductive success of birds protected by the MBTA and CFGC, nesting bird surveys shall be performed not more than 14 days prior to scheduled vegetation clearance and structure demolition. In the event that active nests are discovered, a suitable buffer (typically a minimum buffer of 50 feet for passerines and a minimum buffer of 250 feet for raptors) shall be established around such active nests and no construction shall be allowed within the buffer areas until a qualified biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). No ground disturbing activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Nesting bird surveys are not required for construction activities occurring between August 31 and February 1.	City of Palo Alto Director of Public Works, and the City's construction contractor	City of Palo Alto Director of Planning and Community Environment	Qualified biologist shall be retained prior to any grading and excavation. Nesting bird surveys shall be performed not more than 14 days prior to scheduled vegetation clearance and structure demolition. Nesting season is between February 1 to August 31. On-going monitoring during construction activities.		
BIO-e: Conflict with Tree Preservation Policy and Protected Trees One of the existing trees, of the species Coast Live Oak (Quercus agrifolia), is protected under the City of Palo Alto's Tree Regulations. Although it is designated as a protected tree, this tree will be removed from the site due to previous imprecise pruning leaving it in poor condition and with the potential for breakage.	**MM BIO-2 Tree Preservation and Protection Plan** To avoid disturbance and injury to onsite trees, the recommendations for tree preservation in the Arborist Report dated May 2017 shall be implemented. These recommendations include, but are not limited to, tree protection fencing to enclose as much of the Tree Protection Zone (TPZ) as feasible around City trees on the sidewalks, no grading encroachments closer than 6 inches to the tree trunk diameter, and periodic inspections by the Site Arborist during construction activities.	City of Palo Alto Director of Public Works, and the City's construction contractor	City of Palo Alto Director of Planning and Community Environment in consultation with the City arborist	Prior to construction. On-going during construction activities.		

Thus the project could conflict with a local policy or ordinance protecting biological resources, such as the tree preservation policy or ordinance, if the protected tree is not replaced.						
	MM BIO-3 Tree Replacement The removal of protected Coast Live Oak tree (Tree #8 in the Arborist Report prepared for the project) is subject to the City of Palo Alto's tree removal ordinance in Palo Alto Municipal Code Chapter 8.10. Trees removed will be replaced according to replacement tree mitigation measures using the Tree Canopy Replacement Standard in the City's Tree Technical Manual, Section 3.00. The replacement standards outlined in the Tree Technical Manual will be utilized to achieve no net loss of canopy per Policy 1.G of the Urban Forest Master Plan; specifically, three native oaks will be planted in the Hamilton Avenue right of way at the project site. Site preparation and soil volume requirements shall apply so that newly planted trees have the potential to mature to desired size and thrive.	City of Palo Alto Director of Public Works, and the City's construction contractor	City of Palo Alto Director of Planning and Community Environment in consultation with the City landscape architect and arborist	Prior to construction as part of the landscape architecture drawing. Post construction.		
Topic 4 – Cultural, Paleontological and Tribal Cultural Resources						
CTR-c: Eliminate Important Examples of California History or Prehistory **CTR-d: Adverse Change in the Significance of an Archeological Resource** **CTR-f: Destroy Paleontological Resource** Due to excavation of a significant depth being a necessity to construct the basement of the project, there is a potential to disrupt, alter, or eliminate undiscovered archeological resources including those of human remains. There are no known paleontological resources or unique geologic features in the project site.	**MM CTR-1 Resource Recovery Procedures** In the event that archaeological or paleontological resources are unearthed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist or paleontologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. A Native American representative shall be retained to monitor any mitigation work associated with Native American cultural material.	City of Palo Alto Director of Public Works	City of Palo Alto Director of Planning and Community Environment	Upon discovery of archeological or paleontological site and for the duration of soil-disturbing activities.		
CTR-c: Eliminate Important Examples of California History or Prehistory **CTR-d: Adverse Change in the Significance of an Archeological Resource** **CTR-e: Disturb Human Remains** **CTR-f: Destroy Paleontological Resource** Due to excavation of a significant depth being a necessity to construct the basement of the project, there is a potential to disrupt, alter, or eliminate undiscovered archeological resources including those of human remains.	**MM CTR-2 Human Remains Recovery Procedures** If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to the Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission. Additional surveys will be required if the project changes to include un-surveyed areas.	City of Palo Alto Director of Public Works, and the City's construction contractor	City of Palo Alto Director of Planning and Community Environment	Upon discovery of human remains and for the duration of soil-disturbing activities.		

