3241 PARK BOULEVARD OFFICE PROJECT

Class 3 and Class 32 Categorical Exemption Report

prepared by

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Introduction

The City has determined that the proposed 3241 Park Boulevard Office Project in the City of Palo Alto is categorically exempt from CEQA under the Class 3 (new small structures) and Class 32 (In-fill Development Projects) exemptions. §15303 reads: Class 3 consists of projects that include "construction and location of limited number of new, small structures" and in urban areas applies to commercial buildings not exceeding 10,000 square feet in floor area on sites zone for such use." CEQA Guidelines §15332 reads: "Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section." The documentation herein summarizes the project's consistency with these exemptions, including the conditions for the Class 32 exemption.

The State CEQA Guidelines Section 15332 states that Class 32 exemption must meet the following conditions:

a. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
c. The project site has no value as habitat for endangered, rare, or threatened species.
d. Approval of the project would not result in any significant effects relating to traffic[1], noise, air quality, or water quality.
e. The site can be adequately served by all required utilities and public services.

Additionally, State CEQA Guidelines Section 15300.2 outlines exceptions to the applicability of a Categorical Exemption, including cumulative impacts, significant effects due to unusual circumstances, scenic highways, hazardous waste sites, and historical resources. A full listing of these exceptions and an assessment of their applicability to the proposed project is provided in this report. The information herein documents that no exceptions to the exemptions, as outlined in CEQA Guidelines §15300.2, apply to the project.

1 Impacts related to parking are not discussed in this report, as such impacts are generally not considered as physical effect on the environment under CEQA.

Project Description

The proposed project involves the demolition of an existing building (4,501 square feet) and associated parking lot, and construction of a two-story 7,861 square foot building on a parcel totaling 18,794 square feet (0.431 acres) in size. The existing use at the site is overflow space for auto repair. The proposed use of the site is Research and Development. The parcel is zoned General Manufacturing (GM) and the land use designation is Light Industrial. Research and Development is a permitted use within this zoning district and land use designation.

Consistency Analysis

Criterion (a)

The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The parcel at 3241 Park Boulevard (APN # 132-26-078) is zoned GM (General Manufacturing district), is located within the boundaries of the proposed North Ventura Coordinated Area Plan (NVCAP) and has a 2030 Comprehensive Plan land use designation of Light Industrial. The proposed use is a permitted use within this land use designation and zone district.

The proposed project is consistent with the applicable 2030 Comprehensive Plan designations and applicable 2030 Comprehensive Plan policies outlined in the Land Use and Community Design Element, Transportation Element, Natural Environment Element, and Business and Economics Element as outlined in the findings for the project approval. The project complies with the applicable zoning ordinance designations and regulations as set forth in the Palo Alto Municipal Code (PAMC), including, but not limited to, development standards such as the building height, Floor Area Ratio (FAR), lot coverage, and landscaping requirements.

Therefore, the proposed project is consistent with the applicable general plan policies as well as with the applicable zoning designation and regulations outlined in the Land Use and Community Design Element, Transportation Element, Natural Environment Element, and Business and Economics Element as outlined in the findings for the project approval.

Criterion (b)

The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The proposed project is located on APN # 132-26-078 18,794 square foot site (0.431 acres) that is located wholly within the City of Palo Alto's jurisdiction, which is surrounded by urban uses. Specifically, surrounding parcels are developed with commercial and automobile service uses within Service Commercial (CS), Multi-Family Residential (RM-40), and General Manufacturing (GM) zone districts. Immediately north of the property is the Caltrain Rail and immediately south of the property is a Utility Substation, both of which are zoned Public Facilities (PF). Therefore, the proposed project is consistent with criteria (b).

Criterion (c)

The project site has no value as habitat for endangered, rare, or threatened species.

The existing site is completely devoid of vegetation and covered with a paved parking lot; therefore, it lacks suitable habitat for sensitive animal or plant species. The adopted Palo Alto 2030 Comprehensive Plan includes Map N-1, which identifies sensitive animal and plant species within the Palo Alto quadrangle, a large geographic area that includes the urban portions and portions along the bay and within the foothills, based on information in the California Natural Diversity Database (CNDDB). Based on this map and the urban nature of the site, the subject property does not contain

any habitat for endangered, rare, or threatened species and has not historical supported any of these species.

