



CITY OF **PALO ALTO**

Hamilton Avenue Parking Garage

EIR Addendum Checklist

State Clearinghouse No. 2017052040



Prepared by



May 28, 2026

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Environmental Checklist for Sections 15162- 15164 Findings (For projects with a previously approved EIR or Negative Declaration)

Hamilton Avenue Parking Garage Project Update

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate level of additional environmental documentation, if any, to be completed when there is a previously adopted Negative Declaration (ND), Mitigated Negative Declaration (MND), or a previously certified Environmental Impact Report (EIR) covering the project for which a subsequent discretionary action is required. This Environmental Checklist has been prepared to assist the City in determining whether any additional environmental documentation is needed for the subject discretionary action. This Environmental Checklist is intended to be used to determine the appropriate level of second-tier environmental review, if any, and is not intended to be used for projects not previously analyzed.

1. Background on the Previously Certified EIR:

An EIR for the Palo Alto Parking Garage at 375 Hamilton Avenue (State Clearinghouse No. 2017052040) was released as a Draft EIR on May 18, 2018, with a public review period ending on July 2, 2018. The Final EIR, including responses to comments, was finalized on August 10, 2018. The City Council certified the Final EIR and adopted the associated Mitigation Monitoring and Reporting Program on February 11, 2019. The certified EIR determined that, with the implementation of mitigation measures, all potentially significant impacts of the project would be reduced to less than significant levels. No impacts were found to be significant and unavoidable; therefore, a Statement of Overriding Considerations was not required.

Impacts found to be less than significant or reduced to less than significant with mitigation measures included Aesthetics (including light and glare), Agriculture and Forestry Resources, Air Quality (construction, operational, and plan consistency), Biological Resources, Cultural and Tribal Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Transportation and Circulation, and Utilities and Service Systems.

A Notice of Determination (NOD) was filed with the Santa Clara County Clerk following certification of the EIR on February 13, 2019.

2. Lead Agency Name and Address:

City of Palo Alto

250 Hamilton Avenue

Palo Alto, California 94301

Holly Boyd, Assistant Director of Public Works

Phone (650) 329-2612

E-mail: holly.boyd@pal Alto.gov

3. Summary of the Project Evaluated in the Previously Adopted EIR:

At the time the 2018 EIR was certified, the project consisted of a parking garage with five above-ground parking levels and one basement parking level, with parking provided on the roof level. The structure reached a height of 49 feet-10 inches to the top of the rail of the fifth deck and 63 feet at the top of the elevator. The parking garage replaced the existing City-owned surface parking facility on the western corner of Hamilton Avenue and Waverley Street. The garage footprint covered 23,490 square feet, with approximately 114,048 square feet of above-grade floor area. The Previously Approved Project provided a total of 325 parking stalls, including approximately eight Americans with Disabilities Act (ADA) accessible stalls and 82 stalls designated for electric vehicles (with 17 equipped with charging stations), as well as nine stalls designated specifically for the retail area use. An approximately 585-square-foot bicycle parking area with approximately 50 bicycle parking stalls and space for bicycle trailers and child carriers were located near the entrance along Hamilton Avenue. The project also included an approximately 2,000-square-foot single or dual-tenant commercial retail space fronting Waverley Street. The parking structure was designed to accommodate future photovoltaic panels mounted above the uppermost parking deck. The top level of the photovoltaic structure, approximately 56 feet above grade, was below the top of the elevator. The parking structure included a 3-foot setback along Hamilton Avenue, and a trash enclosure with an area for trash and recycling from adjacent properties on Waverley Street (Lots 84 and 85) and for the retail area.

4. Does the project for which a subsequent discretionary action is now proposed differ in any way from the previously approved project?

YES ☒ NO ☐

The overall purpose, location, and general scale of the project remain consistent with the Previously Approved Project; however, the project currently being evaluated includes design refinements that differ slightly from the Previously Approved Project. Key changes include the removal of the ground-floor retail space and the basement-level parking garage, addition of a sixth above-ground level, inclusion of a publicly accessible plaza, and a reduction in total parking from 325 to 266 stalls. The environmental analysis in this Addendum evaluates whether these changes would result in new significant impacts or a substantial increase in the severity of the previously identified impacts.

SUBJECT AREAS DETERMINED TO HAVE NEW SIGNIFICANT ENVIRONMENTAL EFFECTS OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT ENVIRONMENTAL EFFECTS COMPARED TO THOSE IDENTIFIED IN THE PREVIOUS ND OR EIR

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

☒ None

☐ Aesthetics

☐ Agriculture Resources

☐ Air Quality

☐ Biological Resources

☐ Cultural Resources

☐ Energy

☐ Geology/Soils

☐ Greenhouse Gas Emissions

☐ Hazards and Haz Materials

☐ Hydrology/Water Quality

☐ Land Use/Planning

☐ Mineral Resources

☐ Noise

☐ Population/Housing

☐ Public Services

☐ Recreation

☐ Transportation

☐ Tribal Cultural Resources

☐ Utilities/Service Systems

☐ Wildfire

☐ Mandatory Findings of Significance

Determination:

On the basis of this analysis, the Planning and Development Services Department has determined that:

☒ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section

15162(a)(3). Therefore, the previously adopted ND or previously certified EIR is adequate upon completion of an ADDENDUM.

☐ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, because the project is a residential project in conformance with, and pursuant to, a Specific Plan with a EIR completed after January 1, 1980, the project is exempt pursuant to CEQA Guidelines Section 15182.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However, all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT ND is required.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND or EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

Signature

Date

Printed Name

Title

1. Introduction

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified Environmental Impact Report (EIR) or adopted Negative Declaration for a project.

CEQA Guidelines Section 15162(a) and 15163 state that when an EIR has been certified or a Negative Declaration adopted for a project, no Subsequent or Supplemental EIR or Subsequent Negative Declaration shall be prepared unless the lead agency determines, based on substantial evidence in light of the whole record, that one or more of the following conditions exist:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration; or
 - b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Negative Declaration or previously certified EIR; or
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents declined to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Negative Declaration or EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines Section 15164(a) further provides that an Addendum to a previously certified EIR may be prepared if minor changes or additions are necessary but none of the conditions described in Section 15162 calling for a Subsequent or Supplemental EIR have occurred.

If the factors listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted ND are necessary.

The Addendum is only required to analyze those environmental topics addressed in the original certified EIR. This precedent has been set in two appellate court decisions upholding the preparation of an Addendum for a previously certified EIR *Concerned Dublin Citizens V. City of Dublin*, 214 Cal.App.4th 1301 (2013) and *Citizens for Responsible Equitable Environmental Development V. City of San Diego*, 196 Cal.App.4th 515 (2011). In both cases the lead agency prepared an Addendum to a previously certified EIR. These appellate court decisions indicate that the issues discussed in an Addendum may be limited to those addressed in the original EIR. They also indicate that “changed circumstances” means physical changes, not legal changes. Based on the analysis in this Addendum, none of the conditions described in CEQA Guidelines Sections 15162 or 15163 have occurred, and no new significant environmental effects or substantially more severe impacts would result from the revised design. Therefore, an Addendum to the previously certified EIR is the appropriate level of environmental documentation.

1.1. Background of the Previously Approved EIR

1.1.1. Final 2018 EIR

The City of Palo Alto prepared and certified the Parking Structure at 375 Hamilton Avenue Final EIR (State Clearinghouse #2017052040) on February 11, 2019. The Final EIR analyzed four scenarios (scenarios 1, 2, 3, and 4) and their environmental impacts. The City also prepared and adopted a Mitigation, Monitoring and Reporting Program (MMRP) and certified it on February 11, 2019, as well as certifying a Council Resolution (No. 9818) on February 11, 2019.

1.1.2. City of Palo Alto 2030 Comprehensive Plan

The project would be located entirely in the City of Palo Alto. The 2030 Comprehensive Plan is the fundamental document that governs land use development. It includes goals and policies relating to economic vitality, land use, growth management, transportation, parks, open space, conservation, safety, noise, public facilities, and utilities. The project would be required to abide by all applicable goals and policies in the 2030 Comprehensive Plan. The 2030 Comprehensive Plan land use designation for the site is Regional/Community Commercial (CC), which is intended for “districts that have a wider variety of goods and services than the neighborhood shopping areas. They rely on larger trade areas and include such uses as department stores, bookstores, furniture stores, toy stores, apparel shops, restaurants, theaters and non-retail services such as offices and banks. Examples include Stanford Shopping Center, Town and Country Village and University Avenue/Downtown. Non-residential floor area ratios (FARs) range from 0.35 to 2.0. Consistent with the Comprehensive Plan’s encouragement of housing near transit centers, higher density multi-family housing may be allowed in specific locations. The proposed project would provide parking to support the University Avenue/Downtown shopping area. In addition, the project includes a future housing component that could add affordable residential units on an underutilized site, consistent with 2030 Comprehensive Plan policies L-1.3 and L-1.4 and the City’s adopted Housing Element.

1.1.3. CEQA Guidelines Update

Since the time the 2018 EIR was certified, the *CEQA Guidelines* have been updated by the State of California; the revised *Guidelines* are in effect as of December 2018. Therefore, this Addendum is based on the 2025 Appendix G checklist questions in the updated *CEQA Guidelines*. The current CEQA Guidelines Appendix G checklist questions provide the basis for this analysis.

2. Project Description

As noted earlier, the 2018 Final EIR (2018 EIR) evaluated four (4) design scenarios. The design currently being evaluated (revised design) is most similar to design scenario number 3. However, the revised design is not the same; therefore, the following text describes the design currently being evaluated in this Addendum (revised design).

The revised design is a six-story public parking garage consisting of six above-ground parking levels. The uppermost level would provide parking spaces on the roof. The structure would reach a height of 59'-11" to the top of the rail of the sixth deck and to a height of 72'-6" feet at the top of the elevator. The public parking garage footprint would cover 19,015 square feet, with a total building area of 117,168 square feet.

The garage would provide 266 parking stalls, including ten Americans with Disabilities Act (ADA) accessible spaces (three of which would be designated for electric vehicles). Approximately 100 stalls are planned to be designated for electric vehicle use with 42 initially equipped with charging stations. In total, 38 percent of the parking spaces would be designed to allow the future installation of charging stations, per the City of Palo Alto Green Building Code¹. Initially, 15 percent, or approximately 42 stalls, of the parking spaces would be equipped with a charging station. A 368-square-foot bicycle parking area located near the structure entrance along Hamilton Avenue would provide approximately 42 bicycle parking spaces.

The revised design would also include a publicly accessible plaza adjacent to the garage, sized at approximately 4,048 square feet, replacing the previously approved/proposed retail component. The garage structure would be designed to accommodate the installation of photovoltaic panels and their associated structure above the garage's uppermost deck. The top level of the photovoltaic framework, at 68'0" feet above grade, would be below the top of the elevator, at 72'6" feet above grade.

The garage structure would be designed with a 2-foot setback from the property line along Hamilton Avenue (to the face of structure). Sidewalk improvements would be provided along both street frontages. Along Hamilton Avenue, the sidewalk would be 12 feet from the property line (14 feet total). Along Waverley Street, the sidewalk/bulb-out would be approximately 17 feet 9 inches, tapering to approximately 11 feet 9 inches to match with the existing sidewalk to the north.

Table 1 below presents a summary of the project.

¹ City of Palo Alto, Ordinance No. 5263, Amendment to the California Green Building Standards Code, August 4, 2014, <https://www.cityofpaloalto.org/civicax/filebank/documents/43818>, accessed on November 6, 2017.

Table 1: Project Summary

Use/Characteristics	Amount/Description	Project
Parking	266 stalls	95,962 sf
Circulation	Elevator lobbies, ramp, stairs	18,996 sf
Utilities	Electrical, Mechanical and Trash Rooms	1,648 sf
Storage		194 sf
Bike Parking	42 spaces	368 sf
Total Area		117,168 sf

Note: sf = square feet

Source: Watry Design, May 2026

Figure 1 shows the overall site plan. **Figure 2 through Figure** show the floor plans for each level of the project, illustrating parking layouts, pedestrian and bicycle circulation, and the publicly accessible plaza. **Figure through Figure** show the structure elevations and sections of the revised design highlighting the structure height, setbacks, and façade design.

