



CITY OF
**PALO
ALTO**

Architectural Review Board Staff Report

From: Planning and Development Services Director
Lead Department: Planning and Development Services

Meeting Date: June 4, 2026
Report #: 2601-5814

TITLE

PUBLIC HEARING / QUASI-JUDICIAL. 375 Hamilton Avenue [26PLN-00050]: Request for Recommendation on a Major Architectural Review Application for Construction of a New Six-Story Parking Garage with 266 Parking Spaces Replacing Existing Parking Lot D. CEQA Status: An Addendum to the Previously Certified Downtown Parking Garage Environmental Impact Report (SCH# 2017052040) Has Been Prepared. Zoning District: PF (Public Facilities).

RECOMMENDATION

Staff recommends that the Architectural Review Board (ARB):

1. Consider the Addendum to the previously certified Downtown Parking Garage Environmental Impact Report (EIR); and
2. Recommend approval of the proposed project to the City Council based on findings and subject to conditions of approval in the Record of Land Use Action (Attachment B).

EXECUTIVE SUMMARY

The subject application is a request for Major Architectural Review for a new six-story parking garage with 266 parking spaces at 375 Hamilton Avenue (Capital Improvement Project PE-15007), on an existing 86 space surface parking lot (Lot D, APN 120-15-086). The proposed project location is provided in Attachment A. The project description is provided in Attachment D and project plans are provided in Attachment E.

Staff finds that the project is consistent with relevant plans, policies, and regulations adopted by the City and recommends that the ARB recommend approval of the project, with conditions, to the City Council.

BACKGROUND

Project Information

Owner:	City of Palo Alto
Architect:	Watry Design, Inc.
Applicant:	City of Palo Alto, Public Works Engineering
Representative:	Holly Boyd, Public Works, Assistant Director, Public Works Engineering

Legal Counsel:	Not Applicable (City project)
<u>Property Information</u>	
Address:	375 Hamilton Avenue
Neighborhood:	Downtown Business District
Lot Dimensions & Area:	L-shaped lot; 29,164 square feet (sf) of surface parking lot area
Housing Inventory Site:	Yes
Located w/in a Plume:	Not Applicable
Protected/Heritage Trees:	Five protected trees proposed to be removed (four oaks)
Historic Resource(s):	Not Applicable (Adjacent resources include 526 Waverley Street, a local Category 2 resource; and 380 Hamilton Avenue, the U.S. Post Office, a local Category 1 and National Register Listed resource)
Existing Improvements:	86 space asphalt surface parking lot with planters and seven existing trees
Adjacent Land Use(s) and Zoning:	North East, fronting Waverley Street, zoned CD-C(GF)(P): • 526 Waverley Street, circa 1928, Category 2, 2-story building, vacant; • 550-552 Waverley Street, circa 1952, 1-story Ethel's Fancy restaurant; • 558-560 Waverley Street, 2-story circa 1938, Tai Pan ground floor restaurant, and second floor office space; East, zoned CD-C(P): • 425-555 Hamilton Avenue, circa 1966, All Saints Episcopal Church; North, zoned CD-C (GF)(P): • 352-364 University Avenue, circa 1948, 2-story with CVS ground floor retail and second floor office space; • 510 Waverley Street, circa 1900, 2-story, GF retail, office on the upper floor; West, zoned PF: • 345 Hamilton Avenue, circa 1979, 4-story plus basement AT&T building (31,610 sf); Nearby sites zoned PF and CD-C(GF)(P); South, across Hamilton Avenue, zoned PF: • 380 Hamilton Avenue, Post Office, circa 1932, PF zone.

Aerial View of Property:



Source: Google Maps

Land Use Designation & Applicable Plans

Zoning Designation: Public Facilities (PF)
 Comp. Plan Designation: Regional Community Commercial

	Yes		Yes		Yes
Baylands Master Plan/Guidelines (2008/2005)	☐	El Camino Real Guidelines (1976)	☐	Housing Development Project	☐
Downtown Urban Design Guidelines (1993)	☒	South El Camino Real Guidelines (2002)	☐	Utilizes Chapter 18.24 - Objective Standards	☐
Individual Review Guidelines (2005)	☐	Within 150 feet of Residential Use or District	☐	Context-Based Design Criteria applicable	☐
SOFA Phase 1 (2000)	☐	Within Airport Influence Area	☐		☐
SOFA Phase 2 (2003)	☐		☐		☐

Prior City Review and Action

The Downtown Parking Garage project was first introduced in the City Council's 2014 Infrastructure Plan as part of the City's broader effort to improve downtown parking availability.

