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**TO: HONORABLE CITY COUNCIL**

**FROM: JONATHAN LAIT, DIRECTOR, PLANNING AND DEVELOPMENT SERVICES**

**DATE: JUNE 22, 2021**

**SUBJECT: AGENDA ITEM NO. 8 – PUBLIC HEARING / QUASI-JUDICIAL. 250 HAMILTON AVENUE [20PLN-00118]: APPEAL OF DIRECTOR'S APPROVAL OF THREE WIRELESS COMMUNICATION FACILITIES (VERIZON CLUSTER 4) BY VERIZON TO BE PLACED ADJACENT TO 853 AND 1221 MIDDLEFIELD ROAD, AND 850 WEBSTER STREET. ENVIRONMENTAL ASSESSMENT: EXEMPT FROM THE PROVISIONS OF CEQA PER SECTION 15303 (NEW CONSTRUCTION AND CONVERSION OF SMALL STRUCTURES) AND 15311 (ACCESSORY STRUCTURES).**

As provided in the previously released staff report for the subject application, and due to the quick turnaround time between the receipt of the appeal and agenda packet preparation, this memorandum is intended to provide a fuller response to the appellant's statements for Council's consideration. The appellant requests the Council overturn the Director of Planning and Development Services decision on May 25, 2021 concerning three wireless communication facilities (WCF). The decision letter, appeal statement and other project-related details are included in the previously submitted Council report.<sup>1</sup>

The appellant's nineteen reasons supporting the appeal are enumerated below and followed by a staff response. A heading topic is provided to orient the reader to each of the particular areas of concern:

*Project Noticing*

1. Verizon, the applicant, failed to meet the requirement of Palo Alto's Wireless Ordinance that it notify "all residents and property owners within 600 feet of the project site" of a community meeting regarding their proposed cell towers. In fact, hundreds of residents who should have been notified of this meeting were not. For example, none of the residents of Channing House were notified, even though the proposed installation at 850 Webster is right next to Channing House.

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<sup>1</sup> Council Staff Report, dated June 22, 2021: <https://www.cityofpaloalto.org/files/assets/public/agendas-minutes-reports/reports/city-manager-reports-cmrs/2021/id-12321.pdf>

**Response:** Palo Alto Municipal Code Section 18.42.110 (d)(7) requires an applicant for Tier 2 wireless communication facilities to host a community meeting and provide notice to residents and property owners within 600 feet of a proposed WCF. The applicant has provided a copy of the notice, a list of addresses that received notice and comments made from the lone meeting attendee. This information is available online at the following link and starting on page 64: [https://www.cityofpaloalto.org/files/assets/public/planning-amp-development-services/new-development-projects/wireless-projects/20pln-00118/20pln-00118-c5\\_250ham\\_docs.pdf](https://www.cityofpaloalto.org/files/assets/public/planning-amp-development-services/new-development-projects/wireless-projects/20pln-00118/20pln-00118-c5_250ham_docs.pdf).

Based on a review of the administrative record, staff concurs with the appellant that the applicant failed to provide proper notice in accordance with the municipal code. Staff is expanding its review of the rest of the noticing record to determine if other residents or owners were missed and will be able to report its findings to Council at the hearing.

Related to this issue, staff recently learned when it sent out notices of decision for the 850 Webster Street WCF that Channing House residents (200+ units) did not receive the notice. To address this, staff coordinated with a Channing House employee and hand-delivered sufficient copies of the notice of decision to the mailroom so that residents could be informed of the decision and have an opportunity to file an appeal.

As required by the municipal code, staff uses the most recent County Assessor's address records to send out notices. The County records do not list the number of apartments located at the Channing House as it does for other properties, which explains why residents did not receive mailed notification.<sup>2</sup> This noticing issue is not a deficiency in meeting the zoning code requirement for noticing but falls short of the intent, which is why staff delivered notices when this issue was discovered. There are five addresses associated with the Channing House property according to County Assessor records and notices were sent to those property address. However, the applicant's list of residents and owners that received notice did not include any of the addresses associated with the Channing House property on record with the County Assessor's Office despite a signed applicant affidavit attesting otherwise.