Figure 1: Site Plan

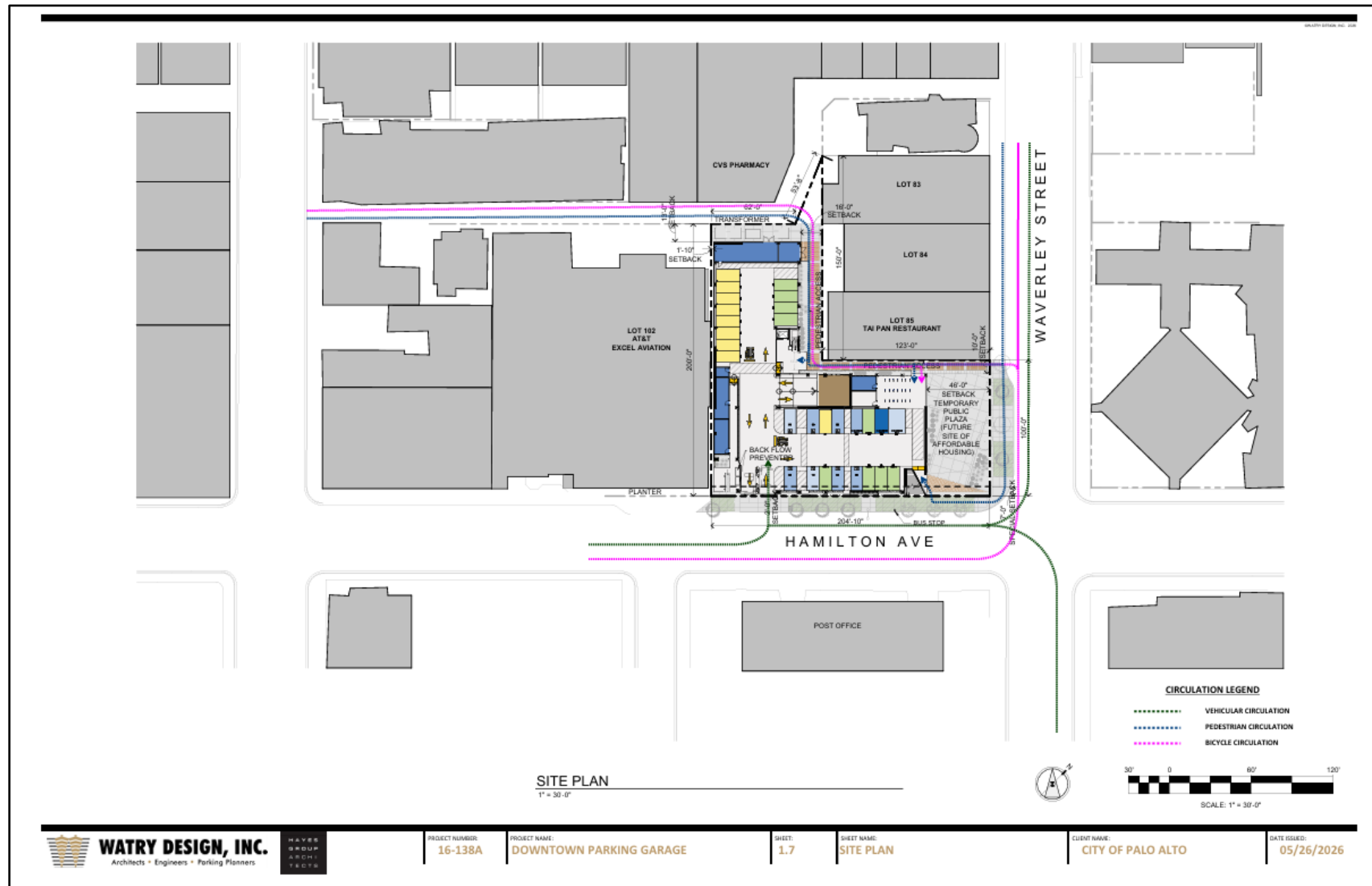


Figure 2: Parking Structure Ground Level

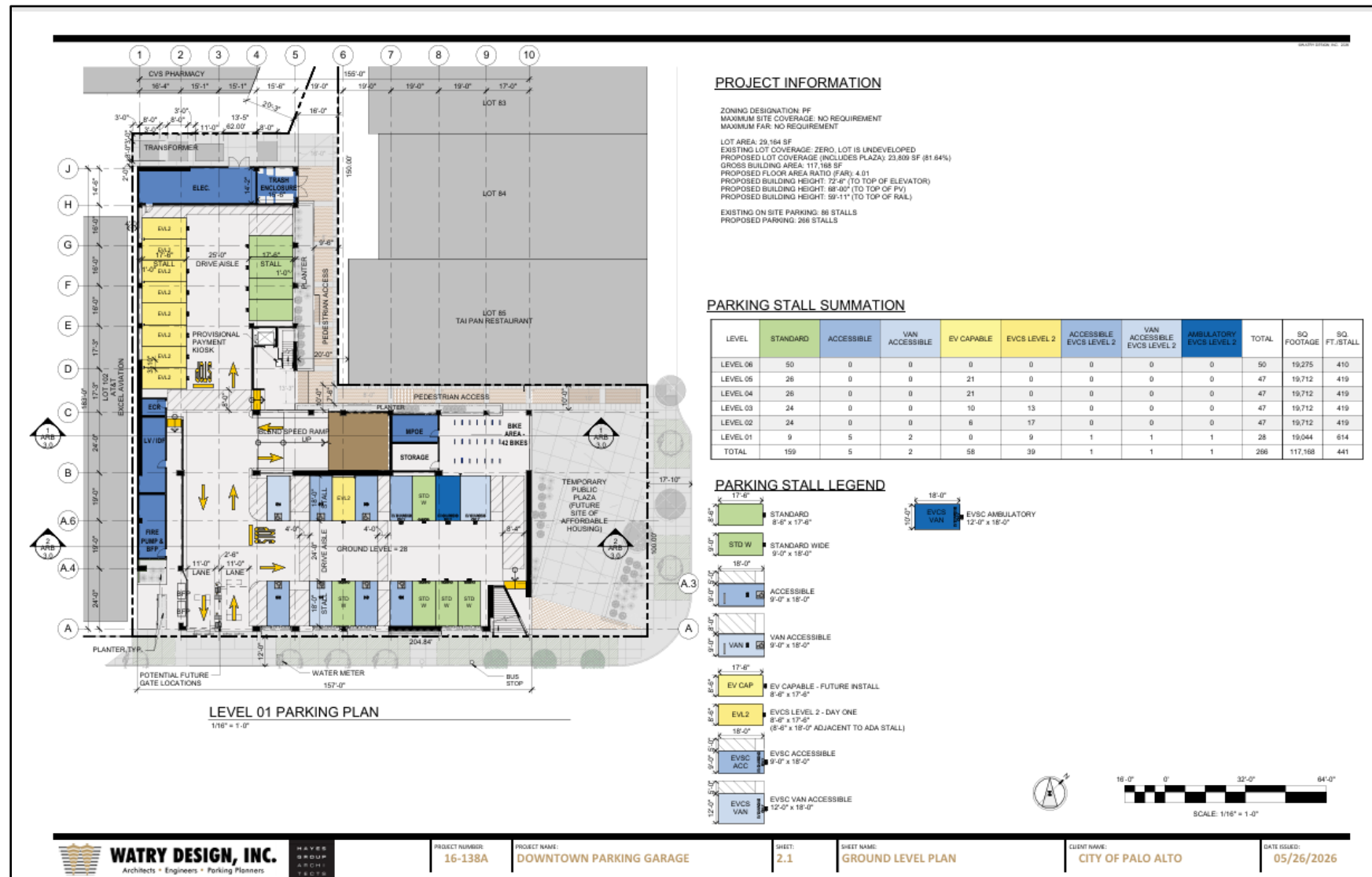


Figure 3: Level 02 and 03 Floor Plan



Figure 4: Level 04 and 05 Floor Plan



Figure 5: Level 6 and PV Plan

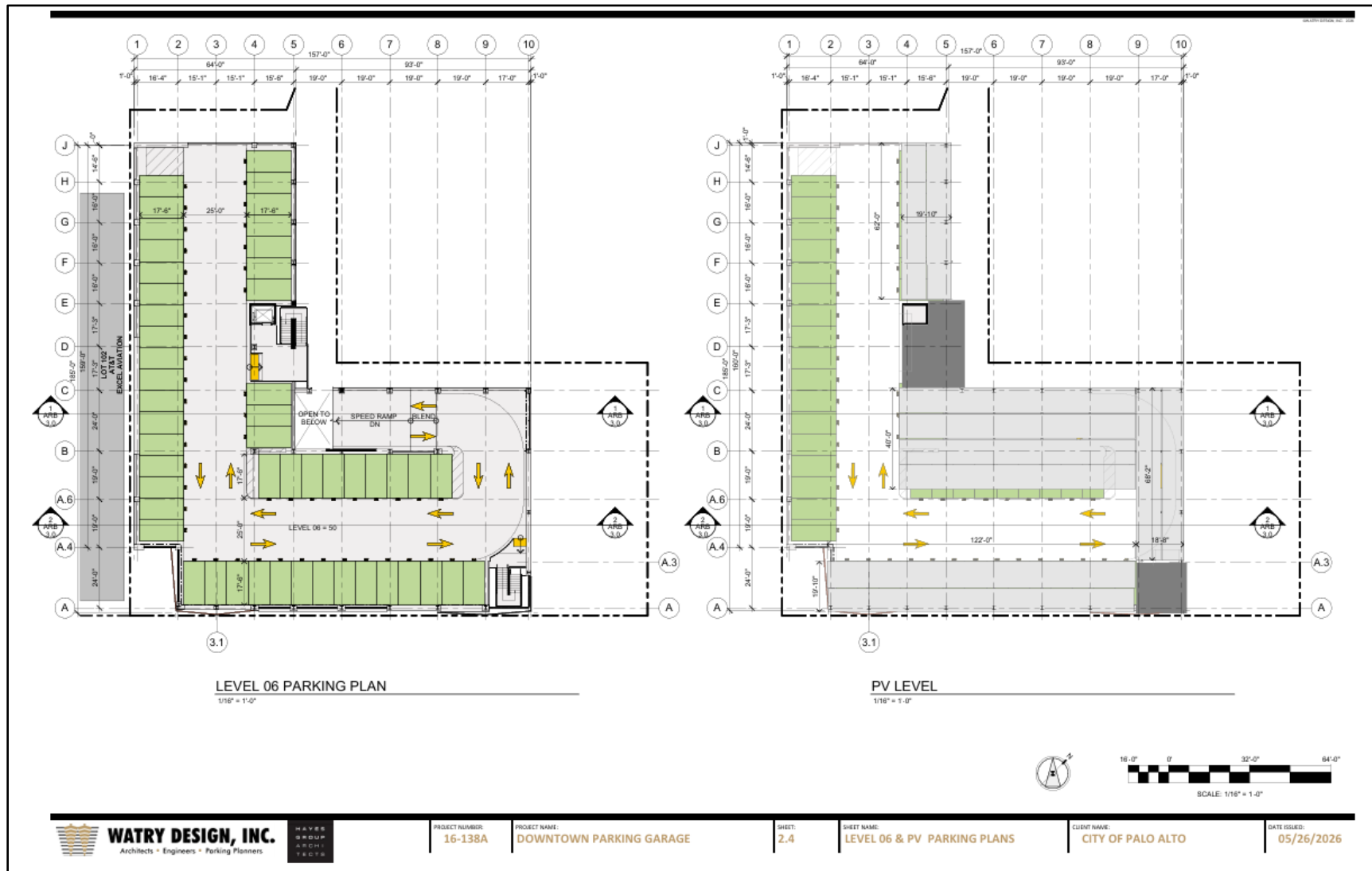


Figure 6: Elevations of Proposed Parking Structure from Hamilton Avenue

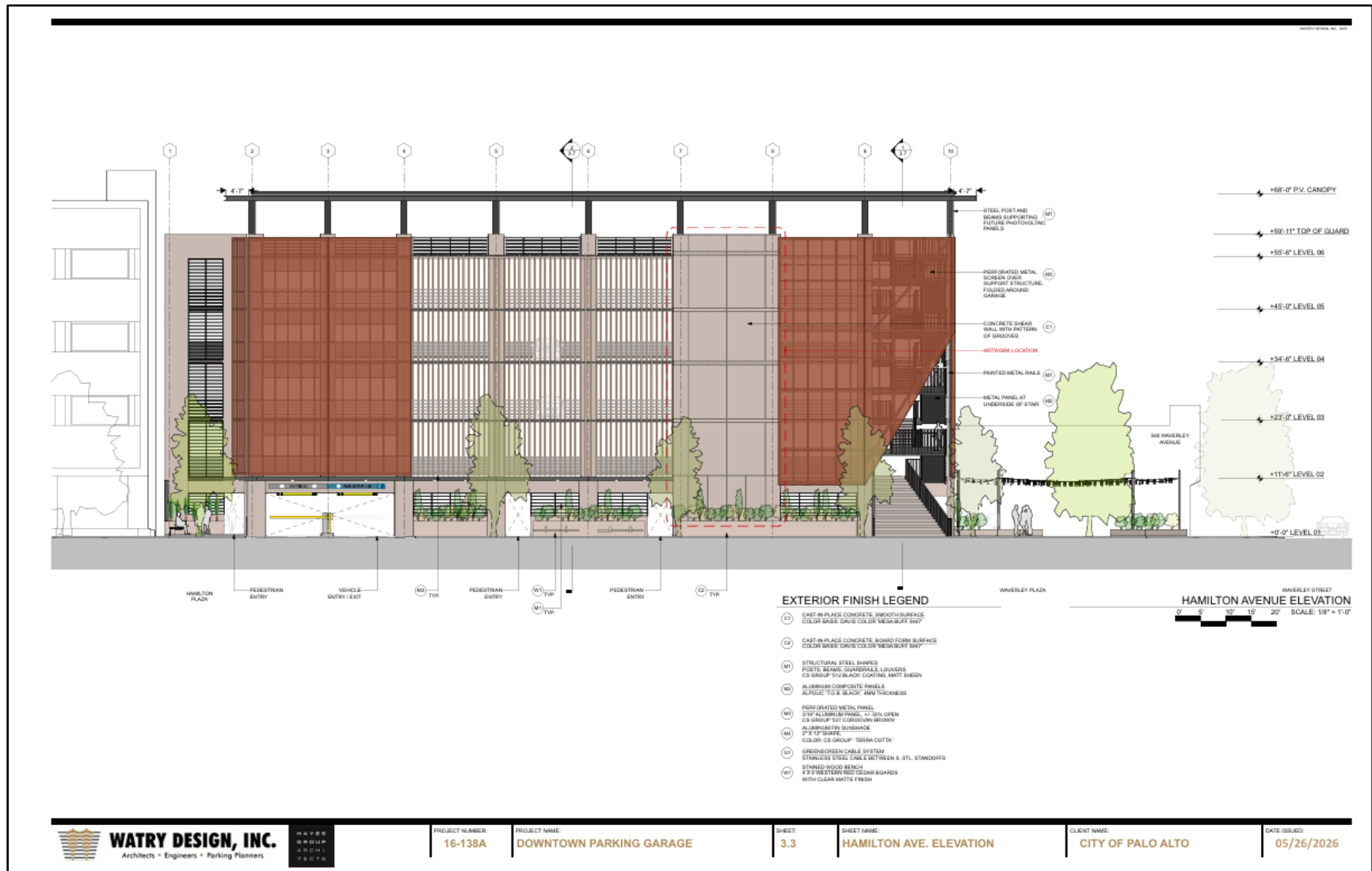


Figure 7: Elevations of Parking Structure from Waverley Street

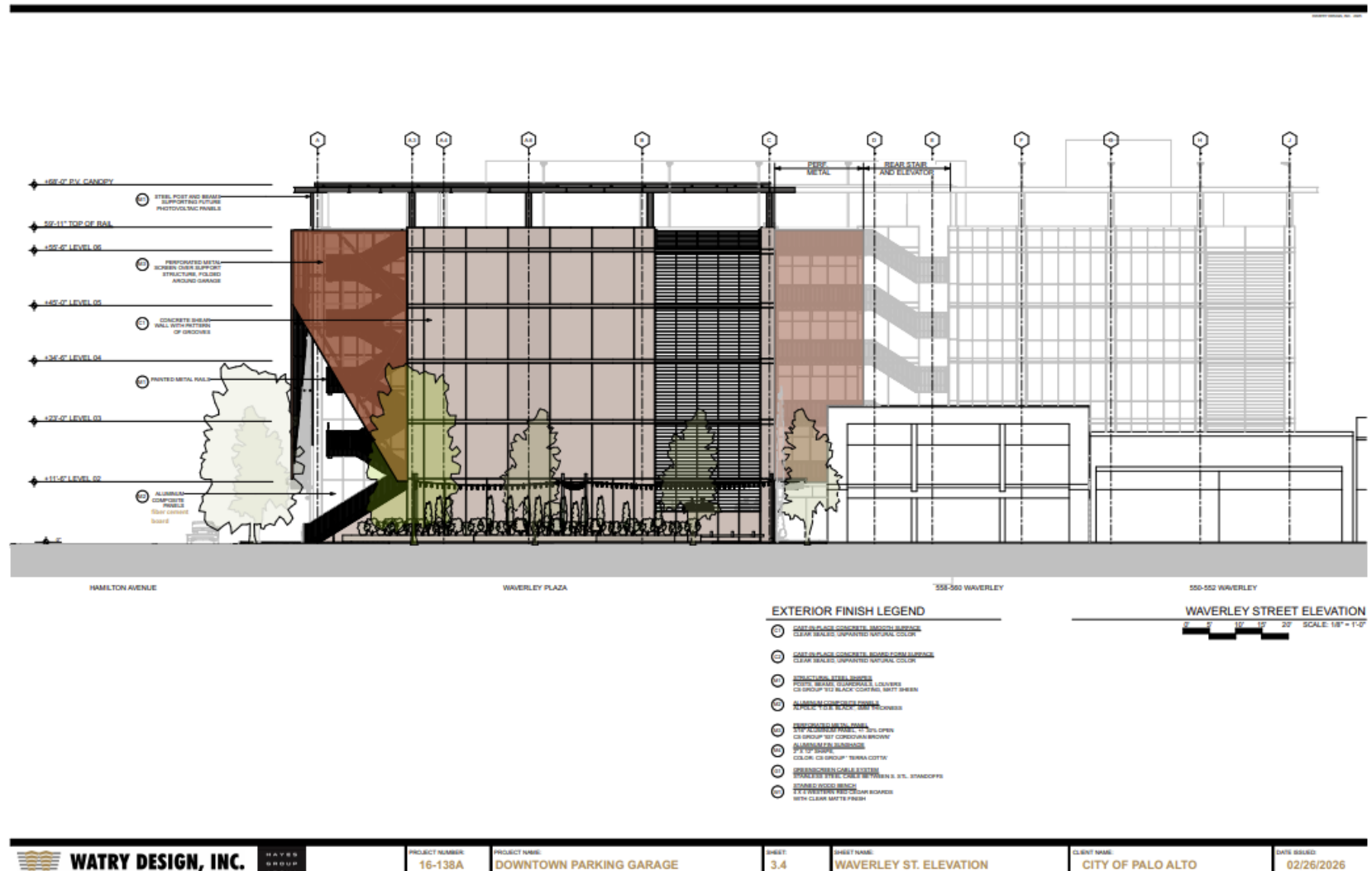
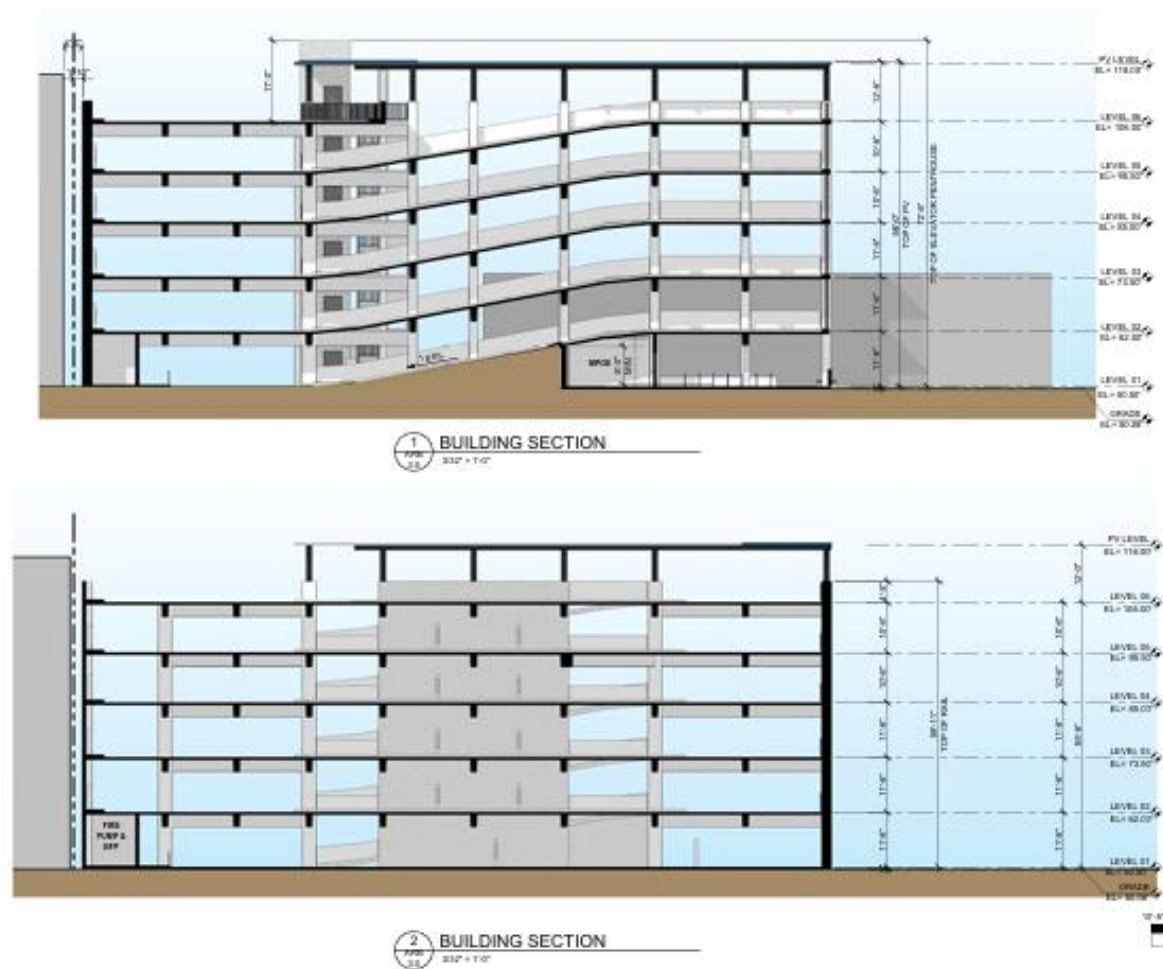


Figure 8: Sections of Revised Design



WATRY DESIGN, INC.
Architects • Engineers • Planning

WATRY GROUP
ARCHITECTS
ENGINEERS
PLANNERS

PROJECT NUMBER
15-138A

PROJECT NAME
DOWNTOWN PARKING GARAGE

SHEET
ARB 3.0

SHEET NAME
BUILDING SECTIONS

CITY OF PALO ALTO

DATE ISSUED
05/26/2025

2.1. Structure Design

The proposed structure would extend 5 feet into the required 7 foot special setback along Hamilton Avenue (providing a 2-foot setback from the property line) and along Waverley Street edge, as well as the interior side lot line shared with the adjacent AT&T building. At the property line shared with the southeastern side of Lot 85 (or 558-560 Waverley Street), the edge of the garage would be set back 10 feet from the property line, allowing openings for natural ventilation into the parking garage, as well as light to reach the existing windows of the property at 558-560 Waverley Street. This necessary setback would also create an opportunity for a pedestrian walkway, which would be ADA-accessible, leading to the secondary stairway. At the property line shared with Lot 84 and the southwestern side of Lot 85, the garage would be set back 16 feet to maintain access for utilities, service, and a secondary means of egress for the existing buildings fronting Waverley Street. Vehicle access in this alley would be restricted to those needed for servicing the adjacent properties. Additionally, the alley would be enhanced with architectural paving, new plantings, benches, and lighting so that it can be a usable space. The project would also include a publicly accessible plaza at the west corner of Hamilton Avenue and Waverley Street, which would provide outdoor gathering space and enhance pedestrian activity. Sidewalks along Hamilton Avenue and Waverley Street would be replaced and widened. Along Hamilton Avenue, the sidewalk would be 12 feet from the property line (14 feet total). Along Waverley Street, the sidewalk/bulb-out would be approximately 17 feet 9 inches, tapering to approximately 11 feet 9 inches to conform with the existing sidewalk to the north.

The project's façade design is intended to be compatible with the surrounding architectural context, and to reflect the character of Palo Alto's Downtown. Potential locations for the integration of public art have also been identified, including the perforated metal panels above the corner stairs and the vehicle entry.

The primary construction material would be concrete, including columns, slabs and walls. Along street frontages, architecturally treated concrete columns and shear walls in a neutral, natural color palette would complement surrounding development. Pedestrian-oriented screening would be provided at the ground floor through decorative metal elements integrated into building openings and stair features, drawing inspiration from metal detailing found in nearby Spanish Revival-style buildings. A perforated metal screen would wrap the primary corner stairs, creating a lantern-like architectural feature that serves as a visual landmark and wayfinding element and would incorporate a public art component. Upper-story facades would include vertical metal elements between columns to define the building mass while accommodating garage ventilation. The overall material palette and architectural detailing would be consistent with applicable provisions in the city's Historic Preservation Ordinance (Municipal Code Chapter 16.49) for the area.

Figure shows the proposed architectural character and massing of the parking structure.

Figure 9: Rendering for Proposed Parking Structure (View from corner of Hamilton Avenue and Waverley Street)



2.1.1. Access Points

The project can be accessed by vehicles via an entrance and exit on Hamilton Avenue. Lane 21 would continue to be one-way circulation, with the entrance on Waverley Street and the exit on Bryant Street. A pedestrian pathway through the structure leads from the bike parking entry near Waverley Street to Lane 21 near the CVS. City Council has not yet decided whether the facility would be a paid parking lot and thus, there is space reserved to accommodate the provisional gates at the entrance and exit. Gates and access points are shown on the ground floor plan (**Figure 1**).

2.1.2. Utilities

Construction of the revised design would require the relocation of the existing fiber optic and high voltage electric lines. Existing electrical and fiber utilities under the site would be redirected prior to construction to allow utilities crossing the site to be abandoned. Based on current design understanding, new transformers would be located above ground along Lane 21, which would avoid the need for below-ground transformer vaults or other subsurface utility vaults. A connection may also be provided from a pad location along Lane 21 to a stub-up nearer the plaza to allow for future residential service.

2.1.3. Transportation

Pedestrian safety improvements at the intersection of Waverley Street and Hamilton Avenue would be included as part of the project. Improvements within the project would include modifications to existing sidewalk and curb ramp features (e.g., pedestrian curb ramps/curb returns) in the public right-of-way at the Waverley Street and Hamilton Avenue intersection to improve accessibility and pedestrian circulation.

2.1.4. Landscaping

The proposed parking structure landscaping is designed to enhance the downtown Palo Alto pedestrian environment and to encourage social interaction through an inviting streetscape. The project landscaping would also encourage social interaction by creating a unique and convenient pedestrian paseo between the existing surrounding buildings and the proposed structure.