The edge of the parking lot includes a retaining wall and guardrail (fence), which forms as the channel to Matadero Creek adjacent the site. The creek is channelized within the area of the project; therefore, there is no native riparian vegetation or natural bank at this portion of Matadero Creek. The project would comply with the general requirements and guidelines for Stream Corridor Protection (PAMC Section 18.40.140). There are three street trees (Chinese pistache) adjacent the project site; two by the western driveway and one by the other end of the driveway in the south. The project proposes to remove these three existing street trees and replace them with three street trees (London Plane). Consistent with best practices, tree removal or construction activities on the project site would occur outside of bird-nesting season (February 1 – August 31). Additional landscaping is planned for the project site; increasing the overall habitat value of the site. The project is required to comply with PAMC Section 16.11 during construction and operation of the proposed project, which will ensure that stormwater runoff from the project site would not affect water quality within Matadero Creek. Therefore, the project complies with criterion C.

Criterion (d)

Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

The following discussion provides an analysis of the project's potential effects with respect to traffic, noise, air quality, and water quality.

A. *Traffic*

Construction-Related Traffic Impacts

The proposed project would involve the construction of a 7,861 square foot building on a 0.431-acre lot over approximately 12-14 months. Construction traffic impacts would be significant if substantial congestion, inconvenience to motorists, or hazardous conditions would be caused by the proposed project on a regular or frequent basis. Construction of the proposed project may involve lane or sidewalk closures adjacent to the project site which could interrupt vehicle, pedestrian, and bicycle travel routes thereby causing congestion, inconvenience, or hazardous conditions. However, the project applicant or representative would be required to obtain an encroachment permit for any work within the public right-of-way and, per standard practice, the City would require review and approval of a construction logistics plan. Following is the City's standard regulations, as reinforced in conditions of approval, for projects with work that would affect the public right-of-way:

> *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, queuing and idling of construction equipment and 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. The plan may need to be modified through the course of the construction to address unanticipated issues.*

With implementation of the required logistics plan per the City's regulations and standard practice, impacts would remain less than significant.

Operational Traffic Impacts

On June 15, 2020, the City of Palo Alto adopted thresholds of significance for evaluating Vehicle Miles Traveled (VMT) in accordance with SB 743 and the CEQA Guideline requirements. For office projects, the City of Palo Alto considers a project to be less than significant if a project exceeds a level of 15% below existing (baseline) regional home-based work VMT per employee. On June 15, 2020, the City of Palo Alto also adopted screening criteria, which determined, based on substantial evidence, that development projects, including office projects, that are less than 10,000 square feet in size would not have a significant impact with respect to VMT. The proposed project is less than 10,000 square feet in size and therefore has already been determined to have a less than significant impact with respect to VMT.

The City no longer considers the projects effect on automobile delay to be a significant impact under CEQA pursuant to California Public Resources Code section 21099(b(2) and CEQA Guidelines Section 15064.3. However, in order to evaluate the project's consistency with the City of Palo Alto's Local Transportation Impact Analysis Policy, this document includes information on the projects trip generation for informational purposes. Project Operational Vehicle trip generation rates were based on estimates from *Trip Generation Manual, 10th Edition (Institute of Transportation Engineers [ITE] 2017),* which are based on a compilation of empirical trip generation surveys at locations throughout the country to forecast the number of trips that would be generated by the project.

In the *Trip Generation Manual,* the ITE rates for the existing use of Automobile Care Center (*ITE LU 942*) are provided for A.M. and P.M. peaks (not for daily trips). In a typical analysis, daily traffic volumes are equivalent to 10 times the P.M. peak hour traffic volumes. An estimate of 31.1 daily rate/ 1,000 square feet (10 times of 3.11, the P.M. peak hour trips) will be used. The existing building is 4,501 square feet, which would generate approximately 140 daily trips.

The proposed project would generate 77 daily trips, 9.16 of which occur during the A.M. peak hour and 9.09 of which occur during the P.M. peak hour. After subtracting the trips generated by the existing buildings on the site, the project is estimated to produce a net decrease of 63 trips daily trips, one trip fewer for A.M. peak hour and five trips fewer for P.M. peak hour.

