



Google Checklist Response – Narrative for Item #3

Google Checklist Item #3

Make construction speedy and predictable

Review the Google Fiber Permitting, Construction, and Maintenance Plan (Appendix 3A) and identify where your city's current practices differ.

If your city's current practices do differ, please explain why and outline ideas to accommodate a large network build with accelerated timelines.

Upload your existing permit application for our review.

Identify any local, city or state-wide requirements that may impact a network build by reviewing and responding to the list of Construction Constraints List (Appendix 3B).

Upload the final Hut License, as agreed upon between Google Fiber and the city.

LEGAL NOTICE

This information is provided to Google in connection with the "Google Fiber City Checklist - Updated February, 2014." Use of the information provided herein, and all related information uploaded to Google Drive is subject to DISCLAIMER set forth in Attachment A to this Google Checklist Response – Narrative for Item #3.

Appendix 3A Permitting Process

Google Fiber’s Process and Standards: Permitting Process

- *We plan to submit all permit application material to you electronically.*
- *For underground construction, we plan on submitting plan view only.*
- *All responses, including approvals, should be sent back to Google Fiber electronically.*
- *Permit applications will include the applicable area and the duration of at least one hundred and eighty (180) days to complete the proposed installation.*
- *We would like the applicable area to be as large as possible, ideally covering the entire city. If not, the applicable area should be a minimum of either:*
 - *twenty-thousand (20,000) households*
 - *three-hundred (300) route miles of underground installation.*
- *We are looking for a response within ten (10) days of submitting the permit application.*
- *If a permit application is not approved, we need to receive a detailed list of alterations needed to get the permit approved.*
- *The city should provide Permit Application communication through a single point of contact.*

Google: *Do your city’s process or standards differ from what is outlined [in Google Fiber’s Process and Standards: Permitting Process]? If so, please provide detailed notes on your alternative requirements or process.*

Palo Alto Response:

No, the City’s process does not differ from what is outlined by Google in the checklist. However, we request that City of Palo Alto inspectors be involved when deciding the placement of conduit when minimum clearances cannot be met. If the project is not exempt from the California Environmental Quality Act (CEQA), the City will have to comply with CEQA before issuing a permit. Further, to the extent any aspect of the project is subject to design review, additional processing time may be required. See additional responses related to hut construction below.



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Google: *Do you have any ideas or suggestions to improve efficiency, speed and predictability of the permitting process with your city?*

Palo Alto Response:

The City of Palo Alto owns the utilities (water, gas, wastewater, electric, streetlights, and traffic signals) and a dark fiber network within the city limits, the Utilities Department is responsible for managing all of these services to the residents and customers in Palo Alto. For projects involving multiple installations such as what is being proposed, dedicated Utilities staff are assigned to work with the applicant to facilitate the design and construction process for all locations to ensure consistency of the process and coordination and scheduling of work. This would include, without limitation, customer service, engineering/project management, inspection, and construction personnel. Staff would initially work with the applicant to identify what information needs to be provided by the applicant to ensure the requests can be addressed without delay, then identify priorities, review applications, meeting with the applicant and develop location specific construction requirements, and schedule and coordinate the work necessary of City staff. This process has been followed with projects from other applicants and has shown to be effective, though a project of this magnitude will require additional staffing to support the applicant's needs.

Development Services staff should be contacted prior to submission to be assigned a single point of contact for the permitting process.

Uploads Requested by Google:

Please upload a standard form of permit application document that Google Fiber will be expected to use.

Palo Alto Response: Documents uploaded are as follows:

Building Permit Application - Public.pdf
Street Work Permit Form for DPW - Public.pdf
Utility Service Application - Commercial – Public.pdf

NOTE: See Appendix 3A Construction Process below for more information on design review



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Please upload your city's standard Conditions of Permit Approval.

