

**APPROVAL NO. 2024- [REDACTED]**  
**RECORD OF THE COUNCIL OF THE CITY OF PALO ALTO LAND USE ACTION FOR 4075 El Camino Way**  
**ADOPTION OF AN ORDINANCE TO AMEND PLANNED COMMUNITY 5116 to PLANNED COMMUNITY (PC)**  
**[REDACTED] (FILE NO. 23PLN-00202)**

On May 5, 2025, the City Council of the City of Palo Alto ("City Council") adopted Ordinance \_\_\_\_\_ approving an amendment to Planned Community (PC) 5116 to allow a 16-Unit addition to an existing 121 unit Assisted Living and Memory Care Facility (Palo Alto Commons). In approving the application, the Council make the following findings, determination and declarations:

**SECTION 1. Background.**

A. Irwin Partner Architects on Behalf of Wellquest Living Requests Approval of a an Ordinance Amending Planned Community Zone District 5116 (PC-5116) to allow a 16-Unit addition and 172 sf of support space to an existing 121-unit Assisted Living and Memory Care Facility. ("The Project").

B. The Project site is located on a 110,642 sf (2.54-acre) site on APN 132-43-177 located at 4075 El Camino Way. The Site is designated on the Comprehensive Plan land Use Map with a split land-use designation of Multi-family and Community Neighborhood and is Zoned Planned Community 5116.

C. On August 7, 2023 City Council conducted a prescreening review of the proposed legislative actions in accordance with PAMC 18.79.

D. On February 28, 2024 Planning and Transportation Commission (PTC) reviewed the project held a duly noticed public hearing and recommended the project return to the PTC. On June 12, 2024 the PTC held a duly noticed public hearing and recommended that the applicant submit the proposed plans to the Architectural Review Board based on the conceptual design and proposed project in accordance with the Planning Community Rezoning process set forth in 18.38.

E. Following PTC and staff review, on July 18, 2024 the ARB held a public hearing to review the project design and recommend modifications in accordance with the ARB findings for approval. On October 17, 2024 ARB held a duly noticed public hearing and recommended approval.

F. On December 11, 2024 PTC held a duly noticed public hearing and recommended approval of only the seven units which do not face Wilkie Way, and to recommend denial of the other nine units and ground floor office space which faces towards the neighborhood.

G. On May 5, 2025, City Council held a duly noticed public hearing, at which evidence was presented and all person were afforded an opportunity to be heard in accordance with the Palo Alto Municipal Code and the Council's Policies and Procedures. After hearing public testimony, the Council voted to [REDACTED] the project subject to the conditions set forth in **Section 6** of this Record of Land Use Action.

**SECTION 2. Environmental Review.** On May 5, 2025, the City Council, as the lead agency for the Project, has determined that the project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) in accordance with CEQA Guidelines Section 15301 because it includes minor modifications to an existing building that involves negligible expansion of use. A document analyzing the project's

eligibility for a categorical exemption was prepared. The document is available on file with the Planning and Development Services department and on the project webpage, as an attachment to the May 5, 2025 Staff Report.

### SECTION 3.      Planned Community Findings

**Finding #1:** The site is so situated, and the use or uses proposed for the site are of such characteristics that the application of general districts or combining districts will not provide sufficient flexibility to allow the proposed development.

*The project is consistent with Finding #1 because:*

The proposed project amends the existing Planned Community zoning in order to accommodate 16 additional Assisted Living units. Because the existing PC 5116 specifies the exact number of units to be constructed on the site (121), modification of the zoning ordinance is necessary to reflect the proposed unit count.

**Finding #2:** Development of the site under the provisions of the PC planned community district will result in public benefits not otherwise attainable by application of the regulations of general districts or combining districts. In making the findings required by this section, the planning commission and city council, as appropriate, shall specifically cite the public benefits expected to result from use of the planned community district.

*The project is consistent with Finding #2 because:*

PC 5116 provides three public benefits offered for the existing Palo Alto Commons Development: 1) rental senior assisted housing (with provisions for aging in place); Roadway, pedestrian and bus stop improvements; and 3) A contribution of \$1000,000 to Avenidas to be ear-marked for the age at home program for low-income seniors. development. Similar to the existing development, the public benefit for the proposed amendment would be addition of these 16 rental assisted living units, which will provide services to more seniors who need a high level of care. Although these units are not considered as dwelling units towards the Regional Housing Needs Allocation (RHNA), they provide a safe place to live for seniors.