Table 1: Project Operation Trip Generation

Land use	ITE Land Use Code	Size	Daily		A.M. (7-9) Peak Hour				P.M. (4-6) Peak Hour			
			Rate	Trips	In	Out	Rate	Trips	In	Out	Rate	Trips
Existing Land Use												
Automobile Care Center	942	4.5 ksf	31.1	140	66%	34%	2.25	10.1	48%	52%	3.11	14.00
Proposed Land Use												
General Office Building	710	7.9 ksf	9.74	77	86%	34%	1.16	9.16	16%	84%	1.15	9.09
Net New Vehicle Trips				**-63**				**-0.96**				**-4.91**

Note: ksf= 1,000 square feet

Source: All rates are from Institute of Transportation Engineers, Trip Generation Manual, 10th Edition, 2017. Average rates used.

Based on the City's standards for determining transportation analysis, as outlined in the City of Palo Alto Local Transportation Impact Analysis Policy adopted in June 2020, preparation of a transportation impact analysis (TIA) is not required for projects that are anticipated to generate less than 50 net new peak-hour trips. As shown in *Table* , the proposed project would generate an estimated net decrease of A.M. peak-hour trips and P.M. peak-hour trips. The proposed project would not generate 50 net new peak-hour trips, and therefore a detailed traffic analysis is not required.

Site Access

The project would not include new curb cuts, roads, or intersections or any other features that may include hazardous design features. The existing site configuration includes two curb cuts with access to Park Boulevard. The proposed project would continue to utilize the pedestrian and vehicular accesses from Park Boulevard. The proposed driveway will provide access to the surface parking lot and covered parking structures at nearly the same location as the existing driveway on the west. The existing driveway along the southeastern part of the site will be removed for the construction of the proposed two-story addition, reducing the overall number of curb cuts at the site. The project expands the width of the sidewalk along the property frontage on Park Boulevard so that it will taper on the edges of the property to five feet but will otherwise maintain an eight-foot sidewalk.

Sight Distance

The proposed two-way driveway includes a 25-foot-wide approach connecting to Park Boulevard, which will provide safe access, sufficient aisle space, adequate turning and maneuvering area to the parking area. Proposed landscape with new trees by the driveway will provide sufficient sight distance clearance at the intersection. The driveway design complies with the standards as outlined in the City's Zoning Code.

Pedestrian, Bicycle, and Transit Analysis

Pedestrian Facilities

The proposed project includes two walkways, which offer pedestrian access to the site from the sidewalk on Park Boulevard. The walkways provide access to the main entrance, refuge and office court in the front elevation. The walkways that are designated for pedestrians are paved or painted. The project includes walkways that are interconnected around the proposed building with access to the side and rear entrances. The Americans with Disabilities Act (ADA) compliant paths of travel are painted individually with access from the building's side entrance to the designated ADA compliant parking spaces.

Bicycle Facilities

The proposed project would provide bicyclists convenient access for short-term parking and secured location for long-term parking within the property. The bicycle facilities are designed and located in accordance to the City's development requirements.

The proposed project would be adequately served by existing and planned bicycle facilities and would not interrupt or otherwise impact existing or planned bicycle facilities.

Transit Services

The project site is located approximately 0.6 miles away from the California Avenue Train Station with service from Caltrain (Gilroy to San Francisco). Bus services operated by Marguerite Shuttle are available along El Camino Real between San Antonio Road and University Avenue. Limited express bus service, offered by Valley Transportation Authority Transit, are also available on El Camino Real and Page Mill Road to other major road intersections across the county. The project would be adequately served by existing transit services and would not cause impact to existing transit services capacity.

Conclusion

The project would not include new curb cuts, roads, or intersections or any other features that may include hazardous design features. Access for both pedestrians and emergency vehicles would be maintained at all times during construction. The project includes modifications to an existing building, primarily on the interior of the building. The project would not affect any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or decrease the performance or safety of these facilities. The proposed project adds bicycle parking on the site and maintains the pedestrian friendly design of the site which would further City goals to encourage multi-modal transportation.

B. Noise

Noise Characteristics and Measurement

Noise is defined as unwanted sound that disturbs human activity. A noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

One of the most frequently used noise metrics that considers duration as well as sound power level is the equivalent noise level (Leq). The Leq is a steady A-weighted noise level that is equivalent to the amount of energy contained in the actual varying levels over a period of time (essentially, L_{eq} is the average sound level).