CTR-g: Tribal Resources Although no tribal cultural resources are expected to be present on-site, new ground disturbance would be below the level of past disturbance. As a result, there is the possibility of encountering undisturbed subsurface tribal cultural resources. The proposed excavation of the project site could potentially result in adverse effects on unanticipated tribal cultural resources.	**MM CTR-3 Unanticipated Discovery of Tribal Cultural Resources** If cultural resources of Native American origin are identified during construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the City determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archeologist and the appropriate Native American tribal representative.	City of Palo Alto Director of Public Works, and the City's construction contractor	City of Palo Alto Director of Planning and Community Environment	Upon discovery of tribal cultural resources and for the duration of soil-disturbing activities.		
Topic 6 – Geology and Soils						
GEO-b: Seismic Ground Shaking, Seismic-Related Ground Failure, including Liquefaction Development of the proposed project would involve the construction and occupancy of a new building in a location where strong seismic ground shaking can be expected to occur over the life of the project. In addition, the northern part of the project site is located within a State designated Liquefaction Hazard Zone as well as Santa Clara County Liquefaction Hazard Zone. The project would thus expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking or seismic-related ground failure, including liquefaction.	**MM GEO-1 Geotechnical Recommendation for Basement Structure** Building foundations shall be designed to tolerate total and differential settlements due to static loads and liquefaction-induced settlement. The current geotechnical report includes recommendation for a no-basement building only. • The project sponsor shall retain the service of a qualified state licensed engineering and geology specialist to include site-specific recommendation to mitigate the potential for risks associated with seismic ground shaking, seismic-related ground failure and liquefaction for the foundation of a building with basement. The updated report shall include design requirements for the construction of the foundation for the basement option. • Foundation recommendations for a structure with basement will be dependent on the final basement depth due to various affects from groundwater, liquefaction, and other soil conditions at the bottom of the proposed basement depth.	City of Palo Alto Director of Public Works, and the City's construction contractor	City of Palo Alto Director of Planning and Community Environment	Prior to beginning of the construction.		
GEO-c: Landslides The construction of the proposed project would require excavation and fill placement, there would be some potential for constructed (cut and fill) slopes to fail if there are improperly designed or constructed. The	**MM GEO-2 Temporary Shoring, Slopes and Cut** The project sponsor's contractor is responsible for maintaining all temporary slopes and providing temporary shoring where required. Temporary shoring, bracing and cuts/fills shall be performed in accordance with the strictest government safety standards. Excavation during site demolition and fill removal	City of Palo Alto Director of Public Works, and the City's construction contractor	City of Palo Alto Director of Planning and Community Environment The qualified state licensed engineering and geology specialist in charge of the	Prior to beginning of the excavation. On-going during excavation and soil disturbance activities.		

excavation of the project site for the basement level of the building would increase the exposure of onsite construction workers to hazards associated with slope failure.	should be sloped at 3:1 (horizontal: vertical) within the upper 5 feet. For excavation extending more than 5 feet below building subgrade, excavations shall be sloped in accordance with the OSHA soil classification. The contractor is responsible for selecting the shoring method according to their judgment and experience considering adjacent improvements such as foundation loads, utilities and pavement. The qualified state licensed engineering and geology specialist in charge of the geotechnical report shall review the shoring design prior to implementation. Recommendations of the geotechnical report for temporary shoring are soldier beams and tie-backs, braced excavation, or other potential methods. The contractor is responsible of using best management practices to maintain all temporary slopes and providing temporary shoring where required.		geotechnical report shall review the shoring design prior to implementation.			
Topic 7 – Hazards and Hazardous Materials						
HAZ-d: Hazardous Materials Contamination It may be possible that some construction activities such as ground disturbance from excavation may come into contact with contamination that has migrated from other sites.	**MM HAZ-1 Health and Safety Plan** The project sponsor will implement the following standard measures to avoid and minimize impacts from hazardous material to construction workers and the general public during construction. 1) In the event of exposing hazardous material during construction, the City will implement standard measures required by the federal, state, and local regulations for the collection, transport, and disposal of the material to prevent the exposure of workers and the public to such material. 2) The City will require the contractor to prepare and implement Health and Safety Plan that include a Hazardous Materials Management and Spill Prevention and Control Plan prior to commencement of construction. The plan will include the project-specific related hazardous materials and waste operations.	City of Palo Alto Director of Public Works, and the City's construction contractor	City of Palo Alto Director of Planning and Community Environment	Prior to construction. On-going during construction activities.		
Topic 12 – Transportation						
TRA-a: Conflict with Plan, Ordinance, Policy – Circulation Implementation of the project could conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Construction activities would generate construction-related truck and employee trips that could create a temporary increase in localized traffic. Also, if the City implements paid parking at the parking structure, gates	**MM TR-1 Construction Traffic Control Plan** Prior to the excavation, the construction contractor shall develop the traffic control plan in accordance with City's policies, coordinate with VTA and submit for City approval. The plan shall be implemented throughout the course of the project construction and shall include, but not limited to, the following elements: • Limit truck access to the project site during peak commute times (7:00 A.M. to 9:00 A.M. and 4:00 P.M. and 6:00 P.M.) • Restrict construction truck routes to truck routes designated	City of Palo Alto Director of Public Works, and the City's construction contractor	City of Palo Alto Director of Planning and Community Environment	Prior to soil disturbance activities and excavation. On-going during construction activities.		

