2023-2031 Housing Element Update

Initial Study – Mitigated Negative Declaration

prepared by

City of Los Altos
1 North San Antonio Road
Los Altos, California 94022
Contact: Nick Zornes, Development Services Director

prepared with the assistance of

Rincon Consultants, Inc.
445 15th Street, Suite 303
Oakland, California 94612

November 2022

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADU	accessory dwelling units
AMI	area median income
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BERD	Built Environment Resource Directory
BFE	base flood evaluations
BMPs	best management practices
CAA	Clean Air Act
CAAP	Climate Action and Adaptation Plan
CAAQS	California Ambient Air Quality standards
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California's Green Building Standards Code
CalOSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
Cal Water	California Water Service
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFCG	California Fish and Game Commission
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CH_4	methane
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent

CRHR	California Register of Historical Resources
dB	decibel
DOC	California Department of Conservation
DOT	Department of Transportation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DUA	dwelling units per acre
EO	Executive Order
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
FHWA	United States Department of Transportation Federal Highway Administration
FTA	Federal Transit Administration
FUHSD	Fremont Union High School District
FWS	Fish and Wildlife Service
GHG	greenhouse gas
GPCD	gallons per capita per day
GSA	Valley Water Groundwater Sustainability Agency
GWh	gigawatt hours
GWP	global warming potential
HCD	California Department of Housing and Community Development
HEU	Housing Element Update
HFCs	hydrofluorocarbons
HFHSZ	high fire hazard severity zone
HMTA	Hazardous Materials Transportation Act
HRA	health risk assessment
HRI	Historic Resources Inventory
HWCL	Hazardous Waste Control Law
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change
IS-MND	Initial Study-Mitigated Negative Declaration
kWh	kilo-watts per hour
LAMC	Los Altos Municipal Code

LASD	Los Altos Elementary School District
LOS	level of service
LRA	local responsibility area
MERV	minimum efficiency reporting value
Mgd	million gallons per day
MLD	most likely descendent
MRP	municipal regional stormwater permit
MT	metric ton
MTC	Metropolitan Transportation Commission
MVLASD	Mountain View-Los Altos Union High School District
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
PBDB	Paleobiology Database
PG&E	Pacific Gas and Electric
PDA	priority development area
PFCs	perfluorocarbons
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PM_{10}	particulate matter less than 10 microns in diameter
PPV	peak particle velocity
PQS	professional qualification standards
PRA	paleontological resources assessment
PRC	Public Resources Code
RHNA	Regional Housing Needs Allocation
RMS	root mean squared
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board

SB	Senate Bill
SCCFD	Santa Clara County Fire District
SCH	State Clearinghouse
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program
SCVWD	Santa Clara Valley Water District
SF_6	sulfur hexafluoride
SFBAAB	San Francisco Bay Area Air Basin
SFBRWQCB	San Francisco Bay Regional Water Quality Control Board
SFHA	special flood hazard areas
SIP	State Implementation Plan
SMP	Soil Management Plan
SRA	state responsibility area
SVCE	Silicon Valley Clean Energy
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TDF	travel demand forecasting
TDM	Transportation Demand Management
TPA	Transit Priority Area
UCMP	University of California Museum of Paleontology
USFWS	United States Fish and Wildlife Service
USACE	U.S. Army Corp of Engineers
USEPA	U.S. Environmental Protection Agency
USGS	United States Geological Survey
UWMP	Los Altos Suburban District Urban Water Management Plan
VHFHSZ	very high fire hazard severity zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VTA	Valley Transportation Authority
WEAP	Worker Environmental Awareness Program
WPCP	Sunnyvale water pollution control plant
WTP	water treatment plan

Initial Study

1. Project Title

City of Los Altos 2023-2031 Housing Element Update

2. Lead Agency Name and Address

City of Los Altos
1 North San Antonio Road
Los Altos, California 94022

3. Contact Person and Phone Number

Nick Zornes, Development Services Director, (650) 947-2625

4. Project Location and Setting

The City of Los Altos is located in the northwest portion of Santa Clara County, approximately five miles west of San Francisco Bay at the southern end of the peninsula. The regional location is shown in Figure 1.

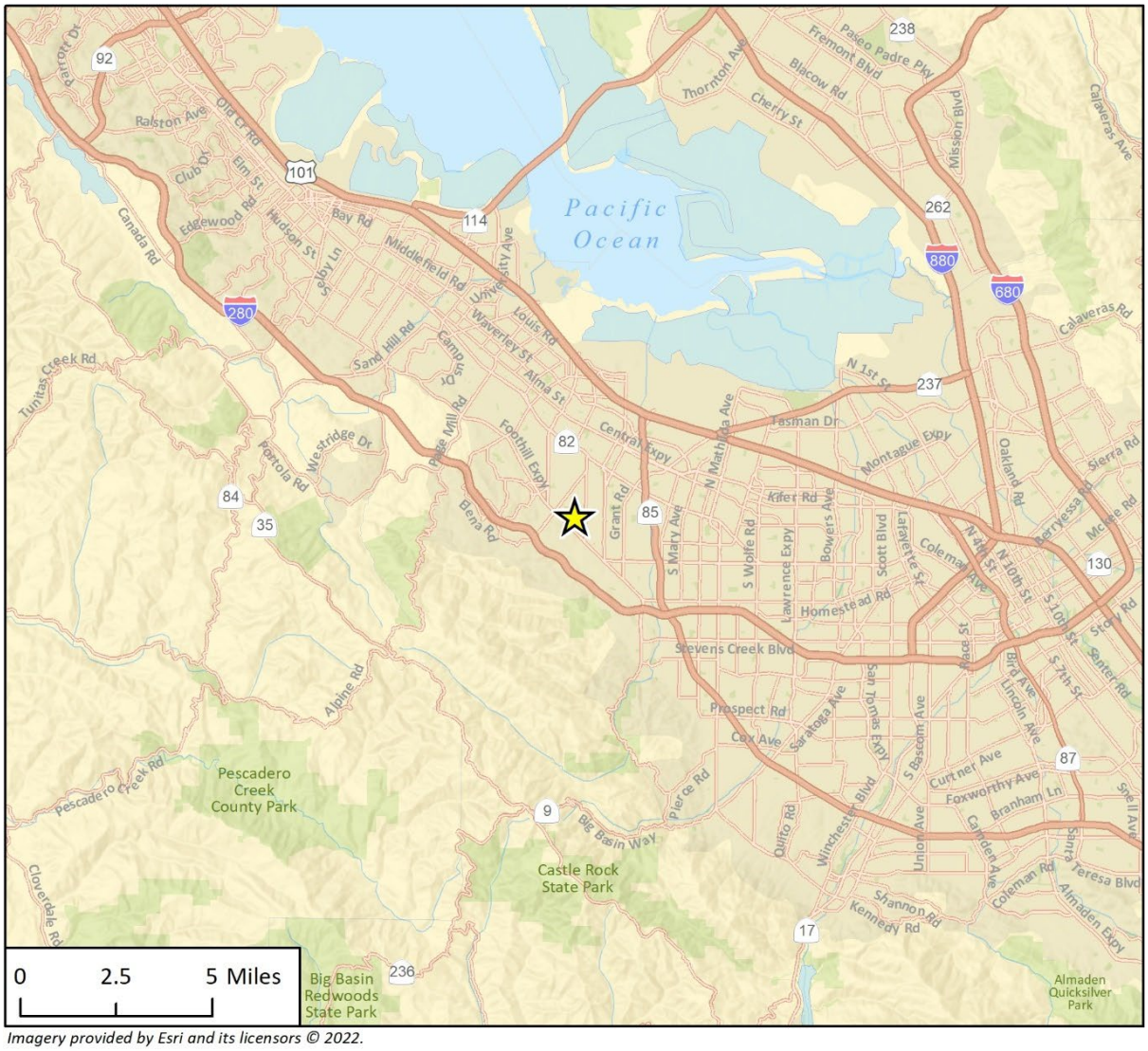
Los Altos encompasses approximately seven square miles. The Housing Element planning boundaries coincide with the City's limits, as depicted in Figure 2.

Los Altos is surrounded by Mountain View and Palo Alto to the north, Sunnyvale to the east, Cupertino to the south, and Los Altos Hills to the west. The city is bound by State Route 82 (SR 82) to the north, SR 85 to the east, and U.S. Interstate 280 (I-280) to the southwest, which provide regional access to the City.

Most of the city's urban development is residential, with small neighborhood commercial areas. Los Altos is served by seven small retail districts, primarily in the downtown area and on Foothill Expressway and El Camino Real.

Los Altos is located approximately 5 miles from the San Francisco Bay with an elevation of 150 feet or more above sea level. The majority of Los Altos is relatively flat terrain, with rolling terrain in the southwest portion of the city. Three creeks that flow north to San Francisco Bay traverse Los Altos: Adobe Creek on its western boundary, Stevens Creek on its eastern boundary, and Permanente Creek running through middle. All three creeks originate on the flanks of Black Mountain, located approximately 4 miles southwest of the city.

Figure 1 City of Los Altos Regional Location



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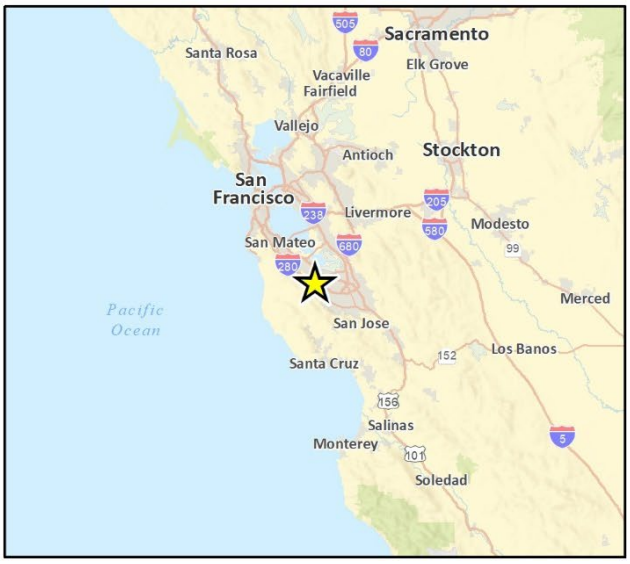
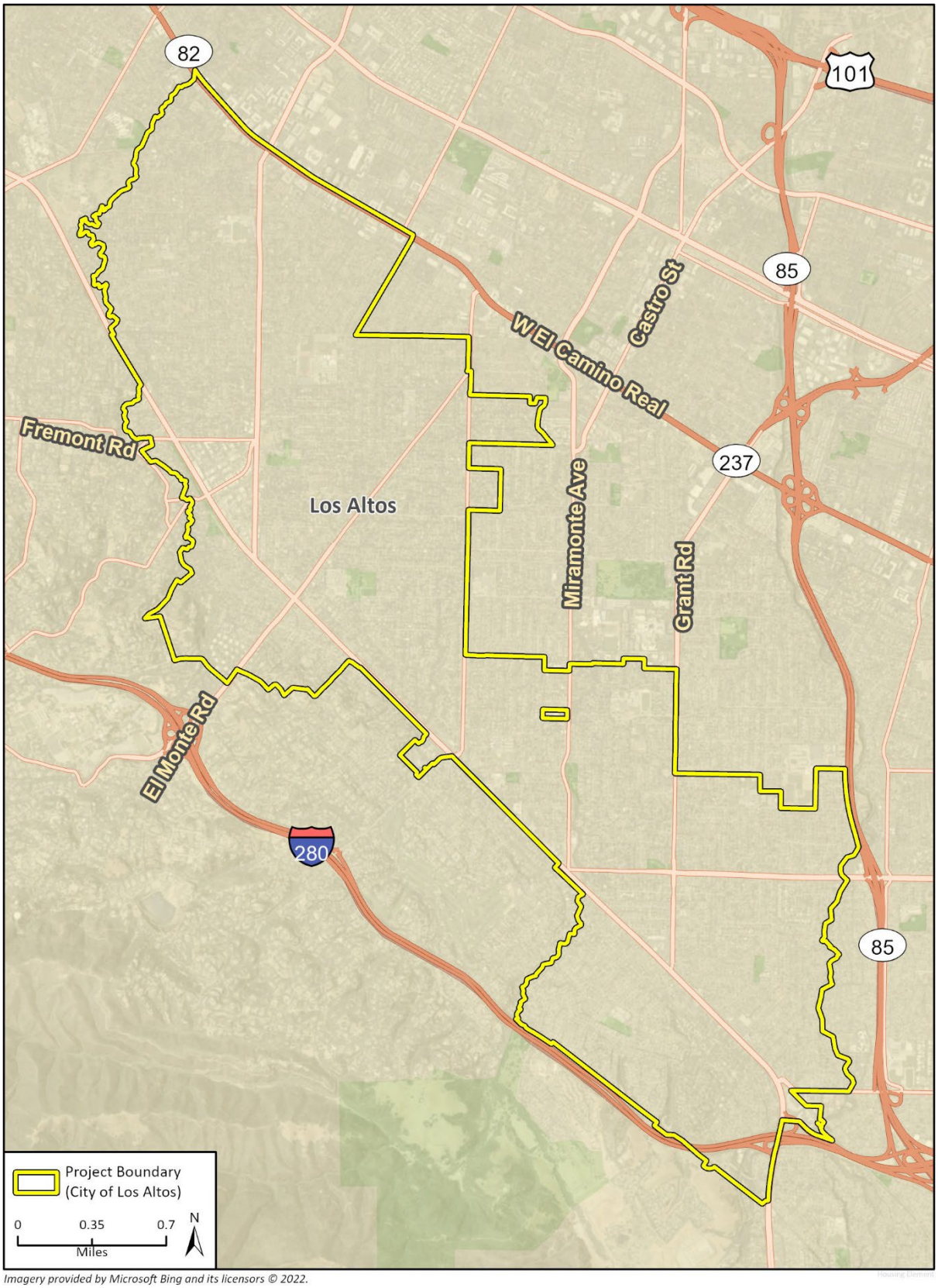


Figure 2 City of Los Altos Location



5. Description of Project

The proposed 2023-2031 Housing Element Update (HEU), herein referred to as the "proposed HEU" or "proposed project," would amend the City of Los Altos' General Plan by replacing the current Housing Element with the proposed 2023-2031 Housing Element and amending the City's General Plan as needed for consistency and HEU implementation.

The Housing Element is one of the State-mandated elements of the General Plan. The current Housing Element was adopted in 2015 and is in effect through 2023. The Housing Element identifies the city's housing conditions and needs and establishes the policies and programs that comprise the city's housing strategy to accommodate projected housing needs, including the provision of adequate housing for low-income households and for special-needs populations (e.g., unhoused people, seniors, single-parent households, large families, and persons with disabilities).