Between 2017 and 2018, Watry Design, Inc. (Watry) completed the preliminary design and environmental review for a 338-space, six-level parking structure, which included five levels above grade and one level below grade, on Lot D (Hamilton Avenue and Waverley Street). The City Council certified the Environmental Impact Report (EIR) and approved the Major Architectural Review application for the parking garage in February 2019. Shortly thereafter, the project was placed on hold to allow further evaluation of alternative parking management strategies.¹ A timeline and history of the previous application and recent discussions is available online.² However a brief summary of Council's previous actions as well as the various boards and the Planning and Transportation Commission (PTC)'s feedback on the previously approved project is provided for informational purposes:

- **December 12, 2016:** Council directed cost and impacts analysis and directed staff to proceed with design and environmental review. The Council staff report is viewable [here](#).
- **April 11, 2017:** Council provided directions on legislative approach. Council meeting minutes are viewable [here](#).
- **May 31, 2017:** PTC Scoping Meeting. The staff report is viewable [here](#). The video of the PTC meeting is viewable [here](#).
- **August 24, 2017:** HRB Study Session. The staff report is viewable [here](#). The video of the HRB meeting is viewable [here](#). HRB meeting minutes are viewable [here](#).
- **September 7, 2017:** ARB Study Session. The staff report viewable [here](#).
- **February 15, 2018:** ARB hearing to review the project plans and hear public testimony regarding the Draft EIR. The staff report is viewable [here](#).
- **June 21, 2018:** ARB hearing to consider the Draft EIR published May 18, 2018, and provide comments on the proposed design. The staff report is viewable [here](#).
- **February 11, 2019:** Council certified the Final EIR and Approved a Record of Land Use Action (RULA) approving Architectural Review Application 17PLN-00360. The Council staff report is viewable [here](#).

In December 2023, Council directed staff to resume work on the Downtown Parking Garage project, with a new goal of integrating it with future affordable housing development on the site.³ This direction aligns with the City's 2023–2031 Housing Element,⁴ specifically Program 1.4,

¹ City Council, February 11, 2019; SR #9263

<https://portal.laserfiche.com/Portal/DocView.aspx?id=101477&repo=r-704298fc>

² Parking Garage Timeline and History is available online at: <https://www.paloalto.gov/Departments/Public-Works/Engineering-Services/Engineering-Projects/Downtown-Parking-Garage-Project>

³ City Council, December 11, 2023; Item #8; SR #2309-2043

<https://portal.laserfiche.com/Portal/DocView.aspx?id=69368&repo=r-704298fc>

⁴ Housing Element, Chapter 5, page 5-9: https://www.paloalto.gov/files/assets/public/v/1/planning-amp-development-services/housing-element/housing-element_2023_2031/palo-alto-housing-element.pdf

which identifies the redevelopment of up to six City-owned surface parking lots to accommodate approximately 290 affordable housing units. The Housing Element also requires replacement of any displaced public parking to maintain downtown access. In this context, the proposed redevelopment of Lot T (existing 52 surface parking spaces) with a seven-story affordable housing project has further reinforced the interest in replacement parking capacity.

To advance these objectives, Council authorized a contract with Watry Design, Inc. in December 2024 to provide design, environmental review, and construction administration services for a new parking garage.⁹ The scope included development of preliminary design options that maximize parking supply while accommodating a future residential component.

On April 14, 2025,¹⁰ staff presented multiple design options to Council. Council directed staff to proceed with Option 1a, which includes a six-level, above-ground parking structure with 274 spaces and a reserved area for future affordable housing with separate access from Waverley Street.

