



City of Palo Alto

City Council Staff Report

(ID # 11421)

Report Type: Action Items

Meeting Date: 6/22/2020

Summary Title: 488 University Ave: Request to Convert Residential Units to Hotel Use

Title: PUBLIC HEARING / QUASI-JUDICIAL. 488 University Avenue [19PLN-00038]: Request for a Waiver From Title 18 to Allow Conversion of a Residential Use to a Hotel Use to Accommodate 100 Guestrooms. In Addition, the Applicant Requests Approval of an Architectural Review and Historic Review Application for Interior and Exterior Renovations to the Hotel President to This Category 2 Historic Building as well as a Parking Adjustment to Accommodate the Conversion to a Hotel Use. The Project Also Includes a Conditional Use Permit to Allow for Restoration and use of a Historic Rooftop Garden and for the On-site Sale of Alcoholic Beverages. Proposed Revisions Include Structural and Seismic Retrofit of the Existing Structure. Zone District: Downtown Commercial District With Ground Floor and Pedestrian Overlays (CD-C)(GF)(P). Environmental Assessment: Exempt From the Provisions of the California Environmental Quality Act Pursuant to CEQA Guidelines Sections 15332 (In-fill Development), 15331 (Historical Resource Restoration/Rehabilitation), 15301 (Existing Facilities) and 15302 (Replacement or Reconstruction).

From: City Manager

Lead Department: Planning and Development Services

Recommendation

Staff recommends that Council grant a waiver to allow conversion of a downtown residential use to a hotel use and approve the requested architectural review, historic review, parking adjustment, and conditional use permit applications, and the associated environmental exemption findings.

Executive Summary

GCPA Owner, LLC, the owner of Hotel President, located at 488 University Avenue, requests Council approval of a waiver from Section 18.18.120 to allow conversion of the existing residential use to a non-residential (hotel) use. The proposed hotel use is consistent with the historic use of the property, which operated as a hotel from 1930 to 1968. The existing ground floor retail uses at the subject property would mostly remain though modifications will be made to the ground floor tenant spaces to accommodate a first-floor lobby for the hotel use.

The project includes modifications to the existing building as well as a Conditional Use Permit (CUP). The existing building is a Category 2 (Major Building) on Palo Alto's Historic Inventory and is eligible for listing in the California Register of Historic Resources; therefore, modifications to the proposed structure require architectural review and historic review. However, the Architectural Review Board (ARB) refers major architectural review applications on significant historic structures to the Historic Resources Board (HRB) for recommendation. The CUP allows for modifications to accommodate the continued use of an existing rooftop open space area and to allow the on-site sale of alcohol.

Attachment A provides a location map of the project site. The project plans are included as a link available in Attachment E. A detailed Record of Land Use Action will be provided as a late packet item on June 18, 2020. In addition, staff will provide a confidential legal memorandum analyzing significant legal risks associated with alternative actions to the staff recommendation.

Background

The Hotel President was designed by noted architect Birge Clark in the Spanish Colonial Revival style and constructed in 1929-1930. It was identified as a "Category 2" (Major Building) on Palo Alto's Historic Inventory in 1979. It has also been deemed eligible for listing in the California Register of Historic Resources. It operated as a commercial hotel from 1930 to 1968. Subsequently the upper five floors of the property were used for residential occupancy in small one or two room units until late 2018. There were 75 total residential units on the site and six ground floor retail spaces. The property is now vacant except for the ongoing commercial/retail uses in four of the six ground floor units.

Two years ago, the property was sold, and the new owner expressed interest in converting the residential portion of the building to a hotel use. This resulted in significant public commentary and the Council enacted a no-fault renter eviction ordinance for certain sized buildings in the City.¹ The City Council also directed staff to explore additional renter protection regulations and since then, the state legislature and Governor enacted other statewide renter reforms.