The 2023-2031 Housing Element would bring the element into compliance with State legislation passed since adoption of the 2015-2023 Housing Element and with the current Association of Bay Area Governments' (ABAG's) Regional Housing Needs Allocation (RHNA). On December 16, 2021, the ABAG Executive Board adopted the 6th Cycle Final RHNA, which includes a "fair share" allocation for meeting regional housing needs for each community in the ABAG region.

The 2023-2031 Housing Element includes the following components, as required by State law:

- Assessment of the city's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations.
- Analysis of resources and constraints related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs as well as restricted financing availability.
- Identification of the city's quantified objectives for the 6th cycle RHNA and inventory of sites determined to be suitable for housing.
- Creation or maintenance of opportunities for energy conservation in residential development. State housing element law requires cities to identify opportunities for energy conservation in residential development.
- Review of the 2013-2021 Housing Element to identify progress and evaluate the effectiveness of previous policies and programs.
- A Housing Plan to address the city's identified housing needs, including housing goals, policies, and programs to facilitate the 2023 Housing Element Update (6th Cycle).

The draft Housing Element Update establishes objectives, policies, and programs to assist the City in achieving state-mandated housing goals. The City's implementation of these policies and programs includes future amendments to other elements of the General Plan (e.g., Land Use Element and Land Use/Zoning Map) and the rezoning of sites identified in the housing site inventory to meet the city's RHNA obligation.

Accommodation of the Regional Housing Needs Allocation (RHNA)

The Regional Housing Needs Allocation (RHNA) reflects the California Department of Housing and Community Development's (HCD's) determination of the projected housing needs in a region by household income level as a percent of the Area Median Income. ABAG was tasked with allocating the RHNA among the jurisdictions in the ABAG region, which includes the City of Los Altos.

Los Altos' RHNA for the current planning period is 1,958 units, which includes:

- 501 extremely low- and very low-income housing units,
- 288 low-income housing units,
- 326 moderate-income housing units,
- 843 above moderate-income housing units.

The heart of a housing element is an inventory of sites within the jurisdiction available for redevelopment to accommodate the jurisdiction's RHNA targets. If a jurisdiction does not have adequate available sites to accommodate its RHNA targets, then it is required to upzone land to sufficient densities to accommodate the targets. To assess options for accommodating its RHNA targets, the City compiled an inventory of candidate housing sites, which includes properties throughout Los Altos. Each site has undergone an assessment to determine development potential and residential unit capacity given existing zoning standards, potential capacity under new zoning regulations, and development trends.

Table 1 summarizes the City's plans for accommodating its RHNA targets. Of the required RHNA of 1,958 units, Los Altos can accommodate 322 units with accessory dwelling unit (ADU) projections[1] and 587 units with entitled and proposed projects. Based on the sites inventory, an additional 1,048 units can be accommodated with available undeveloped or underdeveloped sites. The "baseline sites" for the purposes of this analysis include undeveloped or underdeveloped sites that are included in the sites inventory. The baseline sites are listed in Table 2 and shown on Figure 3.

As shown in Table 1, without a rezoning program, Los Altos is one unit short of meeting the overall RHNA capacity and is 52 units short in the above-moderate income category.

Table 1 Residential Development Potential and RHNA – With Potential Rezoning

Site Category	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total Units
RHNA Required	**See Very Low**	**501**	**288**	**326**	**843**	**1,958**
Accessory Dwelling Units	See Very Low	16	97	161	48	322
Approved/Entitled Projects	22	77	30	38	420	587
RHNA Remaining Need	**See Very Low**	**386**	**161**	**127**	**375**	**1,049**
Sites Inventory	See Very Low/Low	557		168	323	1,048
Surplus/(Shortfall)	See Very Low/Low	**10**		**41**	**(52)**	**(1)**
Rezone Sites (Net New)	See Very Low/Low	**408**		**128**	**64**	**600**
Surplus/(Shortfall) with Rezone Sites	See Very Low/Low	**418**		**169**	**12**	**599**

Source: Adapted from Table III-1 of the proposed HEU

[1] This assumes a continuation of past trends and represents the number of ADUs anticipated to be constructed through 2031 even in the absence of the updated Housing Element.

Table 2 Baseline Sites

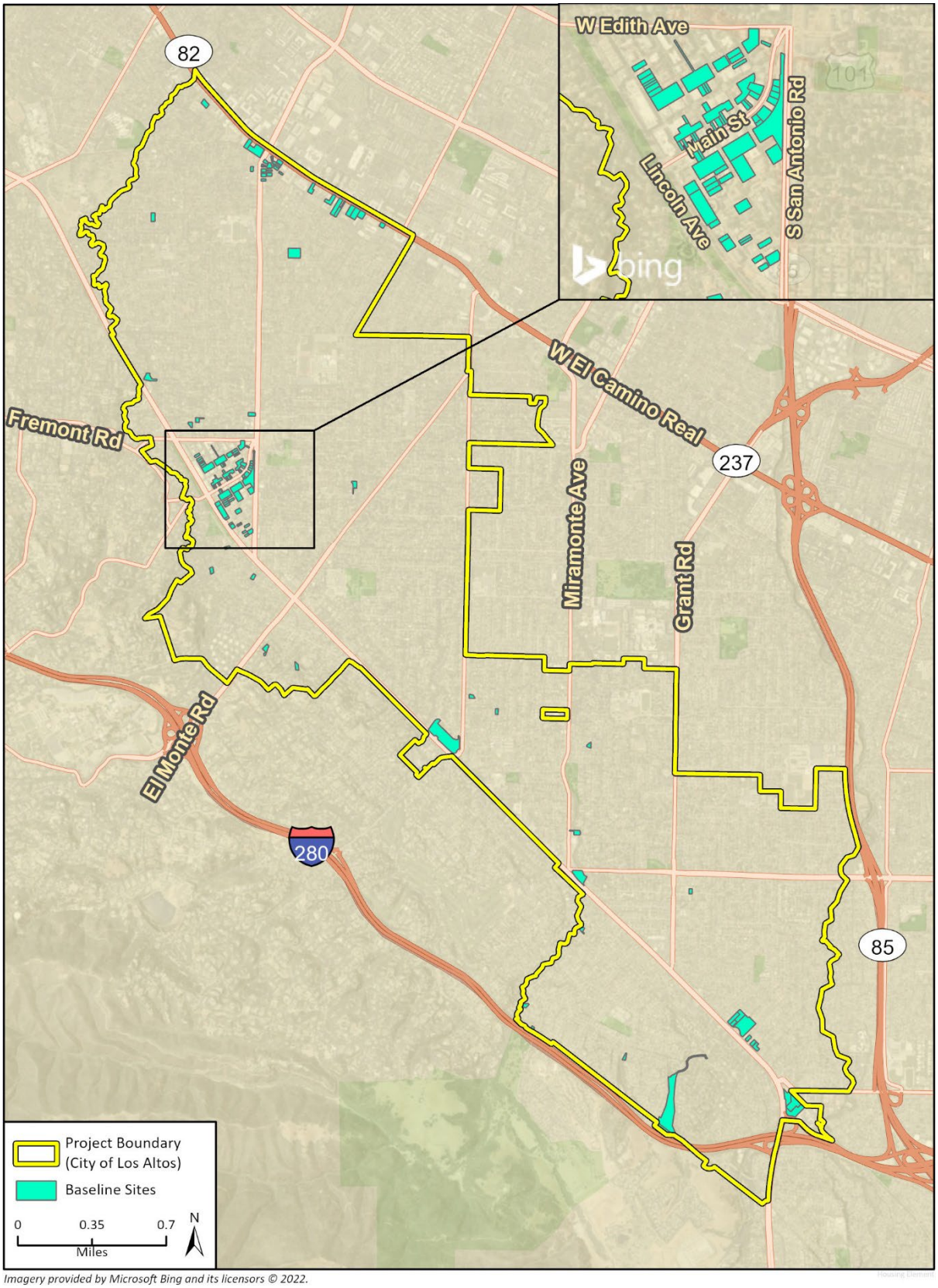
APN	Parcel Size (acres)	Existing Use	Existing Zoning	Potential Buildout (# of Units)
16710094	0.51	Commercial and surface parking	CT	16
17003084	0.54	Surface parking lot	CT	16
17002023	0.55	Individual retail stores	CT	17
16712045	0.56	Multiple or strip stores	CT	17
17004050	0.62	Fast food eatery	CT	19
17003077	0.69	Medical, dental, veterinary	CT	21
31816020	0.71	Commercial building and surface parking lot	CN	14
17064120	0.78	General office	CT	24
31816019	0.88	Supermarket with surface parking lot	CN	14
17064119	0.94	General office	CT	29
17003073	1.05	Restaurant and surface parking lot	CT	32
16712047	1.69	Commercial building and surface parking lot	CT	51
32601052	2.08	Shopping center with large surface parking lot	CN	57
32601053	2.94	Shopping center with large surface parking lot	CN	80
31816022	3.34	Supermarket with surface parking lot	CN	68
18956014	6.07	Strip mall with surface parking lot	CN	82
16741007	0.26	Offices or commercial with surface parking	CD/R3	11
16738020	0.28	Large building	CRS	4
16741065	0.29	Surface parking lot	CRS	4
17001088	0.29	Offices or commercial and surface parking lot	CN	8
31816011	0.30	Offices or commercial and surface parking lot	CN	8
16738008	0.30	Multiple or strip stores	CRS	4
17001047	0.31	Residential or commercial with surface parking	CN	8
31816009	0.31	Commercial building with surface parking	CN	8
17004065	0.31	Individual retail stores	CT	10
31816015	0.32	Auto service, garages, and surface parking	CN	9
16738038	0.34	Surface parking	CRS	5
31816008	0.44	Offices and surface parking lot	CN	12
16739057	0.57	Surface parking lot	CRS	8
16738029	0.58	Surface parking lot	CRS	8
16738028	0.58	Surface parking lot	CRS	8
16739069	0.60	Surface parking lot	CRS	8
16741003	1.00	Supermarket with surface parking lot	CRS	14
16739032	1.04	Surface parking lot	CRS	15
16739007	1.18	Surface parking lot	CRS	16
16739060	0.05	Restaurants, bars	CRS	1
16738024	0.05	Commercial and surface parking lot	CRS	1
16739105	0.05	Commercial	CRS	1

APN	Parcel Size (acres)	Existing Use	Existing Zoning	Potential Buildout (# of Units)
16739089	0.05	Commercial and surface parking lot	CRS	1
16739084	0.05	Commercial	CRS	1
16739085	0.05	Commercial and surface parking lot	CRS	1
17001029	0.05	Commercial and surface parking lot	CN	1
16739075	0.06	Commercial and surface parking lot	CRS	1
17001045	0.06	Surface parking lot	CN	2
16739091	0.06	Commercial	CRS	1
16739011	0.06	Restaurants, bars	CRS	1
16739012	0.06	Restaurants, bars	CRS	1
16740004	0.06	Commercial with surface parking lot	CRS	1
16738057	0.06	Office or church	CRS/OAD	1
16738053	0.06	Commercial or offices	CRS	1
17001036	0.07	Commercial and surface parking lot	CN	2
17001035	0.07	Surface parking lot	CN	2
16741021	0.07	Restaurant and surface parking lot	CD/R3	3
16741022	0.07	Office and surface parking lot	CD/R3	3
16739074	0.07	Commercial or office with surface parking	CRS	1
16739043	0.08	Auto service, garages	CD/R3	4
16739042	0.08	General office	CD/R3	4
17001030	0.08	Surface parking lot	CN	2
16738025	0.09	Bank and surface parking	CRS	1
16741006	0.10	Surface parking lot	CD/R3	4
16738052	0.10	Commercial/restaurant	CRS	1
16738013	0.10	Commercial stores	CRS	1
17001026	0.10	Dentist office and surface parking	CN	3
16738051	0.10	Surface parking lot	CRS	1
16738012	0.10	Commercial and restaurant	CRS	1
16741016	0.11	Surface parking lot	CD/R3	5
16739064	0.11	Stores	CRS	2
17001064	0.11	Offices	CN	3
16739076	0.11	Commercial and surface parking	CRS	2
17001042	0.12	Surface parking lot	CN	3
17001049	0.12	Surface parking lot	CN	3
16739097	0.12	Commercial	CRS	2
16740003	0.12	Commercial	CRS	2
16741018	0.12	Stores and surface parking	CD/R3	5
16741051	0.12	Commercial or office with surface parking	CD/R3	5
16738021	0.12	Office or commercial building with surface parking	CRS	2
16738011	0.13	Commercial building	CRS	2

APN	Parcel Size (acres)	Existing Use	Existing Zoning	Potential Buildout (# of Units)
17001023	0.14	Commercial and surface parking lot	CN	4
16740073	0.14	Parking for existing office buildings	CD	2
16738010	0.15	Commercial	CRS	2
16741054	0.16	Surface parking lot	CD	2
16740050	0.16	Commercial or industrial building	CD/R3	7
16740051	0.16	Auto service, garages	CD/R3	7
16740052	0.16	Auto service, garages	CD/R3	7
16740042	0.16	Surface parking lot	CD	2
16739045	0.16	Restaurants, bars	CD/R3	7
16739041	0.16	Restaurants with surface parking	CD/R3	7
16739040	0.16	Store and surface parking	CD/R3	7
16739044	0.16	Individual retail stores	CD/R3	7
16738050	0.16	Surface parking lot	CRS	2
16739127	0.17	Offices or commercial and surface parking	CD/R3	7
17516020	0.18	Surface parking lot	R1-10	1
16738049	0.18	Surface parking lot	CRS	3
17001043	0.18	Commercial or residential	CN	5
17001032	0.19	Restaurants, bars, and surface parking	CN	5
16716018	0.20	Surface parking lot	CT	6
17001027	0.21	Restaurant and surface parking	CN	6
34224058	0.22	Undeveloped land	R1-10	1
18918102	0.23	Undeveloped land	R1-10	1
31807008	0.23	Undeveloped lot	R1-10	1
17001051	0.23	Home or commercial building with surface parking	CN	6
17001086	0.23	Surface parking lot	CN	6
34205032	0.24	Undeveloped land	R1-10	1
16736068	0.24	Undeveloped land	R1-10	1
17001025	0.24	Offices or commercial with surface parking	CN	7
17516088	0.24	Undeveloped land	R1-10	1
19344033	0.24	Undeveloped land	R1-10	1
18919003	0.25	Undeveloped land	R1-10	1
17514021	0.29	Undeveloped land	R1-10	1
16736008	0.30	Undeveloped lot	R1-10	1
16741072	0.30	Restaurants, bars	CD	4
34210088	0.30	Undeveloped lot	R1-10	1
33603030	0.30	Undeveloped land	R1-10	1
16741046	0.33	General Office and surface parking	CD	5
34209045	0.35	Undeveloped lot	R1-10	1
16737034	0.36	Undeveloped lot	R1-10	1

APN	Parcel Size (acres)	Existing Use	Existing Zoning	Potential Buildout (# of Units)
17028058	0.45	Vacant flag lot	R1-10	1
19341039	0.45	Vacant flag lot	R1-10	1
16738065	0.46	Bank and surface parking lot	CD	6
16720050	0.46	Undeveloped lot	R1-10	1
33602008	0.48	Undeveloped lot	R1-H	1
16735076	0.72	Undeveloped lot	R1-10	1
16740056	0.80	Commercial building and surface parking lot	CD	11
16740039	1.06	Surface parking lot	CD	15
16740072	1.07	Commercial open space uses, public parking lots	CD	15
34204078	1.12	Undeveloped lot	R1-10	1
31801036	1.56	Medical, dental, veterinary with surface parking lot	CN	4
17012042	1.70	Church with surface parking lot	R1-10	5
16738002	2.03	Surface parking lot	CD	28
34204089	7.97	Potentially a school with a playground related to a church	R1-10	10
Total Baseline Sites				**1,048**

Figure 3 Baseline Sites Locations



To accommodate the remaining above moderate-income RHNA of 52 units, the Housing Element Update includes a program to rezone sufficient vacant land or land with redevelopment potential to provide capacity for this shortfall. Table 3 identifies potential parcels for rezoning to address this shortfall and provide excess capacity throughout the planning period. Excess capacity is recommended because of "no net loss" laws that require the City to update its inventory with additional sites to accommodate its RHNA targets if sites identified in the inventory ultimately develop with fewer units than anticipated and. The rezone sites are shown on Figure 4.