As project design has advanced, the total number of parking spaces has been reduced from 274 to 266 spaces, primarily due to design modifications required to accommodate updated electrical infrastructure. Changes in regulations no longer allow certain electrical services to be located below grade, necessitating additional above-grade space for these utilities and resulting in the loss of approximately one parking stall per level. The design also includes expanded electrical room space at Level 1 to support emergency power and future electrical capacity for the anticipated residential component. In addition, the project incorporates a larger trash enclosure to accommodate refuse storage and collection for the adjacent property at 558–560 Waverley Street, which currently has a zero-lot-line condition.

On December 4, 2025,¹¹ the ARB conducted a study session to review preliminary design concepts, including three façade options based on Council’s selected scheme. The ARB provided generally supportive feedback on the project’s overall direction, materials, and pedestrian-oriented design. The Board Members preferred Option 2 and 3, however, the ARB emphasized the need for some refinement as discussed further in the Analysis.

Requested Entitlements, Findings, and Purview:

The following discretionary applications are being requested:

- Architectural Review – Major (AR): The process for evaluating this type of application is set forth in Palo Alto Municipal Code (PAMC) Section 18.77.070. Major AR applications are reviewed by the ARB, and recommendations are forwarded to the Planning & Development Services Director for action. Action by the Director is appealable to the City Council if filed within 14 days of the decision. Notwithstanding, the Director may instead forward a project directly to City Council for final action in accordance with

⁹ City Council, December 2, 2024, SR#2410-3609

<https://portal.laserfiche.com/Portal/DocView.aspx?id=111841&repo=r-704298fc>

¹⁰ April 14, 2025, City Council Report: <https://portal.laserfiche.com/Portal/DocView.aspx?id=162794&repo=r-704298fc&searchid=59ac5e2c-f44f-498a-90b5-a542bb41464a>

¹¹ December 4, 2025, ARB Stat report:

<https://cityofpaloalto.primegov.com/Public/CompiledDocument?meetingTemplateId=16843&compileOutputType=1>

PAMC Section 18.40.170. AR projects are evaluated against specific findings. The findings for approval are provided in Attachment B.

- Development Standards Exception: PAMC 18.28.060 (e) allows for an increased floor area ratio and building height, as well as reduced setbacks, to accommodate public parking garages within the Downtown District. Additional findings for approval of this exception are not required. The project is a parking garage in the Downtown District and therefore is eligible by right for this exception.

ANALYSIS

The proposed project, as shown in Attachment E, consists of a six-story above-grade parking structure containing 266 parking spaces and a designated area along Waverley Street reserved for future affordable housing, consistent with City Council's direction and preliminary ARB review on December 4, 2025. The project would replace the existing surface parking lot on the site, which currently provides 86 public parking spaces. In addition to replacing on-site parking, the project is intended to offset the anticipated loss of 52 public parking spaces from the redevelopment of Lot T, resulting in a net increase of 128 parking spaces in the downtown area. Of this total, 25 spaces are planned to support the future affordable housing component.

As the current proposal does not include construction of the housing component, the reserved area is proposed to function as a temporary public plaza. The plaza design incorporates expanded landscaping, seating opportunities, and hardscape areas to support flexible outdoor use. Landscaping elements extend into the paseo, including climbing vines along the garage edges to enhance the pedestrian environment and soften the building's appearance. The project also includes street improvements along the Hamilton and Waverley street frontages to modify the sidewalks as well as new street trees to reinforce the streetscape and support the Hamilton Avenue District design goals.

At the roof level, the structure includes a steel lattice framework designed to accommodate future photovoltaic panels. In addition, a public art installation is proposed along the Hamilton Avenue façade, to be developed by artist Amy Landsberg in coordination with the City's Public Art Program.

Comprehensive Plan, Area Plans, and Guidelines¹⁵

The Comprehensive Plan designation for this site is Regional/Community Commercial. This designation is intended for larger shopping centers and districts that have a wider variety of goods and services than the neighborhood shopping areas. Examples include Stanford Shopping Center, Town and Country Village, and University Avenue/Downtown. In some locations, residential and mixed-use projects may also locate in this category. The proposed parking garage replaces existing surface parking Lot D within the Downtown area.