Palo Alto Response: Documents uploaded are as follows:

Insurance Certificate Submission Guidelines for DPW Permits - Public.pdf

Street Work Permit General Conditions - Public.pdf

Street Work Permit Info Handout for DPW - Public.pdf

Appendix 3A Construction Process

Google Fiber's Process and Standards: Construction Process

- *The preferred installation method may be shown on the plan view of the permit, but will be determined by field conditions at the time of construction.*
- *Google Fiber will implement the city's standard traffic control plan at the time of installation of the Google Fiber network.*
- *The underground construction methods may include but are not limited to micro-trench, plow, open trench, directional bore and pneumatic bore.*
- *Twenty-four inch (24") horizontal separation from existing facilities will be maintained during installation, except where existing obstructions, underground congestion, or other reasons necessitate a lesser separation.*
- *Twelve inch (12") vertical separation from existing facilities will be maintained during installation, except where existing obstructions, underground congestion, or other reasons necessitate a lesser separation.*
- *Twenty-four (24") depth below existing grade will be maintained during installation, except where existing obstructions, underground congestion, or other reasons necessitate a shallower depth.*
- *When an open trench is utilized for construction in concrete or asphalt, a T-Cut method will be utilized for restoration, except where this method is not practicable.*
- *A single, full sidewalk panel will be replaced when any portion of a sidewalk panel is impacted, except by potholing.*
- *Pothole restoration will be limited to the circular area directly impacted by potholing activity, including in sidewalk areas.*



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Google: *Do your city's process or standards differ from what is outlined [in Google Fiber's Process and Standards: Permitting Process]? If so, please provide detailed notes on your alternative requirements or process.*

Palo Alto Response:

No, the City's process does not differ from what is outlined by Google in the checklist. However, we request that City of Palo Alto inspectors be involved when deciding the placement of conduit when minimum clearances cannot be met.

Google: *Is there anything else we should know about your city as far as installation of infrastructure goes?*

Palo Alto Response:

Hut(s) - According to Google, there will be one or two huts installed. Based on the Checklist these huts are 11' x 26' and 9' high and will be manufactured and assembled in another state. Since there will be no occupants in those huts and they will be full of cables and panels, they are considered to be "equipment" by the City of Palo Alto rather than a structure. As such, we request that Google hire an engineer to address the placement of the huts on the supporting slab. The review of those connections, once the plans are submitted to the City, can be done over the counter at the Development Center or within a couple of days of submission.

In addition, the Department of Planning & Community Environment (PCE) has submitted information regarding the discretionary design review process, the process that is typically required for review of facilities and equipment similar to what may be proposed as part of the Project.

Documents uploaded are as follows:

Minor ARB Process Handout - Public.pdf
Minor ARB Submittal Checklist - 06 11 13 - Public.pdf
ARB Environmental Assessment Wksht - Public.pdf
Planning Application Form - Public.pdf



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CUP Process Handout - Public.pdf (CUP required if use not a “permitted” use)
CUP Submittal Checklist - Public.pdf

These documents provide general information about the process and the application submittal requirement that are needed in order to initiate PCE discretionary design review.

There are three important considerations as part of the discretionary design review process:

- A. The proposed location of huts, cabinets and other equipment may trigger additional design review processes. For example, locations in sensitive environments such as the Baylands and foothills areas are subject to Site and Design review, a process that requires Planning & Transportation Commission and City Council review. Areas that require this additional review are designated on city zone maps with a “(D)”.
- B. This process would trigger CEQA review, and
- C. The discretionary design review decision may be appealed by any member of the public to the City Council, which has the ultimate decision-making authority.

The timeline for minor projects that are appealed to the City Council may extend as far as six months from the date an application for design review is formally considered “complete” per the California Permit Streamlining Act.

The process to satisfy the CEQA analysis has not been determined at this time. The discretionary design review process timeline will be affected by the CEQA process that would apply to the project.

Uploads Requested by Google:

Please upload your standard traffic control plan.