The project proposes construction of a parking garage and new surrounding hardscape. Six (6) trees are proposed for removal, of which all are City-protected trees under the City of Palo Alto's Tree Technical Manual, including a Coast Live Oak (*Quercus agrifolia*) (additional trees became protected during a pause in the project). Tree removals and protection status are documented in the Arborist Report and tree removal plan. Tree removals and protection status are documented in the Arborist Report and tree removal plan in the Arborist plan set. The Arborist's report indicates that previous, imprecise pruning of the Coast Live Oak has resulted in the poor condition of the tree and a potential for breakage, removal and replacement would occur in accordance with City requirements.

New pavement is proposed within the TPZ of one City-protected street tree and one non-protected private tree. Another protected street tree would be preserved but is located outside the area of

development. Existing street trees along Waverley Street would remain. No canopy pruning is anticipated.

All tree removals associated with the project would require replacement. The replacement standards outlined in the City of Palo Alto Tree Technical Manual (as described in the 2018 EIR) would be utilized to achieve no net loss of canopy per Policy 1.G of the Urban Forest Master Plan^[2]. Site preparation and soil volume requirements would apply so that newly planted trees have the potential to mature to desired size and thrive.

The corner of the parking structure would feature a mini park featuring decorative pavers, which are also used in the pedestrian access alleyways, a concrete plaza, plantings and linear concrete benches. In the pedestrian walkway, decorative pervious pavement, generous benches, landscaped storm water treatment planters, and pedestrian-scaled lighting would be used to invite pedestrian use. Storm water planters along the walkway would be raised to capture and cleanse storm water directed from the parking structure deck. These planters would feature a combination of low-growing, knee-high foliage and flowering plants that provide year-round interest and function. Columnar ginkgo trees, similar to the surrounding street trees, would be introduced where width allows to further enhance the pedestrian environment and create a pleasant atmosphere for what is intended to become a well-used passageway.

The streetscape walkways would be widened to provide more room for circulation around the public plaza on Waverley Street and to allow room for enjoying the built-in benches and landscaped raised planters on Hamilton Avenue. New street trees proposed along Hamilton Avenue would be placed in larger four-foot by seven-foot tree wells with a suspended pavement system to help ensure healthy growth. The new trees (Ginkgos) would reflect the existing species of the preserved street trees on Waverley Street. Three native Oak trees would be added on Hamilton Avenue to compensate for the removal of the one protected oak tree.

2.1.5. Foundation and Excavation

The revised design would not include a basement level. Standard foundation work for the above-grade structure would be required. A site survey determined that the site elevation ranges between 49 and 51 feet below sea level. No below grade geotechnical ground improvement or piling is expected. No major soil fill is anticipated. Any minor, localized fill would be limited to areas associated with the Level 1 ramp/slab-on-grade configuration and would not constitute substantial grading or import of fill.

2.1.6. Construction

Construction of the parking structure is expected to last 18 months and would be separated in the following phases:

- Utility relocations are expected to last three to four months and would be coordinated with the City of Palo Alto Utilities (CPAU) for electric and wastewater, AT&T for data, and others to be determined further in the design.

- Demolition and excavation of the site is anticipated to last approximately two to four months and would occur simultaneously with the utility relocations.
- Construction of the structure is expected to last eight months.

Construction days and hours will be in accordance with the City of Palo Alto's Noise Ordinance, as follows:

- Monday through Friday: 8:00 A.M. to 6:00 P.M.
- Saturday: 9:00 A.M. to 6:00 P.M.
- Sundays and Holidays: Construction prohibited.

2.1.7. Staging and Storage Area

There is limited space for staging and storage on the project site. To maintain sidewalk access for pedestrians, staging and storage would be kept on the parcel and rotated as construction progresses. The project construction would result in sidewalk closures during some stages of construction to facilitate the sidewalk improvements and bulb outs. Pedestrians would be diverted across the street during sidewalk improvement work. Road narrowing and possible temporary road restrictions may be required. The existing bus stop shown on the plans may be temporarily relocated during construction, as needed, to maintain transit service and safe pedestrian access. The temporary relocation and any associated signage or stop amenities would be coordinated with the Valley Transportation Authority (VTA). Upon completion of construction, the bus stop would be restored to its planned location, consistent with transit operations.

2.2. Project Changes from Previously Approved Project

The project has been refined from the version analyzed in the certified EIR. The following summarizes the primary changes in design, features, and site use:

- **Basement Level:** The Previously Approved Project included a basement level. The revised design does not include a basement.
- **Retail Component:** The Previously Approved Project included retail space along Waverley Street. The revised design replaces the retail space with a publicly accessible plaza.
- **Parking Capacity and Layout:** The Previously Approved Project included 325 parking stalls, eight ADA accessible stalls, and 82 EV designated stalls. The revised design provides 266 parking stalls, including approximately 100 electric vehicle spaces, 42 of which would initially be equipped with charging stations, and ten ADA accessible stalls. The revised design also includes 42 bicycle parking spaces with additional space for child carriers, slightly less than the 50 bicycle parking spaces included in the Previously Approved Project.
- **Structure Height and Massing:** The Previously Approved Project proposed a structure height of 49'-10" to the top of the fifth-deck rail and 63 feet to the top of the elevator. The revised design reaches a height of 59'-11" to the top of the sixth-deck rail and 72'-6" to the top of the elevator.