Noise Standards

City of Palo Alto Comprehensive Plan

The City of Palo Alto's Natural Environment Element (revised in 2017) incorporates comprehensive goals, policies, and actions related to noise and acceptable noise levels. These policies address unnecessary, excessive, and annoying noise sources, such as vehicles, construction, special sources (e.g., radios, musical instrument, animals) and stationary sources (e.g., heating and cooling systems, mechanical rooms). Policy N-6.1 in the Natural Environment Element sets a guideline of 60 dB Ldn as a maximum outdoor noise level in residential areas. This policy also limits indoor noise at multiple-family dwellings to 45 dB Ldn. The City of Palo Alto has classified exterior noise exposure of 70 Ldn as a maximum outdoor noise level for commercial land uses (City of Palo Alto 2017).

On-site activities associated with a project would have a significant noise impact if they resulted in noise levels exceeding the standards as identified for the applicable noise contour for the project site.

The proposed project is located within the noise CNEL contour of 60-65 dB as defined in the Comprehensive Plan 2030. The nearest sensitive receptors[2] to the project site include the residential use at 3333-3335 Park Boulevard, which is 290 feet away from the site and zoned as R-2, and 3346-3350 Park Boulevard, which is 340 feet away from the site and zoned as R-1.

The project impacts from traffic noise would be significant if project-generated traffic results in the exposure of sensitive receptors to a perceptible increase in roadway noise. Roughly a doubling of traffic volume would be necessary to generate a perceptible increase in roadway noise levels of three dBA or more.

This section also guides the analysis and design of proposed new development to avoid creating new noise impacts on existing sensitive receptors. In addition, this section supports the City's ongoing efforts to coordinate with regional, State and federal authorities on noise issues of concern to the Palo Alto community.

City of Palo Alto Municipal Code 9.10 Noise

According to PAMC 9.10.030, no person shall produce, suffer or allow to be produced by any machine or device, or any combination of same, on commercial or industrial property, a noise level more than eight dB above the local ambient at any point outside of the property plane.

PAMC Section 9.10.060, Special Provisions includes exceptions to the noise thresholds. These include the following:

(a) General Daytime Exception. Any noise source which does not produce a noise level exceeding 70 dBA at a distance of 25 feet under its most noisy condition of use shall be exempt from the provisions of Sections 9.10.030(a), 9.10.040 and 9.10.050(a) between the hours of 8:00 A.M. and 8:00 P.M. Monday through Friday, 9:00 A.M. and 8:00 P.M. on Saturday, except Sundays and holidays, when the exemption herein shall apply between 10:00 A.M. and 6:00 P.M.

(b) Construction. Except for construction on residential property as described in subsection (c) of this section, construction, alteration and repair activities which are authorized by valid city building permit shall be prohibited on Sundays and holidays and shall be prohibited except between the hours of 8:00 A.M. and 6:00 P.M. Monday through Friday, 9:00 A.M. and 6:00 P.M. on Saturday provided that the construction, demolition or repair activities during those hours meet the following standards:

(1) No individual piece of equipment shall produce a noise level exceeding 110 dBA at a distance of 25 feet. If the device is housed within a structure on the property, the measurement shall be made out-side the structure at a distance as close to 25 feet from the equipment as possible.

(2) The noise level at any point outside of the property plane of the project shall not exceed 110 dBA.

Existing Ambient Noise Levels

To determine existing ambient noise levels on the project site, three 15-minute measurements were taken on the project site during the A.M. peak traffic hours. This time period is appropriate to measure peak noise from traffic, the primary source of noise. While the P.M. peak traffic hours may include additional noise from typical evening rooftop activities such as conversations, the noise would not

[2] Noise Sensitive receptors include residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks are generally more sensitive to noise than commercial and industrial land uses.

substantially contribute to existing ambient noise levels compared to traffic. *Figure 1* shows the on-site noise measurement location. The noise level at this location was measured at an average of 58.13 dBA $L_{eq.}$