During this time there were two other locally relevant legislative actions that were made more controversial in light of the anticipated land use conversion at the Hotel President. First, in

¹ No Fault Eviction Ordinance <https://www.cityofpaloalto.org/civicax/filebank/documents/66603>

February 2019, the City Council removed a restriction in the zoning code that limited the growth of non-residential floor area in the downtown to 350,000 square feet over its 1986 level.² This action was consistent with a 2017 Council motion to regulate floor area for office and research and development uses on a citywide basis.

In April 2019, the City Council considered another ordinance to remedy an inadvertent copying error in the municipal code that precluded any change in land use for downtown buildings that no longer met the City's current development standards.³ Previously, land uses in non-compliant buildings could be replaced with other permissive land uses regardless of consideration that a building was taller or had more floor area than allowed in the current code. The President Hotel building and other downtown property owners were impacted by this code language that appeared to have been mistakenly enacted in 2016.

The City Council adopted an ordinance that restored the ability for downtown property owners to change lawfully permitted land uses in non-conforming buildings but precluded the conversion of residential uses to non-residential uses. A property owner who believes this restriction is preempted by state or federal law may seek a waiver from the City Council (PAMC 18.18.120).

Proposed Project

In February 2019, the applicant applied for Architectural Review, Historic Review, and a CUP, all associated with a change of use to convert the residential space to a non-residential (hotel use). Hotel President is a 'grandfathered' legal non-complying facility with respect to building height, floor area ratio (FAR) and setback projections. This means that the design complied with the prevailing regulations at the time that it was constructed; however subsequent revisions to the municipal code have rendered the structure non-complying with respect to the current regulations. Following the City Council's adoption of the above ordinance, the applicant provided information to support the request for a waiver.

Waiver from Title 18 for Conversion of Use

For non-complying facilities, PAMC 18.18.120(b)(2)(F) prohibits the conversion of residential space to a non-residential use. However, the City's municipal code identifies a waiver process, under which the City Council may waive or adjust one or more requirements of Title 18 (Zoning) or Title 21 (Subdivisions and Other Divisions of Land) in order to avoid preemption by state or federal law. In order to process this request, the applicant must provide evidence to support the claim that state or federal law preempts this City regulation. The applicant requests a waiver from Title 18 to allow the conversion of a residential use to a hotel use, and provides

² February 11, 2019 Council Report: <https://www.cityofpaloalto.org/civicax/filebank/documents/68782>

³ April 1, 2019 Council Report:

<https://www.cityofpaloalto.org/civicax/filebank/blobdload.aspx?t=59275.74&BlobID=70005>

evidence to support this claim, as discussed further in this report.

Architectural and Historic Review

The applicant proposes modifications to the interior and exterior of the existing historic structure to accommodate the new use. This requires both Architectural Review and Historic Review. In accordance with PAMC Section 16.49.050, the Architectural Review Board refers applications on significant historic structures to the Historic Resources Board for a recommendation on the proposed alterations. The existing building is a Category 2 historic structure on the City's Historic Inventory, which is identified as a "Major Building" of regional importance, meritorious works of the best architects or an outstanding example of an architectural style. Therefore, any proposed modifications to the structure must retain the original historic character.

Conditional Use Permit

Pursuant to PAMC 18.18.060(e)(2), buildings within the CD-C subdistrict that are noncomplying for height or gross floor area shall be permitted to increase height and expand floor area to the minimum degree necessary to provide rooftop access and related amenities. The applicant is seeking approval of a conditional use permit (CUP) in accordance with this requirement. In addition, the applicant requests approval of a conditional use permit for the on-site sale of alcohol. CUP applications are typically evaluated at a staff level and the Director of Planning & Development Services issues a decision on the application. However, because this CUP is associated with the conversion of the use, which requires Council approval of a waiver, the Director has deferred the request for the CUP to Council in accordance with PAMC Section 18.40.170.

Discussion

The proposed project has been analyzed for consistency with the Comprehensive Plan, Palo Alto Municipal Code, Downtown Design Guidelines, and the Secretary of the Interior's Standards for Rehabilitation of Historic Structures.