- **Setbacks and Sidewalks:** The Previously Approved Project proposed the following setbacks and sidewalks widths respectively, 3-foot setback along Hamilton to the face of the structure, a 10'-0" setback along the southeastern side shared with Lot 85, and a 16' setback along the southwestern side shared with Lots 84 and 85, a sidewalk width of 12' along Hamilton Avenue, and a 17'-9" sidewalk/bulb/out along Waverley Street. The revised design extends 5 feet into the required 7 foot special setback along Hamilton Avenue, leaving a 2-foot setback from the property line to the face of structure, a 10' setback along the southeastern side shared with Lot 85, and a 16-foot setback along the southwestern side shared with Lots 84 and 85. Along Hamilton Avenue, the sidewalk would extend 12 feet from the property line (14 feet total) and along Waverley Street the sidewalk/bulb-out would be approximately 17 feet 9 inches, tapering to approximately 11 feet 9 inches to conform with existing sidewalk to the north.
- **Sustainability Features:** The project structure is still designed to accommodate future photovoltaic panels but now the revised design incorporates infrastructure for future EV charging at 38 percent of parking stalls. These higher percentages reflect an increase in sustainable building measures relative to the Previously Approved Project.
- **Landscaping and Streetscape:** The Previously Approved Project included street trees and basic streetscape improvements along Hamilton Avenue and Waverley Street. The revised design retains and enhances these elements, while also introducing a new publicly accessible plaza, landscaped pedestrian alleyways, stormwater planters, and improved benches and pedestrian pathways. The project proposes removal of six (6) trees, of which all are City-protected trees.
- **Access and Utilities:** Vehicular access to the revised design would be provided via a single entry/exit driveway on Hamilton Avenue, rather than the multiple access points included in the Previously Approved Project. Pedestrian connectivity to Lane 21 would be maintained through the proposed pedestrian pathway. Utility work would include relocation of existing fiber optic and high voltage electric lines; existing electrical and fiber utilities crossing the site would be redirected prior to construction to allow those facilities to be abandoned. Transformers would be located above ground along Lane 21, avoiding the need for below-ground transformer vaults or other subsurface utility vaults. A connection may also be provided from a pad location along Lane 21 to a stub-up nearer the plaza to allow for future residential service. The revised design would not include a public restroom.

These changes reflect the City's refinement of the design to respond to site conditions, community input, and contemporary sustainability standards. Potential environmental impacts associated with these changes are addressed in the analysis presented in this Addendum.

2.3. Location of Project

The project is in the City of Palo Alto, California, as shown in **Figure** . The site is in the University Avenue area, also known as the Downtown area (per the City of Palo Alto Comprehensive Plan).

The project site is located north of State Route 82 (El Camino Real) and south of U.S. Highway 101. The Palo Alto Caltrain Station is located approximately 2,000 feet southwest of the project site and Stanford University is approximately 0.5 miles southwest of the project site. The project vicinity is shown in **Figure 11**.

Lot D, currently occupied by a surface parking lot, is located on the western corner of Hamilton Avenue and Waverley Street, one block east of University Avenue.

Figure 12 provides a view of the Downtown Palo Alto area in relation to the project site.

Figure 10: Regional Map

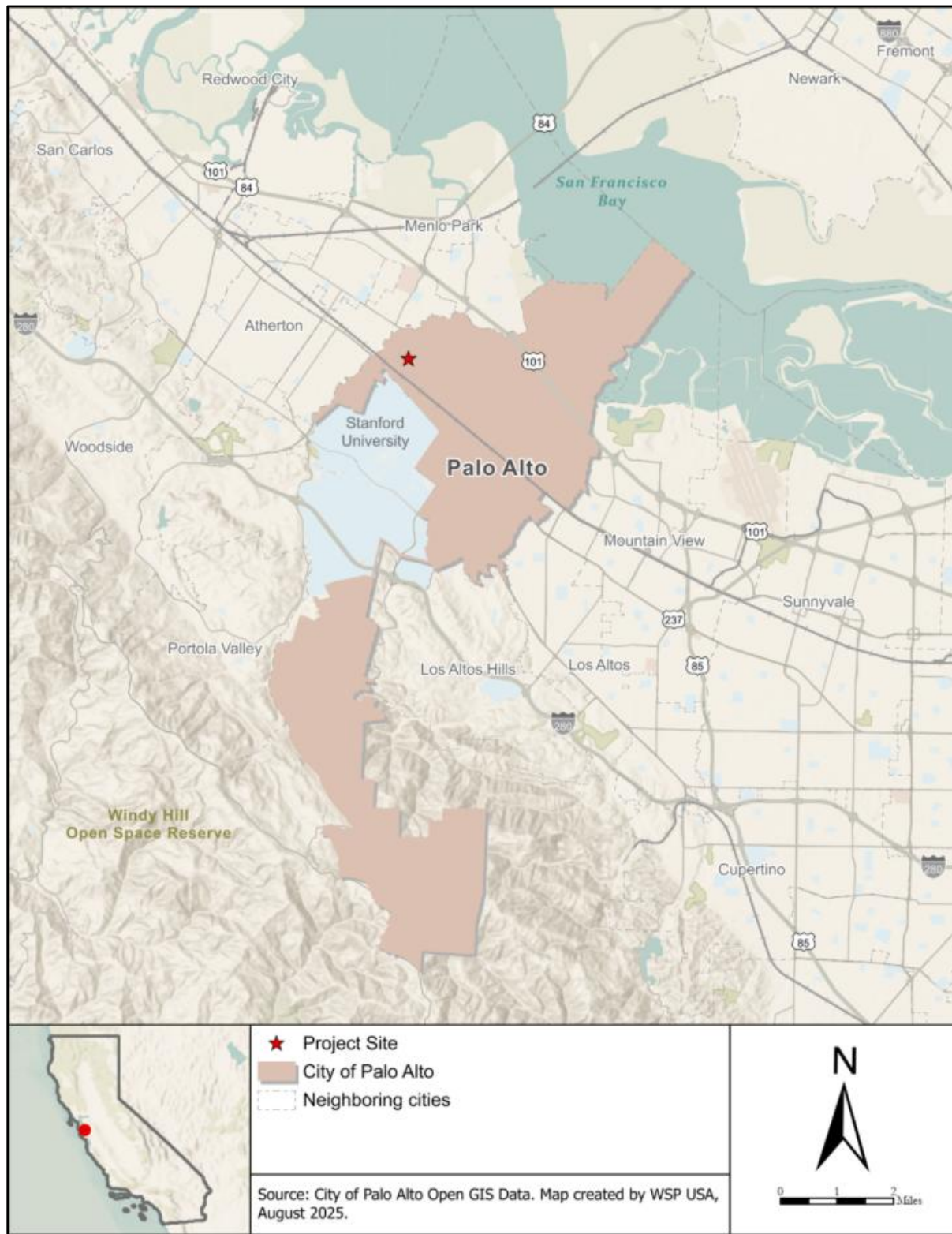
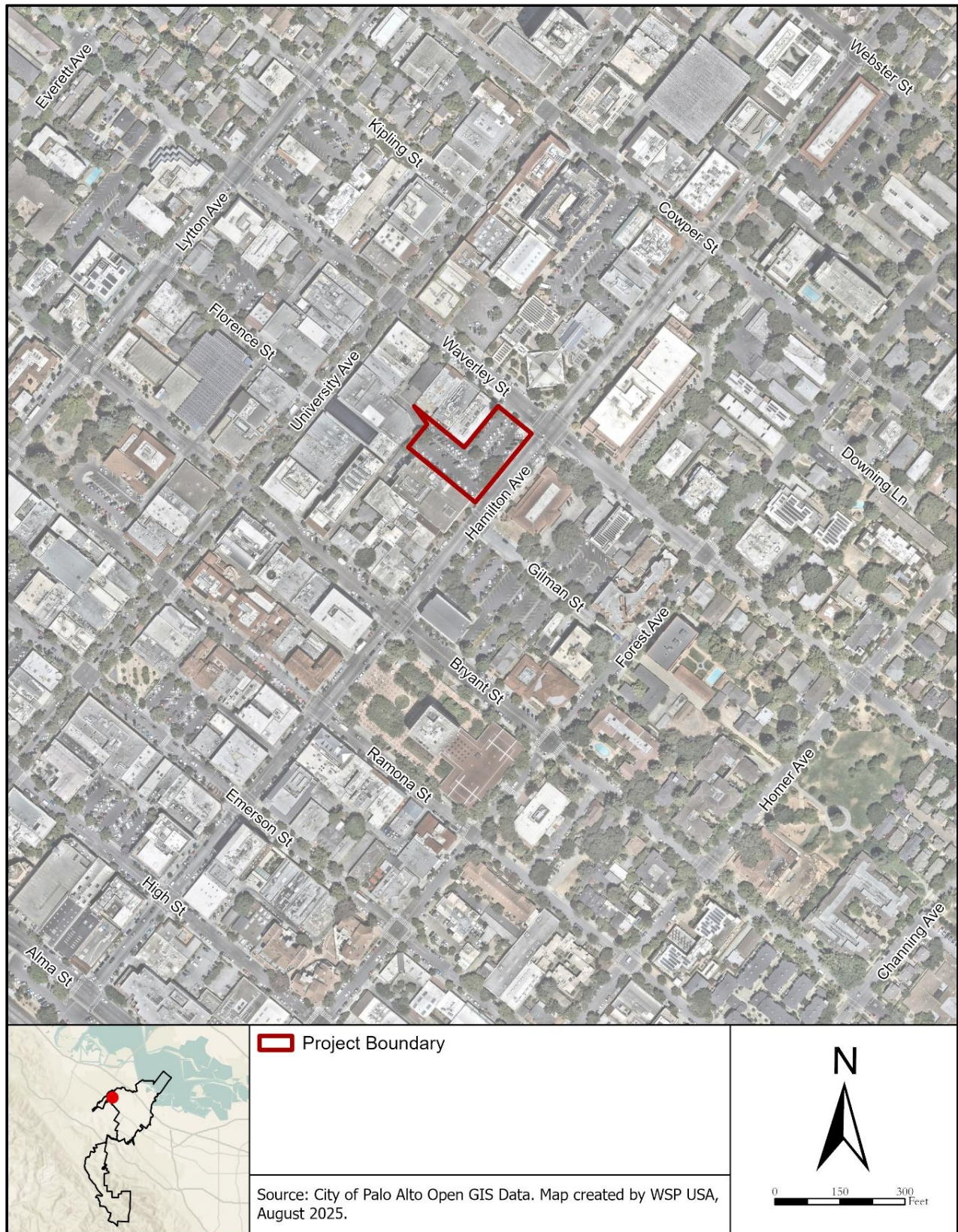


Figure 11: Project Vicinity Map



Figure 12: Project Location



2.4. Project Setting

2.4.1. Project Site

The project site is located on the western corner of Hamilton Avenue and Waverley Street. The project would be located on a parcel with Assessor Parcel Number 120-15-086. The lot is situated on a generally flat area and has an “L”-shaped configuration with 205 feet of frontage to the south on Hamilton Avenue, 100 feet of frontage to the east on Waverley Street and 62 feet of frontage to the north on Lane 21. The total area of the project site is 29,164 square feet (0.67 acres).

The site is occupied by a surface parking lot that contains 86 existing parking spaces. The layout of the lot includes angled parking stalls with a one - way drive aisle for circulation. The surface parking is currently limited to hourly parking, with no permit parking provided. **Figure 13**, shows the actual configuration of the lot.

The project site is located within the PF zoning district according to the City of Palo Alto Zoning Map and has a Comprehensive Plan Land Use Designation of Community Commercial (CC).

2.4.2. Access Points

There are six existing vehicular access points to the site: three ingress/three egress driveways along Hamilton Avenue, Waverley Street and Lane 21, respectively.

2.4.3. Adjacent Land Uses

The project site is abutted by four developed sites. These include:

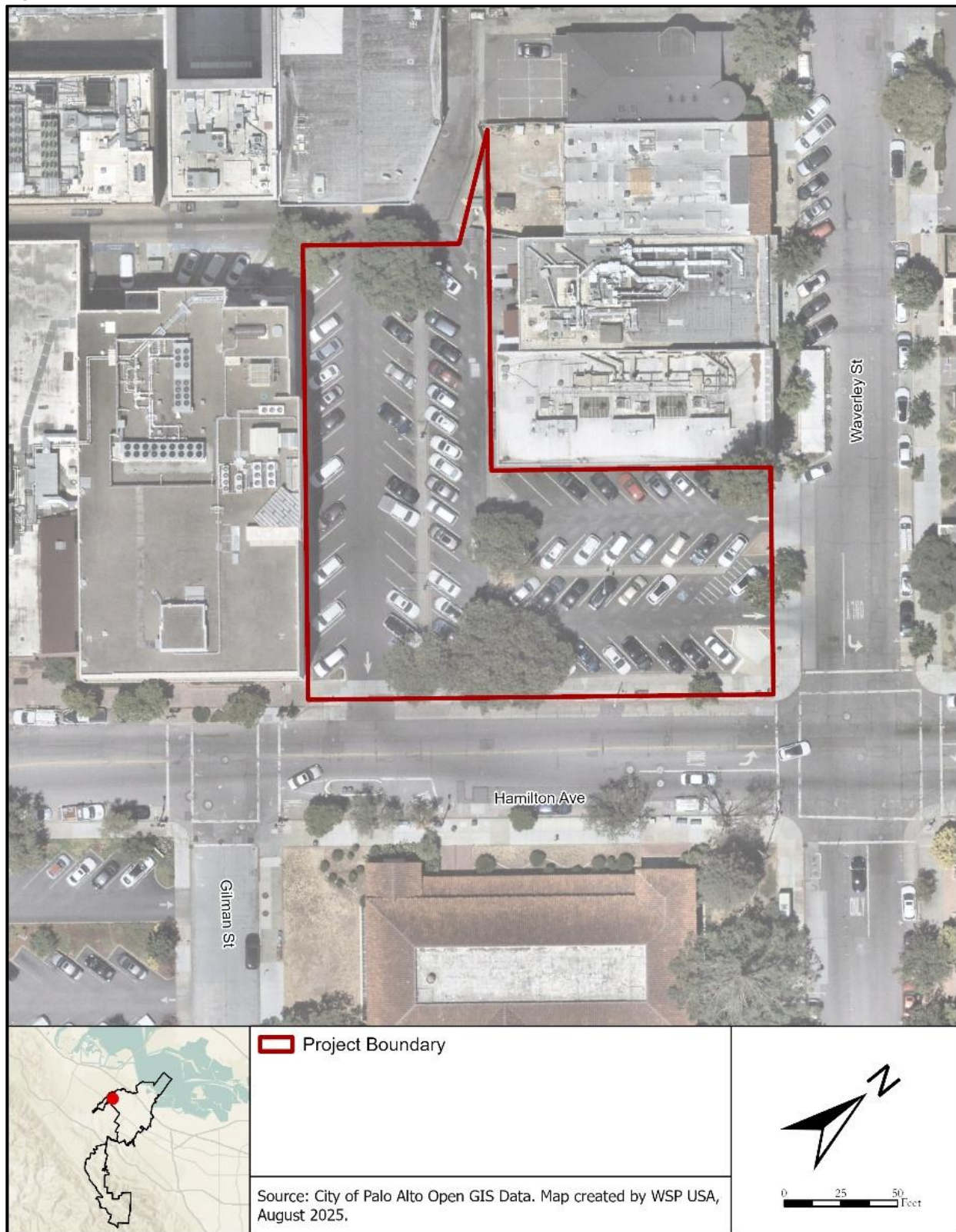
- Lot 102 (or 345 Hamilton Avenue), a building constructed in 1958 and occupied by AT&T and Excel Aviation at time of EIR publication;
- Lot 83 (or 526 Waverley Street), a building constructed in 1928, and Category 2 historic resource; up For Lease as of December 2025;
- Lot 84 (or 550 - 552 Waverley Street), a building occupied by the Ethel’s Fancy (550) and For Lease (552) as of August 2025, and
- Lot 85 (or 558 - 560 Waverley Street), a two-story building constructed in 1938, housing the Tai Pan Restaurant on the ground floor and office space on the second floor.