Separate programs detail specifics of various rezoning actions that would provide additional capacity for all income levels. Potential rezone of vacant and nonvacant parcels to allow higher residential densities and heights would accommodate 600 units.

Table 3 Rezone Sites

APN	Parcel Size	Existing Use	Existing Zoning	Proposed Zone	Potential Buildout (Number of Units)
18915088	0.09	Surface parking lot	CN	CN[1]	2
18915090	0.11	Offices and surface parking lot	CN	CN[1]	3
18915042	0.12	Office and surface parking	CN	CN[1]	3
18915026	0.12	Undeveloped land	CN	CN[1]	3
18915041	0.12	Restaurant and surface parking lot	CN	CN[1]	3
18915038	0.13	Office and surface parking	CN	CN[1]	4
18915059	0.17	Commercial and surface parking	CN	CN[1]	5
18915063	0.17	Offices or commercial and surface parking	CN	CN[1]	5
18915103	0.21	Medical, dental, veterinary and surface parking	CN	CN[1]	6
18915102	0.26	Offices or commercial with surface parking	CN	CN[1]	7
16710094	0.51	Commercial and surface parking	CT	CT[2]	4
17003084	0.54	Surface parking lot	CT	CT[2]	6
16716018	0.20	Surface parking lot	CT	CT[2]	2
17003083	0.20	General office	CT	CT[2]	8
17004065	0.31	Individual retail stores	CT	CT[2]	3
17002023	0.55	Individual retail stores	CT	CT[2]	5
17001055	0.56	General office	OA	OA/Overlay	11
17004045	0.56	General office	OA	OA/Overlay	11
16712045	0.56	Multiple or strip stores	CT	CT[2]	6
17041086	0.60	General office	OA	OA/Overlay	12
17004050	0.62	Fast food eatery	CT	CT[2]	6
17003077	0.69	Medical, dental, veterinary	CT	CT[2]	7
18915106	0.70	Bank and surface parking lot	CN	CN[1]	19
17040082	0.76	Mortuaries	OA	OA/Overlay	15
17064120	0.78	General office	CT	CT[2]	7
17039053	0.13	General office	OA	OA/Overlay	3
17038062	0.15	R-1 converted to office	OA	OA/Overlay	3
17041037	0.19	R-1 converted to office	OA	OA/Overlay	4
17041065	0.22	General office	OA	OA/Overlay	4

APN	Parcel Size	Existing Use	Existing Zoning	Proposed Zone	Potential Buildout (Number of Units)
17041068	0.24	General office	OA	OA/Overlay	5
17039058	0.24	General office	OA	OA/Overlay	5
17040072	0.26	General office	OA	OA/Overlay	5
17041014	0.28	General office	OA	OA/Overlay	6
18916006	0.32	Medical, dental, veterinary	OA	OA/Overlay	6
18916005	0.32	Medical, dental, veterinary	OA	OA/Overlay	6
18916017	0.32	Medical, dental, veterinary	OA	OA/Overlay	6
18916008	0.32	Medical, dental, veterinary	OA	OA/Overlay	6
18916004	0.33	Medical, dental, veterinary	OA	OA/Overlay	7
18916013	0.33	Medical, dental, veterinary	OA	OA/Overlay	7
18916016	0.33	Medical, dental, veterinary	OA	OA/Overlay	7
18916014	0.33	Medical, dental, veterinary	OA	OA/Overlay	7
18916009	0.34	Medical, dental, veterinary	OA	OA/Overlay	7
18916018	0.34	Medical, dental, veterinary	OA	OA/Overlay	7
18916012	0.34	Medical, dental, veterinary	OA	OA/Overlay	7
17040062	0.38	General office	OA	OA/Overlay	8
18916010	0.40	Medical, dental, veterinary	OA	OA/Overlay	8
18916003	0.42	Medical, dental, veterinary	OA	OA/Overlay	8
16716022	0.49	General office	OA	OA/Overlay	10
17042028	0.90	General office	OA	OA/Overlay	18
17064119	0.94	General office	CT	CT[2]	9
17041079	0.99	Bank, savings and loan	OA	OA/Overlay	20
17003073	1.05	Restaurant and surface parking lot	CT	CT[2]	10
31801036	1.56	Medical, dental, veterinary with surface parking lot	CN	CN[1]	39
16712047	1.69	Commercial building and surface parking lot	CT	CT[2]	16
18914081	1.85	Medical, dental, veterinary	OA	OA/Overlay	37
33609023	6.06	Churches	PCF	PCF/Overlay	15
33609018	6.50	Churches	PCF	PCF/Overlay	20
16712042	2.78	Specialty shopping centers (Town and Country Village, El Paseo de Saratoga)	R1-10	CT[2]	111
Total Rezone Sites					**600**

Some APNs are both baseline and rezone sites. The buildout assumptions for these rezone sites would be in addition to the allowable baseline units for particular APNs.

[1] The Loyola Corners Specific Plan (LCSP) will be amended to remove the 20-unit density cap. This affects parcels in the LCSP zoned CN (Program 1.E).

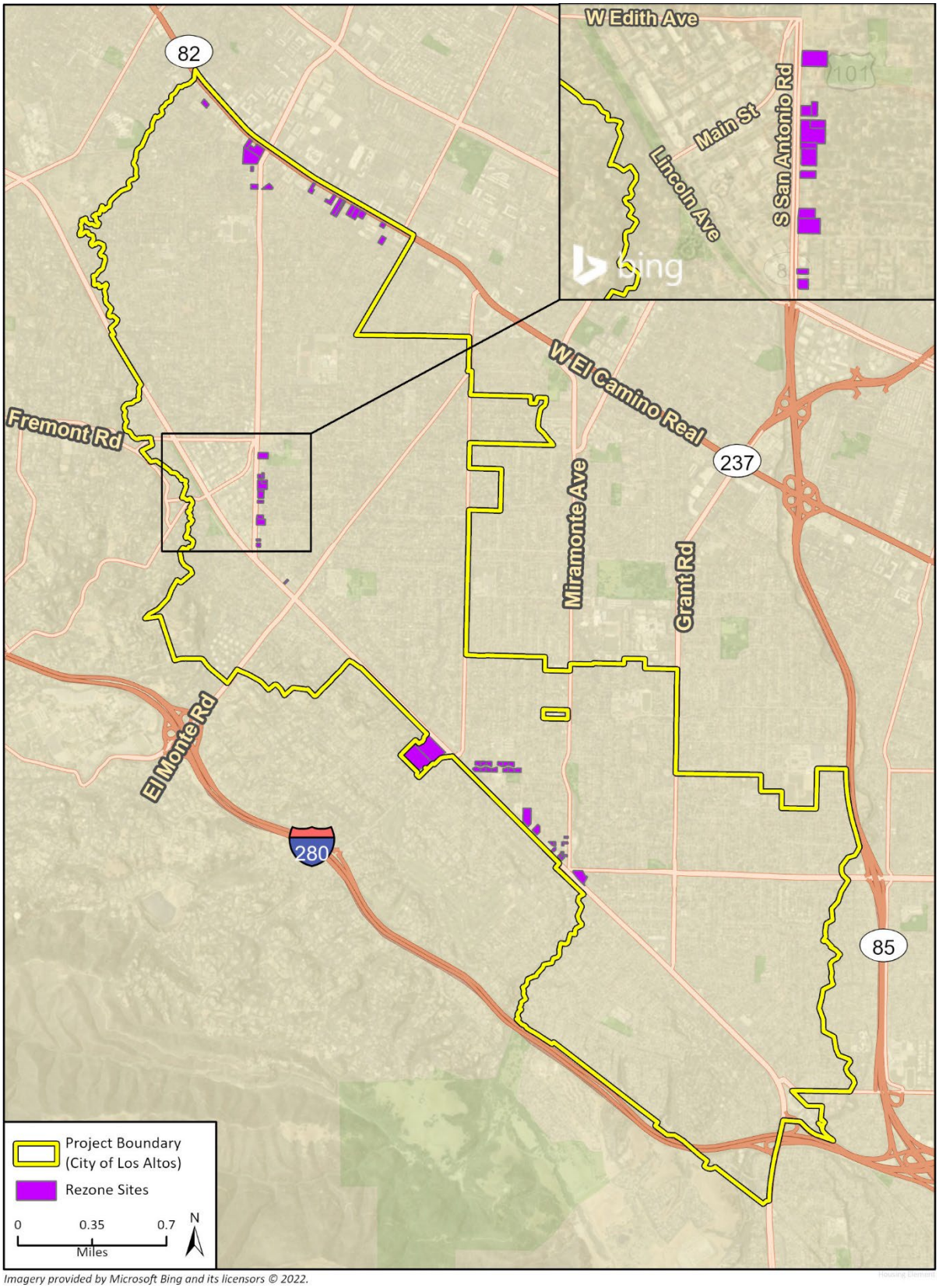
[2] The CT zone will be amended to remove or increase the density maximum and increase allowable height (Program 1.B).

The OA rezone sites will be amended to include an overlay to allow residential at a minimum of 20 dwelling units per acre (dua) and maximum of 30 dua (Program 1.C).

The two PCF rezone sites will have an overlay to allow residential at a minimum of 20 dua and maximum of 30 dua (Program 1.D).

The zoning for APN 16712042 will change from R1-10 to CT with the changes to CT noted above.

Figure 4 Rezone Sites Locations



Buildout Assumptions

The proposed HEU does not propose any specific development and adoption of the proposed HEU would not approve any physical development (e.g., construction of housing or infrastructure). However, it envisions development including the proposed rezoning of sites for the potential development of additional housing units to meet the City's RHNA. Therefore, this analysis assumes that construction of housing is a reasonably foreseeable future outcome of the HEU.

The buildout assumptions for use in this CEQA document include development of the baseline sites shown in Table 2 of 1,048 units plus the buildout associated with the rezones shown in Table 3 of 600 units, for a total of 1,648 units. Together, the baseline sites and rezone sites constitute the "housing inventory sites" for the purposes of this analysis.

According to the California Department of Finance, as of May 2022 there were an estimated 11,841 housing units in Los Altos. The HEU analyzes the development of up to 1,648 net additional units by 2031. If all units were to be permitted and built, there would be a total of 13,489 housing units in Los Altos by 2031. The pace of development is difficult to predict, but the inventory demonstrates more than sufficient capacity to meet the 6th cycle RHNA.

This analysis also accounts for potential increases in allowable height that could occur under the proposed HEU. Program 1.B of the proposed HEU would involve increasing the maximum height in the CT Zone (along El Camino Real) by 10 feet from 45 feet maximum height to 55 feet maximum height. In addition, Program 3.B of the proposed HEU would involve increasing the maximum allowable height in the CN Zone (Downtown area) by 10 feet from 30 feet maximum height to 40 feet maximum height.

Density Bonus

Residential projects proposed in the 2023-2031 Housing Element cycle may be eligible to use provisions of the State Density Bonus (California Government Code Sections 65915 – 65918). The State Density Bonus encourages the development of affordable and senior housing, including up to a 50 percent increase in project densities for most projects, depending on the amount of affordable housing provided, and up to an 80 percent increase in density for certain projects which are 100 percent affordable. The State Density Bonus also includes a package of incentives intended to help make the development of affordable and senior housing economically feasible. These include waivers and concessions, such as reduced setback, increased height or modified open space and other requirements.

Whether an individual project will use the State Density Bonus, or which aspects of State Density Bonus law an individual project would utilize, is difficult to predict. However, based on recent experience, multi-family residential projects in higher density residential and commercial zoning districts are most likely to utilize the State Density Bonus for concessions, such as increased height. The analysis in this document assesses a development potential greater than the projected housing need (RHNA); some of these units may be accommodated through State Density Bonus provisions, such as increased building height.

Zoning Ordinance Amendments

The project includes Housing Element programs that direct amendments to the Los Altos Municipal Code (LAMC) and the Los Altos Zoning Map. LAMC Chapters that would likely be amended include:

- Chapter 2.08, "City Commissions Generally"
- Chapter 14.02, Article 2, "Definitions"
- Chapter 14.04, "Zoning Districts Designated"
- Chapter 14.28, Article 2, "Density Bonus Ordinance"
- Chapter 14.34, "OA Office-Administrative District"
- Chapter 14.34, "OA-1/OA-4.5 Office-Administrative District"
- Chapter 14.40, "CN Commercial Neighborhood District"
- Chapter 14.44, "CD Commercial Downtown District"
- Chapter 14.48, "CRS Commercial Retail Sales District"
- Chapter 14.50, "CT Commercial Thoroughfare District"
- Chapter 14.52, "CD/R3 Commercial Downtown/Multiple Family District"
- Chapter 14.54, "CRS/OAD Commercial Retail Sales/Office-Administrative District"
- Chapter 14.74, "Off-Street Parking and Loading"
- Chapter 14.78, "Design and Transportation Review – Multiple-Family, Public and Community Facilities, Office and Administrative, and Commercial Districts"
- Chapter 14.80, "Use Permits"
- Residential zone chapters necessary for programs associated with allowing transitional and supportive housing, residential care facilities, and employee/farmworker housing.

Other General Plan Element Amendments

The Land Use Element is a guide for the city's future development. It designates the distribution and general location of land uses, such as residential, retail, industrial, open space, recreation, and public uses. The Land Use Element also addresses the permitted density and intensity of the various land use designations as reflected on the City's General Plan Land Use Map.

The Land Use Element likely would be amended to include modifications to land use classifications to maintain consistency with the policies and zoning amendments in the updated Housing Element. Additionally, the Community Design and Historic Resource Element likely would be modified to maintain consistency with the updated Housing Element.