Comprehensive Plan⁴

The Comprehensive Plan includes goals, policies and programs that guide the physical form of the City. ARB finding #1 requires that the design be consistent and compatible with applicable elements of the Palo Alto Comprehensive Plan. The Comprehensive Plan land use designation for the project site is Regional/Community Commercial. This land use designation is "intended to provide a wider variety of goods and services that the neighborhood shopping areas and include such uses as department stores, bookstores furniture stores, apparel shops, restaurants and non-retail services such as offices and banks." Hotel uses are an allowed use within this

⁴ The Palo Alto Comprehensive Plan is available online:

https://www.cityofpaloalto.org/gov/depts/pln/long_range_planning/2030_comprehensive_plan/default.asp

land use designation. A detailed review of the project's consistency with the policies in the Comprehensive Plan is provided in Attachment B. The project is consistent with the policies in the Comprehensive plan and therefore fulfills the goals of the plan.

Zoning Ordinance⁵

The site is zoned Downtown Commercial-Community with Ground Floor and Pedestrian Shopping Combining Districts (CD-C [GF][P]). The Downtown Commercial-Community District is intended to be "a comprehensive zoning district for the downtown business area, accommodating a wide range of commercial uses serving city-wide and regional business and service needs, as well as providing for residential uses and neighborhood service needs." Hotel uses are permitted uses within the CD-C Zone District.

The Ground Floor Combining District is intended to provide design guidelines and modify the uses allowed in the commercial districts and subdistricts to promote active, pedestrian-oriented uses, with a high level of transparency and visual interest at the ground level. The Pedestrian Shopping combining district is intended to modify the regulations of the commercial downtown district in locations where it is deemed essential to foster the continuity of retail stores and display windows and to avoid a monotonous pedestrian environment in order to establish and maintain an economically healthy retail district. The project proposes minor modifications to the façade at 488 University to accommodate the hotel use. These modifications are architecturally sensitive, retaining the integrity of the historic structure. The project retains a pedestrian entrance along the University frontage as well as windows, awnings, and the marquee, which create visual interest on the ground floor of this building. Three of the four existing ground floor retail uses on this parcel would remain in operation.

Staff has performed a detailed review of the project's consistency with applicable development standards. As detailed in the zoning compliance summary table in Attachment B, the proposed project complies with the requirements for the CD-C zone district, as well as the requirements of the Ground Floor and Pedestrian Shopping combining districts or is otherwise seeking, through the requested approvals, permission to deviate from certain code standards in a manner that is consistent with the zoning ordinance. With approval of the requested waiver and the CUP, the proposed project would be consistent with the zoning ordinance.

Section 18.18.120 Waiver

The subject building is a legal non-complying facility in that it complied with the prevailing zoning and building standards at the time that it was constructed. However, due to subsequent changes to the regulations, the building was rendered legal non-complying with respect to

⁵ The Palo Alto Zoning Ordinance is available online:

[http://library.amlegal.com/nxt/gateway.dll/California/paloalto_ca/paloaltomunicipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:paloalto_ca](http://library.amlegal.com/nxt/gateway.dll/California/paloalto_ca/paloaltomunicipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:paloalto_ca)

current standards for height (50 feet), floor area (maximum of 2.0 to 1 floor area ratio), and setbacks (basement, marquee entry, and sixth floor balcony protrude into the setbacks). For non-complying facilities PAMC 18.18.120(b)(2)(F) prohibits the conversion of residential space to a non-residential use. However, for cases where an applicant asserts preemption by state or federal law, the municipal code identifies a waiver process, which requires Council approval.

The applicant's statement of its position and claims with respect to its waiver request, along with supporting documentation, is provided in Attachment C.

Primarily, the applicant claims that prohibiting the conversion of this property to a non-residential use would be contrary to and preempted by the Ellis Act. The applicant's letter states that, "under the Ellis Act, a local government may not prohibit an owner from taking its property out of residential rental use, nor may a city impose a "prohibitive price" or unconstitutional condition on a party exiting the residential rental business, or a burdensome constraint on the subsequent use of property after the owner exercises Ellis Act rights."