The existing parking lot serves adjacent restaurant and retail uses along Waverley Street and provides pedestrian rear-entry access to the CVS Pharmacy to the west (352-364 University Avenue) via Lane 21.

2.4.4. Existing Utilities

The project site contains four streetlight poles and active high voltage electric, streetlight, and fiber optic lines running north-south through the site. Utilities along the site boundaries include electric, water, gas, and sewer to the south, and water, gas, sewer, and storm drain to the east.

Figure 13: 375 Hamilton Avenue



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3. Environmental Review Update Checklist

After certification of an EIR, CEQA requires consideration of whether there are changes in the project, changes in circumstances under which it is undertaken, or “new information of substantial importance” that would result in new or more severe impacts. The following analysis and responses to the CEQA checklist questions describe project changes, evaluate whether those changes result in new information or substantial changes in the previously evaluated impacts, and make a significance determination regarding those changes. The CEQA checklist responses support the final “Determination,” statement as to the type of environmental documentation required for the project.

3.1. Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

3.1.1. Project Changes Since Previous EIR

The Previously Approved Project included a basement level. The revised design no longer includes a basement level but instead proposes a sixth level increasing the height of the structure from 49'-10" to 59'-11" to the top of the sixth-deck rail and from 63' to 72'-6" to the top of the elevator. The revised design replaces the retail space along Waverley Street with a publicly accessible plaza. The Previously Approved Project included street trees and basic streetscape improvements along Hamilton Avenue and Waverley Street. The revised design retains and enhances these elements, while also introducing landscaped pedestrian alleyways, stormwater planters, and improved

benches and pedestrian pathways. Six (6) trees are proposed for removal, all of which are City-protected trees. Removed trees would be replaced consistent with the City's Tree Technical Manual to meet current design standards and achieve no net loss of canopy.

3.1.2. *Impact Analysis*

- a) Would the project have a substantial adverse effect on a scenic vista?

The project site is located in the same downtown area as previously evaluated in the 2018 EIR. The site was not identified in the Comprehensive Plan as containing scenic vistas or major view corridors. The revised design, which includes a sixth level and elevator, would not obstruct or degrade any scenic vistas as none were identified. This is consistent with the previous impact conclusion in the 2018 EIR. There would still be ***No Impact***.

- b) Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project site is not located near a state designated scenic highway. The project would remove six (6) protected trees versus the one that was evaluated in the 2018 EIR. During the pause in the project, additional trees became protected; however, the trees are not state designated scenic resources. Removal of the protected trees would not result in impacts to scenic resources as defined under CEQA. Consistent with the 2018 EIR, there would still be ***no impact***.

- c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Similar to what was analyzed in the 2018 EIR, the revised design proposes to develop the existing surface parking lot into a multi-story parking structure. Compared to the Previously Approved Project, the revised design would increase the structure height by approximately 10'-1" to the top of the parking deck rail (from 49'-10" at the fifth-deck rail to 59'-11" at the sixth-deck rail) and by approximately 9'-6" to the top of the elevator (from 63' to 72'-6"). Despite these increases, the revised design would remain compatible with the surrounding urbanized environment, including nearby multi-story buildings (e.g., AT&T building, Post Office, All Saints Episcopal Church). The revised design is being reviewed by the City of Palo Alto Architectural Review Board (ARB) for consistency with applicable zoning and design standards. The revised design is consistent with the previously evaluated impact in the 2018 EIR. Impacts would remain ***less than significant***.

- d) Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

The project would introduce lighting typical of downtown residential uses and parking uses. The revised design's lighting strategy has remained consistent with the Previously Approved Project and would comply with City design standards to minimize spillover and glare. Building materials are not designed to be highly reflective; exterior materials would be reviewed through the City's design approval process. No substantial new light or glare impacts would occur. As a result, the project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. The revised design does not propose substantially more reflective surfaces or additional lighting compared to the Previously Approved Project. Impacts would remain *less than significant*.

3.1.3. Conclusion

The 2018 EIR analyzed potential aesthetic impacts of the project, including consistency with the City of Palo Alto 2030 Comprehensive Plan, scenic vistas, scenic resources, visual character, and light and glare. That analysis concluded that the proposed development would be consistent with the urban character of downtown Palo Alto and that temporary construction-related visual impacts would be minimized with implementation of measure **MM AES-1**, which would require aboveground structures to be designed consistent with local zoning codes and applicable design guidelines to minimize features that contrast with neighboring development and to implement standard Best Management Practices (BMPs), such as good housekeeping (maintaining a clean site) during construction. The 2018 EIR determined visual and aesthetic impacts would be *less than significant*.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe aesthetic impacts than those previously analyzed. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant aesthetic impacts. Consistent with the 2018 EIR, impacts would remain *less than significant*.

3.2. Agriculture and Forestry Services

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

3.2.1. Project Changes Since Previous EIR

The Previously Approved Project included street trees and basic streetscape improvements along Hamilton Avenue and Waverley Street. The revised design retains and enhances these elements, including installation of replacement trees and additional landscaping. However, these changes would not affect agricultural or forestry resources because the project site remains within an urbanized area and on a fully developed property, which does not include Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Williamson Act lands, or forest land.

3.2.2. Impact Analysis

- a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The project site is in downtown Palo Alto and is designated as Urban and Built-Up Land on the California Department of Conservation Farmland Mapping and Monitoring Program

(FMMP) maps (DOC 2024a). The project site is in the same developed downtown area previously evaluated in the 2018 EIR, which is not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, consistent with the 2018 EIR, the revised design would not convert farmland to non-agricultural use. There would still be *no impact*.

- b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site is in a fully urbanized downtown area and is not subject to agricultural zoning or a Williamson Act contract; therefore, the revised design would not conflict with agricultural zoning or Williamson Act requirements. This is consistent with the 2018 EIR. There would still be *no impact*.

- c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The project site is in a fully urbanized downtown area and is not zoned as forest land, timberland, or Timberland Production Zone; therefore, the revised design would not conflict with forest or timberland zoning. This is consistent with the 2018 EIR. There would still be *no impact*.

- d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The site is in a fully urbanized downtown area and does not contain forest land. The revised design would occur on the same developed site analyzed in the 2018 EIR and would not involve removal or conversion of forest land to a non-forest use. This is consistent with the 2018 EIR. There would still be *no impact*.

- e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The revised design would not involve other changes in the existing environment that could convert Farmland to non-agricultural use or forest land to non-forest use because it would occur entirely within an existing, developed downtown setting. The project site and surrounding area do not contain mapped Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or forest land, and the revised design does not expand the project footprint into any agricultural or forested areas. This is consistent with the 2018 EIR. There would still be *no impact*.

3.2.3. *Conclusion*

The 2018 EIR evaluated agriculture and forestry resources and determined the topic was not applicable because the project site is in a fully urbanized setting with no designated farmland, forest land, or timber resources. Therefore, the EIR concluded that ***no impacts*** to agricultural or forestry resources would occur, and no further analysis was needed. No mitigation measures were required.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe impacts to agricultural or forestry resources. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe impacts. Consistent with the prior findings in the 2018 EIR, no new or more severe significant effects would occur, and no new mitigation measures are required. There would still be ***no impact***.

3.3. Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3.3.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level and adds a sixth above-ground level, which would shift construction activity from below-grade excavation/shoring to above-grade structural work. Removal of the basement level would reduce excavation-related emissions (e.g., diesel equipment use, haul trips, and fugitive dust) relative to the Previously Approved Project. The revised design would also replace the previously approved ground-floor retail space with a publicly accessible plaza and reduce the total number of parking stalls from 325 to 266, which could reduce operational vehicle activity relative to the Previously Approved Project. In addition, the revised design includes expanded electric vehicle charging infrastructure, which could further reduce operational mobile-source emissions over time.

3.3.2. Impact Analysis

- a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

The project site is in the same developed downtown Palo Alto setting evaluated in the 2018 EIR. The revised design would continue to implement the City's applicable Comprehensive Plan policies and would be consistent with the growth projections already accounted for in the regional Clean Air Plan and the Comprehensive Plan. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality plan. This is consistent with the 2018 EIR. Impacts would remain *less than significant*.

- b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

The project is in the San Francisco Bay Area, which is currently designated nonattainment for ozone and fine particulate matter (PM_{2.5}). The revised design would occur within the same developed urban setting analyzed in the 2018 EIR and would remain consistent with the Comprehensive Plan; therefore, it would not result in cumulatively considerable net increase in criteria pollutant emissions beyond what was previously evaluated. This is consistent with the 2018 EIR. Impacts would remain *less than significant*.

- c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors include residences, schools, hospitals, and care facilities. The project site is located in a developed downtown area and is surrounded by commercial and institutional uses; the nearest residential uses are not immediately adjacent. As concluded in the 2018 EIR, localized emissions from construction and operation would not expose sensitive receptors to substantial concentrations of air pollutants. The revised design would not change the location of the project or introduce elements that would substantially change construction and operation of the project. The revised design is consistent with the 2018 EIR. Impacts would remain *less than significant*.

- d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The 2018 EIR did not evaluate odor impacts because this question was not included in Appendix G of the CEQA Guidelines at that time. Construction of the project could generate temporary odors from equipment exhaust, asphalt, paints, and solvents; however, these would be typical of short-term construction activities, highly localized, and not affect a substantial number of people.

Operation of a parking facility and plaza is not associated with long-term odor emissions such as landfills, wastewater treatment plants, or composting facilities. Therefore, the project would not result in other emissions (such as odors) that would adversely affect a substantial number of people. Impacts would be *less than significant*.

3.3.3. Conclusion

The 2018 EIR analyzed potential air quality impacts associated with development under the Comprehensive Plan, including consistency with the Bay Area Air Quality Management District

(BAAQMD)² Clean Air Plan, potential conflicts with adopted standards, and construction and operational emissions. That analysis concluded that impacts would be minimized with standard construction measures and BAAQMD recommended best practices. Therefore, the EIR determined impacts would be *less than significant*. No mitigation measures were required.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe air quality impacts than those previously analyzed. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant air quality impacts. With implementation of applicable construction measures and BAAQMD recommended best practices identified in the 2018 EIR, impacts would remain *less than significant*.

² In 2025 the Bay Area Air Quality Management District (BAAQMD) shortened its name to Bay Area Air District (BAAD) and launched a new logo and brand identity. However, for consistency with the 2018 EIR, the acronym BAAQMD is being used.

3.4. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any 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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

3.4.1. *Project Changes Since Previous EIR*

The revised design would retain on-site landscaping and streetscape elements proposed under the Previously Approved Project but would enhance those elements with the introduction of a new publicly accessible plaza, landscaped pedestrian alleyways, stormwater planters, benches, and improved pedestrian pathways. The revised design would include removal of additional existing trees relative to the one tree removal evaluated under the Previously Approved Project.

3.4.2. *Impact Analysis*

- a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

The project site is a paved parking lot with limited landscaping and trees. A California Natural Diversity Database (CNDDB) and U.S. Fish and Wildlife Service (USFWS) query identified several special-status species in the region. However, the site does not contain suitable habitat for these species, and no critical habitat is present. Therefore, the project would not result in substantial adverse effects on special-status species. The revised design would occur on the same project site and does not introduce new elements that would change these conditions. The revised design is consistent with the 2018 EIR. Impacts would remain *less than significant*.

- b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The project site is fully urbanized and does not contain riparian habitat, wetlands, or other sensitive natural communities. No such resources would be affected. The revised design would occur on the same project site and does not introduce new elements that would change these conditions. The revised design is consistent with the 2018 EIR. There would still be *no impact*.

- c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

According to the National Wetlands Inventory, no federally protected wetlands are located on or near the site. The project would not involve filling, removal, or hydrological modification of wetlands. The revised design would occur on the same project site and does not introduce new elements that would change these conditions. The revised design is consistent with the 2018 EIR. There would still be **no impact**.

- d) Would the project interfere substantially with the movement of any 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?

The project is not located within a regional wildlife corridor. However, trees on-site provide potential nesting habitat for native and migratory birds protected under the Migratory Bird Treaty Act and California Fish and Game Code. Removal of trees during nesting season could directly impact active nests. To avoid this impact, the project would implement **MM BIO-1**, which requires pre-construction nesting bird surveys and establishment of no-disturbance buffers around active nests, or avoidance of tree removal during nesting season.

The revised design includes removal of six (6) on-site trees, all of which are City-protected trees. Tree removals would be required to adhere to the City's Tree Technical Manual and approved arborist plan. Additionally, implementation of **MM BIO-1** would reduce potential impacts to nesting birds. The changes noted between the previously approved project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant impacts to habitat or migratory birds. Consistent with the prior findings in the 2018 EIR, no new significant effects would occur, and no new mitigation measures are required. Impacts would remain *less than significant with mitigation*.

- e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or as defined by the City of Palo Alto's Tree Preservation Ordinance (Municipal Code Section 8.10)?

The project would remove six (6) on-site trees, all of which are City-protected trees, including a Coast Live Oak (*Quercus agrifolia*), which is protected under the City's Tree Ordinance. These design refinements would not introduce new biological resource constraints beyond those analyzed in the 2018 EIR; however, because tree removal could affect nesting birds, the same construction-related avoidance and mitigation measures identified in the 2018 EIR (e.g., nesting bird surveys/avoidance and compliance with the City's tree protection and replacement requirements) would continue to apply. Tree protection measures (**MM BIO-2**) and replacement plantings (**MM BIO-3**) would be implemented per the Arborist Report and the City's Urban Forest Master Plan. These measures ensure no net loss of canopy cover and compliance with the City's tree regulations. The revised design is consistent with the 2018 EIR. Impacts would remain *less than significant with mitigation*.