6. Required Approvals

Implementation of the draft Housing Element Update would require the following discretionary actions by the City of Los Altos Planning Commission and/or City Council:

- Adoption of the 2023-2031 Housing Element

In addition, implementation of the draft Housing Element Update would require the following discretionary actions by the City of Los Altos Planning Commission and/or City Council either at the same time as the Housing Element is adopted or following adoption as policies and programs of the Housing Element are implemented:

- Adoption of a resolution amending the General Plan to update the Housing Element;
- Adoption of an ordinance (two readings) amending the City's zoning ordinance and the City's zoning map, and
- Adoption of a resolution making corresponding changes to the Land Use Element and General Plan Land Use Map and Community Design and Historic Resource Element required to preserve internal consistency and to reflect the location and density of land uses permitted by the Housing Element and City's zoning ordinance.

The 2023-2031 Housing Element will be submitted to HCD for review and comment prior to review and recommendation to the Planning Commission, followed by action by the City Council.

7. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

On March 10, 2022, the City of Los Altos contacted California Native American Tribal governments by sending a Senate Bill (SB) 18 and Assembly Bill (AB) 52 notification letters to tribes with an affiliation with the project area based on a list provided by the Native American Heritage Commission (NAHC). Under AB 52, Native American tribes have 30 days to respond and request further project information and request formal consultation. Under SB 18, Native American tribes have 90 days to respond and request further project information and request formal consultation. The City did not receive a request for formal consultation under AB 52 or SB 18. Therefore, no California Native American Tribes traditionally or culturally affiliated with the project area have requested consultation pursuant to Public Resources Code Section 21080.3.1 and Government Code Section 65352.3.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	■	Air Quality
■	Biological Resources	■	Cultural Resources	☐	Energy
■	Geology/Soils	☐	Greenhouse Gas Emissions	■	Hazards & Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
■	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	■	Transportation	■	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

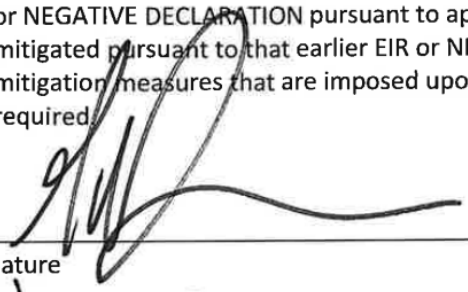
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

11/28/2022
Date

Nick Zornes
Printed Name

Director
Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	■
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

Environmental Setting

The City of Los Altos is largely built out with residential neighborhoods. The majority of Los Altos is relatively flat terrain, with rolling terrain in the southwest portion of the city. According to the Community Design and Historic Resources Element of the City's General Plan, the visual character of Los Altos is "an established low-density residential community with mature landscape and small neighborhood commercial areas." According to the General Plan, the distinctive design features of the city are:

- Relatively flat terrain with mature trees and landscape;
- Established low density residential neighborhoods, many having streets without sidewalks;
- Predominantly low profile, single-story structures throughout the community;
- Tree-lined collector and arterial streets leading to commercial and public activities;
- Vital Downtown core with village atmosphere created by contiguous storefronts, wide; sidewalks, and pedestrian plazas reflective of traditional historic commercial development; and,

- Smaller neighborhood commercial centers developed at a human scale that is pedestrian-friendly.

The City's General Plan does not identify specific scenic vistas, but rather lists the City's parks, open space, and creeks as its most valuable assets. Interstate 280 (I-280), an eligible State Scenic Highway (Caltrans 2019), traverses the southern portion of the City.

Regulatory Setting

Senate Bill 743 (California Public Resources Code Section 21099) passed in 2013, made changes to the CEQA for projects located in transit-oriented development areas. Among these changes are that a project's aesthetics impacts are no longer considered significant impacts on the environment if the project is a residential, mixed-use residential, or employment center project and if the project is located on an infill site within a transit priority area (TPA). Pursuant to Section 21099 of the California Public Resources Code, a "transit priority area" is defined in as an area within 0.5 mile of an existing or planned major transit stop. A "major transit stop" is defined in Section 21064.3 of the California Public Resources Code as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

According to the Association of Bay Area Governments (ABAG)/Metropolitan Transportation Commission (MTC) Transit Priority Area (TPA) Map (ABAG/MTC 2021), housing sites located along the El Camino Real corridor are within a TPA. Because implementation of the proposed rezoning would facilitate residential development on infill sites within a TPA, aesthetics impacts of development of those locations within a TPA may not be considered significant impacts on the environment. Therefore, this analysis focuses on portions of Los Altos where the proposed HEU facilitates new housing development not within a TPA.

Los Altos General Plan

The Land Use Element of the Los Altos General Plan includes the following goals and policies related to aesthetics:

Goal 2: Plan for a compatible and harmonious arrangement of land uses by providing a mix of uses consistent with projected future social and economic conditions in Los Altos.

Policy 2.3: Continue to conduct design review of residential and nonresidential development applications to ensure compatibility with surrounding property and neighborhoods.

Goal 3: Allow for intensification of development within the Downtown Core in keeping with the existing character of the area.

Policy 3.5: Continue to review development plans to ensure compliance with the Downtown Urban Design Plan.

Goal 4: Improve the land use mix along El Camino Real to ensure fiscal stability, encourage affordable housing, and to allow for development intensification along this corridor in a manner that is compatible with the adjacent residential neighborhoods and the local circulation system.

Policy 4.6: Continue to review development proposals to ensure a balance between development rights and impact on surrounding residential neighborhoods.

The Community Design and Historic Resources Element of the Los Altos General Plan includes the following goals and policies related to aesthetics:

Goal 1: Preserve and enhance the identity and unique character of Los Altos.

Policy 1.4: Promote pride in community and excellence in design in conjunction with attention to and compatibility with existing residential and commercial environments.

Policy 1.7: Enhance neighborhood character by promoting architectural design of new homes, additions to existing homes, and residential developments that is compatible in the context of surrounding neighborhoods.

Goal 5: Maintain and enhance the attractiveness of neighborhood shopping centers and businesses throughout the community.

Policy 1.4: Promote pedestrian-friendly site design, circulation, building orientation, parking, landscape, and site amenities (including pedestrian plazas, where feasible).

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

A scenic vista is a view from a public place (roadway, designated scenic viewing spot, etc.) that is expansive and considered important. It can be obtained from an elevated position (such as from the top of a hillside) or it can be seen from a trail, park or roadway with a longer-range view of the landscape. A viewshed is an area of the landscape visible from a particular location or series of points (e.g., an overlook or a trail, respectively) (United States Department of Transportation Federal Highway Administration [FHWA] 2015). A viewshed may be divided into viewing distances called foreground, middle ground, and background. Usually, the closer a resource is to the viewer, the more dominant it appears visually, and thus it has greater importance to the viewer than something farther away. A common set of criteria identifies the foreground as 0.25 to 0.5 mile from the viewer; the middle ground is 3 to 5 miles away, and the background extends away to the horizon.

An adverse effect would occur if a proposed plan or project would block or otherwise damage the scenic vista upon implementation. Los Altos does not contain designated scenic views or scenic vistas. However, some areas of the city and some roadway corridors have background views of the hills on the western portion of the city and of Black Mountain.

The proposed HEU would facilitate increased density and height to accommodate the RHNA allocation in Los Altos. This would consist mostly of infill development, as Los Altos is largely built out. According to Program 1.B of the proposed HEU, allowable maximum height in the CT Zone (along El Camino Real) would be increased by 10 feet and Program 3.B of the proposed HEU would increase allowable height by 10 feet in the Downtown area. As shown on Figure 3 and Figure 4, the

housing inventory sites are largely concentrated along corridors (such as El Camino Real, Foothill Expressway, San Antonio Road) and in the Downtown. Any impact of proposed height increases in the absence of specific project proposals would be wholly speculative, and CEQA does not require a public agency to speculate about environmental impacts. Additionally, a height increase of 10 feet or one additional story along El Camino Real or in the Downtown compared to what is currently allowed would not substantially block views, as most views are already fully or intermittently impeded by mature trees and existing buildings. Although additional future development along roadway corridors could potentially block views from roadways due to increased height facilitated under the proposed HEU, many of these views are limited, are oriented away from background views of the hills, or are already fully or intermittently impeded by mature trees and buildings.

For the east-west oriented roadways, such as El Camino Real and Foothill Expressway, views of the hills to the southwest are already largely blocked by existing development, overhead transmission lines, and mature trees on private properties and beside roadways. For the north-south oriented roadways such as San Antonio Road, views of scenic resources are limited and already blocked by existing development and mature trees, and therefore the incremental increase of the scale of allowable development would not substantially block views. Overall, in the limited areas where views are available from public roadways, these views are already blocked by existing urban development and landscaping and an increase in that development would not directly or substantially block those views. Impacts to scenic vistas would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no designated state scenic highways within or adjacent to the city. Therefore, development under the proposed HEU would not substantially damage scenic resources within a state scenic highway and there would be no impact.

Although there are no designated state scenic highways, as shown in Figure 3, two housing sites are located adjacent to or near I-280, an eligible State Scenic Highway, in the southern portion of Los Altos. I-280 is elevated through Los Altos and crosses through the city for approximately 1 mile, or approximately two minutes at freeway speeds. Existing views from I-280 are mostly of mature trees or retaining/sound walls surrounding the highway and rooftops of existing development. Therefore, views from I-280 are limited to views within the freeway corridor and expansive views of Los Altos are not available. Development on the two housing inventory sites adjacent to I-280 would not be visible from freeway motorists.

NO IMPACT

c. Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Los Altos is a largely built-out, urbanized area surrounded by other urban communities to the north, east, and south, and open space and mountains to the west. As such, the following analysis focuses on whether the 2023-2031 Housing Element would conflict with applicable zoning and other regulations governing scenic quality. Scenic quality refers to the character of Housing Element's plan

area, in this case the Los Altos community, or existing development in the surrounding area and existing natural topography.

Consistency with the City of Los Altos General Plan

The Land Use Element and Community Design and Historic Resources Element of the City's existing General Plan contain implementing policies related to aesthetics. Those policies and the proposed HEU's consistency with those policies are shown below in Table 4.

Table 4 Project Consistency with the General Plan

Implementing Policy	Consistency
Land Use Element	
Policy 2.3: Continue to conduct design review of residential and nonresidential development applications to ensure compatibility with surrounding property and neighborhoods.	**Consistent.** Development facilitated by the project would be required to conform with applicable height, use, and intensity limits, as well as general design standards pursuant to LAMC Chapter 14.66. Future development would also be subject to the City's design review process pursuant to Section 14.78.020 of the LAMC, as applicable.
Policy 3.5: Continue to review development plans to ensure compliance with the Downtown Urban Design Plan.	**Consistent.** Development facilitated by the project in the Downtown Plan Area would be required to comply with the Downtown Urban Design Plan and Downtown Design Guidelines, where applicable, which outline guidelines and recommendations for improving the visual quality of the area. Future development may also be subject to the City's design review process.
Policy 4.6: Continue to review development proposals to ensure a balance between development rights and impact on surrounding residential neighborhoods.	**Consistent.** Development facilitated by the project would be required to conform with applicable height, use, and intensity limits for development, and would be subject to the City's design review process as applicable.
Community Design and Historic Resources Element	
Policy 1.4: Promote pride in community and excellence in design in conjunction with attention to and compatibility with existing residential and commercial environments.	**Consistent.** Development facilitated by the proposed HEU would be subject to the City's design review process as applicable.
Policy 1.7: Enhance neighborhood character by promoting architectural design of new homes, additions to existing homes, and residential developments that is compatible in the context of surrounding neighborhoods.	**Consistent.** Development facilitated by the proposed HEU would add new residences that would be subject to the City's design review process, as applicable, and LAMC Chapter 14.66.
Policy 5.2: Promote pedestrian-friendly site design, circulation, building orientation, parking, landscape, and site amenities (including pedestrian plazas, where feasible).	**Consistent.** Development facilitated by the proposed HEU in the Downtown would be located within transit priority areas and be designed to ensure transit is accessible, which would promote walkability.

Source: City of Los Altos 2002

Consistency with Los Altos Municipal Code

The City's Zoning Ordinance, Title 14 of the Los Altos Municipal Code (LAMC), aims to ensure a harmonious, convenient relationship among land uses and to conserve the City's natural beauty and preserve and enhance its distinctive physical character. The Zoning Ordinance sets forth regulations controlling the uses of land, the uses and locations of structures, the height and bulk of structures,

the open spaces about structures, the areas of sites in the districts, and the external appearance of structures in certain districts. Implementation of the proposed HEU would involve changes to the LAMC, as detailed under the Project Description, to encourage the development of housing; however, development facilitated by the project would be required to comply with zoning standards pertaining to the preservation of visual character. Development facilitated by the project would be reviewed by the City and evaluated for consistency with the City's Zoning Ordinance prior to approval. Therefore, the proposed HEU would be consistent with LAMC.

Consistency with Downtown Land Use Plan

A majority of the housing inventory sites are located within the Downtown Land Use Plan, which sets design guidelines in order to preserve and enhance the special qualities of the Downtown Los Altos village scale and character and serves to provide fairness and consistency in the City's downtown developmental review and approval process. Appendix II of the Downtown Land Use Plan provides Downtown design guidelines for architecture, landscaping, signage, building material, and appearance, and Appendix III provides a Downtown Design Plan to improve the visual quality of the Downtown Area. Development proposed on housing sites within the Downtown Land Use Plan Area would be subject to design standards within the Downtown Land Use Plan, as applicable under the plan and state planning and zoning laws. Conformance with requirements and guidelines established in this specific plan would further ensure that development facilitated by the proposed HEU would not conflict with the Downtown Land Use Plan.

Consistency with Sherwood Gateway Specific Plan

A few housing inventory sites are located within the Sherwood Gateway Specific Plan, which aims to provide a clear vision and direction for future development and improvements within the neighborhood with an emphasis on the maintenance of residential character and quality of life in the area. Chapter IV of the Sherwood Gateway Specific Plan includes land use and development standards while Chapter V sets forth guidelines for the design of appropriate development including architectural characteristics, site planning, parking, landscaping, and signs. Development proposed on housing sites within the Sherwood Gateway Specific Plan Area would be subject to the development standards and design guidelines as established by the specific plan, where applicable and subject to state planning and zoning laws. Conformance with the requirements of the specific plan would ensure that development facilitated by the proposed HEU would not conflict with the Sherwood Gateway Specific Plan.

Therefore, implementation of the proposed HEU would not conflict with the City's General Plan, Specific Plans, or LAMC. No impact with respect to the proposed HEU's impacts consistency with applicable zoning and other regulations governing scenic quality would occur.

NO IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

For the purposes of this analysis, light refers to light emissions (brightness) generated by a source of light. Stationary sources of light include exterior parking lot and building security lighting; moving sources of light include the headlights of vehicles driving on roadways within Los Altos. Streetlights and other security lighting also serve as sources of light in the evening hours.