Figure 1: On-site Noise Measurement Location

Source: Google Maps 2020

Construction Noise

Construction of the project would temporarily generate increases in ambient noise levels. Construction noise was estimated using the Federal Highway Administration's Roadway Construction Noise Model (RCNM). Noise was modeled based on the list of anticipated equipment list for each phase of construction and the distances to nearby receptors. As a project-specific construction equipment list is not currently available, the equipment list for the project was derived from CalEEMod (see discussion of CalEEMod model in Section 4.C, Air Quality). CalEEMod takes into consideration the project's proposed land uses, construction schedule, building and lot area, volume of export, and square footage of demolition. *Table 2* shows the results of construction noise modeling for the project in RCNM. The façade of the nearest adjacent building (an Automotive Service facility) is approximately 85 feet from the property line and the nearest sensitive receptors[3] to the project site are the residential use at 3333-3335 Park Boulevard, zoned as R-2 and is 290 feet away and 3346-3350 Park Boulevard, zoned as R-1 and is 340 feet away from the subject property.

[3] Noise Sensitive receptors include residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks are generally more sensitive to noise than commercial and industrial land uses.

Table 2: Estimated Construction Noise Levels

Construction Phase	Equipment	Estimated Noise Level (dBA Leq)	
		At 25 feet	At 85 feet
Demolition	Tractor/backhoe/loader (2), dozer, concrete saw	95.6	85
Site preparation	Tractor/backhoe/loader, grader	91.0	80.4
Grading	Tractor/backhoe/loader (2), dozer	90.0	85
Building construction	Crane, forklift (2), tractor/backhoe/loader (2)	95.6	80.4
Paving	Cement/mortar mixer (4) tractor/backhoe/loader, paver, roller	90.0	79.4
Architectural coating	Air compressor	83.7	79.4

Source: See RCNM modeling results.

As shown in *Table 2*, construction noise would reach an estimated of 95.6 dBA Leq during certain phases of the project. Demolition, grading, foundation work and the exterior of the building is anticipated to last approximately eleven months followed by one to three months of interior work. Construction of the project is anticipated to occur over a 12 to 14-month period. The façade of the nearest adjacent building is approximately 85 feet from the property line at 3241 Park Boulevard and the nearest sensitive receptor (a residential use zoned R-2) is located approximately 290 feet east of the site. The project would be required to comply with the regulations outlined in Title 9 of the Palo Alto Municipal Code (PAMC) with respect to construction noise, which stipulates maximum allowed decibels and restricts construction hours. The noisiest activities would be demolition and grading, which generates noise levels of approximately 85 dBA at 85 feet. Demolition assumes use of typical demolition equipment, including a dozer, tractor, backhoe, and loaders) and is expected to take only a few days. Grading is anticipated to occur over one work week and would use typical equipment such as a tractor or backhoe. Given that only a portion of the existing building and the existing parking lot is proposed to be demolished, that noise-sensitive receptors are located more than double the distance from the nearest adjacent building, that there are physical barriers between these developments and the project site; that exterior construction activities would occur for less than a year only during daytime hours; and because the project would be required to comply with Title 9 of the PAMC, the project would not have a significant effect on noise during construction.

Construction Vibration

A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is barely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Significant impacts occur when vibration or groundborne noise levels during frequent vibration events exceed the Federal Transit Administration (FTA) maximum acceptable level threshold of 65 VdB for buildings where low ambient vibration is essential for interior operations (such as hospitals and recording studios), 72 VdB for residences and buildings where people normally sleep (including hotels), and 75 VdB for institutional land uses with primary daytime use (such as churches and schools).

Construction of the project over an anticipated 12 to 14-month period would intermittently generate vibration on and adjacent to the project site. *Table 3* identifies various vibration velocity levels for the types of construction equipment that are likely to operate at the project site during construction.

Table 3: Vibration Source Levels for Construction Equipment

Equipment	Approximate VdB	
	25 Feet	85 Feet
Large Bulldozer	87	75
Loaded Trucks	86	74
Jackhammer	79	67
Small Bulldozer	58	46

Source: Federal Transit Administration 2018

Based on the information presented in *Table 3*, vibration levels would be approximately 75 VdB at the nearest adjacent building, an Automotive Service Use, during daytime hours. The nearest noise-sensitive receptor, a residential use, is located much further from the project site and therefore would experience lower levels of vibration during the daytime. In addition, compliance with Section 9.10.060 of the Palo Alto Municipal Code would restrict vibration-generating construction activity to daytime hours that are outside of normal sleeping hours, i.e., 8:00 A.M. to 6:00 P.M. Monday through Friday and 9:00 A.M. to 6:00 P.M. on Saturday. Therefore, while vibration from construction activity may be perceptible at adjacent residences during daytime hours at less than significant levels, this timing restriction would also ensure that vibration does not exceed the FTA's criterion of 72 VdB during normal sleeping hours at residential uses. Vibration levels also would not exceed 100 VdB at any fragile historic buildings and therefore would not damage such buildings. The project would have a less than significant impact from groundborne vibration.