This net increase in parking capacity supports several key Comprehensive Plan goals related to mobility, economic vitality, and land use efficiency, including:

¹⁵ The Palo Alto Comprehensive Plan is available online:
https://www.paloalto.gov/files/assets/public/v/4/planning-amp-development-services/3.-comprehensive-plan/comprehensive-plan/full-comp-plan-2030_with-dec19_22-amendments.pdf

- Mobility (Policy T-3.1 and T-3.4): Expanding parking supply in the downtown core enhances access for residents, visitors, and employees, and supports the City's transportation management and parking efficiency goals.
- Business and Economic Vitality (Goal B-1): Improved downtown parking availability supports local businesses by facilitating customer access and sustaining the economic health of the Downtown area.
- Land Use (Goal L-1 and Policy L-2.5): The project efficiently utilizes publicly owned land to accommodate both public parking and future housing, aligning with the City's strategy to integrate civic and residential uses within the downtown.
- Housing Element (Program 1.4): By incorporating provisions for a future affordable housing component, the project supports the City's broader objective to create new affordable housing opportunities on City-owned sites while maintaining replacement parking.

Housing Element

The proposed garage is designed to accommodate a future residential building to the east, ensuring that the site contributes to a cohesive urban block and supports the long-term vision for Downtown livability. Although the project does not include construction of an affordable housing project, the project has specifically been designed to accommodate this future use, consistent with Housing Element Program 1.4, which targets the creation of 290 affordable housing units through the redevelopment of up to six City-owned surface parking lots. Additionally, this site is designated as a Housing Inventory Site with a projected capacity of 44 units, 22 of which are identified for low income and 22 of which are identified for very-low income. Although the proposed project does not include housing, the design accommodates the potential for a future housing component.

Downtown Urban Design Guidelines

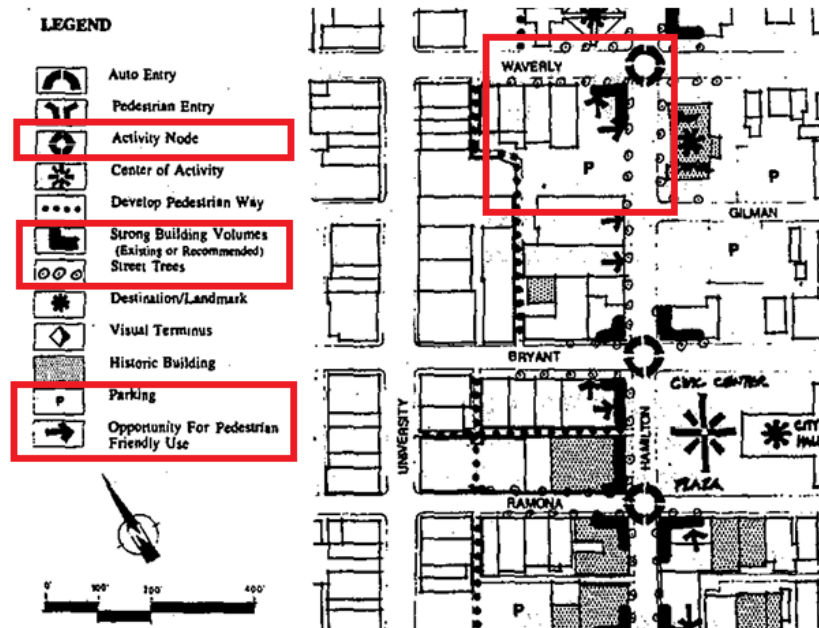
The project is located within the boundaries of the Downtown Design Guidelines, within the Hamilton Avenue District. The Hamilton Avenue District Goals include:

- Promote Hamilton Avenue as an active mixed-use district, which comfortably accommodates larger scale commercial office, civic, and institutional buildings.
- Maintain Hamilton Avenue as a pleasing, tree-lined pedestrian environment with complimentary outdoor amenities to offset the urban intensity which naturally results from the provision of transit service and convenient surface parking.