Glare is defined as focused, intense light emanated directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Reflective surfaces are associated with buildings that have expanses of polished or glass surfaces, light-colored walls or pavement, and the windshields of parked cars.

Los Altos is an urbanized area that is largely built out with residential, commercial, and public uses with commensurate levels of light and glare. New development facilitated by the proposed HEU would mostly occur as infill on or among already developed parcels within Los Altos along transportation corridors and in the Downtown. New lighting could occur on buildings for safety and in pedestrian walkways, and light could be emitted from interior sources through windows on upper stories of taller buildings. The main source of glare would likely be from the sun shining on vehicles and reflective or light-colored building materials and glazing.

Development facilitated by the proposed HEU would mainly occur as redevelopment of existing built sites or infill development of unused parcels between existing built sites. When facilities such as parking lots are replaced with buildings, these replacements may reduce nighttime sources of light, because parking lots are often more brightly lit at night than many buildings. Development of underutilized or vacant parcels may result in new light sources, but they would likely be congruous with nearby light sources (e.g., lighting from residential windows). Furthermore, as the development facilitated by the project would be residential, light from windows would be mostly filtered or obscured by window coverings. Light spillover from exterior residential lighting is typically blocked by adjacent structures or trees.

Further, the LAMC has requirements to reduce the potential for new or substantial sources of light pollution. Title 24 of the LAMC provides regulations concerning interior and exterior lighting and effects of glare for each zoning district. Pursuant to LAMC Title 24 for each zoning district, lighting within any lot that unnecessarily illuminates any other lot or substantially interferes with the use or enjoyment of the other lot is prohibited. Additionally, lighting shall be designed to minimize glare and intensity of external illumination and to respect the privacy of adjacent neighbors by avoiding direct and reflected illumination onto adjacent properties. Development facilitated by the proposed HEU would be required to conform with these standards, which would ensure that the project would not result in substantial or adverse new sources of light or glare.

Therefore, new residential development would be in existing residential neighborhoods or along corridors or in the Downtown area where sources of light and glare already exist. Accordingly, implementation of the proposed HEU would not create new sources of substantial light or glare that would adversely affect daytime or nighttime views in the area and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

Environmental Setting

The City of Los Altos is categorized as "Urban and Built-Up Land," according to maps prepared by the California Department of Conservation (DOC 2016a). The city does not contain farmland as defined in the Farmland Mapping and Monitoring Program.

Impact Analysis

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The City of Los Altos is categorized as "Urban and Built-Up Land;" there is no farmland as defined by the Department of Conservation in Los Altos. No proposed housing sites are located on or near Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would not result in the conversion of Farmland to non-agricultural use. No impact would occur.

NO IMPACT

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

The City of Los Altos is categorized as "Urban and Built-Up Land;" there is no farmland as defined by the Department of Conservation in Los Altos. No proposed housing sites are located on or near farmland. Furthermore, no parcels in Los Altos are currently enrolled in a Williamson Act contract (DOC 2016b). Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

NO IMPACT

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Los Altos is predominantly urbanized and does not contain forest or timberland resources according to the California Department of Fish and Wildlife (CDFW 2015). The City's zoning map indicates that there are no areas within Los Altos zoned for forestry, timberland, or timberland production. Therefore, the proposed HEU would not result in an impact related to the conversion or rezoning of forest land, timberland, or areas zoned for timberland production, and there would be no impact.

NO IMPACT

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

As discussed under checklist questions (a) through (d), there would be no impacts associated with agricultural or forest lands. The proposed HEU would not involve other changes in the existing environment that could result in the conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	■	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	■	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

Environmental Setting

Overview of Air Pollution

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide (CO), volatile organic compounds (VOC)/reactive organic gases (ROG),[2] nitrogen oxides (NO_X), particulate matter with diameters of ten microns or less (PM_{10}) and 2.5 microns or less ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog).

[2] CARB defines VOC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term ROG is used in this IS-MND.

Air pollutant emissions are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources that may be legally operated on roadways and highways.
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Air Quality Standards and Attainment

Los Altos is located within the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). As the local air quality management agency, BAAQMD is required to monitor air pollutant levels to ensure that the NAAQS and CAAQS are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the U.S. EPA classifies specific geographic areas as "attainment area" or "nonattainment area" for each pollutant. Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. BAAQMD is in nonattainment for the ozone NAAQS and CAAQS, the $PM_{2.5}$ NAAQS and CAAQS, and the PM_{10} CAAQS and is required to prepare a plan for improvement.[3] The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 5.

Table 5 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).

[3] Bay Area Air Quality Management District (BAAQMD). 2017a. BAAQMD CEQA Air Quality Guidelines. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en (accessed July 2022).

Pollutant	Adverse Effects
Suspended particulate matter ($PM_{2.5}$)	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.[1]

[1] More detailed discussion on the health effects associated with exposure to suspended particulate matter can be found in the following documents: EPA, Air Quality Criteria for Particulate Matter, October 2004.

Source: Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gases. Last updated April 2021. https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases (accessed July 2022).

The Bay Area 2017 Clean Air Plan (the 2017 Plan) provides a plan to improve Bay Area air quality and protect public health as well as the climate. The legal impetus for the 2017 Plan is to update the most recent ozone plan - the 2010 Clean Air Plan - to comply with state air quality planning requirements as codified in the California Health & Safety Code. Although steady progress in reducing ozone levels in the SFBAAB has been made, the region continues to be designated as non-attainment for both the one-hour and eight-hour ozone CAAQS. In addition, emissions of ozone precursors in the Bay Area contribute to air quality problems in neighboring air basins. Under these circumstances, state law requires the 2017 Plan to include all feasible measures to reduce emissions of ozone precursors.[4]

In 2006, the USEPA reduced the 24-hour $PM_{2.5}$ NAAQS regarding short-term exposure to fine particulate matter from 65 micrograms per cubic meter ($\mu g/m^3$) to 35 $\mu g/m^3$. Based on air quality monitoring data for the 2006-2008 cycle showing that the region was slightly above the standard, in December 2008 the USEPA designated the SFBAAB as non-attainment for the 24-hour $PM_{2.5}$ NAAQS. This triggered the requirement for the BAAQMD to prepare a State Implementation Plan (SIP) to demonstrate how the region would meet the standard. However, data for both the 2008-2010 and the 2009-2011 cycles showed that $PM_{2.5}$ levels in the SFBAAB currently meet the standard. On October 29, 2012, the USEPA issued a proposed rulemaking to determine that the SFBAAB now meets the 24-hour $PM_{2.5}$ NAAQS. The SFBAAB will continue to be designated as nonattainment for the 24-hour $PM_{2.5}$ NAAQS until such time as the BAAQMD elects to submit a "redesignation request" and a "maintenance plan" to the USEPA, and the USEPA approves the proposed redesignation.

Regulatory Setting

Los Altos General Plan

The Natural Environment and Hazards Element of the Los Altos General Plan includes the following goals and policies related to air quality:

Goal 8: Maintain or improve air quality in Los Altos.

Policy 8.1: Support the principles of reducing air pollutants through land use, transportation, and energy use planning.

Policy 8.2: Encourage transportation modes that minimize contaminant emissions from motor vehicle use.

[4] Bay Area Air Quality Management District (BAAQMD). 2017b. Final 2017 Clean Air Plan. https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf (accessed July 2022).

Policy 8.3: Interpret and implement the General Plan to be consistent with the regional Bay Area Air Quality Management Plan, as periodically updated.

Policy 8.4: Ensure location and design of development projects so as to conserve air quality and minimize direct and indirect emissions of air contaminants.

Los Altos Municipal Code

Title 14 of the LAMC states that any use that emits any air contaminant as defined by BAAQMD shall comply with applicable State standards concerning air pollution. Additionally, no use may generate any odor that reasonably may be found objectionable as determined by an appropriate agency such as the Santa Clara County health department and the Bay Area Air Quality Management District beyond the boundary occupied by the enterprise generating the odor. All mechanical, venting, and/or exhausting equipment that generates odors shall be located away from residential properties.

BAAQMD Significance Thresholds

This analysis uses the BAAQMD's May 2017 *CEQA Air Quality Guidelines* to evaluate air quality. The plan-level thresholds specified in the May 2017 BAAQMD *CEQA Air Quality Guidelines* were used to determine whether the proposed project impacts exceed the thresholds identified in *CEQA Guidelines* Appendix G.

Consistency with Air Quality Plan

Under BAAQMD's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

1. Supports the primary goals of the 2017 Clean Air Plan
2. Includes applicable control measures from the 2017 Clean Air Plan
3. Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures

Short-Term Emissions Thresholds

The BAAQMD's May 2017 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutants emissions. However, they do include project-level screening and emissions thresholds for temporary construction-related emissions of air pollutants. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions and are discussed in detail below (BAAQMD 2017a). Construction emissions associated with plan implementation are discussed qualitatively to evaluate potential air quality impacts.

The BAAQMD developed screening criteria in the 2017 *CEQA Air Quality Guidelines* to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. The screening criteria for residential land uses are shown in Table 6.

Table 6 BAAQMD Criteria Air Pollutant Screening Levels

Land Use Type	Operational Criteria Pollutant Screening Size (du)	Construction Criteria Pollutant Screening Size (du)
Single-family	325 (NO_X)	114 (ROG)
Apartment, low-rise	451 (ROG)	240 (ROG)
Apartment, mid-rise	494 (ROG)	240 (ROG)
Apartment, high-rise	510 (ROG)	249 (ROG)
Condo/townhouse, general	451 (ROG)	240 (ROG)
Condo/townhouse, high-rise	511 (ROG)	252 (ROG)
Mobile home park	450 (ROG)	114 (ROG)
Retirement community	487 (ROG)	114 (ROG)
Congregate care facility	657 (ROG)	240 (ROG)

du = dwelling unit; NOX = oxides of nitrogen; ROG = reactive organic gases

Source: BAAQMD 2017a

If a project meets the screening criteria, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration (BAAQMD 2017a).

In addition to the screening levels above, several additional factors are outlined in the 2017 *CEQA Air Quality Guidelines* that construction activities must satisfy for a project to meet the construction screening criteria:

- All basic construction measures from the 2017 *CEQA Guidelines* must be included in project design and implemented during construction
- Construction-related activities would not include any of the following:
  - Demolition
  - Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would occur simultaneously)
  - Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high density infill development)
  - Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity

For projects that do not meet the screening criteria above, the BAAQMD construction significance thresholds for criteria air pollutants, shown in Table 7, are used to evaluate a project's potential air quality impacts.

Table 7 BAAQMD Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds Average Daily Emissions (lbs/day)	Operational Threshold Average Daily Emissions (lbs/day)	Operational Threshold Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	Not Applicable

lbs = pounds; NO_X = oxides of nitrogen; ROG = reactive organic gases; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns

Source: BAAQMD 2017a

For all projects in the SFBAAB, the BAAQMD 2017 *CEQA Air Quality Guidelines* recommends implementation of the Basic Construction Mitigation Measures listed in Table 8-2 of the Guidelines (BAAQMD 2017b). For projects that exceed the thresholds in Table 7, the BAAQMD 2017 *CEQA Air Quality Guidelines* recommends implementation of the Additional Construction Mitigation Measures listed in Table 8-3 of the Guidelines (BAAQMD 2017a).

Operation Emissions Thresholds

The BAAQMD's 2017 *CEQA Air Quality Guidelines* contain specific operational plan-level significance thresholds for criteria air pollutants. Plans must show the following over the planning period:

- Consistency with current air quality plan control measures, and
- Vehicle miles traveled (VMT) or vehicle trips increase is less than or equal to the plan's projected population increase.

If a plan can demonstrate consistency with both criteria, then impacts would be less than significant. The current air quality plan is the 2017 Clean Air Plan.

For project-level thresholds, the screening criteria for operational emissions are shown in Table 6. For projects that do not meet the screening criteria, the BAAQMD operational significance thresholds for criteria air pollutants, shown in Table 7, are used to evaluate a project's potential air quality impacts.

Carbon Monoxide Hotspots

BAAQMD provides a preliminary screening methodology to conservatively determine whether a proposed project would exceed CO thresholds. If the following criteria are met, a project would result in a less than significant impact related to local CO concentrations:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
2. Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

3. Project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Toxic Air Contaminants

For health risks associated with TAC and $PM_{2.5}$ emissions, the BAAQMD May 2017 CEQA Air Quality Guidelines state a project would result in a significant impact if the any of the following thresholds are exceeded (BAAQMD 2017b):

- Non-compliance with Qualified Community Risk Reduction Plan;
- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or
- Ambient $PM_{2.5}$ increase of > 0.3 µg/m^3 annual average

Odors

The BAAQMD provides minimum distances for siting of new odor sources shown in Table 8. A significant impact would occur if the project would result in other emissions (such as odors) affecting substantial numbers of people or would site a new odor source as shown in Table 8 within the specified distances of existing receptors.

Table 8 BAAQMD Odor Source Thresholds

Odor Source	Minimum Distance for Less than Significant Odor Impacts (in miles)
Wastewater treatment plant	2
Wastewater pumping facilities	1
Sanitary Landfill	2
Transfer Station	1
Composting Facility	1
Petroleum Refinery	2
Asphalt Batch Plant	2
Chemical Manufacturing	2
Fiberglass Manufacturing	1
Painting/Coating Operations	1
Rendering Plant	2

Source: BAAQMD 2017a

Methodology

Construction Emissions

Construction-related emissions are temporary but may still result in adverse air quality impacts. Construction of development facilitated by the project would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances.

At this time, there is not sufficient detail to provide analysis of individual construction projects that would be facilitated by the project, and thus it would be speculative to analyze project-level impacts. Rather, consistent with the programmatic nature of the project, construction impacts for the project are discussed qualitatively and emissions are not compared to the project-level thresholds.

Operation Emissions

Based on plan-level guidance from the BAAQMD 2017 *CEQA Air Quality Guidelines,* long-term operational emissions associated with implementation of the proposed project are discussed qualitatively by comparing the proposed project to the 2017 Clean Air Plan goals, policies, and control measures. In addition, comparing the rate of increase of plan VMT and population is recommended by BAAQMD for determining significance of criteria pollutants. If the proposed project does not meet either criterion then impacts would be potentially significant.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Project Consistency with the Current Air Quality Plan

A project that supports the goals within the 2017 Clean Air Plan would be consistent with the 2017 Clean Air Plan. Consistency with BAAQMD quantitative thresholds is interpreted as demonstrating support for the 2017 Clean Air Plan goals. Assumed buildout under the proposed HEU involves a net increase of 1,648 residential units mainly located within the Downtown Land Use Plan Area which is a Priority Development Area (PDA).[5] Inventory sites are also located in the Sherwood Gateway Specific Plan Area and along transportation corridors within the city, which would encourage denser housing on sites in proximity to services, transit, and bicycle routes. By allowing for the easier use of alternative modes of transportation, the proposed HEU could reduce the use of personal vehicles and subsequent mobile emissions than if the residential units were placed farther from transit. As shown in the VMT analysis memorandum prepared by Hexagon Transportation Consultants, included in Appendix A (Hexagon Transportation Consultants 2022a), the proposed HEU would reduce VMT per resident by 0.17 VMT compared to VMT per resident without implementation of the HEU. In addition, development facilitated by the project would be required to comply with the latest Title 24 regulations, including requirements for residential indoor air quality. The analysis is based on compliance with 2019 Title 24 requirements although individual projects developed under the plan would be required to comply with the most current version of Title 24 at the time of project construction. These requirements currently mandate Minimum Efficiency Reporting Value (MERV)-13 (or equivalent) filters for heating/cooling systems and ventilation systems in residences (Section 150.0[m]) or implementation of future standards that would be anticipated to be equal to or more stringent than current standards. Therefore, the project would improve air quality compared to development farther from transit and services through reducing VMT and would protect public health through stringent requirements for MERV-13 filters or equivalent indoor air quality measures, which would be consistent with the primary goals of the 2017 Clean Air Plan.