Based on the foregoing, the Council has a few options. It could decide to uphold the appeal and deny Node 204 adjacent to 850 Webster Street because the applicant failed to properly notice the code-required community meeting it hosted. Another option is that the Council could determine that despite the applicant's omission, residents of the Channing House did receive sufficient notice of the decision through the City's actions and had an opportunity to appeal the project. Further to this perspective is the fact that the Council is having a noticed public hearing on this WCF, which gives interested parties an opportunity to express their opinions about the project despite not having a chance to participate in an initial applicant-led community meeting. The Council could support this option and still decide to uphold or

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<sup>2</sup> Staff will follow up with the County Assessor's Office to discuss this discrepancy and its implication on our noticing procedures and seek opportunities to ensure the Channing House residents receive future public notices as intended.

reject the appeal as appropriate. Lastly, Council could engage the applicant in a discussion about a tolling agreement to postpone the decision on the subject WCF to give the applicant time to cure its mistake. This option would address a procedural misstep but is unlikely to result in any substantive change to the proposed project. The Council's decision may also be informed by whether staff identifies other noticing irregularities for this or other WCF nodes.

### Misleading Notice

2. The notice of a community meeting that Verizon did send to other Palo Altans who live near the proposed installations was misleading with respect to the scale of the installations being proposed.

**Response:** The previous response includes a link to a copy of the notice. It is unclear what the appellant is asserting with respect to the notice providing misleading information. The City Council can review the notice and make its own conclusions and determine whether there is sufficient cause to uphold the appeal based on this assertion.

### Coverage

3. Verizon's application is incomplete because it does not include important information conventionally provided in cell tower applications and necessary to properly assess the three proposed locations and alternatives to these locations-information such as 1) whether the few alternatives Verizon considered represent all feasible alternatives; 2) the relative coverage offered by the permissible alternatives (for example, how much coverage would be lost by placing the cell tower in a location that requires fewer exceptions from the City's standards); 3) defined dimensions and characteristics of the target gap; and 4) a map of alternatives in preferred, non-residential zones, including adjusting the location of existing poles given that pole replacement is already proposed). As a result of the inadequacy of the information supplied by Verizon, there is: 1) no way to know why they selected these three particular sites for new cell towers; 2) no way to know why they considered some poles and not others as alternate locations; and 3) no way to assess whether any of their many requests for "exceptions" from the City's aesthetic and other standards with respect to the siting of cell towers are justified.

**Response:** The City's application submittal requirements, checklist, and Municipal Code do not specify the number of alternatives required in order to determine that an application is complete or incomplete, nor does it require consideration of all feasible alternatives. The applicant is required to provide alternative WCF locations that were considered and explanations as to why certain locations were rejected. The applicant has complied with this requirement.

The location of the proposed WCF nodes were provided by the applicant based on its network objectives. The City does not have the authority to prohibit a carrier from establishing or expanding a wireless network in the City. Staff reviewed the proposed WCF nodes and alternatives and rendered a decision based on applicable objective standards documented in the Council report. The City Council, in its review of the record, may come to a different

conclusion and determine that an alternative node is preferable to the tentatively approved node.

#### Integrated Shroud

4. The Planning Director approved the application despite the fact that the three proposed cell towers do not meet the City's Design Standards expressed in the City's December, 2019, Wireless Resolution (Resolution No. 9873). In particular, these Standards require that all "antenna(s) shall be placed in a shroud at the top of [the pole.]" and that "Antennas and/or equipment at the top of the pole shall be covered by a single integrated shroud." Instead, the three proposed installations have either two or three separately shrouded antennas at the top of their poles, not a single, integrated shroud.