Staff believes the applicant has made a sufficient showing to support the approval of a waiver under Section 18.18.120 and recommends that the requested waiver, allowing conversion to a hotel use, be granted. Section 18.18.120 broadly authorizes the City Council to waive or adjust provisions of Title 18 (Zoning) or Title 21 (Subdivisions and Other Divisions of Land), in response to a waiver request. Thus, rather than granting a waiver that would allow conversion of the residential use to a hotel use, the Council could adjust the City's regulations on conversion of rental units to condominiums in Chapter 21.40, which currently prohibit conversion of the building to ownership housing. However, staff does not recommend such action, based on advice from the City Attorney's Office. A thorough analysis of the legal risks associated with various options before the Council will be provided confidentially in tandem with this staff report.

Rooftop Open Space

The project proposes a new elevator, which would provide ADA compliant access throughout the building, including access to the rooftop open space. The elevator overrun would extend beyond the existing height of the building (80 feet) to 90 feet, three inches. This is the minimum necessary height to provide access to the rooftop. PAMC 18.18.060(e)(2) allows for this increase in height on legal non-complying buildings within the downtown area through approval of a Conditional Use Permit process. The project meets the conditional use permit findings with respect to revisions and access to the open space, as outlined in the Record of Land Use Action. In accordance with this code section, the floor area associated with rooftop access is not counted toward gross floor area; therefore, this would not increase the building's non-compliance with respect to floor area.

The project also includes modifications to the existing rooftop features, including existing

enclosed space on the rooftop. As shown on the project plans in Attachment E, these revisions would not increase the gross floor area or increase the height of the proposed structure, except as previously stated to accommodate access to the rooftop. Therefore, with approval of the requested CUP, the proposed modifications to the rooftop would comply with the zoning ordinance. Though this open space has historically been used by residents; conditions of approval have been provided to ensure that use of the rooftop open space by hotel guests would not be impactful to neighboring properties.

Sale of Alcoholic Beverages

The on-site sale of alcohol requires approval of a conditional use permit in accordance with PAMC 18.42.090. The project complies with the CUP findings, as outlined in the Record of Land Use Action. Therefore, with approval of the CUP, the on-site sale of alcoholic beverages would be consistent with the zoning ordinance.

Modifications to a Historic Structure

As outlined in the Historic Resources Memorandum entitled “Hotel President-SOI Standards Consultation Memorandum” dated March 2, 2020, the proposed modifications to this historic structure are consistent with the SOI standards for Treatment of a Historic Resources. This memorandum is provided in Appendix B of Attachment D. The findings for historic and architectural review approval are provided in the Record of Land Use Action.

The Historic Resources Board held a hearing on the proposed project on May 14, 2020.⁶ At the hearing the board unanimously recommended approval of the project. The board’s motion included agreement with the conclusion that the building is eligible for the CRHR and an agreement with the conclusion that the project is consistent with the SOI Standards for the Treatment of Historic Resources. The HRB’s motion also included a provision that the applicant return to the HRB subcommittee for further review of some of the building’s proposed finishes, including:

- The proposed new tile on the University Avenue façade
- Details regarding the proposed modifications to the sixth floor guard
- Color brushouts
- Details of the arches of the lobby wall

The Record of Land Use Action includes a condition of approval that requires the applicant to return to the HRB subcommittee prior to issuance of a building permit to provide these details.

Ground Floor Retail Preservation

In accordance with the City’s ground floor retail preservation ordinance, as codified in PAMC

⁶ Meeting Minutes Historic Resource Board, May 14, 2020:
<https://www.cityofpaloalto.org/civicax/filebank/documents/77187>

Section 18.40.180, ground floor retail and retail-like uses that were legally established as of March 2015 may only be replaced with other retail and retail-like uses. The proposed project's ground floor retail and retail-like (restaurant) uses would therefore be required to remain or otherwise be replaced with other retail or retail-like uses. The proposed project modifies the ground floor retail spaces and former ground floor residential access to accommodate a lobby, bar, and kitchen for the hotel use. Hotel uses are considered retail-like uses in accordance with PAMC Section 18.04.030(125.1). Therefore, the proposed project increases the overall retail and retail-like uses on the ground floor.