- f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other adopted regional or state conservation plan. The revised design would be located on the same site evaluated in the 2018 EIR and does not introduce new elements that would change these conditions. The revised design is consistent with the 2018 EIR. There would still be *no impact*

3.4.3. Conclusion

The 2018 EIR evaluated potential biological resource impacts associated with development under the Comprehensive Plan, including special-status species, natural communities, wetlands, wildlife movement, local policies, and approved plans. That analysis concluded that impacts would be minimized by construction activities complying with the City's tree preservation policies and with the implementation of **MM BIO-1** through **MM BIO-3**. Therefore, the EIR determined impacts would be *less than significant with mitigation*.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe biological resources impacts than those previously analyzed. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant biological impacts. With implementation of **MM BIO-1** through **MM BIO-3** identified in the 2018 EIR, impacts would remain *less than significant with mitigation*.

3.5. Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

3.5.1. Project Changes Since Previous EIR

The revised design no longer includes a below-grade (basement) parking level or ground-floor retail space and instead adds a sixth above-ground level and a publicly accessible plaza.

3.5.2. Impact Analysis

- a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

There are no historic resources on the project site. Several historic buildings exist nearby, including the U.S. Post Office (NRHP-listed) and structures on Waverley and Bryant Streets that appear on the City's Historic Inventory. However, the project does not involve demolition or alteration of historic structures and incorporates compatible architectural design features, including massing, façade articulation, and material selection. As a result, the project would not directly or indirectly cause a substantial adverse change to the significance of a historical resource. Consistent with the 2018 EIR, the revised design does not involve demolition or alteration of historic structures and incorporates compatible architectural design features. Impacts would remain *less than significant*.

- b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The project site is in a moderately sensitive area for archaeological resources but has been heavily disturbed by prior development, paving, and subsurface utility installation. No known archaeological resources have been recorded within the project boundary. The revised design removes the basement level parking component, which from a cultural resources perspective would reduce the depth and extent of excavation and other ground-disturbing activities relative to the Previously Approved Project. The revised design does not introduce new ground disturbance areas beyond those previously evaluated in the 2018

EIR and would reduce the potential to encounter unknown subsurface archaeological resources. Ground disturbance would be reduced and would generally be limited to typical foundation and utility-related work. Nonetheless, any ground-disturbing activities could potentially encounter previously undiscovered resources. **MM CTR-1** (Resource Recovery Procedures) requires halting work and professional evaluation if cultural resources are unearthed. Relative to the Previously Approved Project, the revised design is consistent with the 2018 EIR. With implementation of **MM CTR-1**, impacts would remain *less than significant*.

- c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

No human remains are known to exist on site. However, in the event of accidental discovery during ground disturbance, **MM CTR-2** requires compliance with state law, including immediate notification of the County Coroner and coordination with the Native American Heritage Commission if remains are determined to be of Native American descent. The revised design does not introduce new elements that would change these conditions and relative to the Previously Approved Project, the revised design is consistent with the 2018 EIR. With the implementation of **MM CTR-2**, impacts would remain **less than significant**.

3.5.3. Conclusion

The 2018 EIR analyzed potential cultural resources impacts associated with development under the Comprehensive Plan, including historic resources, archaeological resources, paleontological resources, and tribal cultural resources.

Consistent with the current CEQA Appendix G checklist, this addendum addresses paleontological resources under Geology and Soils and tribal cultural resources under its own topic area.

The revised design would not result in new or more severe significant cultural resource impacts than those previously evaluated in the 2018 EIR. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant cultural impacts. In particular, the revised design no longer includes basement level parking reducing the depth and extent of ground disturbance relative to the Previously Approved Project. This change would likely reduce the potential to encounter previously unknown subsurface cultural resources. With implementation of **MM CTR-1** through **MM CTR-3** identified in the 2018 EIR, impacts would remain *less than significant with mitigation*.

3.6. Energy

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

3.6.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level and instead proposes a sixth level, increasing the height of the structure from 49'-10" to 59'-11" to the top of the sixth-deck rail and from 63' to 72'-6" at the top of the elevator. The revised design also replaces the previously approved retail space along Waverley Street with a publicly accessible plaza and reduces the total number of parking stalls from 325 to 266. The revised design includes updated electric vehicle (EV) charging infrastructure, including capacity (conduit) to accommodate additional EV chargers in the future. Solar photovoltaic panels are planned on the top level. The revised design also includes energy-using operational features such as plaza lighting (e.g., decorative string lighting), parking guidance/wayfinding signage, and automatic/provisional vehicle access gates.

3.6.2. Impact Analysis

- a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The revised design would involve the construction and operation of a parking garage with a publicly accessible plaza, in an already developed downtown area. Energy use would be typical for a project of this size and would comply with the California Energy Code (Title 24, Part 6) and CALGreen (Title 24, Part 11) standards. Measures such as natural ventilation of parking levels, EV charging stations (with capacity to accommodate additional chargers in the future), and planned photovoltaic panels on the top level would further enhance energy efficiency. Therefore, energy impacts during construction and operation would be *less than significant*. No mitigation is required.

- b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project would comply with the City of Palo Alto's local energy efficiency requirements and support state and local renewable energy goals by providing infrastructure for EV charging (with capacity to accommodate additional chargers in the future) and planned photovoltaic systems. The project would not obstruct or conflict with any applicable state or local plans. Impacts would be *less than significant*. No mitigation is required.

3.6.3. Conclusion

The 2018 EIR analyzed potential energy impacts associated with development under the Comprehensive Plan, including the type and amount of energy use during construction and operation, effects on local and regional energy supplies and capacity, and transportation energy demand. Although the Appendix G checklist has since been updated, the 2018 analysis addressed the same issues now encompassed by the current CEQA questions on energy efficiency and consistency with state and local energy plans. The 2018 EIR analysis concluded that the project would be consistent with the Comprehensive Plan, would not result in wasteful, inefficient, or unnecessary consumption of energy, and that the energy use would be consistent with applicable state and local energy efficiency standards. Therefore, the EIR determined impacts would be *less than significant*. No mitigation measures were required.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe energy impacts than those previously analyzed. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant energy impacts. The project would comply with current state and local energy efficiency requirements, which are more stringent than those in effect at the time of the Previously Approved Project. Impacts related to energy consumption and consistency with state and local energy efficiency plans would remain *less than significant*.

3.7. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: 1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. 2. Strong seismic ground shaking? 3. Seismic-related ground failure, including liquefaction? 4. Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Note: Impact Statement F originally discussed in 2018 Certified EIR under Cultural Resources.

3.7.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level but instead proposes a sixth level increasing the height of the structure from 49'-10" to 59'-11" to the top of the sixth deck rail and

from 63' to 72'-6" at the top of the elevator. The revised design replaces the retail space along Waverley Street with a publicly accessible plaza. Removal of the basement level would reduce excavation depth and the extent of below-grade ground disturbance compared to the Previously Approved Project.

3.7.2. Impact Analysis

- a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- (1) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The project site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known active or potentially active faults cross the site. The San Andreas Fault lies approximately 7.6 miles west. No project components would exacerbate fault rupture risk. Impacts would remain *less than significant*.

- (2) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Strong seismic shaking is expected in the San Francisco Bay Area during the life of the project. The structure would be designed and constructed consistently with California Building Standards Code (CBC) seismic design requirements and geotechnical recommendations. Adherence to standard codes and geotechnical recommendations would ensure structures can withstand seismic loads and avoid exacerbating risks. Impacts would remain *less than significant*.

- (3) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

The site is located within a mapped liquefaction hazard zone. Subsurface borings identified potentially liquefiable soils below 30 feet, with potential differential settlement. Implementation of **MM GEO-1** requires foundations to be designed to accommodate liquefaction-related settlement. Impacts would remain *less than significant*.

- (4) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project site is in a flat alluvial valley and not within a mapped landslide hazard area. The revised design no longer includes a basement level; therefore, the potential for deep excavation and temporary cut slopes is reduced compared to the Previously Approved Project. The project would not expose people or structures to substantial adverse effects related to landslides. Impacts would remain *less than significant*.

- b) Would the project result in substantial soil erosion or the loss of topsoil?

The project site is already paved and developed, with limited exposed soils. With the removal of the previously approved basement level, ground disturbance would be limited primarily to excavation for building footings (and other minor, localized excavation typical of utility connections), rather than substantial site grading or deep excavation. These activities could cause temporary erosion or sediment transport during construction; however, implementation of construction BMPs (e.g., SWPPP measures) would control erosion and sediment movement. No long-term erosion would occur after construction as the site would be mostly paved. Impacts would remain *less than significant*.

- c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The geotechnical investigation identified potential for differential settlement and liquefaction. With implementation of **MM GEO-1** and compliance with CBC requirements, building foundations would be designed to avoid exacerbating soil instability. Impacts would remain *less than significant*.

- d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Testing of shallow soil indicates low expansion potential. Compliance with CBC and geotechnical recommendations would prevent damage from expansive soils. Impacts would remain *less than significant*.

- e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The project would connect to the City's existing municipal sewer system. No septic systems are proposed. There would still be *no impact*.

- f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The site is underlain by late Quaternary alluvial deposits, which may contain paleontological resources at depth. The revised design no longer includes a basement level; therefore, compared to the Previously Approved Project, ground disturbance would be reduced and generally limited to typical foundation and utility-related work. Nonetheless, any ground-disturbing activities could potentially encounter paleontological resources if present. Implementation of **MM GEO-3** requires monitoring and evaluation of any discoveries, ensuring preservation or proper treatment. Impacts would remain *less than significant*.

3.7.3. Conclusion

The 2018 EIR analyzed potential geology and soil impacts associated with development under the Comprehensive Plan, including seismic hazards, soil stability, erosion, landslides, liquefaction, and expansive soils. That analysis concluded that impacts related to ground shaking and localized liquefaction hazards would be minimized with adherence to the California Building Standards Code (CBC) and project-specific geotechnical design recommendations, and the implementation of **MM GEO-1**. Potential impacts to paleontological resources would continue to be addressed through implementation of **MM GEO-2** and **MM GEO-3**, which are retained as precautionary measures despite the reduced depth and extent of excavation associated with elimination of the basement level. Therefore, the EIR determined impacts would be *less than significant*.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe significant geological and soil impacts than those previously analyzed. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant geology and soil impacts. With implementation of **MM GEO-1** and compliance with applicable CBC requirements, and implementation of **MM GEO-2** and **MM GEO-3** for any ground-disturbing activities with paleontological sensitivity, impacts would remain *less than significant*.

3.8. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

3.8.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level but instead proposes a sixth level raising the height of the structure from 49'-10" to 59'-11" to the top of the sixth deck rail and from 63' to 72'-6" at the top of the elevator. The revised design replaces the retail space along Waverley Street with a publicly accessible plaza. The revised design also reduces the total number of parking stalls from 325 to 266 but increases the number of electric vehicle (EV) spaces from 82 (with 17 being installed with charging stations) to 100 (with 42 being installed with charging stations). Accommodation for future photovoltaic panels would now support EV charging up to 38 percent of parking stalls, instead of 25 percent as previously analyzed in the 2018 EIR.

3.8.2. Impact Analysis

- a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Although the project now proposes a sixth level which could generate additional construction emissions due to the need for more robust, material-intensive construction and potentially longer construction time, the removal of the basement level is expected to offset potential increased construction emissions. Particularly, because foundation work and specialized construction for underground parking can result in higher emissions. Additionally, the commercial retail area, that constituted the basis for operational emissions in the 2018 EIR, would no longer be included in the finalized design and is instead being replaced by a publicly available plaza. The change from commercial retail area to plaza is expected to reduce emissions by decreasing expected vehicle trips. Further, the increase in the number of EV parking spaces and EV charging stations is expected to reduce operational emissions by limiting the number of emitting vehicles that can be accommodated in the parking structure. Therefore, the revised design is not expected to result in more emissions than what was analyzed in the 2018 EIR, which was well below

the BAAQMD recommended threshold for greenhouse gas (GHG) emissions. Impacts would remain *less than significant*.

- b) Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As described above, the revised design is expected to result in equivalent or less GHG emissions than the project analyzed in the 2018 EIR and would remain below the BAAQMD recommended threshold for GHG emissions. Therefore, the revised design would avoid conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would remain *less than significant*.

3.8.3. Conclusion

The 2018 EIR analyzed potential GHG emission impacts associated with development under the Comprehensive Plan, including GHG emissions generation and conflicts with state or local plans for renewable energy or energy efficiency. That analysis concluded that GHG emissions would be below the BAAQMD recommended threshold and that the project would not conflict with applicable plans, policies, or regulations. Therefore, the 2018 EIR determined impacts would be *less than significant* and no mitigation measures were required.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe GHG emissions impacts than those previously analyzed. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant GHG emissions impacts. Consistent with the prior findings, no new significant effects would occur, and no new mitigation measures are required. Impacts would remain *less than significant*.

3.9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

3.9.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level but instead proposes a sixth level increasing the height of the structure from 49'-10" to 59'-11" to the top of the sixth deck rail and from 63' to 72'-6" at the top of the elevator. The revised design replaces the retail space along Waverley Street with a publicly accessible plaza. The revised design also reduces the total number of parking stalls from 325 to 266.

3.9.2. Impact Analysis

- a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction activities would require limited use of hazardous materials. Transport, storage, use, or disposal of hazardous materials would be subject to federal, state, and local regulations, which would ensure that risks associated with the use of hazardous materials are minimized. Operation would also require very limited use of hazardous materials. Materials would be labeled properly and likely used until depleted, limiting remaining hazardous waste. The revised design would not result in increased use, transport, or disposal of hazardous materials in excess of what was considered in the 2018 EIR. Impacts would remain *less than significant*.

- b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The Phase I ESA completed for the 2018 EIR determined that there were no recognized environmental conditions (RECs) on the project site that could be released into the environment. However, three nearby/adjacent facilities were identified as RECs. The revised design does not include a change in location or a different site use, so the risk of hazards being released into the environment would not change from what was analyzed in the 2018 EIR. Further, the revised design no longer includes a basement level requiring ground disturbance to depth, decreasing the likelihood of encountering unknown hazardous materials below surface and releasing contaminants into the environment. Impacts would remain *less than significant*.

- c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

There are no schools within a quarter mile of the project area and the revised design does not include a change in project location. Therefore, consistent with the 2018 EIR, there would still be *no impact*.