**Response:** The City's objective wireless standards include an adjustment intended to accommodate 5G technology that may not be able to comply with the City's shrouding requirement referenced in the appeal statement. The equipment adjustment instead provides an alternative standard that restricts the height of the antenna and total volume. Applying the adjustment to a WCF does not require an exception from the objective standards. The complete adjustment language is provided below:

*WCF Equipment Adjustment. For Streetlight Poles: Equipment that cannot propagate an adequate signal within the shrouding required by the standard designs shall be attached to a streetlight pole at a height of 2 feet below the light mast or higher. Each instance of such equipment shall not exceed 0.85 cubic feet, nor shall the total volume of such equipment and any shrouding exceed 2.6 cubic feet per streetlight pole. [Emphasis Added]*

The decision letter takes into consideration the objective standard that allows an adjustment and restricts the total volume of each antenna and associated equipment and shroud to the required thresholds.

#### Architecture Review Board (ARB) Review

5. The Planning Director approved the application without consulting the Architectural Review Board (ARB). He bypassed the ARB: 1) despite the fact that this was the first time the siting standards in the City's December, 2019, Wireless Resolution (Resolution No. 9873) were being applied; 2) despite the fact that Verizon considered very few alternate sites; and 3) despite the fact that the sites Verizon chose required multiple exceptions to the City's standards, including, for example, the standards related to the visibility of facilities.

**Response:** The Municipal Code requires review of WCF applications by the Planning Director and allows the Director to refer any application to the ARB. This optional design review procedure replaced a prior mandatory design review requirement for several reasons. Changes in the federal regulatory scheme encouraged local jurisdictions to adopt clear objective standards over subjective, design review interests. Further, new federally-mandated aggressive timelines to process WCF applications constrain staff's ability to

conduct its analysis, schedule a hearing before the ARB and have sufficient time to prepare a decision letter and process a potential appeal before the City Council within the federal time limits.

While the appellant's concerns about not engaging the ARB are understood, it alone is not a basis for granting an appeal to overturn the decision. However, embedded in the appellant's statement is a concern that the public has one less opportunity to voice its concerns to a Council-appointed body where public testimony or ARB recommendations could inform a final decision on a proposed WCF application. Accordingly, staff is exploring opportunities to further streamline staff's review of these applications that may allow for one hearing before ARB and still meet federal processing timelines. If changes can be enacted, these would likely apply to future applications.

#### Outside Input

6. There is no indication that the Planning Director consulted a siting expert in the process of evaluating Verizon's application, even though Verizon was obligated to pay for the service. If no consultation on siting, RF compliance and propagation was obtained, a justification is needed for why the Planning Director ultimately declined to obtain a consultation, given, in particular, that, again, 1) this was the first time the siting standards established in the City's December, 2019, Wireless Resolution were being applied; 2) Verizon considered very few alternate sites to the three it proposed; and 3) all three of the sites Verizon chose required that the City grant multiple material exceptions to Palo Alto's standards.

**Response:** The City had its third-party consultant, Columbia Telecommunications Corporation (CTC) review the applications to provide a comparative RF analysis of each site. Attachment E of the staff report identifies their analysis of the proposed locations in relation to the relevant RF emissions standards adopted by the Federal Communications Commission (FCC). Here, CTC concluded that the anticipated RF exposure is significant within 4.5 feet from the antenna face, but at the ground level and nearby buildings, RF exposure is within the allowable thresholds that the FCC regulates.

#### Additional Tree Screening at Node 205

7. Node 205 at 853 Middlefield Road does not comply with the City's Standards "to the greatest extent feasible" because Verizon has failed to demonstrate why a tree planted further southeast than 35 feet from the pole is either 1) infeasible, or 2) would not be helpful in hiding the cell tower from view, as required by 18.42.11 0(k)(1 )(A) of the Wireless Ordinance.