would be required which could slow the flow of the traffic resulting in vehicle queuing on to Hamilton Avenue. **TRA-e: Emergency Access Impact.** There could be a temporary impact to emergency access at the project site during construction. **TRA-f: Conflict With Policies, Plans, Programs or Decrease Performance Or Safety for Public Transit, Bicycle, and Pedestrians** The project could conflict with adopted policies, plans, or program regarding public transit, bicycle or pedestrian facilities or decrease their performance. The project could involve a temporary closure of the sidewalk on Hamilton Avenue or Waverley Street and a bus stop on Hamilton Avenue in front of the project site. Furthermore, entries and exits of trucks and heavy constructions vehicles from the project site in the downtown area could impact the bicyclists and the pedestrians.	by the City • Contractor will provide adequate parking or carpool strategy for construction employees near the construction site, as approved by the City • Require traffic control in the project entrance driveway, including flag persons wearing bright orange or red vests and using "Stop/Slow" Paddle to control oncoming traffic • Coordinate with VTA to temporarily relocate the bus stop to ensure minimal impacts during sidewalk closure, if needed • Maintain bicycle and pedestrian access and circulation during project construction. If construction encroaches on a sidewalk, a safe detour will be provided for pedestrian at the nearest crosswalk • Repair or restore the road right-of-way to its original condition or better upon completion of the work • Provide access for emergency vehicles at all time					
TRA-a: Conflict with Plan, Ordinance, Policy – Circulation Implementation of the project could conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Construction activities would generate construction-related truck and employee trips that could create a temporary increase in localized traffic. Also, if the City implements paid parking at the parking structure, gates would be required which could slow the flow of the traffic resulting in vehicle queuing on to Hamilton Avenue.	**MM TR-2 Vehicle Queuing Analysis** In the event the project includes a paid parking component; and, therefore, includes a parking gate, the project sponsor must prepare and submit a queuing study that shows, to the satisfaction of the Transportation Division, that queuing into Hamilton Avenue would be avoided. The study will consider the configuration and the anticipated volume of vehicles accessing the parking garage during the peak hour. The provisional gates must process vehicles efficiently such that vehicles do not have to wait to turn into the parking facility.	City of Palo Alto Director of Public Works	City of Palo Alto Director of Planning and Community Environment	Prior to the operation of the project. On-going basis during the operation of the project.		
TRA-f: Conflict With Policies, Plans, Programs or Decrease Performance Or Safety for Public Transit, Bicycle, and Pedestrians The project could conflict with adopted policies, plans, or program regarding public transit, bicycle or pedestrian facilities or decrease their performance. The project could involve a temporary closure of the sidewalk on Hamilton Avenue or Waverley Street and a bus stop on Hamilton Avenue in front of the project site. Furthermore, entries and exits of	**MM TR-3 Parking Structure Access and Exit Safety Improvement.** The following improvement shall be implemented to improve safety in accessing and exiting the proposed parking structure: The City will install a stop sign at the intersection of Lane 21 and Bryant Street.	City of Palo Alto Director of Public Works	City of Palo Alto Director of Planning and Community Environment	Prior to the operation of the project.		

trucks and heavy constructions vehicles from the project site in the downtown area could impact the bicyclists and the pedestrians.						

Certificate Of Completion

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Sandra Lee Sandra.Lee@CityofPaloAlto.org Assistant City Attorney Security Level: Email, Account Authentication (None)	DocuSigned by: Sandra Lee 36C6B9D557AF4E3... Signature Adoption: Pre-selected Style Using IP Address: 73.202.225.230	Sent: 2/13/2019 5:28:24 PM Viewed: 2/14/2019 6:36:03 AM Signed: 2/14/2019 6:36:55 AM
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Eric Filseth eric.filseth@cityofpaloalto.org Security Level: Email, Account Authentication (None)	 Signature Adoption: Pre-selected Style Using IP Address: 108.169.4.229	Sent: 2/28/2019 7:17:51 AM Viewed: 2/28/2019 10:23:11 AM Signed: 2/28/2019 10:23:49 AM
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Beth Minor Beth.Minor@CityofPaloAlto.org City Clerk City of Palo Alto Security Level: Email, Account Authentication (None)	 Signature Adoption: Pre-selected Style Using IP Address: 12.220.157.20	Sent: 2/28/2019 10:23:52 AM Viewed: 2/28/2019 10:46:10 AM Signed: 2/28/2019 10:46:39 AM
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In Person Signer Events	Signature	Timestamp

Editor Delivery Events	Status	Timestamp

Agent Delivery Events	Status	Timestamp

Intermediary Delivery Events	Status	Timestamp

Certified Delivery Events	Status	Timestamp

Carbon Copy Events	Status	Timestamp

Notary Events	Signature	Timestamp

Envelope Summary Events	Status	Timestamps
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Certified Delivered	Security Checked	2/28/2019 10:46:11 AM
Signing Complete	Security Checked	2/28/2019 10:46:39 AM
Completed	Security Checked	2/28/2019 10:46:39 AM

Payment Events	Status	Timestamps