Multi-Modal Access & Parking

The proposed hotel use increases the site's existing non-compliance with respect to parking requirements in that it requires more parking in accordance with PAMC Section 18.52 than the existing use. Therefore, in order to allow for the conversion to a hotel use, the project would need to bring the parcel into compliance with the parking requirements.

California Health and Safety Code Section 18962 requires that local jurisdictions provide a 25 percent reduction in parking requirements for conversion of a designated historical resource to any non-residential use. Therefore, with application of the 25 percent reduction, the proposed project is required to provide a total of 115 parking spaces. The applicant is proposing 14 spaces (12 standard spaces and 2 valet spaces) on-site and 25 spaces off-site at 330 Everett (11 standard spaces and 14 valet spaces). The remaining 76 spaces would be paid in-lieu to the Downtown Parking Assessment District; the current fee is \$106,171 per space and is expected to increase to \$111,862 per space in late August. The conditions of approval will require compliance with a valet management plan that has been reviewed and approved by the City's Office of Transportation.

The applicant will comply with bicycle parking requirements and does not propose any new curb cuts that could create a new hazard for bicyclists.

Three-Party Parking Agreement

The applicant proposes off-site parking for 25 of their required parking spaces at 330 Everett. Eleven of these spaces would be provided as standard spaces and 14 would be provided as valet spaces. Off-site parking is allowed in accordance with PAMC Section 18.52.080(d), which allows off-site parking at other sites within the boundaries of the parking assessment district. With this proposal, parking at a ratio of 0.75 parking spaces per unit would be provided for the senior housing use at this property. This complies with the current parking standards for senior housing facilities and would not conflict with the Planned Community Ordinance (PC-4053) for that site, which does not specify parking requirements. The conditions of approval will require documentation of the use of these parking spaces for Hotel President through a minor architectural review application and a three-party parking agreement between the two properties owners and the City. The agreement will ensure the parking spaces at 330 Everett

are not being used by any other entity except for the Hotel President and the senior housing facility.

Transit Demand Management Plan

The City requires implementation of a Transit Demand Management (TDM) plan in conjunction with the approval of parking adjustments, including parking design alternatives, such as the proposed valet parking plan. The TDM plan is also required to comply with the City's Comprehensive Plan requirements, which identify TDM reduction requirements for projects within the Downtown area. The proposed TDM plan has been reviewed by the Office of Transportation. The Office of Transportation has included conditions of approval, which require revisions to the proposed TDM plan, prior to approval. Review and approval of the revised TDM plan will be required prior to approval of a building permit.

Policy Implications

The proposed project converts a residential use within an existing historic building to its historic hotel use. The project includes modifications to the interior and exterior that restore the existing historic building, and seismically retrofit the building. The policy implications associated with this change in use and the proposed modifications to the structure are discussed below and primarily relate to housing, compliance with state regulations, the treatment of historic resources, and safety.

Housing

The City's Comprehensive Plan, including the adopted Housing Element, encourage residential uses throughout the City and identifies the City's Regional Housing Needs Allocation (RHNA), which outline the City's targets for the production of housing units at all income levels. The proposed project would convert an existing residential rental use to a non-residential (hotel use). Although this conversion is not consistent with goals encouraging housing development, the existing residential rental units were never identified as part of the City's housing inventory. Therefore, the conversion of these units would not result in a loss of housing units that affects the City's RHNA targets. The project site is currently vacant and has been vacant since November 2018.

Historic

As outlined in the Record of Land Use Action, the project is consistent with several policies outlined in the Land Use Element of the Comprehensive Plan related to the preservation and restoration of historic resources. Specifically, the project would result in rehabilitation of an existing Category 2 historic building that is currently vacant and encourage its reuse consistent with the historical use of the site. The proposed modifications to the building comply with the SOI standards and therefore would preserve the historic integrity of the structure, including its character defining features.