**Response:** The landscape screening requirement provides that a WCF shall be placed where existing street tree foliage or new street tree or amenity tree foliage within 35 feet of the WCF provide interruption of direction views. This is an objective standard and the City does not have the authority to require additional screening beyond 35 feet. The City Council could decide to change this objective standard when an updated ordinance and resolution return to Council, tentatively scheduled for later this year, but any such changes would only apply to new applications filed after the effective date of new requirements. Additionally, there are

practical limitations at the subject node where existing utility infrastructure precludes additional trees to better screen this facility within and beyond 35 feet.

#### Existing Trees at Node 205

8. Verizon incorrectly asserts that deciduous trees—for example, the Chinese Pistaches cited with respect to the proposed facility at 853 Middlefield Road (Node 205)—will adequately conceal cell towers from view. In fact, deciduous trees such as these are leafless or close-to-leafless for significant portions of the year, during which times they will provide little to no concealment of the towers.

**Response:** The screening requirement is summarized in the previous response. The City's objective standards do not specify a preference for evergreen or deciduous trees. The appellant raises an issue that could be addressed when the City Council considers revisions to the City's WCF regulations, anticipated to occur later this year. Regardless, the applicant has requested an exception to the landscape screening requirement for this WCF node. The staff report includes more analysis as to why the Director supported this exception, however, the Council in its review may come to a different conclusion.

#### RF Emissions by Proposed Antennas

9. Verizon's three sites are located within range of a macro-tower (it's on the roof of Channing House) and an AT&T small cell node cell tower. The Palo Alto Fire Department's Hazardous Materials Inspector recommended that the proposed sites not be approved because he was concerned that, among other things, "People may be exposed to excessive levels of RF at the following locations: People on the rooftop at 433 Addison and 442 Ramona; occupants at 519 Webster second story balcony; people working on street trees or utility poles at 1221 Middlefield, 850 Webster, and 853 Middlefield [i.e., at the locations of each of the three cell towers Verizon is proposing]." When City Staff raised these concerns with Verizon, Verizon's response was evasive and misleading, and failed to address the core issue raised by the City's Hazardous Materials Inspector: Is this safe?

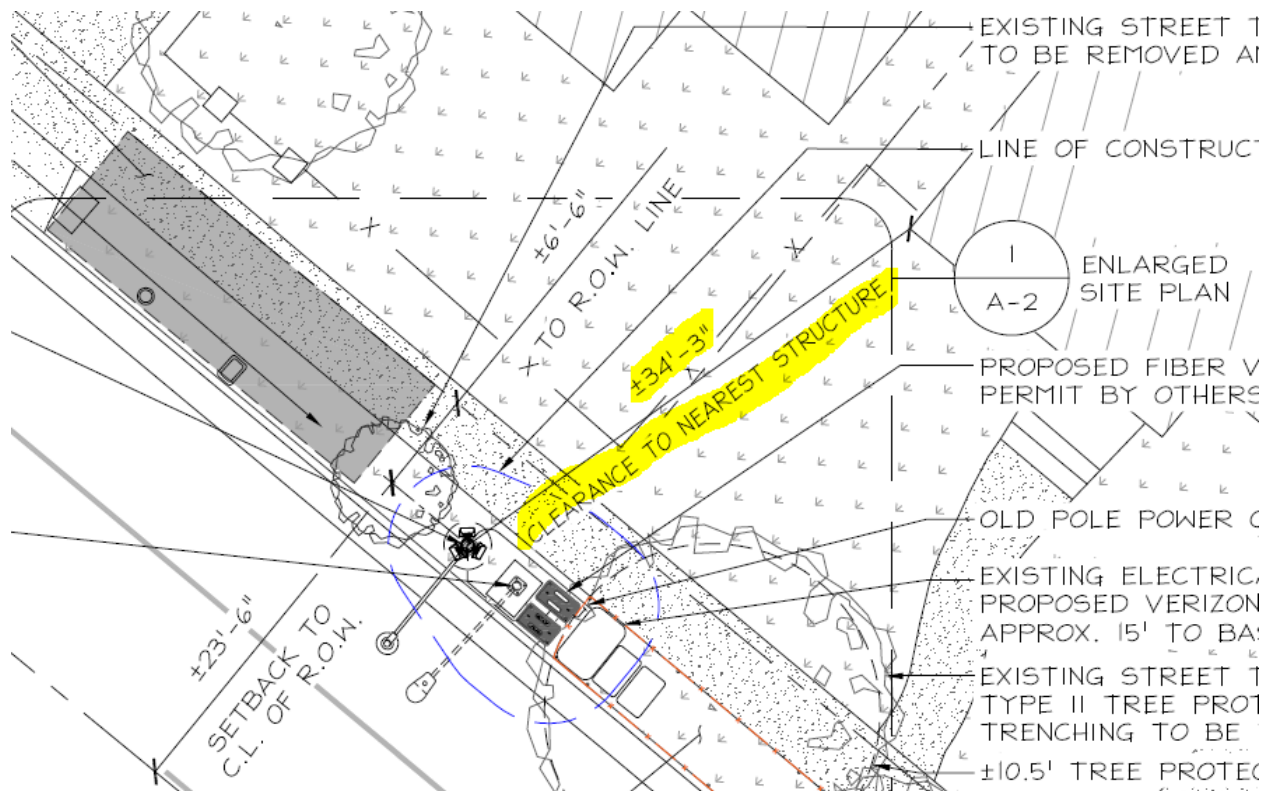
**Response:** As noted in Attachment E of the staff report, CTC provided a peer analysis of the RF emissions predicted by the applicant and found them to be accurate and appropriate. Any proposed buildings are located outside the range where RF emissions exceed the FCC's allowances and RF emissions are within allowable levels at the ground near the facilities. The City has also required that RF warning signs be placed at an 8- to 10-foot height from ground level as well as at least four feet from the bottom of the antennas on each pole to warn nearby workers of the impacts caused by these facilities at close range (see COAs #88 and 89 in Attachment H). CTC has confirmed that these are appropriate safety measures for these facilities.