**Finding #3:** The use or uses permitted, and the site development regulations applicable within the district shall be consistent with the Palo Alto Comprehensive Plan, and shall be compatible with existing and potential uses on adjoining sites or within the general vicinity.

*The project is consistent with Finding #3 because:*

This project is consistent with the Palo Alto Comprehensive Plan, as described further in Architectural Review Finding #1 below. The proposed project is a negligible expansion of the existing use, which is compatible with the neighborhood. The site is shared with an independent senior living apartment building, and other surrounding uses are currently mostly one- to two-story single-family houses, as well as condominiums and the Goodwill store. The character of the neighborhood will remain the same, and improvements are being made to privacy landscaping bordering the single-family neighborhood.

### SECTION 4.      Architectural Review Findings

**Finding #1:** The design is consistent with applicable provisions of the Palo Alto Comprehensive Plan, Zoning Code, coordinated area plans (including compatibility requirements), and any relevant design guides.

*The project is consistent with Finding #1 because:*

In conformance with the following Comp Plan Goals and Policies, the project will include high quality design compatible with surrounding development.

<b><i>Comp Plan Goals and Policies</i></b>	<b><i>How project adheres or does not adhere to Comp Plan</i></b>
The Comprehensive Plan land use designation for the site is a split land use that includes both Multiple Family Residential and Neighborhood Commercial.	The project maintains the existing use of Assisted Living.
<b><i>Land Use Element</i></b>	
<b>Policy L-1.3</b> Infill development in the urban service area should be compatible with its surroundings and the overall scale and character of the city to ensure a compact, efficient development pattern.	This project proposes to expand an existing facility, in a manner that is compatible with the neighborhood and will improve the services provided.
<b>Policy L-2.11</b> Encourage new development and redevelopment to incorporate greenery and natural features such as green rooftops, pocket parks, plazas and rain gardens.	As a part of the project, landscaping is being improved to provide better privacy and more greenery.
<b>Policy L-6.1</b> Promote high-quality design and site planning that is compatible with surrounding development and public spaces.	The proposed building additions will meet the high-quality standards of the Architectural Review Board.
<b>Policy L-6.7</b> Where possible, avoid abrupt changes in scale and density between residential and non-residential areas and between residential areas of different densities. To promote compatibility and gradual transitions between land uses, place zoning district boundaries at mid-block locations rather than along streets wherever possible.	The proposed addition does not add additional height to the building, which borders a single-family residential neighborhood. The new windows are proposed with privacy measures and privacy landscaping is being added to and/or maintained.
<b>Policy L-6.8</b> Support existing regulations that preserve exposure to natural light for single family residences.	The proposed addition complies with the R-1 side yard daylight plane that was initially applied to the existing building and adopted in PC Ordinance 3775. A shadow study was prepared that showed the increases in shadows as a result of the addition would be minimal.
<b><i>Transportation Element</i></b>	
<b>Policy T-1.2</b> Collaborate with Palo Alto employers and business owners to develop, implement and expand comprehensive programs like the TMA to reduce single-occupant vehicle commute trips, including through incentives.	In keeping with this policy and the related policy programs, a TDM plan will reduce the number of single-occupant vehicle employee trips.

<b>Policy T-5.11</b> Work to protect residential areas from parking impacts of nearby businesses and uses, recognizing that fully addressing some existing intrusions may take time.	The proposed TDM plan and parking plan are expected to minimize parking impacts of Palo Alto Commons on the nearby neighborhood.
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As an amendment to a Planned Community, adoption of the zoning ordinance to allow for the proposed modifications to the development, and specifically the total number of units would ensure that the project is in compliance with the zoning ordinance in accordance with the provisions set forth in the municipal code. No other design guidelines or documents apply to this location.

**Finding #2:** The project has a unified and coherent design, that:

- a. creates an internal sense of order and desirable environment for occupants, visitors, and the general community,
- b. preserves, respects and integrates existing natural features that contribute positively to the site and the historic character including historic resources of the area when relevant,
- c. is consistent with the context-based design criteria of the applicable zone district,
- d. provides harmonious transitions in scale, mass and character to adjacent land uses and land use designations,
- e. enhances living conditions on the site (if it includes residential uses) and in adjacent residential areas.