Safety

The project includes a structural and seismic retrofit of the existing building, which would improve the safety of the building. These upgrades are consistent with the Comprehensive Plan Safety Element policies S-2.5 and S-2.6 which encourage seismic rehabilitation of existing buildings, particularly those whose loss would have the greatest community impacts. Because this is a historic structure of major regional importance, seismic upgrades of this building are a priority under Policy S-2.6.

Resource Impact

The proposed project is a private development that is subject to cost recovery; therefore, processing of this application does not directly impact City resources. Hotel uses provide transit occupancy taxes to the City of Palo Alto. All hotel guests are required to pay transit occupancy taxes in accordance with PAMC Section 2.33; therefore the proposed hotel use will provide revenue for the city in the form of transit occupancy taxes. This revenue is split between the general fund and infrastructure. The project also proposes paying in-lieu fees to the Downtown Parking Assessment District for 76 additional spaces which cannot be feasibly parked on site. The current rate for in-lieu parking spaces is \$106,171; therefore the applicant proposes to pay an estimated \$8,068,996 toward the Downtown Parking Assessment District. In addition, the project would be subject to impact fees in the amount of \$933,675.42.

Timeline

If approved, the project would file a building application for approval of the proposed revisions. Modifications to the proposed structure are anticipated to take 16 months to construct. Exterior modifications are anticipated to take approximately 12 weeks to construct.

Stakeholder Engagement

Several members of the public expressed concern regarding the conversion of a residential use to a non-residential use. Many of these concerns were provided in response to hearings in April 2019 regarding Title 18 amendments. Those proceedings ultimately resulted in code revisions that prohibited the conversion of residential uses to non residential uses on legal noncomplying buildings and created the waiver process, which is the subject of the current request.

One current commercial tenant at the site also expressed concern that approval of the subject application would increase the property tax or insurance payments for the existing ground floor tenants. The applicant provided information to the tenant confirming that the proposed application would not result in a change/increase in property tax or insurance payments.

Environmental Review

The subject project has been assessed in accordance with the authority and criteria contained

in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the City. Specifically, the project was found to be exempt under CEQA pursuant to CEQA Guidelines Section 15332 (in-fill); 15331 (Restoration of Historic Resource); 15301(Existing Structures); and 15302 (Reconstruction)

A documented exemption outlining how the project complies with these exemptions is included in Attachment D. The proposed modifications to the building would be consistent with the Secretary of the Interior's Standards for Rehabilitation of Historic Resources, as outlined in the analyses provided in Appendices B and C of Attachment D.

Attachments:

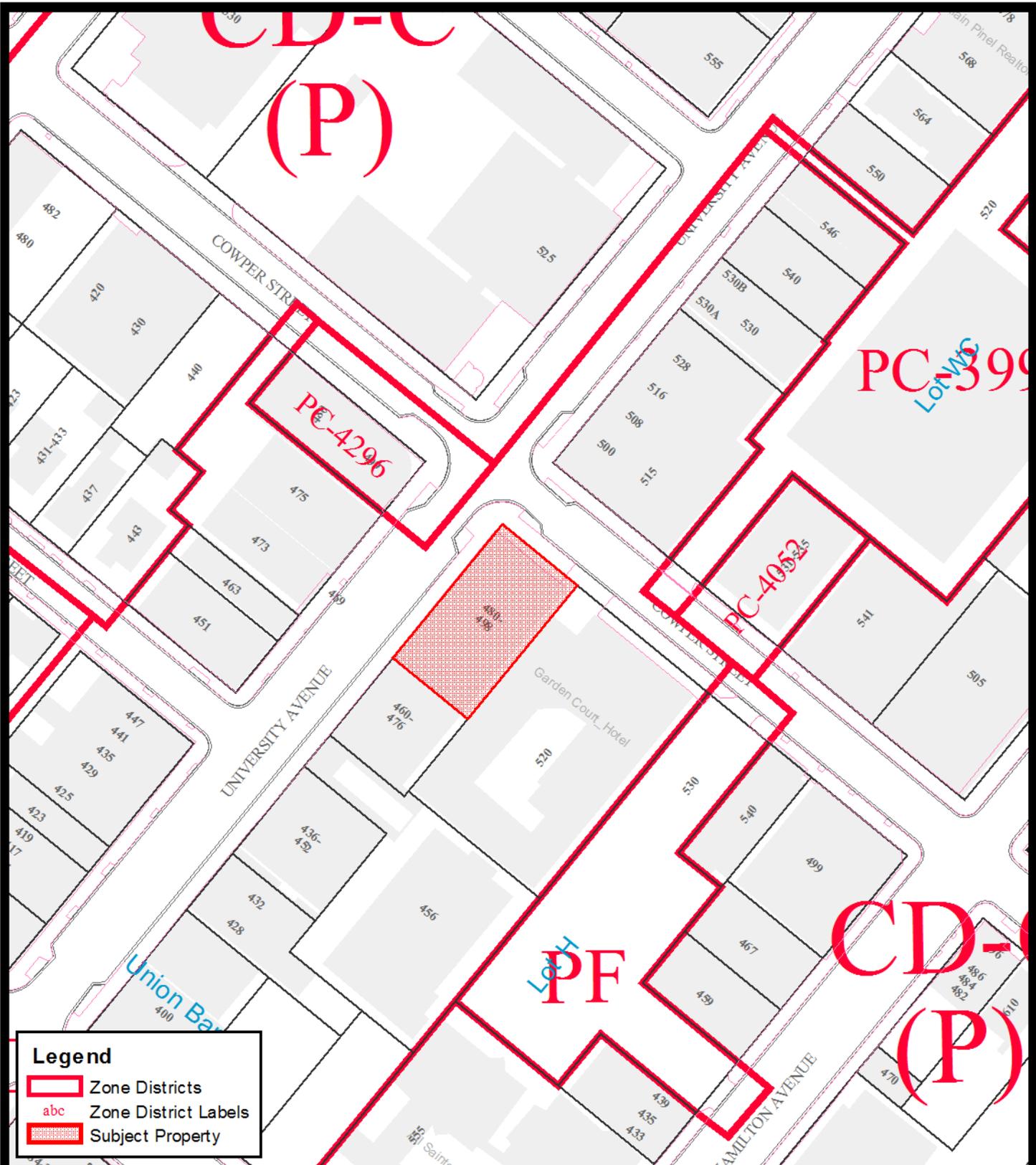
Attachment A: Location Map

Attachment B: Zoning Comparison Table

Attachment C: Applicant Letter Regarding Waiver

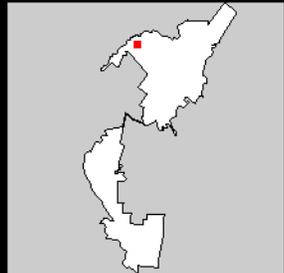
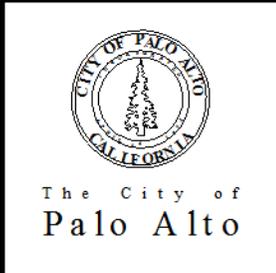
Attachment D: Documentation for CEQA Notice of Exemption

Attachment E: Project Plans (DOCX)