#### Distance of Antenna from 1221 Middlefield Road

10. The City's current Standards allow cell towers to be located as close as twenty feet to a residence. The proposed cell tower at 1221 Middlefield Road (Node 061) appears to be even closer than that to a home. (We did not want to enter the property to measure the distance

without the permission of the resident, who was not available.) To be clear, the twenty-foot setback is a "no exceptions" provision of the City's Standards.

**Response:** As noted on Sheet A-1 of Attachment F (Approved Plans), the adjacent house is 30+ feet away from the facility.



#### Antenna Facing Private Property

11. The approval letter grants to Verizon an exception which allows the company to aim one of the antennas on the proposed cell tower at 1221 Middlefield Road (Node 061) directly at a residence. This is the same residence that we believe is less than twenty feet from the proposed cell tower site. The application and the approval letter fail to adequately justify this decision.

**Response:** Attachment A (Findings for Approval – Node 061) within Attachment C (Directors Decision Letter) of the staff report identifies the relevant findings for approval of the exception for equipment to face private property. As this equipment is directionally focused, it needs to be pointed in the area where service will be provided in order to achieve its network objective and signal propagation.

#### Screening of ROW WCFs from View

12. The application and approval letter are deficient because, for all three proposed cell towers, they incorrectly limit analysis with respect to visibility to the view of the proposed cell tower

from the sidewalk and the street, ignoring the view of the proposed facility by the individuals who live in the residences nearest to them.

**Response:** The visibility of the proposed WCF nodes from the perspective of adjacent residential properties was considered and evaluated in the context of the alternative sites, existing or proposed screening and other objective criteria. The City does not have the authority to impose a condition on the applicant to place landscaping on private property and there are no objective criteria that would allow the City to impose this requirement on the subject application even if there were a willing property owner interested in additional landscape screening. Again, this could be explored for future regulations with appropriate limitations that would not prohibit effectively prohibit wireless service and with the agreement of the affected property owner(s).