- d) Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The project site is not listed on a hazardous materials site compiled pursuant to Government Code Section 65962.5 and the revised design does not include a new site location. The previously prepared Phase I ESA identified three nearby/adjacent RECs that could create hazards to the public or environment. To minimize hazards associated with these RECs and any unknown hazards, **MM HZ-1** would be implemented. This measure would require the preparation and implementation of a Health and Safety Plan and the implementation of

additional measures to properly handle unknown hazardous materials if encountered. Impacts would remain *less than significant*.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The project site is not located within an airport land use zone or two miles from a public airport and the revised design does not include a new site location. Therefore, consistent with the 2018 EIR, there would still be *no impact*.

- f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The revised design would not alter roadway and transportation systems to physically interfere with emergency response or evacuation plans. Traffic control measures would be adopted during the project construction as part of the Public Works Engineering Department's required logistics plan to ensure that emergency access is maintained in all directions. In addition, **MM TR-1** requiring the preparation and implementation of a Traffic Control Plan would be implemented for project construction. The Traffic Control Plan would further reduce potential interference with emergency response or evacuation plans by always ensuring emergency access. Operation of the project is not expected to interfere with circulation or emergency access. Any potential fire hazards would be mitigated during the fire and building departments' permit review process and all fire safety regulations would be followed. The revised design does not introduce changes that would alter roadway or transportation systems and all measures and regulations identified in the 2018 EIR and applicable to the revised design would be followed. Impacts would remain *less than significant*.

- g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

As described in Section 3.20, Wildfire, the project site is not located in or near a State Responsibility Area (SRA) or a Very High Fire Hazard Severity Zone (VHFHSZ). In addition, the project is in a developed and urban area, with minimal chance of wildland fires. There would still be *no impact*.

3.9.3. Conclusion

The 2018 EIR analyzed potential hazards and hazardous materials impacts associated with development under the Comprehensive Plan, including the transport, use, or disposal of hazardous materials, the release of hazardous materials into the environment, the use of hazardous materials within one-quarter mile of an existing or proposed school, listed hazardous materials sites, aviation hazards, and emergency response/evacuation plans. That analysis concluded that impacts due to

the proximity to RECs identified in the Phase I ESA, would be minimized with implementation of **MM HZ-1**. Therefore, the EIR determined impacts would be *less than significant*.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe hazards and hazardous materials impacts than those previously evaluated in the 2018 EIR. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant hazards and hazardous materials impacts. With implementation of **MM HZ-1** and **MM TR-1**, impacts would remain *less than significant*.

3.10. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: I. result in substantial erosion or siltation on- or off-site; II. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; III. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or IV. impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

3.10.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level but instead proposes a sixth level increasing the height of the structure from 49'-10" to 59'-11" to the top of the sixth deck rail and from 63' to 72'-6" at the top of the elevator. The revised design replaces the retail space along Waverley Street with a publicly accessible plaza, which includes improvements such as landscaped pedestrian alleyways, stormwater planters, and improved benches and pedestrian pathways.

3.10.2. Impact Analysis

- a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The 2018 EIR identified potential construction pollution and sediment sources that could degrade surface or ground water quality. However, contractors would be required to implement year-round storm water BMPs and conditions of the NPDES permit that would ensure the project complies with the City of Palo Alto Municipal Ordinance and does not violate any water quality standards or waste discharge requirements. The revised design does not introduce new conditions that would significantly change the previously identified impacts and is consistent with the project evaluated in the 2018 EIR. The project would be required to implement BMPs, adhere to applicable City of Palo Alto Municipal Ordinances, and comply with the project's conditions of approval to ensure water quality standards are not violated. Impacts would remain *less than significant*.

- b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The project proposes replacing an existing surface parking lot with a six-story parking structure. The project includes a plaza consisting of hardscape and landscape areas. The landscaped areas include bio-retention features to capture and treat storm water runoff. Overall, the project would reduce impervious surfaces compared to the existing condition. The revised design also includes landscaped areas that would catch and treat stormwater runoff and does not include new elements that would create barriers to groundwater recharge or impede sustainable groundwater management. Water demand associated with operation would be limited to minor uses (e.g., fire suppression) consistent with City requirements. The revised design proposes an additional sixth story and a surface level first floor versus a basement level. The change in design would not substantially reduce groundwater storage capacity. The revised design is consistent with the 2018 EIR. Impacts would remain *less than significant*.

- c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- (1) Result in substantial erosion or siltation on- or off-site;

The project would be located on a site that is presently developed as a surface parking lot and mostly covered with impervious surfaces. The revised design includes landscaping and stormwater planters as part of the public plaza to facilitate capture of stormwater runoff and reduce impervious surface area. The project would also implement year-round water quality BMPs. During construction, the

project would use standard BMPs and conformance with the City of Palo Alto Public Works Code to control potential on- and off-site erosion. The revised design is consistent with the project evaluated in the 2018 EIR and would implement the same measures to address potential erosion and siltation. Therefore, the revised design would not result in substantial erosion or siltation on- or off-site. Impacts would remain *less than significant*.

- (2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

The revised design would reduce impervious surfaces on the project site and the amount of storm water discharged into the storm drain system through the use of on-site BMPs and bio-retention planters. The revised design is consistent with the 2018 EIR. Impacts would remain *less than significant*.

- (3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

The project would be required to implement year-round storm water BMPs and requirements under the NPDES that would ensure water quality standards or waste discharge requirements are followed. The revised design would include landscaped areas to reduce impervious surfaces and capture stormwater runoff. The revised design would not generate runoff in excess of what was considered in the 2018 EIR. Impacts would remain *less than significant*.

- (4) Impede or redirect flood flows?

The project is not in a flood hazard area and as described above, the project takes place in an already developed urban area. The revised design would not introduce new elements that would further impede or redirect storm water flow. The project includes landscaped areas that would reduce the amount of impervious surfaces. The revised design is consistent with the 2018 EIR. Impacts would remain *less than significant*.

- d) Would the project be located in flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The project is not in a flood hazard area and the revised design does not include a change in location. Additionally, the project is not located in the vicinity of any water bodies that could be subject to seiche or tsunami. Therefore, the risk of release of pollutants due to project inundation is extremely low. The revised design is consistent with the 2018 EIR. Impacts would remain *less than significant*.

- e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The project would replace an existing surface parking lot with a six-story parking structure and would include new landscaped areas designed to capture stormwater runoff. Additionally, the project would be required to comply with the City of Palo Alto Municipal Ordinance for water quality standards and waste discharge requirements and would implement year-round water quality BMPs consistent with applicable NPDES requirements. The project is not expected to significantly impact surface or groundwater quality because it would incorporate stormwater treatment features and comply with applicable local and regional water quality requirements. The revised design is consistent with the project evaluated in the 2018 EIR and does not introduce new elements that would obstruct implementation of water quality control or sustainable groundwater management plans. Therefore, impacts would be *less than significant*.

3.10.3. Conclusion

The 2018 EIR analyzed potential hydrology and water quality impacts associated with development under the Comprehensive Plan, including surface and groundwater quality, groundwater supply, alteration of drainage patterns, and flood hazard, tsunami, seiche zones, and inundation. That analysis concluded that impacts would be minimized with BMPs and compliance with water-related requirements and regulations. Therefore, the EIR determined impacts would be *less than significant*.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe hydrology and water quality impacts than those previously evaluated in the 2018 EIR. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant hydrology and water quality impacts. The project proposes development of a six-story parking structure replacing an existing surface parking lot. The project includes a plaza area that incorporates year-round BMPs and bio-retention planters for stormwater management. The project would not conflict with or obstruct implementation of water quality control plans or sustainable groundwater management plans. Consistent with the prior findings, no new significant effects would occur, and no new mitigation measures are required. Impacts would remain *less than significant*.

3.11. Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

3.11.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level but instead proposes a sixth level increasing the height of the structure from 49'-10" to 59'-11" to the top of the sixth deck rail and from 63' to 72'-6" at the top of the elevator. The revised design also reduces the total number of parking stalls from 325 to 266. The revised design replaces the retail space along Waverley Street with a publicly accessible plaza, which includes improvements such as landscaped pedestrian alleyways, stormwater planters, and improved benches and pedestrian pathways. The revised design also reduces the setback along Hamilton Avenue from three feet to two feet, while expanding the sidewalks along Hamilton Avenue from 12 feet to 14 feet, and along Waverley Street from 12' to 17'9", tapering to 11'9".

3.11.2. Impact Analysis

- a) Would the project physically divide an established community?

Consistent with the 2018 EIR, the revised design would not alter the established street grid, permanently close any streets, or impede pedestrian or other travel through the neighborhood. The project is replacing an existing surface parking lot with a parking structure that would offer a publicly accessible plaza. The structure is intended to meet the needs of the downtown area and would not physically divide an established community. The revised design is consistent with the 2018 EIR. Impacts would remain *less than significant*.

- b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

As described in the 2018 EIR, the project is compatible with the existing land use designation but seeks an amendment to the zoning code to allow for a greater intensity of use authorized under the Public Facilities zoning designation. The revised design would eliminate the basement level of the parking garage and instead introduce a sixth level, slightly increasing the structure height by about 11 feet. The revised design also replaces the originally proposed retail space with an open plaza concept. These changes would not result in a more intense use or a change in land use patterns. Like the design evaluated in the 2018 EIR, the project would require approval of the Zoning Code text amendment to allow an increase in structure height. The revised design is consistent with the 2018 EIR and the policies outlined in the Comprehensive Plan Land Use Element as well as the land use designation in the Comprehensive Plan. Impacts would remain *less than significant*.

3.11.3. Conclusion

The 2018 EIR analyzed potential land use and planning impacts associated with development under the Comprehensive Plan, including dividing established communities and conflicts with land use plans, policies, or regulations. That analysis concluded that the project would not alter general land use patterns and would be consistent with applicable plans, policies, and regulations. Therefore, the EIR determined impacts would be *less than significant*. No mitigation measures were required.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe land use and planning impacts than those previously evaluated in the 2018 EIR. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new land use and planning impacts. Consistent with the prior findings, no new or more severe significant effects would occur, and no new mitigation measures are required. Impacts would remain *less than significant*.

3.12. Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

3.12.1. Project Changes Since Previous EIR

The revised design does not include any changes that are relevant to the mineral resources impact analysis.

3.12.2. Impact Analysis

- a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The revised design does not include a change in location and would be built on an already developed site and in an urban area. There are no known mineral resources of value to the region and the residents of the state at the project site. The revised design is consistent with the 2018 EIR. There would still be ***no impact***.

- b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

As mentioned above, the revised design does not include a change in location and would be built on an already developed site and in an urban area. The project site would not be located on or adjacent to a locally important mineral resource recovery site. The revised design is consistent with the 2018 EIR. There would still be ***no impact***.

3.12.3. Conclusion

The 2018 EIR evaluated mineral resources and determined the topic was not applicable because the project site is not part of a mineral resources recovery site and is not located on lands with

known mineral resources. Therefore, the EIR concluded there would be ***no impact*** to mineral resources and no further analysis was required. No mitigation measures were identified.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe impacts to mineral resources. There are no changes in circumstance or new information of substantial importance that would result in new or more severe impacts. Consistent with the prior findings no new or more severe significant effects would occur, no new mitigation measures are required, and there would be ***no impact*** to mineral resources.

3.13. Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

3.13.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level but instead proposes a sixth level increasing the height of the structure from 49'-10" to 59'-11" to the top of the sixth deck rail and from 63' to 72'-6" at the top of the elevator. The revised design also reduces the total number of parking stalls from 325 to 266 and replaces the retail space along Waverley Street with a publicly accessible plaza.

3.13.2. Impact Analysis

- a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

As described in the 2018 EIR, any noise generated during construction would comply with the City of Palo Alto's Noise Ordinance which limits construction to Monday-Friday from 8:00 A.M. to 6:00 P.M. and on Saturdays from 9:00 A.M. to 6:00 P.M. No construction would be allowed on Sundays or on any holidays. Operation is not expected to produce

excess noise as traffic noise levels with the proposed project are predicted to be the same as without the proposed project. Additionally, with the removal of the retail space, no new vehicle trips would be generated. The project is intended to provide an alternate parking option for vehicles coming into the area. Even with the reduction in the number of parking spaces, that option would remain. Consistent with the 2018 EIR, the revised design would not increase ambient noise levels temporarily or permanently. Impacts would remain ***Less than significant***.

- b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

As described in the 2018 EIR, construction of the project would intermittently generate vibration on and adjacent to the project site. However, the project would comply with Section 9.10.060 of the PAMC and 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 A.M. to 6 P.M. on Saturday). Additionally, any groundborne vibration is anticipated to be well below 72VdB during daytime hours, which is lower than the FTA's criterion of 75 VdB. The revised design no longer includes a basement level, which may reduce the amount of heavy equipment and excavation needed and minimize the potential generation of groundborne vibration and noise. Operation of the project would not increase groundborne vibration or noise, as the main source in the area is roadway traffic. The revised design is consistent with the 2018 EIR. Impacts would remain ***less than significant***.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The revised design does not include a change in project location. Therefore, as described in the 2018 EIR, the project is not located in an airport land use plan and would not expose people residing or working in the project to excessive noise levels. There would still be ***no impact***.

3.13.3. Conclusion

The 2018 EIR analyzed potential noise impacts associated with development under the Comprehensive Plan, including excess noise, ground borne vibration or noise levels, and airport vicinity noise. That analysis concluded that the construction would comply with noise ordinances and operation would not raise ambient noise levels. Therefore, the EIR determined impacts would be ***less than significant***. No mitigation measures were required.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe noise impacts than those previously evaluated in the 2018 EIR. The project is not closer to any

structures and would not produce more noise. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new noise impacts. Consistent with the prior findings, no new or more severe significant effects would occur, and no new mitigation measures are required. Impacts would remain *less than significant*.

3.14. Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

3.14.1. Project Changes Since Previous EIR

The revised design reduces the total number of parking stalls from 325 to 266. The revised design replaces the retail space along Waverley Street with a publicly accessible plaza, which includes improvements such as landscaped pedestrian alleyways, stormwater planters, and improved benches and pedestrian pathways.

3.14.2. Impact Analysis

- a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The project would not induce unplanned growth in the area directly or indirectly as it does not propose new housing or businesses. The parking garage is intended to address existing congestion in the downtown area and would be utilized as part of a city congestion management strategy. The need for parking exists with or without the development of the project and is not associated with population growth. Although the number of parking stalls is reduced in the revised design, the parking structure would still serve the purpose of addressing existing parking demand. The revised design would replace the commercial retail space proposed in the Previously Approved Project with a plaza further reducing the potential for unplanned growth. The revised design is consistent with the 2018 EIR. There would still be ***no impact***.

- b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The revised design does not include a change in project location, which is currently a developed surface parking lot. Construction of the parking structure would not displace

people or housing. The revised design is consistent with the 2018 EIR. There would still be ***no impact***.

3.14.3. Conclusion

The 2018 EIR analyzed potential population and housing impacts associated with development under the Comprehensive Plan, including population growth and displacements. That analysis determined the topic was not applicable because the project did not propose improvements that would result in population growth or changes to existing employment and housing conditions. Therefore, the EIR concluded that ***no impact*** to population and housing would occur, and no further analysis was required. No mitigation measures were required.