Key guidelines within the plan relevant to the proposed project include providing pedestrian links from Hamilton Avenue to University Avenue in conjunction with development of the alleys and parking lots. They also recommended "strong building volume" and "opportunity for pedestrian friendly use" at this corner.

The proposed project is consistent with the Downtown Urban Design Guidelines in that the project reinforces the established urban character, promotes pedestrian activity, and generally provides a cohesive relationship with the surrounding downtown context. The six-story building replaces an existing surface parking lot with a more efficient land use that supports both public parking and future affordable housing. The design incorporates articulated façades, high-quality materials, and screening elements to break up massing and enhance visual interest, consistent

with the guidelines' emphasis on human scale and architectural quality. At the street level, the project improves the pedestrian experience through widened sidewalks, active ground-level elements, and landscaping/trees along Hamilton Avenue and Waverley Street consistent with the Hamilton Avenue District goals. Until the future housing is developed, the inclusion of a temporary public plaza east of the garage further contributes to downtown's public realm, aligning with the City's vision for an accessible, vibrant, and well-designed urban environment.



Downtown Urban Design Guidelines, page 52

Zoning Consistency Analysis

The project site is zoned Public Facility (PF). Allowed uses within this zone district include public facilities and uses owned or leased by the City of Palo Alto. Both the parking garage and any future affordable housing on the site are permitted uses, so long as the site continues to be owned or leased by the City would be permitted.

The proposed plans exceed the allowable height, floor area, and setbacks, including a seven-foot special setback on Hamilton Avenue. However, in accordance with PAMC Section 18.28.060(e), on sites within the Downtown district where the primary use is a parking garage, Council may modify the development standards and setbacks lines established by a special setback map to achieve community objectives. The code states that these exceptions shall be included in the review of the applicable development review process. Therefore, the requests for increased height and floor area as well as reduced setbacks are proposed as requested exceptions in accordance with the code. The project includes construction of a public parking garage to support parking for the downtown area. An analysis of the project's consistency with the PF Zone District Development Standards is included in Attachment C.

Multi-Modal Access and Parking

Vehicular ingress and egress are proposed via a combined entrance and exit along Hamilton Avenue near the southern corner of the site. The existing one-way service access (Lane 21), with entry from Waverley Street and exit to Bryant Street, would be retained and enhanced

with architectural paving, landscaped planters, and upgraded lighting. As the City Council has not yet determined whether the garage will operate as a paid facility, the design includes space to accommodate potential future gate infrastructure at the garage entry and exit. If a gate is provided, the EIR requires implementation of mitigation to prepare a queuing analysis to ensure that queuing onto Hamilton Avenue does not occur.

The proposed electrical and trash rooms are strategically located to support efficient operations. This includes provisions for trash and recycling serving both the project site and an adjacent property on Waverley Street (Lot 85), as well as the publicly accessible plaza. Sidewalk improvements are proposed along both Hamilton Avenue and Waverley Street, with widths increased to approximately 12 feet and 17 feet and 10 inches, respectively, before tapering to match existing conditions, thereby enhancing pedestrian circulation and streetscape quality. A pedestrian pathway through the structure provides a connection from the bicycle parking area near Waverley Street to Lane 21 adjacent to the CVS building.

In addition, the proposed separation between the new garage and the building at 560 Waverley Street (lot 84) creates an opportunity for a pedestrian-oriented passageway aligned with the secondary stair and vertical circulation elements. This pedestrian alley provides a visual connection to All Saints Episcopal Church and is designed to include architectural paving, landscaping, seating, and decorative lighting. As shown on Plan Sheet 2.1 (Attachment E), this interior accessway connects the public plaza to the garage and promotes pedestrian circulation.

Although there are currently no bicycle lanes along the project frontage, the proposed 2026 Bicycle and Pedestrian Transportation Plan (BPTP), which has not yet been adopted, includes a planned Class IV bicycle lane along Hamilton Avenue as part of its long-term vision. The draft plan does not provide details such as which side of the road the bike lane may be placed. If implemented in the future, the project is not anticipated to preclude the City's ability to accommodate bicycle improvements. The proposed project would result in more vehicles entering and exiting the site on Hamilton Avenue but would also reduce curb cuts on both Hamilton Avenue and Waverley Street. The proposed entrance is in approximately the same location as the entrance to the existing parking lot.