#### Fiber Backhaul

13. The application is deficient in that it does not show all fiber backhaul as required by Notice of Incompleteness Item 66 and by the City's Dig Once policy. Nothing in the Small Cell Order, or other law, disallows Palo Alto's mandate that an applicant must demonstrate that it has arranged for all necessary services and equipment needed to actually operate the proposed equipment, regardless of whether the installation is conducted by the applicant or another entity, and regardless of whether that additional equipment is a "small cell." In short, the City of Palo Alto is entitled to require fiber backhaul documentation from Verizon.

**Response:** The Dig Once policy cited in the Notice of Incompleteness is not a formal policy and is not an objective requirement that was available to the applicant prior to its application submittal. Accordingly, in consultation with the City Attorney's Office, staff did not pursue this further for the subject application. Through the City's encroachment permit process, compliance with applicable City regulations will be verified.

#### Pole Replacement Exception

14. Verizon has not justified the exceptions to the pole replacement/style standards it sought and obtained for Node 061 at 1221 Middlefield Road and for Node 204 at 850 Webster Street. Specifically, the applicant asserts that a 10" diameter pole is required to support two to three antennas at each of these locations, even though Node 205 is sited on an 8" diameter pole, and the 8" pole is supporting three antennas identical to those at the other two sites.

**Response:** Attachment A (Findings for Approval – Node 061) within Attachment C (Directors Decision Letter) of the staff report identifies the relevant findings for approval of the exception for pole replacement. The applicant identified to the City that the pole needed to be modified in order to support the structural stability of the pole and antenna attachments. The pole types used within the Downtown style (Node 061 and 204) are a different configuration and starting thickness than the pole to be replaced at Node 205, which explains why the thickness is slightly different between the two styles used.

#### Volume Thresholds for Equipment



15. The proposed cell towers at 1221 Middlefield (Node 061) and 853 Middlefield (Node 205) do not appear to comply with the 2.6 cu. ft. maximum per streetlight pole mandated by the City because the three shrouded antennas alone total 2.55 cu. ft. (0.85 x 3), and this 2.55 cu.ft. does not include the mounting brackets or the pole extension supporting the antennas. Nor does 2.55 cu.ft. include the total volume of the "single integrated shroud and 'antenna skirt'" that will be required to encompass all three antennas per the City Standards.

**Response:** This concern is partially addressed in number 4 above. The applicable objective standard, which in this case is an adjustment to account for 5G technology provides the following:

*WCF Equipment Adjustment. For Streetlight Poles: Equipment that cannot propagate an adequate signal within the shrouding required by the standard designs shall be attached to a streetlight pole at a height of 2 feet below the light mast or higher. Each instance of such equipment shall not exceed 0.85 cubic feet, nor shall the total volume of such equipment and any shrouding exceed 2.6 cubic feet per streetlight pole.*

The term equipment used in this context is defined in the municipal as follows:

"Associated equipment" means any and all on-site equipment, including, without limitation, back-up generators and power supply units, cabinets, coaxial and fiber optic cables, connections, shelters, radio transceivers, regular power supply units, and wiring, to which a wireless antenna is attached in order to facilitate mobile broadband service and personal wireless service delivered on mobile broadband devices.

Based on the above objective criteria as further clarified in the definition section of the zoning code, staff concluded that the volume measure relates to equipment functionally necessary for a WCF's operation and the concealing shroud, and therefore, mounting brackets were not included in the total volume calculation.

The City Council in its review may conclude that the mounting bracket should be included in the total volume calculation. If so, Council could consider denying the applications for failure to comply with this requirement, conditioning the project on complying with the total volume calculation that includes mounting brackets, or entering into a tolling agreement with the applicant to allow the applicant time to amend the application to include another exception request to City's objective design criteria.

#### Certificate of Insurance

16. The Certificate of Insurance provided in the application is deficient in that it does not specify coverage for any liability sought for injuries due to non-FCC compliant RF, which is generally an exception to general liability policies.