The 2017 Clean Air Plan includes 85 control measures under the following sectors: stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Many of these measures are industry-specific and would not be applicable to development facilitated by the proposed HEU (e.g., stationary sources,

[5] PDAs are places near public transit planned for new homes, jobs, and community amenities. All PDAs are created and planned by local governments, which nominate eligible areas to ABAG for adoption (ABAG 2022).

agriculture, and natural and working lands). Measures from transportation, energy, building, water, waste, and super-GHG pollutants sectors are focused on larger-scale planning efforts (e.g., transit funding, utility energy procurement, regional energy plans) and would not directly apply to development facilitated by the proposed HEU. Table 9 shows project consistency with applicable control measures from the 2017 Clean Air Plan.

Table 9 Project Consistency with Applicable 2017 Clean Air Plan Control Measures

Control Measures	Consistency
Transportation	
TR9: Bicycle and Pedestrian Access and Facilities. Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	**Consistent**: The proposed HEU would facilitate development of housing within the city's Priority Development Area (the Downtown area), as well as the Sherwood Gateway Specific Plan Area and near or adjacent to transportation corridors currently served by Class II and Class III bicycle lanes such as San Antonio Road and Foothill Expressway, which would encourage the use of bicycles and reduce reliance on single-occupancy vehicles. Future residents would also be able to utilize bicycle parking facilities around the city which would encourage residents to bicycle and walk to transit and services (City of Los Altos 2012).
Energy	
EN2: Decrease Electricity Demand. Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	**Consistent.** Development facilitated by the project would be required to comply with the LAMC Chapter 12.22, which mandates the implementation of Title 24. Compliance would include complying with the most updated rooftop solar requirements at the time of construction. Future development would also be required to comply with the City's Reach Code which is currently being revised, but would require all-electric construction for all newly constructed buildings. Electricity would be provided either by Silicon Valley Clean Energy (SVCE) or PG&E, which are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).
Buildings	
BL1: Green Buildings. Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for on-site renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	**Consistent**: Development facilitated by the project would be required to comply with the energy and sustainability standards of Title 24 (including the California Energy Code and CALGreen) and the City's associated amendments that are in effect at that time. For example, the current 2019 CALGreen standards and the LAMC Chapter 6.14 require a minimum of 65 percent diversion of construction and demolition debris. New low-rise residential buildings would also be required to install solar photovoltaic (PV) panels. The Title 24 standards are updated every three years and become increasingly more stringent over time. Future development would also be required to comply with the City's Reach Code which would require all-electric construction for all newly constructed buildings.

Control Measures	Consistency
Water	
WR2: Support Water Conservation. Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	**Consistent**: Future development that needs new or expanded water service would be required to comply with the California Water Service Company's and CALGreen's water efficiency regulations, and the state's Model Water Efficiency Landscape Ordinance to reduce indoor and outdoor water use.

Source: BAAQMD 2017b

As shown in Table 9, the project would be consistent with the applicable measures as development facilitated by the project would be required to comply with the latest Title 24 regulations and would increase density in Downtown and along transportation corridors, allowing for greater use of alternative modes of transportation. Development facilitated by the project would not contain elements that would disrupt or hinder implementation of a 2017 Clean Air Plan control measures. Therefore, the project would be consistent with the 2017 Clean Air Plan.

Project VMT and Population Growth

According to the BAAQMD 2017 *CEQA Air Quality Guidelines,* the threshold for criteria air pollutants and precursors includes an assessment of the rate of increase of plan VMT versus population growth. As discussed above under Environmental Setting, to result in a less than significant impact, the analysis must show that the project's projected VMT increase would be less than or equal to its projected population increase. Put another way, the project's projected VMT per resident must be less than what would occur without the project. As shown in Table 27 in Section 17, *Transportation*, 2031 conditions without the project would involve a VMT per resident of 12.85 whereas 2031 conditions with the project would result in VMT per resident of 12.71. Therefore, compared to 2031 without the project, the proposed HEU would reduce VMT per resident. Therefore, the project's VMT increase would not conflict with the BAAQMD's 2017 *CEQA Air Quality Guidelines* operational plan-level significance thresholds for criteria air pollutants and would be consistent with the 2017 Clean Air Plan. Accordingly, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Construction

Development facilitated by the proposed HEU would involve activities that result in air pollutant emissions. Construction activities such as demolition, grading, construction worker travel, delivery and hauling of construction supplies and debris, and fuel combustion by on-site construction equipment would generate pollutant emissions. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The extent of daily emissions, particularly ROGs and NO_X emissions, generated by construction equipment, would depend on the quantity of equipment used and the hours of operation for each project. The extent of $PM_{2.5}$ and PM_{10} emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting

excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts. According to the 2017 BAAQMD *CEQA Air Quality Guidelines,* PM_{10} is the greatest pollutant of concern during construction (BAAQMD 2017a).

As discussed above under BAAQMD Significance Thresholds, BAAQMD's 2017 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutant emissions that would apply to the project. However, the guidelines include project-level thresholds for construction emissions. If an individual project's construction emissions fall below the project-level thresholds, the project's impacts on regional air quality would be individually and cumulatively less than significant. Mitigation Measure AQ-1 would require future development that does not meet the BAAQMD construction screening criteria under Table 6 to conduct individual air quality analysis and compare emissions to BAAQMD significance thresholds as detailed under Table 7, and to implement mitigation measures to reduce emissions.

Construction of development envisioned under the project would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution concentrations or air quality nuisances. Therefore, construction air quality impacts would be potentially significant. Furthermore, site preparation and grading during construction activities facilitated by development under the proposed project may cause wind-blown dust that could contribute particulate matter into the local atmosphere. The BAAQMD has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices (BMPs) for fugitive dust control during construction would have a less-than-significant impact related to fugitive dust emissions. The BAAQMD has identified feasible fugitive dust control measures for construction activities. These Basic Construction Mitigation Measures are recommended for all projects (BAAQMD 2017a). In addition, the BAAQMD and CARB have regulations that address the handling of hazardous air pollutants such as lead and asbestos, which could be aerially disbursed during demolition activities. BAAQMD rules and regulations address both the handling and transport of these contaminants. Implementation of Mitigation Measure AQ-2 would be required to ensure incorporation of BAAQMD Basic Construction Mitigation Measures to reduce temporary construction impacts and fugitive dust emissions. Every use in the City is also mandated to comply with rules, regulations, and standards of the BAAQMD pursuant to Policy NEH 29 of the Los Altos General Plan Natural Environment and Hazards Element. Construction activities from development facilitated under the project may also potentially result in a cumulatively considerable net increase in criteria pollutants, which would be addressed by Mitigation Measure AQ-2.

Operation

According to the BAAQMD 2017 *CEQA Air Quality Guidelines,* the threshold for criteria air pollutants and precursors requires an assessment of the rate of increase of plan VMT and population. As discussed under checklist question (a), the VMT per resident in Los Altos would decrease with the proposed HEU compared to conditions without the HEU. VMT increases at a lower percentage because the proposed project would change land uses to concentrate growth and residences to jobs and services to reduce singular vehicle trips and encourage alternative models of travel. Therefore, impacts concerning criteria pollutants generated from operation of the project would be less than significant.

Although operational impacts from emissions of criteria pollutants would be less than significant, future projects that do not satisfy the BAAQMD operational screening criteria as shown in Table 6 would also be required to implement Mitigation Measure AQ-1, which would ensure emissions from individual projects are reduced to below thresholds detailed under Table 7.

Mitigation Measures

The following mitigation measures are required:

AQ-1 Individual Air Quality Analysis

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *For individual projects subject to CEQA that do not meet the BAAQMD construction and/or operational screening criteria under Table 6, individual air quality analysis shall be conducted to determine project significance. Where individual projects exceed BAAQMD significance thresholds detailed under Table 7, mitigation measures shall be incorporated to reduce emissions to below thresholds. Construction mitigation measures may include, but are not limited to, incorporation of Tier 4 and/or alternative fueled equipment, use of onsite power sources instead of generators, and use of low/no-VOC content architectural coatings. Operational mitigation measures may include, but are not limited to, increased incorporation of photovoltaic systems (PV) beyond regulatory requirements, increased incorporation of EV charging stations and/or infrastructure beyond regulatory requirements, incorporation of a development-wide ride-share system, or elimination of natural gas usage within residential developments. Individual project analysis and accompanying emission-reduction measures shall be approved by the City prior to issuance of a permit to construct or permit to operate.*

AQ-2 Construction Emissions Measures

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *Project applicants shall comply with the current Bay Area Air Quality Management District's basic control measures for reducing construction emissions of PM_{10} (Table 8-2, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the May 2017 BAAQMD CEQA Guidelines), outlined below.*
>
> 1. *All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day.*
> 2. *All haul trucks transporting soil, sand, or other loose material off-site shall be covered.*
> 3. *All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.*
> 4. *All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.*
> 5. *All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.*
> 6. *Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.*
> 7. *All construction equipment shall be maintained and properly tuned in accordance with manufacture's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation.*

8. *Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's number shall also be visible to ensure compliance with applicable regulations.*

Significance After Mitigation

Implementation of mitigation measures AQ-1 and AQ-2 would require individual air quality analysis and incorporation of BAAQMD Basic Construction Measures which reduce temporary construction impacts and fugitive dust emissions to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. The entire Basin is in conformance with state and federal CO standards (BAAQMD 2017c). There are no current exceedances of CO standards within the BAAQMD jurisdiction and have not had a CO exceedance in the Bay Area since before 1994.[6] For 2019 the Bay Area's reported maximum 1-hour and average daily concentrations of CO were 5.6 ppm and 1.7 ppm respectively (BAAQMD 2019).[7] These are well below the respective 1-hour and 8-hour standards of 20 ppm and 9 ppm. Given the ambient concentrations, which include mobile as well as stationary sources, a project in the Bay Area would need to emit concentrations three times the hourly maximum ambient emissions for all sources before project emissions would exceed the 1-hour standard. Additionally, the project would need to emit seven times the daily average for ambient concentrations to exceed the 8-hour standards. Typical development projects, even plan level growth, would not emit the levels of CO necessary to result in a localized hot spot. Therefore, impacts to CO hotspots would be less than significant.

Toxic Air Contaminants

Construction

Construction-related activities would result in short-term emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing), building construction, and other miscellaneous activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM, as discussed below, outweighs the potential non-cancer[8] health impacts (CARB 2021).

Generation of DPM from construction typically occurs in a single area for a short period. Construction of development facilitated by the project would occur over approximately a decade, but use of diesel-powered construction equipment in any one area would likely occur for no more than a few years for an individual project and would cease when construction is completed in that area. It is impossible to quantify risk without identified specific project details, timelines, and locations.

[6] BAAQMD only has records for annual air quality summaries dating back to 1994.
[7] Data for 2019 was used as the data for 2020 and 2021 are not currently available.
[8] Non-cancer risks include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function (CARB 2021a).

Each project developed under the proposed HEU would be required to comply with applicable BAAQMD regulatory requirements and control strategies and the CARB In-Use Off-Road Diesel Vehicle Regulation, which are intended to reduce emissions from construction equipment and activities. Additionally, future development facilitated by the proposed HEU would be required to comply with Mitigation Measure AQ-2 requiring implementation of construction emission measures that would reduce construction-related TACs. According to the OEHHA, construction of individual projects lasting longer than two months or placed within 1,000 feet of sensitive receptors could potentially expose nearby sensitive receptors to substantial pollutant concentrations and therefore could result in potentially significant risk impacts (OEHHA 2015). These projects could exceed BAAQMD's thresholds of an increased cancer risk of greater than 10.0 in a million and an increased non-cancer risk of greater than 1.0 Hazard Index (Chronic or Acute). Therefore, construction impacts from TAC emissions would be potentially significant and Mitigation Measure AQ-3 would be required.

Operation

In the Bay Area, there are several urban or industrialized communities where the exposure to TACs is relatively high in comparison to others. The City of Los Altos is not located in an impacted community according to BAAQMD *CEQA Guidelines*. Sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities (BAAQMD 2017a). Operation of development facilitated by the project would not involve these uses, and therefore, would not be considered a source of TACs. In addition, residences do not typically include new stationary sources onsite, such as emergency diesel generators. However, if a residential project did include a new stationary source onsite, it would be subject to BAAQMD Regulation 2, Rule 2 (New Source Review) and require permitting. This process would ensure that the stationary source does not exceed applicable BAAQMD health risk thresholds. Development facilitated by the project would be required to comply with the residential indoor air quality requirements in the Title 24 Building Energy Efficiency Standards, which currently require Minimum Efficiency Reporting Value 13 (or equivalent) filters for heating/cooling systems and ventilation systems in residences (Section 150.0[m])). Therefore, this impact would be less than significant.

Mitigation Measures

The following mitigation measure is required.

AQ-3 Construction Health Risk Assessment

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *For individual projects where construction activities would last longer than two months and where construction would occur within 1,000 feet of sensitive receptors, Tier 4 equipment and/or alternative fuel construction equipment shall be used.*

Significance After Mitigation

Implementation of Mitigation Measure AQ-3 would require use of Tier 4 or alternative fuel construction equipment for projects with construction timelines greater than two months and within 1,000 feet of sensitive receptors, in order to reduce potential risk associated with diesel fuel emissions exposure to nearby sensitive receptors to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust both during normal use and when idling. However, these odors would be temporary and transitory and would cease upon completion. Therefore, development facilitated by the project would not generate objectionable odors affecting a substantial number of people.

BAAQMD includes odor screening distances for land uses with the potential to generate substantial odor complaints. Those uses include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants. The proposed HEU would facilitate residential development which does not have the potential to generate substantial odor emissions. Therefore, development facilitated by the project would not generate objectionable odors affecting a substantial number of people during operation. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	■	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	■	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

Environmental Setting

Vegetation and Wildlife

The City of Los Altos is urbanized and significant vegetation communities and biological resources have not been identified and are not likely to exist. However, there are riparian corridors and stands of mature trees along creek corridors and within the Redwood Grove Nature Preserve, which provide habitat for animal species. Mature trees are also scattered throughout the city's low-density residential neighborhoods, parks, and school sites.

