



## NOTICE OF EXEMPTION

**PROJECT TITLE:**

Fire Station Replacement at 3600 Middlefield Road

**PROJECT LOCATION:**

3600 Middlefield Road, Palo Alto, Santa Clara County, CA 94303

**PROJECT DESCRIPTION:**

Approval of a Major Architectural Review to allow the deconstruction of the existing Palo Alto Fire Station Number 4 and construction of a new 8,000 square foot fire station. The application also includes a Variance request from the City's 50% shading canopy coverage in the parking lot as allowed in compliance with the zoning ordinance.

A link to the approved plans can be found here:  
<https://www.cityofpaloalto.org/Departments/Planning-Development-Services/Current-Planning/Projects/3600-Middlefield-Road>

**NAME OF PUBLIC  
AGENCY APPROVING  
THE PROJECT:**

City of Palo Alto

**NAME OF PERSON OR  
GROUP CARRYING OUT  
PROJECT:**

Valerie Tam, City of Palo Alto Public Works Engineering  
250 Hamilton Avenue  
Palo Alto, CA 94301

**EXEMPT STATUS**

(check one)

- Ministerial (Sec. 21080(b)(1); 15268)
  - Declared Emergency (Sec. 21080(b)(3); 15269(a))
  - Emergency Project (Sec. 21080(b)(4); 15269(b)(c))
  - Categorical Exemption: CEQA Guidelines §15302 (Replacement facilities); § 15303 (New Construction).
  - Statutory Exemptions.
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**REASONS WHY  
PROJECT IS EXEMPT:**

See Attachment A

**PROJECT CONTACT:**

Garrett Sauls  
Planner, Department of Planning and Development Services  
[Garrett.Sauls@CityofPaloAlto.org](mailto:Garrett.Sauls@CityofPaloAlto.org); (650) 329-2471

**IF FILED BY APPLICANT:**

1. Attach certified document of exemption finding.
2. Declare if a Notice of Exemption has been filed by the public agency approving the project

Yes

N/A

N/A

DocuSigned by:

*Garrett Sauls*

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*Signature (Public Agency)*

*Planner*

*Title*

*10/23/2023*

*Date*

### **ATTACHMENT A: Documentation of Project's Eligibility for Class 2 and Class 3 Exemptions Under CEQA**

The City has determined that the proposed fire station at 3600 Middlefield Road project is categorically exempt from CEQA under the Class 2 (Replacement or Reconstruction) and Class 3 (New Construction of Small Structures) Exemptions. CEQA Guidelines §15302 reads: "Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, including but not limited to: (b) Replacement of a commercial structure with a new structure of substantially the same size, purpose, and capacity." CEQA Guidelines §15303 reads: construction and location of limited numbers of new, small facilities or structure" and includes " up to four such commercial buildings not exceeding 10,000 square feet in floor area on sites zoned for such use if not involving the use of significant amounts of hazardous substances where all necessary public services and facilities are available and the surrounding area is not environmentally sensitive"

The information herein documents the project's compliance with these exemptions in addition to confirming that no exceptions to the exemptions, as outlined in CEQA Guidelines §15300.2, apply to the project.

#### **Eligibility for Exemption**

The Project is eligible for a Class 2 (15302) exemption because it consists of the redevelopment of an existing parcel by replacing the existing 2,900 square foot fire station with a new 8,000 square foot fire station. Other site improvements associated with the project are primarily focused on increasing landscaping and modifying the parking lot to bring the site into compliance with the City's current requirements. While the square footage of the building increases, this increase will not substantially alter the purpose or capacity of the building. The future use will remain a fire station and it will serve the same number of employees per shift as the current building does (five staff per shift). Therefore, the replacement of the existing building would be consistent with the Class 2 exemption.

The Project is also eligible for a Class 3 (15303) exemption because it consists of only one building of less than 10,000 sf on a site zoned for the proposed use and which does not involve significant amounts of hazardous substances, is located in an urban area where public services and facilities are available, and where the surrounding environment is not sensitive."

#### **Exceptions to the Exemptions**

The City is aware that there are six categories or exceptions that preclude the use of Categorical Exemptions, as listed in CEQA Guidelines 15300.2 These categories, followed by the reason(s) the City believes they are not applicable to this project, are as follows:

*15300.2(a) Location. Classes 3,4,5,6 and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact may in a particularly sensitive environment be significant*

The proposed project would be located on an existing developed site, most of which is currently utilized as a fire station and electric substation. The project site is located within a developed area; no special status species are known to occur on or within the immediate vicinity of the project site.

*15300.2(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The project is a stand-alone redevelopment project that would not be completed in multiple phases that could result in a cumulative impact over time.

*15300.2(c) Significant Effect. There are no unusual circumstances creating the possibility that the project will have a significant effect on the environment pursuant to CEQA.*

Apart from the existing uses on the site, there is nothing unique about the site, such as the presence of cultural resources and nothing unique about the project itself that would constitute an unusual circumstance, creating the possibility that the project will have a significant effect on the environment pursuant to CEQA. Although the project increases the floor area on site when compared to the existing building, the addition falls within the maximum allowances for the site based on the current zoning code and will not substantially alter the buildings capacity.

*15300.2(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, with a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

The project site is not visible from a scenic highway. I-280 and Skyline Blvd (HWY 35) are the only State scenic highways in Palo Alto and they are not visible from the project site.

*15300.2(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

This property is not listed on any site listed under Section 65962.5 of the Government Code.

*15300.2(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of an historical resource.*

The City hired a consultant, Page and Turnbull, to evaluate whether the existing fire station qualified as a historical resource. The analysis concluded that the property is not eligible for the California Register, National Register, or local register under any criteria. The report is available as part of the public record upon request. As the existing fire station does not appear to be eligible for listing on the state or national register, the project would not have the potential to cause a substantial adverse change in the significance of a historic resource.