Operational Noise

Operation of the proposed project, which includes an office use, would be similar to the noise levels for the existing use on the site and within the immediate vicinity of the site. Fewer trips are anticipated to and from the site in comparison to the existing use; therefore, vehicle trips would not perceptibly change ambient noise levels at the site. HVAC equipment would also comply with all applicable code requirements for permanent noise producing equipment. Therefore, the project would not result in any significant impact to noise.

Conclusion

The project would have a less than significant impact from both short-term and long-term increases in noise.

C. *Air Quality*

A significant adverse air quality impact may occur when a project individually or cumulatively interferes with progress toward the attainment of the ozone standard by releasing emissions that equal or exceed the established long term quantitative thresholds for pollutants, or causes an exceedance of a state or federal ambient air quality standard for any criteria pollutant. Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere. Commonly found primary criteria pollutants include reactive organic gases (ROG), nitric oxides (NO_x), carbon monoxide (CO), and particulate matter (PM_{10} and $PM_{2.5}$). PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. The project site is located within the San Francisco Bay Area Basin and falls under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). In May 2017, the BAAQMD Board of Directors adopted thresholds of significance to assist in the review of projects under CEQA.

The BAAQMD includes screening criteria to determine whether a proposed project would result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, a detailed air quality assessment of the project's air pollutant emissions is not required. The screening criteria developed for criteria pollutants and precursors were derived using the default assumptions used by the Urban Land Use Emissions Model (URBEMIS). Projects that are below the screening criteria are reasonably expected to not generate operational-related criteria air pollutants and/or precursors that would exceed the Thresholds of Significance as identified by BAAQMD. Operation of the proposed project would therefore result in a less-than-significant cumulative impact to air quality from criteria air pollutant and precursor emissions. The screening level criteria for general office building are presented below:

Table 4: BAAQMND Screening Criteria

Land Use Type	Operational Screening Size		Construction Screening Size
General Office Building	346 ksf (NOX)	53 ksf (GHG)	277 ksf (ROG)
Source: Table 3-1, page 3-3 BAAQMD 2017 CEQA Guidelines, May 2017 ksf= thousand square feet			

Table 4 shows the screening size for construction and operation of a general office building use. The proposed project with an approximate 8,000 square feet of general office use, is below the screening criteria for operation (346,000 square feet for criteria pollutants and 53,000 square feet for GHG's). The proposed construction is below the screening criteria of 277,000 square feet for reactive organic gases.

Conclusion

Given the project size is well below the screening criteria, the project does not trigger the need for a quantitative air quality analysis on operation and construction. It can be conclusively determined that the proposed infill project would have no impact due to degraded air quality. Additionally, as discussed in the Traffic section, this project would not result in significant increases in traffic at intersections. The project would not require analysis for CO hotspots based on BAAQMD criteria. Therefore, impacts from air quality emission as a result of the proposed project would be negligible.

E. Water Quality

Urban runoff can have a variety of negative environmental impacts. Oil, grease and heavy metals such as lead, cadmium, and copper commonly found in urban stormwater runoff can be toxic to aquatic organisms and have the potential to contaminate drinking water supplies. Additionally, nutrients from fertilizers, including nitrogen and phosphorous, can result in excessive or accelerated growth of vegetation or algae, resulting in oxygen depletion and additional impaired uses of water. San Francisquito Creek is approximately 2.5-miles northwest of the project site and does not flow through or adjacent to the site. The project site is bordered by the Matadero Creek from the east to the west. This portion of Matadero Creek is in a culvert channelized by concrete walls. The project site is currently developed, and construction of the proposed project would not alter the course of this creek or other stream or river (no other surface water features are identified in the project area). The project site is connected to an existing stormwater drainage system located in the City of Palo Alto's Matadero Creek Watershed. Stormwater runoff in the project area is currently flowing Matadero Creek and eventually to the San Francisco Bay – see Figure ES-1 of the Palo Alto Storm Drain Master Plan Update (June 2015).