According to a search on the California Department of Fish and Wildlife's (FWS) Information for Planning and Consultation (IPaC) database, the following endangered species could potentially be present within City limits: Salt marsh harvest mouse (*Reithrodontomys raviventris*), California clapper rail (*Rallus longirostris obsoletus*), California least tern (*Sterna antillarum browni*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), Vernal pool tadpole shrimp (*Lepidurus packardi*), Fountain thistle (*Cirsium fontinales var. fontinales*), San Mateo thronmint (*Acanthomintha obovate ssp. Duttonii*), and Showy Indian clover (*Trifolium amoenum*) (FWS 2022).

Creek Channels

Four creeks are located within the city: Adobe Creek, Hale Creek, Permanente Creek, and Stevens Creek. The creeks provide open space for preservation of biological resources and riparian habitat. The City's creeks and flood zones are shown in Figure 5.

Impact Analysis

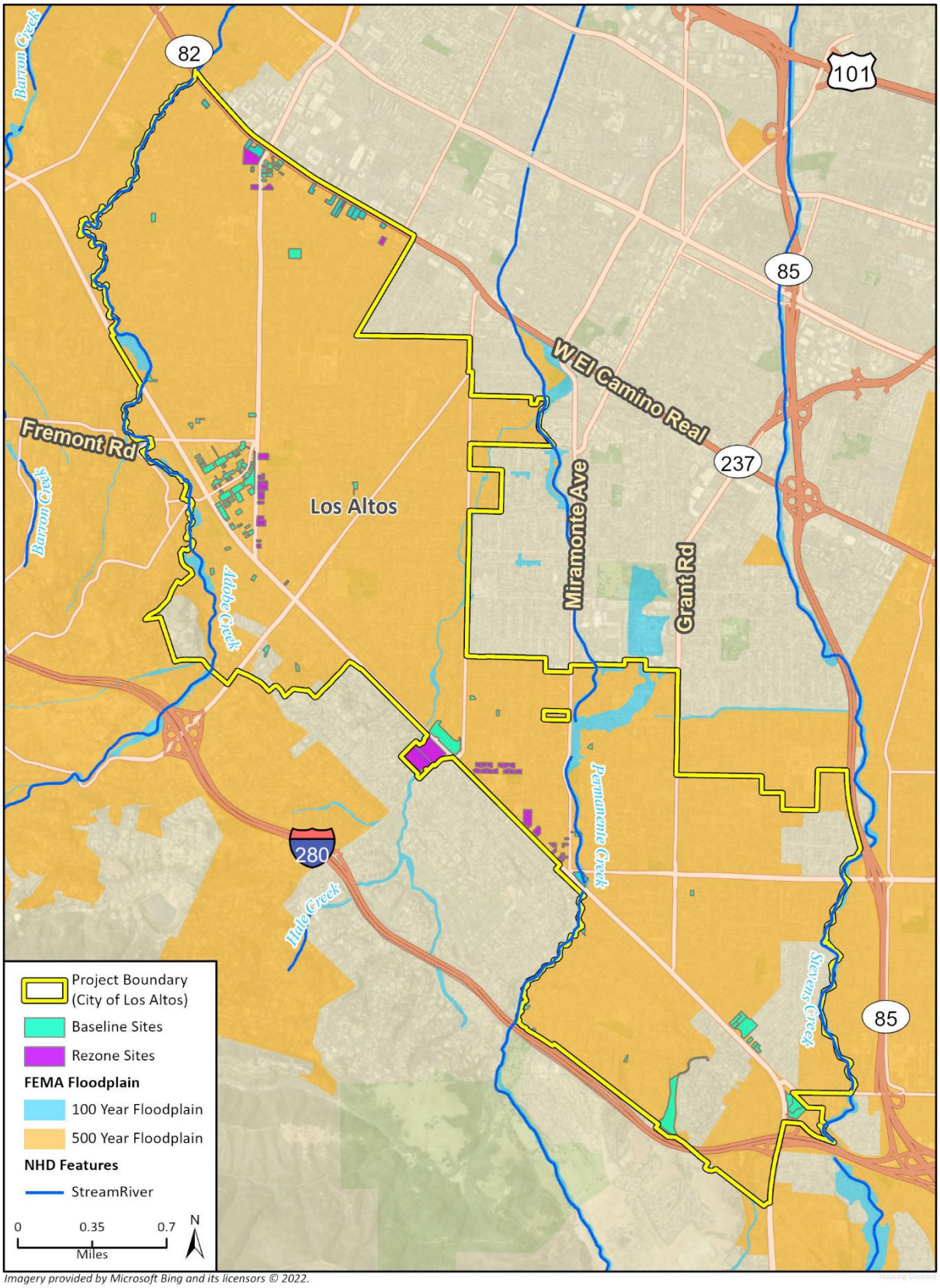
a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the United States Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act. According to the USFWS Critical Habitat for Threatened & Endangered Species Map, there is no critical habitat within the city (USFWS 2022).

Future development projects would be subject to federal and State laws, regulations, and management policies regarding biological resources, such as the federal and State Endangered Species Act and permitting pursuant to California Fish and Game Commission (CFGC) Section 1600 et seq.

Although special-status species would be protected by the California Fish and Game Code or the Migratory Bird Treaty Act regulations, special-status bat species could potentially be present in Los Altos and may be affected by proposed projects where they occur in buildings or similar structures or in native habitat adjacent to construction areas. Therefore, impacts to these species are potentially significant and Mitigation Measure BIO-1 would be required.

Figure 5 Los Altos Creeks and Flood Zones



Imagery provided by Microsoft Bing and its licensors © 2022.
Additional data provided by National Hydrology Dataset, FEMA, 2022.

Mitigation Measures

The following mitigation measure is required:

BIO-1 Special-status Bat Species Avoidance and Minimization

The City shall establish the following Standard Condition of Approval for projects requiring approval:

> *For projects that involve demolition of uninhabited buildings or removal of mature trees large enough to contain crevices and hollows that could support bat roosting, focused surveys to determine the presence/absence of roosting bats shall be conducted prior to demolition or tree removal. If active maternity roosts are identified, a qualified biologist shall establish avoidance buffers applicable to the species, the roost location and exposure, and the proposed construction activity in the area. If active non-maternity day or night roosts are found on the project site, measures shall be implemented to passively relocate bats from the roosts prior to the onset of construction activities. Such measures may include removal of roosting site during the time of day the roost is unoccupied or the installation of one-way doors, allowing the bats to leave the roost but not to re-enter. These measures shall be presented in a Bat Passive Relocation Plan that shall be submitted to, and approved by, CDFW.*

Significance After Mitigation

Implementation of Mitigation Measure BIO-2 would reduce impacts to roosting bats to a less than significant level.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The four creeks in Los Altos (Adobe Creek, Hale Creek, Permanent Creek, and Stevens Creek) may provide corridors for wildlife movement and may provide refugia and habitat for wildlife. Common and special-status wildlife and plant species that have acclimated to urban areas could be present on the housing sites at the time of development, particularly on parcels that are located in proximity to the creeks. The four creeks present within Los Altos could provide a wildlife corridor for fish and other aquatic species, and construction activities from future development could potentially result in impacts to the movement of native fish.

Since the proposed HEU would mostly facilitate infill development in already developed areas and increase of density and height on sites to accommodate the City's RHNA numbers, there is a low likelihood that habitat for listed species to occur on the sites. However, as shown in Figure 5, two housing sites would be located adjacent to Permanente Creek, two would be located adjacent to Hale Creek, and several housing sites would be located in proximity to the four creeks, which could result in impacts to sensitive biological resources during construction-related activities such as vegetation removal and result in degradation to plant and wildlife habitat.

Future development would be required to comply with LAMC Chapter 6.32, which outlines watercourse protection regulations and prohibits modification and pollution of the creeks. Section 6.32.030 prohibits residents of properties through which a watercourse passes from polluting the specific part of the watercourse, and prohibits residents from removing healthy vegetation on or adjacent to the watercourse bank; and Section 6.32.040 outlines setback requirements along Adobe Creek. Additionally, LAMC Chapter 10.16 details requirements for stormwater pollution prevention measures which would reduce stormwater runoff from polluting the creeks. This would reduce the

potential for modifications to the waterways that would prohibit wildlife movement or affect riparian habitat or sensitive species.

Future development proposals would also be subject to the Los Altos General Plan and its policies regarding the protection of biological resources. Specifically, Policies 2.3 and 2.7 of the Open Space Element aim to protect creeks, creek-side areas, and riparian habitats in their natural state and establish buffers from adjoining land uses to protect creek-side areas. Additionally, housing sites near creeks and streams would be subject to the Santa Clara Valley Water Resources Protection Collaborative's (Water Collaborative) Guidelines and Standards for Land Use Near Streams manual during the City's development review process (Water Collaborative 2007), which are designed to protect creeks and riparian habitats.

Nonetheless, because implementation of the proposed HEU could encourage development and rezone sites that contain waterways and may contain sensitive species or habitat, this impact is potentially significant and Mitigation Measure BIO-3 would be required.

Mitigation Measures

The following mitigation measure is required:

BIO-2 Biological Resources Screening and Assessment

The City shall establish the following Standard Condition of Approval for projects requiring approval:

> *For projects on sites located on or adjacent to a creek, the project applicant shall hire a qualified biologist to perform a preliminary biological resources screening, for the City's review and approval, to determine whether the project has the potential to impact special status biological resources, inclusive of special status plants and animals, sensitive vegetation communities, jurisdictional waters (including creeks, drainages, streams, ponds, vernal pools, riparian areas and other wetlands), critical habitat, wildlife movement area, or biological resources protected under local or regional ordinances or an existing HCP or NCCP. If it is determined that the project has no potential to impact biological resources, no further action is required.*
>
> *If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 50 feet around the project footprint, as is feasible, and to determine the potential impacts to those resources, as approved by the City. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, State, and/or federal agencies. If the project would have the potential to impact these resources, recommendations developed to enhance wildlife movement (e.g., installation of wildlife friendly fencing), as applicable, to reduce impacts to less than significant levels. Pending the results of the project-specific biological analysis, City review, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, NMFS, CDFW, and/or other local, State, and federal agencies may be required.*

Significance After Mitigation

Implementation of Mitigation Measure BIO-2 would reduce impacts to special status species by requiring biological resources studies for projects located on or adjacent to creeks and implementation of further requirements to avoid or reduce impacts on a project-by-project basis.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Adobe Creek, Hale Creek, Permanente Creek, and Stevens Creek are the four creeks present within the City. Hale Creek and Permanente Creek traverse the middle of the City, while Adobe Creek runs along the northwestern border of the City and Stevens Creek runs along the southeastern border of the City, as shown in Figure 5. The four creeks eventually flows into San Francisco Bay, a Traditional Navigable Water, and therefore are potentially under the jurisdiction of the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and/or Regional Water Quality Control Board (RWQCB). Although the 2023-2031 would facilitate development on or adjacent to the four creeks, especially Hale Creek and Permanente Creek, future development would be required to comply with Water Collaborative's Guidelines and Standards for Land Use Near Streams manual during the City's development review process (Water Collaborative 2007), which involve the protection of creeks and water quality. Future development would also be required to adhere to LAMC Chapter 6.32, which outlines watercourse protection regulations. Specifically, Section 6.32.030 prohibits residents of properties through which a watercourse passes from polluting the specific part of the watercourse and prohibits residents from removing healthy vegetation on or adjacent to the watercourse bank; and LAMC Section 6.32.040 outlines setback requirements along Adobe Creek. Additionally, LAMC Chapter 10.16 details requirements for stormwater pollution prevention measures which would reduce stormwater runoff from polluting the creeks. Therefore, adherence to federal, State, and local regulations, would reduce impacts to wetlands and creeks. Nonetheless, as implementation of the proposed project would involve development on sites adjacent to creeks and the exact design of such development is unknown at this time, impacts to waters and wetlands would be potentially significant and mitigation measures BIO-3 and BIO-4 would be required.

Mitigation Measures

The following mitigation measures are required:

BIO-3 Jurisdictional Delineation

The City shall establish the following Standard Condition of Approval for projects requiring approval:

> *If potentially jurisdictional waters and/or wetlands are identified by the project-specific analysis (as required by Mitigation Measure BIO-3), for projects on sites that are on or adjacent (within 200 feet) to a creek, a qualified biologist shall complete a jurisdictional delineation to determine the extent of the jurisdictions for CDFW, USACE, and/or RWQCB. This delineation shall be conducted in accordance with the requirements set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the City, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Jurisdictional areas shall be avoided. If jurisdictional areas are expected to be impacted, then the RWQCB would require a Waste Discharge Requirements (WDRs) permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to CWA Section 404 would likely be required. Furthermore, a compensatory mitigation program shall be implemented in accordance with Mitigation Measure BIO-4 and the measures set forth by the aforementioned regulatory*

agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the state shall be completed at a ratio as required in applicable permits but shall not be less than a minimum ratio of 1:1. All temporary impacts to waters of the U.S. and waters of the State shall be fully restored to natural condition. The project applicant shall submit the report documenting restoration activities and monitoring to the City for review and approval.

BIO-4 General Avoidance and Minimization

The City shall establish the following Standard Condition of Approval for projects requiring approval:

Potential jurisdictional features on sites identified in jurisdictional delineation reports shall be avoided. Projects that may impact jurisdictional features shall include a report detailing how all identified jurisdictional features will be avoided, including groundwater draw down. The project applicant shall submit this report to the City for review and approval prior to construction.

- *Material/spoils generated from project activities shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate.*
- *Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank.*
- *Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.*

Significance After Mitigation

Implementation of mitigation measures BIO-3 and BIO-4 would reduce impacts to State and federally protected waters and wetlands by requiring jurisdictional delineations for projects within the housing inventory sites on or adjacent to creeks, and implementation of further requirements to avoid or reduce impacts on a project-by-project basis. Impacts to waters and wetlands would be mitigated to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The City of Los Altos is largely built-out and does not function as a significant regional or local wildlife movement corridor. Wildlife corridors often overlap land designated as open space, but as there are limited wildland open spaces with connectivity to larger undeveloped open spaces within urban Los Altos, natural wildlife corridors are not present in most parts of the city. As discussed in checklist question (b) above, the city's four creeks could provide a wildlife corridor for fish and other aquatic species, and construction activities from future development could potentially result in impacts to the movement of native fish. However, adherence to State and local regulations discussed above and implementation of Mitigation Measure BIO-2 would reduce impacts to a less than significant level.