*The project is consistent with Finding #2 because:*

This project balances adding new units to the existing building, while making improvements to the existing operations. The new TDM plan will improve parking and vehicle circulation for occupants, visitors, and staff. The proposed addition is consistent with the existing height and existing PC daylight plane, which combined with new landscaping and privacy measures for new windows, will maintain an appropriate mass and character adjacent to the residential neighborhood. The new assisted living and memory care units will provide an important service to seniors in the community.

**Finding #3:** The design is of high aesthetic quality, using high quality, integrated materials and appropriate construction techniques, and incorporating textures, colors, and other details that are compatible with and enhance the surrounding area.

*The project is consistent with Finding #3 because:*

The project proposes horizontal siding in a variety of colors, including gray, blue, and khaki, with brown awnings, and white railings. This palette is appropriate for a residential building, and the variety of colors helps break up the massing. The change from white trim to brown trim helps to visually minimize the height, while white emphasizes it. Existing balcony railings will remain, and balcony awnings will be replaced in the new color scheme. New sloped roof area will also add visual interest and enhance the residential feel. The corners will be finished in a manner that meets the requirements of the Architectural Review Board.

**Finding #4:** The design is functional, allowing for ease and safety of pedestrian and bicycle traffic and providing for elements that support the building's necessary operations (e.g. convenient vehicle access to property and utilities, appropriate arrangement and amount of open space and integrated signage, if applicable, etc.).

*The project is consistent with Finding #4 because:*

Functional operations of this building is important because the building has multiple shifts of approximately 50 employees. The TDM plan will help manage parking on site and encourage staff and visitors to take alternative modes of transportation through provisions such as the addition of bicycle parking. Residents are not expected to drive vehicles. The existing number of parking spaces is sufficient for the proposed number of assisted living beds, consistent with the zoning code requirements.

**Finding #5: The landscape design complements and enhances the building design and its surroundings, is appropriate to the site's functions, and utilizes to the extent practical, regional indigenous drought resistant plant material capable of providing desirable habitat that can be appropriately maintained.**

*The project is consistent with Finding #5 because:*

The project primarily maintains existing landscaping. No trees are proposed for removal. An additional 8 trees, four Tupelo and four Forest Pansey Redbud are proposed to fill gaps in the existing screening. While normally evergreen trees are preferred for privacy, deciduous trees are proposed at the request of neighbors who would like to minimize additional shade in their backyards. Proposed trees are low to medium water use. Windows on the new addition were also designed in a manner that respects privacy of adjacent neighbors including higher sill heights and angling of windows to reduce views into neighboring yards.

**Finding #6: The project incorporates design principles that achieve sustainability in areas related to energy efficiency, water conservation, building materials, landscaping, and site planning.**

*The project is consistent with Finding #6 because:*

In accordance with the City's Green Building Regulations, the building will satisfy the requirements for CALGreen Mandatory + Tier 2.

**SECTION 5.**      **Development Plan Approval.** The plans submitted for Building Permit shall be in substantial conformance with those plans prepared by the applicant titled Palo Alto Commons, Wellquest Living, 4075 El Camino Way, Palo Alto, CA 94306, consisting of 79 pages, uploaded to Accela Citizen Access on October 4, 2024, except as modified to incorporate the conditions of approval in Section 6. A copy of these plans is on file in the Department of Planning and Community Development. The conditions of approval in Section 6 shall be printed on the cover sheet of the plan set submitted with the Building Permit application.

**SECTION 6.**      **Conditions of Approval.**

## **PLANNING DIVISION**

1. **CONFORMANCE WITH PLANS:** Construction and development shall conform to the approved plans entitled, " Palo Alto Commons, Wellquest Living, 4075 El Camino Way, Palo Alto, CA 94306" uploaded to the Palo Alto Online Permitting Services Citizen Portal on October 4, 2024, as modified by these conditions of approval.
2. **BUILDING PERMIT:** Apply for a building permit and meet any and all conditions as contained in this document.