Currently, there is approximately 20,442 square feet of impervious surface area on the project site. With the proposed project, proposed impervious areas of the site would be decreased to approximately 8,010 square feet. The City of Palo Alto standard conditions of approval include a requirement that the project applicant develop and implement Best Management Practices (BMPs) to control erosion during construction and include permanent features to treat stormwater runoff.

Under Chapter 16.11 of the PAMC, the project is considered a "significant redevelopment project" because it would result in the replacement of 10,000 square feet or more of impervious surface. Significant redevelopment projects must treat, either through capture, flow-through filtration, or a combination of capture and flow-through filtration, the volume of stormwater specified in the PAMC. The project would include a total of 355 square feet of bio-retention areas in four separate locations. Two bio-retention areas are located northwest of the building, one area is located north of the project site and one area is at the planters on the building's second floor. These bio-retention areas would capture and filter runoff before entering the storm drain system, thereby removing pollutants and reducing the rate and volume of stormwater flow. The proposed square footage of bio-retention area would exceed City of Palo Alto requirements. A reduction in impervious surface that would occur with development of the project would not substantially increase runoff from the project site such that new or increased flooding would occur on- or off-site. Stormwater leaving the project site would enter the City's existing stormwater conveyance system via catch basins and below ground piping. The decrease in impervious surface that would result from construction of the proposed project would not create or contribute runoff that would exceed the capacity of the existing stormwater conveyance infrastructure or otherwise result in flooding on or near the project site.

Because the project would not substantially increase stormwater runoff and would comply with City requirements to control and filter runoff, development of the proposed project would not degrade the quality of stormwater runoff from the site.

Conclusion

The proposed project would not introduce new surface water discharges, would not substantially increase runoff volumes, result in substantial erosion or siltation, and would not result in flooding on- or off-site. The project would also not alter the existing drainage pattern of the site. No significant water quality impacts would occur.

Criterion (e)

The site can be adequately served by all required utilities and public services.

The project would be located in an existing urban area served by existing municipal services, including utilities, sewer, gas, water, and electric. As the proposed project would involve the demolition of the existing building with an increase in square footage, a substantial increase in demand for services or utilities would not occur with implementation of the proposed project. The City of Palo Alto provides water, sewer, and solid waste collection services (through GreenWaste of Palo Alto) to the existing commercial building and would continue to provide these services to the proposed project. Other services, including gas and electricity, would also continue to be provided to the proposed project by existing service providers. Thus, the project meets this criterion for exemption.

Class 15303 Exemption

The proposed project involves the demolition of an existing building (4,501 square feet) and associated parking lot, and construction of a two-story 7,861 square foot building on a parcel totaling 18,794 square feet (0.431 acres) in size. Class 3 exemptions apply to projects that include "construction and location of limited number of new, small structures. The exemption states that "In urbanized areas this exemption applies to up to four commercial buildings not exceeding 10,000 square feet in floor area on a site zoned for such use, if not involving the use of significant amounts of hazardous substances where all necessary public services and facilities are available and the surrounding area is not environmentally sensitive."

The project is located in an urbanized area and would involve construction of only one building addition that is less than 10,000 square feet in floor area. The site is zoned for office use and the project does not include the use of any hazardous substances. Although the project includes minor upgrades for electrical service, the site is already served by existing public utilities and other public services and facilities (Fire, Police, libraries, etc.). The site is located adjacent to Matadero Creek; however, the creek is concretized in the area adjacent the site and there is not habitat on the site or adjacent the creek in the site area.

Therefore, the project also qualifies for a Class 3 exemption.

Exceptions to the Exemption

CEQA Guidelines Section 15300.2 outlines exceptions to the applicability of a Categorical Exemption, including cumulative impacts, significant effects due to location, unusual circumstances, scenic highways, hazardous waste sites, and historical resources. These exceptions are discussed below. As shown, none of the exceptions would apply.

Location

By definition, this exception does not apply to Class 32 Exemptions. Although this exemption does apply to Class 3 exemptions, as noted above there is no habitat on the site or adjacent Matadero Creek in the area of the site. The project would comply with all stormwater requirements, in accordance with the municipal code, both during construction and operation to ensure that water quality is protected, similar to all development projects within the City of Palo Alto.