Palo Alto Response: Documents uploaded are as follows:

Traffic Control Plan Submission Requirements for DPW - Public.pdf
Traffic Control Plan Typical for DPW - Public.pdf

Please upload other applicable specifications, for example those regarding:



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Utility System Engineering Design Manual Utility System Construction Standards

Palo Alto Response:

City of Palo Alto Utilities (“CPAU”) engineering and construction standards are consistent with Pacific Gas & Electric standards and follows California Public Utilities Commission (“CPUC”) General Orders 95 and 128 (“G.O.-95 and G.O.-128”) *Rules for Overhead Electric Line Construction and Underground Line Construction*. The purpose of these rules is to formulate, for the State of California, uniform requirements for overhead electrical and underground line construction, the application of which will insure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead electrical lines and to the public in general.

Link to the General Order PDF files:

California Public Utilities Commission General Order No. 95: Rules for Overhead Electric Line Construction

<http://docs.cpuc.ca.gov/PUBLISHED/Graphics/162158.PDF>

California Public Utilities Commission G. O.-128: Rules for Construction of Underground Electric Supply and Communication Systems

http://docs.cpuc.ca.gov/PUBLISHED/GENERAL_ORDER/52591.htm

Line-clearing and Tree-Trimming Service

Palo Alto Response:

Documents uploaded are as follows: Line Clearing Work for DPW - Public.pdf

Arborist requirements for working around trees

Palo Alto Response:

Documents uploaded are as follows:

Tree Protection During Construction for DPW - Public.pdf

Tree Technical Manual for DPW - Public.pdf



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Please upload building code specifications. This is helpful as we plan for multiple dwelling unit designs. Specifications requested:

Fire Safety

Electrical/Telecommunications Wiring

Grounding

Utilities

Palo Alto Response:

Fire Safety

The 2013 California Building Code Sections 707 through 711 and 714 through 715 is applied. In case of commercial and multi-family dwellings, the cabling could potentially penetrate walls that are designated as fire walls or fire barriers. In this case an architect should be retained to address those penetrations and ensure adequate protection so the integrity of these walls or barriers is not compromised.

http://www.ecodes.biz/ecodes_support/free_resources/2013California/13Building/PDFs/Chapter%207%20-%20Fire%20and%20Smoke%20Protection%20Features.pdf

Electrical/Telecommunications Wiring

The 2013 California Electrical Code (CEC) is applied. Installation of any metered panel shall comply with CEC Art. 230.70. Protection of conductors for branch circuit to comply with CEC Articles 240.4 and 300.1. Equipment shall be listed and labeled by a Nationally Recognized Testing Laboratories (NRTL) per CEC Article 800.18.

Grounding

The 2013 California Electrical Code is applied. Installation to comply with CEC Articles 250.24, 250.28, 250.52, 250.53, and 250.64. Equipment shall be grounded per CEC Articles 800.100(A) through 800.100(D).

Utilities

Complete and submit an application for electrical utility service to CPAU Department.

<http://www.cityofpaloalto.org/civicax/filebank/documents/27600/>

Appendix 3A Maintenance

Google Fiber’s Process and Standards: Maintenance

- For Google Fiber maintenance work activities, Google Fiber will provide forty-eight (48) hours’ electronic notice to the Right-of-Way Operator’s maintenance department before commencing planned work.
 - Service wire to the home (drops) installation will be considered a maintenance activity.
-

Google: *Do your city’s process or standards differ from what is outlined? If so, please provide detailed notes on your alternative requirements or process.*

Palo Alto Response:

There are no standard maintenance notice requirements at the City of Palo Alto and no applicable uploads.

Appendix 3B

Construction Constraints List

Google: *Are there any rules or regulations regarding when work can be performed throughout the year?*

Palo Alto Response:

Municipal Code sections pertaining to construction hours can be found in Chapter 9.10 Noise, specifically sections [9.10.030](#) through [9.10.060](#).