3. **BUILDING PERMIT PLAN SET:** A copy of this cover letter and conditions of approval shall be printed on the second page of the plans submitted for building permit.
4. **PROJECT MODIFICATIONS:** All modifications to the approved project shall be submitted for review and approval prior to construction. If during the Building Permit review and construction phase, the project is modified by the applicant, it is the responsibility of the applicant to contact the Planning Division/project planner directly to obtain approval of the project modification. It is the applicant's responsibility to highlight any proposed changes to the project and to bring it to the project planner's attention.
5. **ENTITLEMENT EXPIRATION.** The project approval shall be valid for a period of two years from the date of issuance of the entitlement. If within such one/two years period, the proposed use of the site or the construction of buildings has not commenced, the Planning entitlement shall expire. Application for a one year extension of this entitlement may be made prior to expiration.
6. **LANDSCAPE PLAN.** Plantings shall be installed in accordance with the approved plan set and shall be permanently maintained and replaced as necessary.
  - a. The screening landscaping is developed in concert with neighbor preferences and Architectural Review findings. No screening landscaping shall be altered without approval from the Director of Planning and Development Services.
7. **NOISE THRESHOLDS ON RESIDENTIAL PROPERTY.** In accordance with PAMC Section 9.10.030, No person shall produce, suffer or allow to be produced by any machine, animal or device, or any combination of same, on commercial property, a noise level more than eight dB above the local ambient at any point outside of the property plane. All noise producing equipment shall be located outside of required setbacks.
8. **OPEN AIR LOUDSPEAKERS (AMPLIFIED MUSIC).** In accordance with PAMC Section 9.12, no amplified music shall be used for producing sound in or upon any open area, to which the public has access, between the hours of 11:00pm and one hour after sunrise.
9. **SIGN APPROVAL NEEDED.** No signs are approved at this time. All signs shall conform to the requirements of Title 16.20 of the Palo Alto Municipal Code (Sign Code) and shall be subject to approval by the Director of Planning.
10. **TRASH ROOM.** The trash room shall be used solely for the temporary storage of refuse and recycling that is disposed on a regular basis and shall be closed and locked during non-business hours.

11. **REFUSE.** All trash areas shall be effectively screened from view and covered and maintained in an orderly state to prevent water from entering into the garbage container. No outdoor storage is allowed/permitted unless designated on the approved plan set. Trash areas shall be maintained in a manner to discourage illegal dumping.
12. **UTILITY LOCATIONS:** In no case shall utilities be placed in a location that requires equipment and/or bollards to encroach into a required parking space. In no case shall a pipeline be placed within 10 feet of a proposed tree and/or tree designated to remain.
13. **ESTIMATED IMPACT FEE:** Development Impact Fees, currently estimated in the amount of \$381,959.69 shall be paid prior to the issuance of the related building permit. Fees are subject to change per annual Municipal Fee Schedule.
14. **IMPACT FEE 90-DAY PROTEST PERIOD.** California Government Code Section 66020 provides that a project applicant who desires to protest the fees, dedications, reservations, or other exactions imposed on a development project must initiate the protest at the time the development project is approved or conditionally approved or within ninety (90) days after the date that fees, dedications, reservations or exactions are imposed on the Project. Additionally, procedural requirements for protesting these development fees, dedications, reservations and exactions are set forth in Government Code Section 66020. IF YOU FAIL TO INITIATE A PROTEST WITHIN THE 90-DAY PERIOD OR FOLLOW THE PROTEST PROCEDURES DESCRIBED IN GOVERNMENT CODE SECTION 66020, YOU WILL BE BARRED FROM CHALLENGING THE VALIDITY OR REASONABLENESS OF THE FEES, DEDICATIONS, RESERVATIONS, AND EXACTIONS. If these requirements constitute fees, **taxes, assessments**, dedications, reservations, or other exactions as specified in Government Code Sections 66020(a) **or 66021**, this is to provide notification that, as of the date of this notice, the 90-day period has begun in which you may protest these requirements. This matter is subject to the California Code of Civil Procedures (CCP) Section 1094.5; the time by which judicial review must be sought is governed by CCP Section 1094.6.
15. **INDEMNITY.** To the extent permitted by law, the Applicant shall indemnify and hold harmless the City, its City Council, its officers, employees and agents (the “indemnified parties”) from and against any claim, action, or proceeding brought by a third party against the indemnified parties and the applicant to attack, set aside or void, any permit or approval authorized hereby for the Project, including (without limitation) reimbursing the City for its actual attorneys’ fees and costs incurred in defense of the litigation. The City may, in its sole discretion, elect to defend any such action with attorneys of its own choice.
16. **FINAL INSPECTION:** A Planning Division Final inspection will be required to determine substantial compliance with the approved plans prior to the scheduling of a Building Division final. Any revisions during the building process must be approved by Planning, including but not limited to; materials, landscaping and hard surface locations. Contact your Project Planner, Emily Kallas at [emily.kallas@cityofpaloalto.org](mailto:emily.kallas@cityofpaloalto.org) to schedule this inspection.