**Response:** As noted in prior responses and Attachment E of the staff report, CTC has confirmed that the expected RF emissions are consistent with FCC regulations and would not create a situation where emissions exceed allowable levels for the General Population thresholds. Applicant's insurance requirements are set forth in the Master License Agreement (MLA) between the City and applicant (Contract No. C16165156, Section 13.0).

Removal of Abandoned Equipment

17. Under City Code 18.42.110(1), Verizon is not eligible for a new WCF permit until any component of an existing Verizon WCF in the City that has not been used in 90 days has been removed. In fact, Verizon has not certified either 1) that it has removed any abandoned components of their equipment (e.g., now-disused cabling or wires) or 2) that there are no abandoned components.

**Response:** The Municipal Code section cited by appellant states the following:

*A WCF (Tier 1, Tier 2, or Tier 3) or a component of that WCF that ceases to be in use for more than ninety (90) days shall be removed by the applicant, wireless communications service provider, or property owner within ninety (90) days of the cessation of use of that WCF. A new WCF permit shall not be issued to an owner or operator of a WCF or a wireless communications service provider until the abandoned WCF or its component is removed.*

The City has not received any communication from the applicant that any WCF equipment has been abandoned or ceased use or operation. Staff intends to follow up to obtain applicant's attestation for the administrative record as to the status of existing equipment. In the future, staff will clarify that an attestation addressing 18.42.110(l) is a requirement in the application checklist.

Tier 2 vs. Tier 3 WCF Permit Requirements

18. The proposed nodes do not qualify as Tier 2 WCF under PAMC 18.42.110, but rather are Tier 3. Hence the application is deficient in that 1) it does not include the scaled drawing, required for Tier 3 applications, of potential increases in physical dimensions; and 2) it does not address the findings required for Tier 3, including those required by Section 18.76.01 0(c) of the Wireless Ordinance. Moreover, the approval letter does not, as the law mandates, make the required findings.

**Response:** Per PAMC 18.42.110(c)(3) a Tier 3 permit, *"shall be required for the siting of any WCF, including a small wireless facility, that is not a collocation subject to a Tier 1 or 2 WCF Permit. An application shall not require a Tier 3 WCF Permit solely because it proposes the replacement in-place of an existing streetlight or wood utility pole."* As noted in the FCC's recent Small Cell Order, a collocation of equipment on an existing street light pole can qualify as a Tier 1 application, however, should the light pole need to be replaced, it would qualify as a Tier 2 project. This is highlighted within the City's ordinance in that a Tier 3 WCF permit, *"is not needed solely because an application proposed the replacement in-place of an existing*

*streetlight or wood utility pole*". While the street light poles may be adjusted slightly at existing locations by one or two feet, staff does not believe it would require the applicant to apply under a Tier 3 application type as they are substantially in the same location. If a pole were to be relocated in a completely different area than where it originally existed, then staff would agree that a Tier 3 permit would be necessary.

**Verizon's Coverage Gap and Burden of Proof**

19. Verizon has not met, as the law requires, its "burden of proving" that denial of the application would "deprive the applicant of rights guaranteed by federal law." For example, Verizon in fact 1) has not established the existence of a significant gap, particularly not a gap in personal wireless services, and 2) has not proved that the proposed nodes are the least intrusive means of addressing that gap, as compared to other feasible alternatives.

**Response:** The applicant's supporting documents note that there is a significant coverage gap within the City of Palo Alto for 5G services. Additionally, staff believes that the applicant has provided locations within the City that meet its objective standards to the greatest extent feasible; this is outlined in Findings for Approval in Attachments A, B, and C of Attachment C to the staff report. While staff would like to see an application that requires no exceptions to City standards, these nodes represent the least intrusive means within the area of service that Verizon seeks to provide. Denying this application because of the selected node locations could be viewed as a material prohibition of service if Council does not identify less intrusive locations available within the coverage area, because this implies that no wireless facilities could be placed within this requested coverage area.

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Jonathan Lait

Director of Planning & Development Services

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Ed Shikada

City Manager

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