Construction in downtown area during the holidays

Construction in the public rights-of-way in downtown Palo Alto is generally not permitted during the holiday season between Thanksgiving and New Year's, because of the negative impact on retailers and shoppers. The areas covered by this restriction are defined as the University Avenue and the California Avenue parking assessment districts. Restricted work includes street closures, lane reductions, sidewalk closures and parking lot closures. If possible, such work should be delayed until after the New Year. If not, the work should be reviewed carefully to assure that its impact on holiday shoppers is minimal and must not be more than one day's duration, with that day preferably being a Saturday. Close coordination with the Transportation Division is recommended.

Google: *Please upload your tree-trimming regulations and outline any other information relevant to tree-trimming.*

Palo Alto Response:

Documents uploaded are as follows:

Tree disclosure statement - Public.pdf

Tree T-1 - Public.pdf

Google: *Are there historical site regulations?*

Palo Alto Response:



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The placement/installation of equipment related to the Google Fiber Project may affect nearby historic resources. The City maintains a list of these resources at:

<http://www.cityofpaloalto.org/gov/depts/pln/preservation.asp>

Historic resources within Palo Alto are governed by the Historic Preservation Ordinance of the Palo Alto Municipal Code, Section 16.49. The Secretary of the Interiors Standards for Rehabilitation of Historic Resources would also apply if the request involves discretionary action.

The information below outlines the review process for requests to alter the exterior of properties that are subject to the Historic Preservation Ordinance. This process may also be used when the placement or location of equipment adjacent to a historic resource is proposed.

Application for Alterations:

The HRB reviews only those alterations that require a building permit, unless the applicant requests other types of review.

Prior to submitting an application, the applicant is encouraged to meet with the Historic Preservation Planner for guidance on the project. The Historic Preservation Planner can also discuss the specific requirements for a complete HRB application with the applicant.

Submit Application to the City of Palo Alto Development Center:

Applicants must schedule an appointment to submit an HRB application. To schedule an appointment call the Planning Department at 650.329.2441 and then press zero to speak with the receptionist who will make an appointment for you. You can also schedule the appointment in person at the Development Center, located at 285 Hamilton Ave.

The requirements for a complete application are listed in the Application Procedure guidelines. All the required items on the form must be submitted at the same time, along with the fee for



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Board review. Most alteration applications are considered minor projects for the purpose of fee assessment.

Staff Review:

Planning Division staff will review the application for completeness and for consistency with the City's zoning regulations, (Title 18 of the Municipal Code).

Notification:

Staff will notify the applicant within 30 days from the date it was submitted whether the application is complete or incomplete. If staff finds the application complete, the project will be placed on the next available HRB agenda. If the application is incomplete, staff will inform the applicant what is needed. The project will be scheduled for the HRB meeting only when the application has been deemed complete and the plans have been checked for zoning compliance.

Staff Recommendation:

The Historic Preservation Planner will review the project for consistency with the HRB's standards of review (the Secretary of the Interior's Standards for Rehabilitation) and will make a recommendation to the HRB.

Historic Resources Board Meeting:

The Historic Preservation Planner will present the staff recommendation and a summary of the project to the HRB. The applicant will then have the opportunity to present the project to the Board. The Board will ask any questions they have of the applicant and/or staff, and allow the public to comment on the project. After public comment has been received, the public hearing will be closed and the Board will discuss the project. The Board will then make a motion on the project. The motion will be to recommend approval of the project, recommend approval of the



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project with conditions, continue the project to another HRB meeting, or recommend against the project.

HRB Recommendation:

The Board will make a recommendation to the Architectural Review Board, or the Director of Planning and Community Environment, or the City Council, depending on the type of project and its procedural requirements. For applications involving single-family and duplex residences on the Historic Inventory, compliance by the property owner with the HRB recommendations is voluntary, not mandatory.