17. A building permit is required for the scope of work shown.
18. At building permit submit the following:
  - a. Structural calculations
  - b. Green building compliance
  - c. T24 Energy calculations
  - d. Complete MEP plans
  - e. Accessible building elements (i.e, elevator, bathrooms, etc.) and onsite (i.e., accessible route from public sidewalk, bus stop, entrances, etc.)
19. Refer to this link for additional submittal requirements:  
<https://www.cityofpaloalto.org/files/assets/public/v/3/development-services/building-division/checklists/simplified/c1-new-comm-shell-checklist-07062023.pdf>

#### **PUBLIC WORKS ZERO WASTE**

20. WellQuest will need to have the bins pulled out to within 25' of the gate. Otherwise GreenWaste of Palo Alto pull out charges will apply. Please add a note to the plans to specify how the bins will be pulled to the pick up area.
21. Ensure the refuse staging area can house three - 4 cubic yard bins plus three - 96 gallon carts. Please show bins and carts to scale in the staging area.
22. Refuse truck pull-out spot shall contain signage notifying tenants and other users that parking is not allowed during trash pickup days.
23. The following comments below are part of the Palo Alto Municipality Code. If your scope of work includes internal and external bins then cut-sheets for the color-coded internal and external containers, related color-coded millwork, and it's colored signage must be included in the building plans prior to receiving approval from Zero Waste. Please see below for more details.

As per Palo Alto Municipal Code 5.20.108 the site is required to have color-coded refuse containers, related color-coded millwork, and colored signage. The three refuse containers shall include recycle (blue container), compost (green container), and garbage (black container). Applicant shall present on the plan the locations and quantity of both (any) internal and external refuse containers, it's millwork, along with the signage. This requirement applies to any external or internal refuse containers located in common areas such as entrances, conference rooms, open space, lobby, garage, mail room, gym, and etc. except for restrooms, copy area, and mother's room. Millwork to store the color-coded refuse containers must have a minimum of four inches in height worth of color-coding, wrapping around the full width of the millwork. Signage must be color coded with photos or illustrations of commonly discarded items. Restrooms must have a green compost container for paper towels and an optional black landfill container if applicable. Copy area must have either a recycle bin only or all three refuse receptacles (green compost, blue recycle, and black landfill container). Mother's room must minimally have a green compost container and black landfill container. Please refer to PAMC 5.20.108 and the Internal Container Guide. Examples of appropriate signage can be found in the Managing Zero Waste at Your Business Guide. Electronic copies



of these signage can be found on the Zero Waste Palo Alto's website, <https://www.cityofpaloalto.org/Departments/Public-Works/Zero-Waste/What-Goes-Where/Toolkit#section-2> and hard copies can be requested from the waste hauler, Greenwaste of Palo Alto, (650) 493-4894.

## **PUBLIC WORKS ENGINEERING**

24. LOGISTICS PLAN: A construction logistics plan shall be provided addressing all impacts to the public including, at a minimum: work hours, noticing of affected businesses, bus stop relocations, construction signage, dust control, noise control, storm water pollution prevention, job trailer, contractors' parking, truck routes, staging, concrete pours, crane lifts, scaffolding, materials storage, pedestrian safety, and traffic control. All truck routes shall conform to the City of Palo Alto's Trucks and Truck Route Ordinance, Chapter 10.48, and the route map. NOTE: Some items/tasks on the logistics plan may require an encroachment permit.