Cumulative Impacts Criterion

State CEQA Guidelines Section 15300.2 states that "all exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant." The project is a stand-alone, site specific construction project that would not be phased. No other projects are planned for this site in the foreseeable future.

Significant Effects due to Unusual Circumstances Criterion

State CEQA Guidelines Section 15300.2 states that "a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." As discussed under the *Project Description* section, the project site is currently developed with existing structures, surface parking and landscaping. The proposed project includes demolition the existing building and construction of a new two-story building to accommodate an office use. The project meets the requirements of the Comprehensive Plan and Zoning District; therefore, there is nothing unusual about the project that constitutes an unusual circumstance.

The project site is located within the California-Olive-Emerson groundwater plume, similar to many parcels within this area of the City. Based on a soil investigation of the site, the site may include soil contamination. CEQA does not require analysis of impacts of the environment on the project site; therefore, impacts on future tenants at the site is not discussed in this report; however, the City evaluates this issue as part of the planning entitlement process. Specifically, for any project within the plume, applicants are required to coordinate with one of three oversight agencies (the Regional Water Quality Control Board, County Department of Environmental Health, or Department of Toxic Substances Control) to prepare and obtain approval of a remediation plan. This plan ensures that the project will meet the state screening level requirements for any contaminants found on the site.

Although any Volatile Organic Compounds released during construction activities dissipate quickly and would not affect the surrounding environment, construction workers participating in active earthmoving work could come into contact with VOCs. The construction contractor and their employees are required to comply with OSHA standards during construction; compliance with existing regulation, e.g. the use of personal protective equipment, would ensure that workers are protected during construction. The construction contractor would also be required to comply with state requirements with respect to classification of soils prior to disposal so that any contaminated soil, if found, is disposed of properly. The contractor would also be required to test pumped groundwater (if pumping occurs) and obtain permits from the RWQCB for disposal of any contaminated groundwater. Compliance with these standard regulations would not preclude the project from being eligible for using the CEQA Categorical exemption.

Scenic Highways Criterion

State CEQA Guidelines Section 15300.2 states that a categorical exemption "shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway." There are no designated State Scenic Highways in the vicinity of the project site. The closest scenic highway is I-280, which has been recognized as eligible for designation as a State Scenic Highway, located approximately three miles west of the project site. Due to distance and intervening structures, the project site is not visible from I-280. Therefore, the project would not

damage scenic resources within a highway officially designated as a state scenic highway. This exception would not apply to the project.

Hazardous Waste Sites Criterion

State CEQA Guidelines Section 15300.2 states that a categorical exemption "shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code." A search of the EnviroStor environmental database and the California Department of Toxic Substances Control Hazardous Waste and Substances Sites (Cortese) List was conducted in June 2020. The records review indicated that this project is not located on a site included on any list compiled pursuant to Section 65962.5 of the Government Code (Department of Toxic Substances Control 2019). Therefore, exception does not apply to the project.

Historic Resources Criterion

State CEQA Guidelines Section 15300.2 states that a categorical exemption "shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. The project site was the subject of a Historic Resource Evaluation (HRE) conducted by M-Group (May 2020)[4]. Based on the HRE, the existing commercial structure at 3241 Park Boulevard, does not possess individual historical significance, is not an exceptionally strong example of a style or type, was not designed by a master architect or builder, and is not associated with important events or persons. Therefore, the property was found to be ineligible for listing in the California Register of Historical Resources or the City's register of historic resources. In accordance with the Historic Resources & Permit Review Requirements of the City of Palo Alto, the property is not considered a historical resource for the purposes of CEQA and its demolition and proposed alterations would not result in the substantial adverse change in the significance of a historical resource. Therefore, this exception does not apply to the project.

Conclusion

Based on this analysis, the proposed project meets all criteria for Class 3 and Class 32 Categorical Exemptions pursuant to Sections 15303 and 15332 of the State CEQA Guidelines. Furthermore, none of the exceptions to the Categorical Exemption listed in CEQA Guidelines Section 15300.2 apply to the proposed project.

[4] Historic Resource Evaluation (HRE) conducted by M-Group (May 2020)[4], accessible at this link: https://tinyurl.com/3241-Park-Project

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