The proposed project would narrow the roadway width from the existing 50 feet to 43 feet, six inches. The existing bus stop would remain but would be temporarily relocated during construction in accordance with VTA recommendations. This project also includes the installation of revised traffic signals and streetlights and new street trees to further improve the public right-of-way at the intersection.



Proposed Access & Circulation, Sheet 2.1



Renderings from the Plan Set on Sheet 3.15 Attachment E

Downtown Parking

The Downtown Parking Assessment District in Palo Alto is a designated area that funds and manages downtown parking facilities through assessments on businesses and properties. Businesses within this district can purchase permits for employees for various City-owned garages and lots, and the district also oversees public parking options like street parking, color-coded zones, and paid garages for all visitors. Similarly, the Downtown Palo Alto Residential Preferential Parking (RPP) program provides residents with a permit to park on the street for longer durations.

Consistency with feedback received from ARB

At its December 4, 2025, study session, the ARB provided preliminary feedback on the proposed project, identifying key areas for further refinement. Since that time, the project has been revised in response to the Board's comments. The following table summarizes how the current proposal addresses the ARB's direction.

	ARB Comment	Applicant Response
Massing & height	Reconsider overall height (six stories) and reduce perceived massing	Reducing the overall height of the building would negatively impact total stall counts and overall efficiency. The Council concluded that a basement level is neither cost effective nor a viable option. Therefore, the project is proposed as a six-story building. As noted below, some modifications were made to address perceived massing
	Refine massing to break down bulk and improve proportions	Hamilton Ave Option 2 and Waverley Street Option 3 were favored by the ARB for their proportions and design features. Accordingly, this scheme has been developed to incorporate openings in concrete walls, perforated translucent metal scrims, open horizontal louvers, and vertical fins.
Façade Improvements	Improve Waverley Street façade to avoid blank/secondary appearance; design as a long-term condition	The Waverley Street façade includes an opening on the right side to avoid a blank appearance. Planters in the plaza have been expanded to incorporate seating and additional plant material, while festoon lighting enhances and activates the outdoor space.
	Ensure cohesive design between Hamilton and Waverley façades	The project design features a perforated screen that wraps the Hamilton and Waverley corner, unifying the two frontages. Both façades use the same colored concrete material to maintain visual cohesion.
	Refine overall façade design by simplifying heavy/unnecessary elements	The updated design reduces the length of the canopy along Hamilton Avenue, decreases the extent of the concrete wall along Waverley Avenue, and simplifies the forms of the perforated metal screens.

	ARB Comment	Applicant Response
Future Housing	Demonstrate clear integration with future affordable housing (“day two condition”)	Since the affordable housing project is a future development with no defined timeline, the City prefers to avoid integrating garage and residential circulation or functions. The two uses will be separate structures.
	Ensure design will not be compromised by future housing construction	The plan set includes drawings that show how future housing can be set back from the Hamilton Avenue staircase. The drawings show the future housing will not block the garage circulation or the perforated metal screen on the garage.
Plaza Design	Redesign public plaza to function as a permanent, usable space	The public plaza has been redesigned to incorporate elements such as brick paving, ornamental planting, and string lighting. It will function as a small park until the affordable housing project is realized.
	Increase landscaping in plaza (especially in-ground trees); Use landscaping to soften the garage structure	Landscaping elements, including low ornamental planting, have been added to the plaza to soften the appearance of the garage structure.
	Improve plaza materials for durability and long-term use; introducing seating opportunities	Materials in the plaza have been updated to be more durable such as linear concrete benches and brick paving.
Circulation	Strengthen pedestrian connections and wayfinding	Openings in the garage along Hamilton Avenue provide direct access to the sidewalk. At the sidewalk there are seats integrated into the design. See sheet 1.7 for Pedestrian Circulation Paths through site.
	Improve relationship to adjacent uses and alley conditions	A privacy fence has been included to conceal the utility and trash areas of the adjacent commercial property. The location of the trash room gates has moved based on comments from Palo Alto Zero Waste.
	Evaluate traffic impacts, queueing, and safety	The EIR and updated addendum evaluated traffic impacts, queueing and safety and concluded that the project did not result in a significant impact. The garage is designed without gate arms and access control so entry into the garage would not be hindered. Any future access control system would be assessed in relation to queueing times before installation as required per the mitigation measures set forth in the adopted EIR. It is understood that the section of Hamilton adjacent to the garage is to be modified with the removal of the mail drop area.