## **TRANSPORTATION**

25. TDM PROGRAM AND ANNUAL REPORTING REQUIREMENT: The applicant shall abide by the Final Transportation Demand Management (TDM) plan, entitled "Palo Alto Commons 4075 El Camino Way Transportation Demand Management Plan" uploaded to Accela on April 9, 2025 to the satisfaction of the Director of Planning and Development Services. The TDM plan includes measures and programs to achieve a reduction in single-occupancy vehicle trips to the site by a minimum of 20%, in conformance with the City's Comprehensive Plan. The TDM plan includes an annual monitoring plan to document mode split and trips to the project site. The TDM annual report shall be submitted to the Chief Transportation Official, beginning one year from the date of Ordinance approval. Monitoring and reporting requirements may be revised in the future if the minimum reduction is not achieved through the measures and programs initially implemented. Projects that do not achieve the required reduction may be subject to daily penalties as set forth in the City's fee schedule.
26. PARKING PLAN: The applicant shall abide by the Parking plan, entitled "Parking Study & Parking Management Plan for Palo Alto Commons at 4075 El Camino Way in Palo Alto, California" uploaded to Accela on April 9, 2025 to the satisfaction of the Director of Planning and Development Services.

## **URBAN FORESTRY**

The following conditions and/or standard Municipal Code requirements are provided for supplemental guidance, recommendation and/or best practices. Any applicable items shall be addressed prior to any future related permit application such as a Building Permit, Excavation and Grading Permit, Certificate of Compliance, Street Work Permit, Encroachment Permit, etc

27. Show outline of tree protection fencing in a boxed off dashed line for tree to be protected as specified in the consulting Arborist report.
28. The owner and contractor shall implement all protection and inspection schedule measures, design recommendations and construction scheduling as stated in the TPR and/or Sheet T-1, and is subject to

code compliance action pursuant to PAMC 8.10.080. The required protective fencing shall remain in place until final landscaping and inspection of the project. If called for, project arborist approval must be obtained and documented in the monthly activity report sent to the City. When required, the Contractor and Arborist Monthly Tree Activity Report shall be sent monthly to the City (pwps@cityofpaloalto.org) beginning with the initial verification approval, using the template in the Tree Technical Manual, Addendum 11.

29. Revisions and/or changes to plans before or during construction shall be reviewed and responded to by the (a) project site arborist, or (b) landscape architect with written letter of acceptance before submitting the revision to the Building Department for review by Planning, PW or Urban Forestry.
30. Tree Damage, Injury Mitigation and Inspections apply to Contractor. Reporting, injury mitigation measures and arborist inspection schedule (1-5) apply pursuant to TTM, Section 2.20-2.30. Contractor shall be responsible for the repair or replacement of any publicly owned or protected trees that are damaged during the course of construction, pursuant to Title 8 of the Palo Alto Municipal Code, and city Tree Technical Manual, Section 2.25.
31. The following general tree preservation measures apply to all trees to be retained: No storage of material, topsoil, vehicles or equipment shall be permitted within the tree enclosure area. The ground under and around the tree canopy area shall not be altered. Trees to be retained shall be irrigated, aerated and maintained as necessary to ensure survival.
32. Prior to any site work, contractor must call Derek Sproat at 650-496-6985 to schedule an inspection of any required protective fencing. The fencing shall contain required warning sign and remain in place until final inspection of the project.
33. Any approved grading, digging or trenching beneath a tree canopy shall be performed using 'air-spade' method as a preference, with manual hand shovel as a backup. For utility trenching, including sewer line, roots exposed with diameter of 1.5 inches and greater shall remain intact and not be damaged. If directional boring method is used to tunnel beneath roots, then Table 2-1, Trenching and Tunneling Distance, shall be printed on the final plans to be implemented by Contractor.

SECTION 8. Term of Approval.

The approval shall be valid for a term consistent with the Development Schedule provided in PC Ordinance No.   .

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INTRODUCED AND PASSED:

AYES:

NOES:

ABSENT:

ABSTENTIONS:

ATTEST:

\_\_\_\_\_  
City Clerk

APPROVED:

\_\_\_\_\_  
Mayor

APPROVED AS TO FORM:

\_\_\_\_\_  
Assistant City Attorney

APPROVED AS TO CONTENT:

\_\_\_\_\_  
City Manager

\_\_\_\_\_  
Director of Planning and  
Development Services

PLANS AND DRAWINGS REFERENCED:

1. Those plans prepared by the applicant titled Palo Alto Commons, Wellquest Living, 4075 El Camino Way, Palo Alto, CA 94306, consisting of 79 pages, uploaded to Accela Citizen Access on October 4, 2024, except as modified to incorporate the conditions of approval in Section 6.