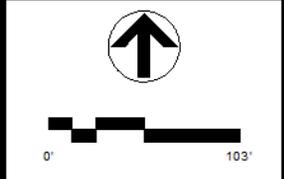
Legend

- Zone Districts
- abc Zone District Labels
- Subject Property



488 University Avenue
19PLN-00038

This map is a product of the City of Palo Alto GIS



ATTACHMENT B
ZONING COMPARISON TABLE
488 University Avenue, 19PLN-00038

Table 1: COMPARISON WITH CHAPTER 18.18 (CD-C DISTRICT) Exclusively Non-Residential Development Standards			
Regulation	Required	Existing	Proposed
Minimum Setbacks			
Front Yard (Cowper St.)	None Required	7 ft 1 in	7 ft 1 in
Rear Yard	None Required	0 ft	0 ft
Interior Side Yard	None Required	10 ft	10 ft
Street Side Yard (University Ave.)	None Required	0 ft ⁽⁶⁾	0 ft ⁽⁶⁾
Special Setback	Pursuant to Code Section 20.08	N/A	N/A
Minimum street setback for sites sharing a common block face with any abutting residential zone district	Note 4	N/A	N/A
Minimum yard (ft) for lot lines abutting or opposite residential zone districts	10 feet (Note 1)	N/A	N/A
Maximum Site Coverage	None Required	3,092 sf	3,226 sf
Maximum Height	50 ft (Note 3)	85 ft to penthouse 90 ft 1 in to Wireless equipment enclosure	90 ft 3 in to elevator
Maximum Floor Area Ratio (FAR)	2.0:1 (18,850 sf) (Note 5)	5.42: 1 (51,115 sf)	5.36:1 (50,540 sf)
Daylight Plane for lot lines abutting one or more residential zone districts			
Initial Height at side or rear lot line	(Note 2)	N/A	N/A
Slope	(Note 2)	N/A	N/A

Notes

- 1) The yard shall be planted and maintained as a landscaped screen, excluding area required for site access.
- 2) The initial height and slope shall be identical to those of the residential zone abutting the site line in question.
- 3) The maximum height within 150 feet of any abutting residential zone district shall not exceed the height limit of the abutting residential district.
- 4) The minimum street setback shall be equal to the residentially zoned setback for 150 feet from the abutting single-family or multiple family development.
- 5) FAR may be increased with transfers of development and/or bonuses for seismic and historic rehabilitation upgrades, not to exceed a total site FAR of 3.0:1 in the CD-C subdistrict or 2.0:1 in the CD-S or CD-N subdistricts.
- 6) Property includes entry marquee (8'-9") on the ground floor and balcony (4'0") on the 6th floor that encroach into this setback.

18.18.110 Context-Based Design Criteria. As further described in a separate attachment, development in a commercial district shall be responsible to its context and compatible with adjacent development, and shall promote the establishment of pedestrian oriented design.

**Table 2: CONFORMANCE WITH CHAPTER 18.52.040 (Off-Street Parking and Loading)
for Downtown University Avenue Parking Assessment District**

Type	Required		Existing	Proposed	Conforms?
Vehicle Parking (within the Downtown Parking Assessment District) PAMC 18.52.040 Table 2	All uses except residential: 1 space per 250 sf 7,645 sf x 5 floors = 38,225/250 =	153 spaces 115 spaces after State reduction ⁽¹⁾	12 spaces	14 spaces, 25 off-site, 76 in-lieu	Yes ⁽²⁾
Bicycle Parking (within the Downtown Parking Assessment District) PAMC 18.52.040 Table 2	All uses except residential: 1 space per 2,500 sf 40% Long Term (LT) 60% Short Term (ST)	20 spaces 8 LT 12 ST	12 ST	11 Long Term 12 Short Term	Yes
Loading Space	10,000-99,999 sf	1 space	1	1	Yes

(1) California Health & Safety Code Section 18962 allows a 25% reduction for historic properties

(2) Off site parking required and payment of parking in-lieu fee

Attachment C

Direct Link to Applicant Letter Regarding Waiver:

https://bit.ly/pa_waiver_letter

Attachment D

Direct Link to Documentation for CEQA Notice of Exemption:

https://bit.ly/pa_ceqa_noe

Attachment E

Project Plans

During Shelter-in-Place, project plans are only available online.

Directions to review Project plans online:

1. Go to: bit.ly/PAwaitingprojects
2. Scroll to find “488 University Avenue” and click the address link
3. On this project specific webpage you will find a link to the Project Plans and other important information

Direct Link to Project Webpage:

<https://www.cityofpaloalto.org/news/displaynews.asp?NewsID=4536&TargetID=319>