Additional reviews would be required if construction on or adjacent to a historic site is requested. More information is available at:

<http://www.cityofpaloalto.org/news/displaynews.asp?NewsID=536&TargetID=127>

Google: *Are there landscaping requirements for new structures?*

Palo Alto Response:

All landscape requirements that our Utilities group works with are described here: <http://www.cityofpaloalto.org/gov/depts/utl/residents/resrebate/landscape.asp>

The landscape elements were integrated into the adoption of CAL Green in 2010.

Recycled water ordinance number 5002, section [16.12](#) in the Municipal Code.

Sections and restrictions related to non-residential and residential lot coverage

The definition of lot coverage is found in Chapter 18.04 section [18.04.030](#) (86).

Residential

Maximum lot coverage on residential zoned properties is set forth in tables within Zoning Code Chapters [18.10](#), [18.12](#), [18.13](#). There, it is called “site coverage”:

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- For R-1: Table 2 in Section 18.12.040: “equivalent to maximum allowable FAR for single story development, 35% for multi-story development, additional 5% coverage by overhang or patio).
- For multifamily (RM-15, RM-30, RM-40):
 - RM-15 base is 35% plus 5% additional for overhang/patio
 - RM-30 base is 40% plus 5% additional “ “
 - RM-40 base is 45% plus 5% additional “ “
- For Low Density residential: R-E, R-2 and RMD are in Table 2 of Section 18.10.040:
 - R-E is 25% for both single story and multi-story
 - R-2 is 40% for one story, 35% for two story plus 5% overhang/patio
 - RMD is 40% for both single story and multi-story

Non-Residential

Lot coverage on non-residential properties is governed by Zoning Code Chapters [18.16](#), [18.18](#), [18.20](#), and [18.28](#).

- Chapter 18.16: CN zone limits to 50% maximum site coverage, no limits in CC and CS, see table 3 of section 18.16.060 (a) exclusively non-residential development. Mixed use development lot coverage is on table 4 of the same section, item (b) where CC2 is 100% and the other three zones are 50%.
- Chapter 18.18: Table 2 of 18.18.060 (a), CD-S and CD-N mixed use development max is at 50%, no requirement for CD-C. Exclusively non-residential development Table 3, same section (b) has no max lot coverage.
- Chapter 18.28, Special Purpose Districts PF, OS, and AC, Section 18.28.050 (a) Table 2 has this:
 - PF is 30% max site coverage
 - AC is 10% site coverage plus 10% additional allowed to be covered by impervious ground surfaces
Table 3 of same section (b)(1) has OS at a complex formula for impervious coverage but not called site coverage.



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- Chapter 18.20: Section 18.20.040 (a) nonresidential is:
 - MOR, ROLM, RP are all 30% max site coverage
 - RP is 15% max site coverage
 - GM and RP(5) has no max site coverage

Link to the entire Palo Alto Municipal Code:

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

Google: *Are there any underground construction requirements beyond NESC standards?*

Palo Alto Response:

City of Palo Alto Utilities (CPAU) follows California Public Utilities Commission (CPUC) General Order 128 (“G.O.-128”) - *Rules For Underground Line Construction*. The purpose of G.O.-128 is to formulate, for the state of California, uniform requirements for underground line construction, the application of which will ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of underground electrical lines and to the public in general.

Link to CPUC website:

California Public Utilities Commission General Order No. 128: Rules for Construction of Underground Electric Supply and Communication Systems

http://docs.cpuc.ca.gov/PUBLISHED/GENERAL_ORDER/52591.htm

Documents uploaded are as follows:

City Utility Marking Requirements – Public

PCC-AC Special Cndns (S Pmt) - Public.pdf

Trench Backfill Standard Detail for DPW - Public.pdf

Underground Work Attachment - Public.pdf

Utilities Dept Special Conditions - Public.pdf

Google: *Are there any other environmental factors?*



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Palo Alto Response:

None outside of any applicable historic and CEQA reviews.

Google: *Anything else that may impede or slow construction within your city?*

Palo Alto Response:

Nothing additional that will impede or slow construction.



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