The revised design is within the scope of the 2018 EIR and would not result in new or more severe impacts to population and housing. The changes noted between the Previously Approved Project and the revised design do not represent changes in circumstances, or new information of substantial importance that would result in new or more severe significant population and housing impacts. Consistent with the prior findings, no new significant effects would occur, no new mitigation measures are required, and there would still be ***no impact***.

3.15. Public Services

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1. Fire Protection?	☐	☐	☒	☐
2. Police Protection?	☐	☐	☐	☒
3. Schools?	☐	☐	☐	☒
4. Parks?	☐	☐	☐	☒
5. Other Public Facilities?	☐	☐	☐	☒

3.15.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level and instead proposes a sixth above-ground level. The revised design also replaces the previously approved ground-floor retail space with a publicly accessible plaza and reduces the total number of parking stalls from 325 to 266.

3.15.2. Impact Analysis

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

(1) Fire Protection

The revised design represents a refinement of that previously analyzed parking garage and does not introduce new land uses or operational characteristics that

would materially increase fire risk or demand for fire protection services. The revised design would continue to be subject to review by the Fire Department and would be required to comply with applicable fire and building code requirements, including requirements related to fire flow, emergency access, fire detection, standpipes or sprinklers, as applicable, and life-safety systems. Accordingly, the revised design would not require new or physically altered fire protection facilities, and impacts would remain *less than significant*.

(2) Police Protection

The revised design would not introduce residential development, substantially increase site activity beyond the level already evaluated in the 2018 EIR, or create a new condition that would materially increase demand for police services. The revised design remains a parking garage serving the downtown area, and the design changes do not alter the basic use, intensity, or function of the site in a way that would require new or expanded police facilities. Therefore, no new or more severe police protection impacts would occur. There would still be *no impact*.

(3) Schools

The revised design would not add housing, residents, or school-aged population. The revised design would not increase school enrollment or require construction of new or expanded school facilities. Therefore, no new or more severe impacts to schools would occur. There would still be *no impact*.

(4) Parks

Demand for parks and recreational facilities is generally associated with residential population growth. The revised design would not generate new residents and would not increase demand for neighborhood or community park facilities beyond the level previously considered. Additionally, the revised design features a mini park with decorative pavers and enhanced plaza area with landscaping and benches. The inclusion of a publicly accessible plaza would provide a small on-site gathering space but would not create a need for new or expanded off-site park facilities. Therefore, no new or more severe impacts to parks would occur. There would still be *no impact*.

(5) Other Public Facilities

The revised design would not create a demand for new or expanded libraries, community centers, or other public facilities because it would not add residential population or introduce a new public-serving use of a type that would materially increase demand for those services. The revised design remains substantially

similar in function to the Previously Approved Project, and no new or more severe impacts to public facilities would occur. There would still be ***no impact***.

3.15.3. Conclusion

The 2018 EIR analyzed public services, including fire protection, police protection, schools, parks, and other public facilities, and concluded that impacts would be ***less than significant***.

The revised design remains within the scope of the 2018 EIR. Changes between the Previously Approved Project and the revised design would not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts related to public services. Impacts would remain ***less than significant***.

3.16. Recreation

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

3.16.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level and instead proposes a sixth above-ground level. The revised design also replaces the previously approved ground-floor retail space with a publicly accessible plaza and reduces the total number of parking stalls from 325 to 266.

3.16.2. Impact Analysis

- a) Would the project increase the use of existing neighboring and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The project would not add housing or residents and would not increase demand for neighborhood or regional parks. The revised design still proposes development of the site as a public parking structure in the downtown area. Replacement of the previously approved retail space with a publicly accessible plaza would provide a small on-site amenity rather than increase demand for off-site recreational facilities. There would still be **no impact**.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The project does not include recreational facilities or require construction or expansion of recreational facilities. The revised design includes a publicly accessible plaza as an accessory site feature that does not create demand for new off-site recreation facilities. There would still be **no impact**.

3.16.3. *Conclusion*

The 2018 EIR analyzed potential recreation impacts associated with development under the Comprehensive Plan, including increased use and construction or expansion of recreational facilities. That analysis determined the project would not increase demand for recreational facilities or require expansion of existing facilities. Therefore, the EIR concluded there would be ***no impact*** and no further analysis was required. No mitigation measures were identified.

The revised design remains within the scope of the 2018 EIR. Changes between the Previously Approved Project and the revised design do not result in new, significant environmental effects or a substantial increase in the severity of previously identified recreation impacts. The revised design would not increase demand for neighborhood or regional parks and would not require construction or expansion of recreational facilities. There would still be ***no impact***.

3.17. Transportation

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☒	☐	☐

3.17.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level and instead proposes a sixth above-ground level. The revised design also replaces the previously approved ground-floor retail space with a publicly accessible plaza and reduces the total number of parking stalls from 325 to 266. Vehicle access would continue to be provided from Hamilton Avenue, and Lane 21 would continue to function as a one-way service and circulation corridor. Sidewalk, plaza, and pedestrian improvements along Hamilton Avenue and Waverley Street would refine the public realm but would not fundamentally change the circulation framework evaluated in the 2018 EIR.

3.17.2. Impact Analysis

- a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

During construction, the revised design would generate temporary truck and worker trips and could require temporary sidewalk closures, lane narrowing, or similar traffic control measures. As with the Previously Approved Project, implementation of **MM TR-1** (Traffic Control Plan) would ensure that construction effects on transit, roadway, bicycle, and pedestrian circulation are managed in coordination with the City and applicable service providers. The bus stop shown on the plans would be temporarily relocated during construction and replaced in the same location as part of the completed project, consistent with current design information. During operation, the revised design would function as a downtown public parking facility on the same site, with substantially similar access and circulation patterns as the Previously Approved Project. The reduction in parking supply

from 325 stalls to 266 stalls and removal of the retail component would not increase operational transportation impacts beyond those previously evaluated. If the City elects to install controlled-entry gates, **MM TR-2** would ensure that vehicle queues do not back up onto Hamilton Avenue. Accordingly, impacts would remain *less than significant with mitigation incorporated*.

- b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The revised design remains a downtown infill parking facility in a transit-served area near established pedestrian, bicycle, and transit facilities. Relative to the Previously Approved Project, the revised design reduces the number of parking stalls and removes the retail component, both of which would tend to reduce, rather than increase, vehicle travel demand. The revised design therefore would not create a vehicle miles traveled impact beyond the scope of the 2018 EIR analysis and would not conflict with CEQA Guidelines section 15064.3(b). As a conservative matter and for consistency with the section as a whole, impacts would remain *less than significant with mitigation incorporated*.

- c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The revised design would not introduce sharp curves, unsafe roadway geometry, or incompatible uses. Project access points remain substantially similar to those evaluated in the 2018 EIR, and the revised design does not change the basic relationship between the site and the surrounding circulation network. Construction-period safety effects for pedestrians, bicyclists, and vehicles would continue to be addressed through **MM TR-1**, and sight distance and operational safety at Lane 21 would continue to be addressed through **MM TR-3**, as applicable. Therefore, impacts would remain *less than significant with mitigation incorporated*.

- d) Would the project result in inadequate emergency access?

The revised design would not permanently reduce or obstruct emergency access. During construction, **MM TR-1** would continue to require maintenance of emergency access and coordination regarding temporary circulation controls. During operation, the revised design would continue to use substantially the same access framework as the Previously Approved Project and would not impair emergency response. Therefore, impacts would remain *less than significant with mitigation incorporated*.

3.17.3. Conclusion

The 2018 EIR concluded that transportation impacts would be less than significant with mitigation. The revised design remains within the scope of the 2018 EIR. The revised design removes the retail component and reduces the number of stalls from 325 to 266; however, access, circulation,

and the overall transportation function of the site remain substantially similar to those previously evaluated. Vehicle movement through the building remains the same as does exiting and entry.

The revised design remains within the scope of the 2018 EIR. The changes between the Previously Approved Project and the revised design do not result in new significant environmental effects or a substantial increase in the severity of previously identified transportation impacts. With implementation of **MM TR-1**, **MM TR-2**, and **MM TR-3**, as applicable, transportation impacts would remain *less than significant with mitigation incorporated*.

3.18. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☒	☐	☐
I. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
II. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

3.18.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level and instead proposes a sixth above-ground level. From a tribal cultural resources perspective, the most relevant change is elimination of the basement, which reduces the depth and extent of excavation and other ground-disturbing activities relative to the Previously Approved Project. The revised design does not expand the project footprint into previously undisturbed areas and generally would reduce the potential to encounter unknown subsurface resources.

3.18.2. Impact Analysis

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- I. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

The 2018 EIR and supporting consultation record did not identify any known tribal cultural resources on the project site that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources. The Sacred Lands File search for the project area was negative, and the current record does not indicate the presence of any known tribal cultural resources on the site. Accordingly, the revised design would not cause a substantial adverse change in the significance of a known tribal cultural resource of this type, and impacts would remain *less than significant*.

- II. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

No tribal cultural resource determined by the lead agency to be significant to a California Native American tribe has been identified on the project site. Relative to the Previously Approved Project, the revised design would reduce excavation depth and extent by eliminating the basement level. Nevertheless, because limited ground disturbance would still occur for foundations, utilities, and related improvements, there remains a possibility that previously unknown tribal cultural resources could be encountered during construction. As with the Previously Approved Project, implementation of **MM CTR-3** would require appropriate treatment in the event of an inadvertent discovery. With implementation of **MM CTR-3**, impacts would remain *less than significant with mitigation incorporated*.

3.18.3. Conclusion

The 2018 EIR concluded that impacts to tribal cultural resources would be less than significant with mitigation. The revised design remains within the scope of the 2018 EIR. The revised design eliminates the basement level, thereby reducing the depth and extent of ground disturbance compared to the Previously Approved Project; however, the project footprint and location remain the same as previously evaluated. Known tribal cultural resources have not been identified on the site.

The revised design remains within the scope of the 2018 EIR. The changes between the Previously Approved Project and the revised design do not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts related to tribal cultural

resources. With implementation of **MM CTR-3**, impacts to tribal cultural resources would remain *less than significant with mitigation incorporated*.

3.19. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

3.19.1. Project Changes Since Previous EIR

The revised design no longer includes a basement level and instead proposes a sixth above-ground level. The revised design also replaces the previously approved ground-floor retail space with a publicly accessible plaza, reduces the total number of parking stalls from 325 to 266, and includes landscape and stormwater treatment features associated with the plaza and pedestrian improvements. Utility relocation requirements remain generally similar to those previously anticipated, although the revised design proposes transformers that would be located above ground along Lane 21 rather than in below-ground vaults.

3.19.2. Impact Analysis

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The revised design would require utility connections and limited utility relocation typical of redevelopment on an urban infill site. Existing electrical and telecommunications facilities crossing the site would be redirected as needed, and stormwater improvements would be incorporated through bioretention planters and related treatment features associated with the plaza and streetscape improvements. The revised design would not require major off-site expansion of utility systems beyond the type and scale already considered in the 2018 EIR, and the above-ground transformer approach would avoid the need for below-ground transformer vaults. Therefore, impacts would remain *less than significant*.

- b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Operational water demand for the revised design would be limited and would be typical of a parking structure and plaza. Relative to the Previously Approved Project, removal of the retail component and elimination of any associated restroom or tenant-serving demand would reduce or maintain water demand at or below the level previously evaluated. The revised design would be served by existing municipal water infrastructure, and sufficient water supplies would be available. Impacts would remain *less than significant*.

- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The revised design would generate wastewater typical of a parking facility and associated site improvements. Relative to the Previously Approved Project, removal of the retail component and elimination of the basement level would reduce or maintain wastewater generation at or below the level previously evaluated. The revised design would continue to be served by existing wastewater infrastructure and would not require new or expanded wastewater treatment facilities. Impacts would remain *less than significant*.

- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Construction and operation of the revised design would generate solid waste typical of a project of this type. Construction debris would continue to be subject to applicable diversion requirements, and operational waste handling would occur in accordance with City and franchise-hauler requirements. Because the revised design removes the retail component and does not intensify the use of the site beyond what was previously analyzed, it would not generate solid waste in excess of applicable standards or landfill capacity. Impacts would remain *less than significant*.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The revised design would be required to comply with all applicable federal, state, and local solid waste statutes and regulations, including requirements related to diversion, recycling, and composting. No feature of the revised design would interfere with such compliance. Impacts would remain *less than significant*.

3.19.3. Conclusion

The 2018 EIR concluded that utilities and service systems impacts would be *less than significant*. The revised design removes the retail component, reduces the number of parking stalls from 325 to 266, and incorporates stormwater treatment features; however, the project would continue to be served by existing utility infrastructure and utility demand would remain within the range previously evaluated.

The revised design remains within the scope of the 2018 EIR. The changes between the Previously Approved Project and the revised design do not result in new significant environmental effects or a substantial increase in the severity of previously identified utilities and service systems impacts. Utilities and service systems impacts would remain *less than significant*, and no new mitigation measures are required.

3.20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

3.20.1. Project Changes Since Previous EIR

The revised design includes design refinements to the parking garage and plaza, but none of those changes are relevant to wildfire risk. The project site remains the same fully urbanized downtown site evaluated in the 2018 EIR.

3.20.2. Impact Analysis

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

The project site is located in a fully urbanized downtown setting and is not within or near a State Responsibility Area or a Very High Fire Hazard Severity Zone. The revised design would not alter the surrounding roadway network, block emergency routes, or interfere with adopted emergency response or evacuation plans. Construction-period circulation control would continue to be addressed through applicable traffic control requirements. Therefore, there would be ***no impact***.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The project site is generally flat, surrounded by developed urban uses, and located well outside mapped wildfire hazard areas. The revised design would not introduce a wildland interface condition, increase exposure to wildfire fuel loads, or otherwise exacerbate wildfire risk. Therefore, there would be *no impact*.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The revised design would not require fuel breaks, new emergency access roads, or other wildfire-related infrastructure that could exacerbate fire risk. Utility work associated with the revised design would be typical urban utility work and would not create a wildfire-specific hazard. Therefore, there would be *no impact*.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Because the project site is not in a wildfire-prone setting and is not characterized by steep slopes or post-fire drainage conditions, the revised design would not expose people or structures to significant risk from post-fire flooding, slope instability, or related hazards. Therefore, there would be *no impact*.

3.20.3. Conclusion

Although wildfire was not presented as a standalone topic in the 2018 EIR, the project site was previously analyzed as a fully urbanized downtown setting with no wildfire risk. The revised design remains within the scope of the 2018 EIR and does not introduce changes to the project location or surrounding conditions that would alter wildfire risk or emergency access.

The revised design remains within the scope of the 2018 EIR. The changes between the Previously Approved Project and the revised design do not result in new significant environmental effects or a substantial increase in the severity of previously identified impacts related to wildfire or emergency access. Therefore, there would be *no impact*.

4. Resources

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