Consistency with AR Application Findings

Pursuant to PAMC Section 18.77.070, approval of a Major AR application requires compliance with the required findings set forth in PAMC Section 18.76.020(d). Staff found the project to be consistent with these findings as detailed in Attachment B. Staff notes that waste-gas-water is still finalizing their conditions of approval for this project; therefore, the record of land use action includes a placeholder for their conditions of approval. These final conditions will be incorporated prior to the Council hearing and are not anticipated to affect the site design.

FISCAL/RESOURCE IMPACT

The existing contract with Watry Design Inc. covers the phases of the project design and environmental review work. Funding for this continued design is available in the Fiscal Year 2026 Adopted Capital Budget for the New Downtown Parking Garage project (PE-15007). The FY 2027 proposed budget includes a funding plan for construction.

STAKEHOLDER ENGAGEMENT

Notice of a public hearing for this project was published in the Daily Post on May 22, 2026, which is 13 days in advance of the meeting. Postcard mailing occurred on May 20, 2026, which is 12 days in advance of the meeting. As of the writing of this report, no written comments have been received. During the ARB preliminary review hearing,¹⁷ the property owner at 558-560 Waverley Street provided verbal comments regarding concerns about trash pickup and storage limitations created by the new parking garage. Trash collection would occur along Lane 21, with service vehicles entering from Waverley Street and exiting onto Bryant Street through a one-way circulation pattern. The project also proposes a new trash enclosure to accommodate trash and recycling service for the adjacent property on Waverley Street (Lot 85), as well as waste generated from the project's publicly accessible plaza area.

ENVIRONMENTAL REVIEW

On February 11, 2019, City Council certified the Final Environmental Impact Report (EIR) for the Downtown Parking Garage Project at 375 Hamilton Avenue (Resolution No. 9818), and adopted findings, a statement of overriding considerations, and a Mitigation Monitoring and Reporting Program (MMRP) in accordance with the California Environmental Quality Act (CEQA). The certified EIR evaluated a project consisting of a five-level above-grade parking structure with one level of below-grade parking, totaling 338 parking spaces. The current proposal differs from the previously approved project in that it includes a six-level above-grade parking structure with no below-grade parking and a reduced total of 266 parking spaces. It also includes removal of the retail space and inclusion of a new plaza area. To evaluate these changes, an Environmental Checklist (EIR Addendum) has been prepared pursuant to CEQA Guidelines Sections 15162–15164 to determine whether the project would result in new or more severe significant environmental impacts than those identified in the certified EIR.

Based on this analysis, the proposed modifications do not result in new significant impacts or a substantial increase in the severity of previously identified impacts. The project remains within the scope of the impacts analyzed in the 2019 EIR, and all applicable mitigation measures

¹⁷ ARB, December 4, 2025, SR#2510-5376:

<https://cityofpaloalto.primegov.com/api/compilemeetingattachmenthistory/historyattachment/?historyId=9d41b2cc-0eea-4832-9af0-5c2ae5671546>

continue to apply. Accordingly, preparation of a subsequent or supplemental EIR is not required, and an Addendum to the previously certified EIR has been prepared in accordance with CEQA Guidelines Section 15164.

ALTERNATIVE ACTIONS

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

1. Approve the project with modified findings or conditions;
2. Continue the project to a date (un)certain; or
3. Recommend project denial based on revised findings.

ATTACHMENTS

Attachment A: Location Map

Attachment B: Draft Record of Land Use Action

Attachment C: Zoning Consistency Analysis

Attachment D: Applicant's Project Description

Attachment E: Project Plans and EIR Addendum

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