Los Altos contains mature groves of trees that could provide suitable nesting substrates for birds protected under the MBTA and CFGC. In addition, mature tree groves exist along creek corridors, which could be used for nursery sites by native bird species. Future development would be required to comply with tree protection regulations pursuant to LAMC Section 11.08.120, which would preserve existing trees. Furthermore, sensitive species such as nesting birds and roosting bats would be protected by the California Fish and Game Code or the Migratory Bird Treaty Act regulations. Nonetheless, if construction of specific development projects implemented under the proposed project occurs during the breeding season, impacts to nesting

birds may occur. Impacts may include direct impacts to active nests, including eggs or young, if nesting substrates are removed as part of the project. Indirect impacts may result if noise, vibration, and human presence cause adult birds to abandon the nests for prolonged periods of time, preventing them from incubating eggs, brooding chicks, and defending the nest from predators. Therefore, this impact is potentially significant and Mitigation Measure BIO-5 would be required.

Mitigation Measures

The following mitigation measure is required:

BIO-5 Preconstruction Surveys for Nesting Birds

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *For projects that would involve native or naturalized vegetation or tree removal, a general pre-construction nesting bird survey shall be conducted by a qualified biologist within 14 days prior to the initiation of construction activities. If construction is stopped for more than 14 days during the nesting season, a pre-construction survey shall be conducted prior to the re-start of construction activities. Surveys shall include the disturbance area plus a 50-foot buffer for passerine species, and a 500-foot buffer for raptors.*
>
> *If active nests are located, an appropriate avoidance buffer shall be established within which no work activity would be allowed that would impact these nests. The avoidance buffer shall be established by the qualified biologist on a case-by-case basis based on the species and site conditions. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until juveniles have fledged and/or the nest is inactive. A qualified biologist shall confirm that breeding/nesting is complete, and the nest is no longer active prior to removal of the buffer. If work within a buffer area cannot be avoided, then a qualified biologist shall be present to monitor all project activities that occur within the buffer. The biological monitor shall evaluate the nesting avian species for signs of disturbance and shall have the ability to stop work.*

Significance After Mitigation

Implementation of Mitigation Measure BIO-5 would reduce impacts to nesting birds to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Future development in Los Altos may involve the removal of mature trees during construction. As outlined in the City's Tree Protection Ordinance (LAMC Chapter 11.08), all trees, regardless of species, that are 48-inches or larger in circumference are protected would require a Tree Removal Permit before they can be removed. Additionally, future development would be required to comply with Section 11.08.120 of the LAMC which outlines tree protection measures during construction such as installing protective fencing and repairing damaged trees. Therefore, with required adherence to the City's Tree Protection Ordinance, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no habitat conservation plans or natural community conservation plans adopted in Los Altos. The city is also located outside of the Santa Clara Valley Habitat Conservation Plan. There would be no impact.

NO IMPACT

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	■	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	■	☐

Regulatory Setting

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires a lead agency determine whether a project may have a significant effect on historical resources (Public Resources Code (PRC), Section 21084.1). A historical resource is a resource listed in, or determined by the California Historical Resources Commission to be eligible for listing, in the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines on the basis of substantial evidence to be historically significant (State CEQA Guidelines, Section 15064.5(a)(1-3)). Historical resources may include eligible built environment resources and archaeological resources from any time period.

If a resource has sufficient integrity to convey information about the past, it may be considered historically significant based on substantial evidence that it:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a "unique archaeological resource" as identified in PRC Section 21083.2. If it can be demonstrated that a project would cause damage to a unique archaeological resource,

the lead agency may require reasonable efforts be made to permit any or all these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b]).

PRC, Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

City of Los Altos Municipal Code

The City of Los Altos' Municipal Code Chapter 12.44 *Historic Preservation* defines the criteria for historic resource and historic landmark designation and procedures for the treatment of historic resources. Section 12.44.040 establishes the criteria for designation. A structure, property or object may be eligible for designation as a historic resource or historic landmark, if it/they satisfy each of the three criteria listed below:

A. **Age.** A structure or property should be more than fifty (50) years in age. (Exceptions can be made to this rule if the building(s) or site(s) is/are truly remarkable for some reason - such as being associated with an outstanding architect, personage, usage or event).
B. **Determination of Integrity.** A structure or property should retain sufficient historic integrity in most of the following areas:
    1. Design: The combination of elements that create the form, plan, space, structure and style of a property.
    2. Setting: The physical environment of a historic property.
    3. Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
    4. Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
    5. Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.
C. **Historic Significance.** A structure or property should be clearly associated with one or more of the following areas of significance:
        1. Event: Associated with a single significant event or a pattern of events that have made a significant contribution to broad patterns of local or regional history, or cultural heritage of California or the United States;
        2. Person/People: Associated with the lives of persons important to the local, California or national history;

3. Architecture/Design: Embodies the distinctive characteristics of a design-type, period, region or method of construction, or represents the work of a master or possesses high artistic value; or
4. Archaeology: Yields important information about prehistory or history of the local area, California or the nation.

City of Los Altos Housing Development Permit Application Requirements

While not part of the City's adopted Municipal Code, Los Altos' Housing Development Project Application process includes a requirement for historic resources evaluations for certain projects involving properties over 50 years of age. Permit applications are required to include a set of State of California Department of Parks and Recreation (DPR) Series Forms 523A and 523B, documenting a historic resource evaluation in the following project scenarios:

Environmental Setting

The environmental setting research completed for this analysis included a review of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), the California Office of Historic Preservation (OHP) Built Environment Resource Directory (BERD) for all previously evaluated historic properties within the City of Los Altos, including the 1,048 baseline housing opportunity sites and the 600 rezone sites located throughout the City, and comprising of a total of 175 parcels. It also included a review of the City's Historic Resources Inventory (HRI), which identifies designated Historic Landmarks in addition to Historic Resources and designated Historic Districts that are significant at the local level. All properties on the HRI are subject to the City's Historic Preservation Ordinance. Properties on the HRI are potentially eligible for designation as Historic Landmarks (City of Los Altos Historic Resources Inventory, 2012). The research identified a number of properties that are listed in or eligible for listing in the NRHP, CRHR, or the City's HRI ; of these, two historical resources are located on housing opportunity sites, as described below.

- 625 Palm Avenue (APN 17516088) consists of a landscaped area presumed to be associated with the Lanthier House, with which it shares an address. Lanthier House is listed on the City's Historic Inventory and is identified in the BERD with an OHP status of 5S2, meaning it is individually eligible for local listing or designation.
- 398 Main Street (APN 16739091) contains the Altos Land Company Building which is designated locally as a landmark and identified in the BERD with a status code of 5S2.

A review of parcel data and historical aerial photographs of the properties comprising the housing opportunity sites identified 116 parcels with properties that have not been subject to previous historical resources evaluation and currently meet the 45-year threshold which, pursuant to guidance from OHP, generally triggers the need for evaluation as part of review of a proposed project on those sites, recognizing there is commonly a lag between resource identification and when planning decisions are made. Of these, 13 properties were previously analyzed as part of the environmental review for the 5th Cycle Housing Element (2015-2023). An additional 12 properties would become 45 years of age during the 2023-2031 planning period of the 2023-2031 Housing Element. Two of these were previously included in the 5th Cycle Housing Element. Pending further analysis there is a potential for these properties to qualify as historical resources pursuant to CEQA. All previously unevaluated properties that are currently aged 45 years and those that will become age-eligible during the 2023-2031 planning period of the Housing Element are listed in Appendix B.

Checklist question (a) broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, analysis under checklist question (a) is limited to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to Section 15064.5 and those that may be considered unique archaeological resources pursuant to Section 21083.2, are considered under checklist question (b).

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

The proposed HEU does not propose any specific development. However, it envisions development including the proposed rezoning of sites for the potential development of additional housing units to meet the City's RHNA needs on parcels that contain buildings that meet the age threshold for potential historical resources pursuant to CEQA. Development on these parcels could be proposed by a property owner or project applicant with or without the City's adoption of the HEU; still, development associated with the proposed HEU could result in the material impairment of historical resources, which *CEQA Guidelines* Section 15064.5(b)(2)(A) defines as the demolition or alteration in an adverse manner of those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register. The City of Los Altos' Historic Preservation Ordinance provides procedures for designating a property as part of the local Historic Inventory and provisions to review and regulate proposed changes, including demolition, new construction, or alteration to designated properties (Chapter 12.44). Additionally, the City has submittal requirements in place for housing development project applications for any building listed or determined eligible for listing at the national, state, or local level or that contains any building, structure, or permanently located object that has been in existence for at least 45 years. The City's regulations would mitigate impacts to historical resources listed in the NRHP, CRHR, as a City Landmark or on the City's HRI. Additionally, buildings 45 years or older, are subject to planning review requiring a historical resource evaluation to be prepared by a professional architect or someone with at least one year of graduate study in architectural preservation, American architectural history, preservation planning, or closely related field or at least one year of full-time professional experience on historic preservation projects. This is to identify any property that may qualify as a historic resource that has not previously been identified as such, to ensure that any redevelopment of such a property either: (1) will not impair those elements or aspects of the property that convey historic significance, or (2) is done in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer.

With compliance with the City's regulations and application requirements and State and federal regulations, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Although the City of Los Altos does not maintain an inventory of archaeological sites, it is understood that archaeological sites are present in the City of Los Altos and the surrounding areas.

Therefore, there is potential to encounter archaeological resources in the City of Los Altos and on residential opportunity sites specified in the 2023-2031 Housing Element. Undeveloped properties in the housing inventory sites have a higher probability of containing previously unidentified archaeological resources given the probable lack of previous ground-disturbing activities on those properties. However, ground-disturbance into native soils on housing inventory sites could encounter prehistoric or historic-period archaeological resources.

Because the proposed HEU is a policy document and does not include specific development proposals, it cannot be ascertained with certainty where ground-disturbing activities could occur in these areas. Specific impacts to archaeological resources are therefore unknown at this time and would be determined by project-level analysis. Effects on archaeological resources can only be known once a specific project has been proposed, because potential effects are highly dependent on the individual project site conditions and the characteristics of proposed ground-disturbing activity. However, the proposed HEU would prioritize the development of new housing near areas that have previously been developed and disturbed and away from undeveloped land and/or environmentally sensitive resources. Therefore, it is likely that on future development sites under the proposed project, prior grading, construction, and modern use of the sites would have either removed or impacted archaeological resources within surficial soils.

Nonetheless, there is the potential for archaeological resources to exist below the ground surface throughout the City of Los Altos, which could be disturbed by grading and excavation activities associated with new housing development. As such, individual development projects under the proposed project that would involve ground disturbing activities would have the potential to damage or destroy archaeological resources, especially if they occur below the existing road base or in less disturbed or native soils.

Consequently, damage to, or destruction of previously unknown sub-surface archaeological resources could occur as a result of development implemented under the proposed HEU. This represents a potentially significant impact and mitigation measures CUL-1 and CUL-2 are required.

Mitigation Measures

The following mitigation measures are required:

CUL-1 Archaeological Resources Assessment

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

> *Prior to approval of any individual development projects under the 2023-2031 Housing Element that will involve ground disturbance activities that may include, but are not limited to, grading and excavation, an archaeological resources assessment shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards in either prehistoric or historic archaeology. Assessments shall include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center (NWIC) and a Sacred Lands File Search maintained by the Native American Heritage Commission (NAHC). The records searches shall characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around the project site. A Phase I pedestrian survey shall be undertaken in proposed project sites that are undeveloped to identify the presence or absence of any surface cultural materials. By performing a records search, a Sacred Lands File search, and a Phase I*

survey, a qualified archaeologist will classify the project site as having high, medium, or low sensitivity for archaeological resources.

If the Phase I archaeological survey identifies resources that may be affected by the project, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are determined significant or unique through Phase II testing and site avoidance is not possible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation. These measures may include, but would not be limited to, a Phase III Data Recovery Program, avoidance, or other appropriate actions to be determined by a qualified archaeologist. If significant archaeological resources cannot be avoided, impacts may be reduced to less than significant by adding fill soils on top of the resources rather than cutting into the cultural deposits. Alternatively, and/or in addition, a data collection program may be warranted, including mapping the location of artifacts, surface collection of artifacts, or excavation of the cultural deposit to characterize the nature of the buried portions of sites. Curation of the excavated artifacts or samples would occur as specified by the archaeologist in consultation with the City of Los Altos and with other relevant parties.

CUL-2 Unanticipated Discoveries of Archaeological Resources

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities associated with the 2023-2031 Housing Element, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City of Los Altos shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).

Significance After Mitigation

Mitigation measures CUL-1 and CUL-2 would reduce potential impacts to a less than significant level by requiring the identification and evaluation of any archaeological resources that may be present prior to project construction and by providing steps for the evaluation and protection of unanticipated finds encountered during construction.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Human burials outside of formal cemeteries often occur in prehistoric archaeological contexts. Although much of Los Altos is developed and the City of Los Altos does not have records of burial sites within Los Altos, the potential still exists for these resources to be present. Excavation during construction activities in Los Altos related to the proposed HEU would have the potential to disturb these resources, including Native American burials.

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in PRC Section 5097. The California Health and Safety Code (Section 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protect them from disturbance, vandalism, or destruction. They also include established procedures to be implemented if Native American skeletal remains are discovered. PRC Section 5097.98 also addresses the disposition of Native American burials, protects such remains, and established the NAHC to resolve any related disputes.

Development projects are subject to State of California Health and Safety Code Section 7050.5 which states that, if human remains are unearthed, no further disturbance can occur until the county coroner has made the necessary findings as to the origin and disposition of the remains pursuant to the PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site and make recommendations to the landowner within 48 hours of being granted access. If the landowner rejects the MLD's recommendations, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance and shall take additional steps outlined in the statute for protecting the site where the human remains and associated items are reinterred. With adherence to these existing regulations impacts to human remains would be less than significant. No mitigation is required.

LESS THAN SIGNIFICANT IMPACT

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6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	■	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	■	☐

Environmental Setting

California is one of the lowest per-capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate. Most of the electricity generated in California is from natural gas-fired power plants, which provided approximately 48 percent of total electricity generated in 2020. According to the California Energy Commission (CEC), in 2020 California used 272,575 gigawatt hours (GWh) of electricity and produced 70 percent (190,913 GWh) of the electricity it used and imported the rest from outside the state (CEC 2020). In 2018, SB 100 accelerated the state's Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy and zero-carbon resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Energy consumed by the transportation sector accounts for roughly 39.5 percent of California's energy demand, amounting to approximately 3,073.3 trillion Btu in 2019. Petroleum-based fuels are used for approximately 98.4 percent of the state's transportation activity. Most gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet state-specific formulations required by the California Air Resources Board (CARB). California's transportation sector, including on-road and rail transportation, consumed approximately 662 million barrels of petroleum fuels in 2019 (EIA 2021).

According to the CEC, Santa Clara County consumed approximately 16,436 giga-watts per hour (GWh) of electricity and 419 million of therms of natural gas in 2020 (CEC 2022a; CEC 2022b). The City of Los Altos residential sector consumed approximately 80,391,486 kilo-watts per hour (kWh) of electricity and 6,640,225 therms of natural gas in 2018 (City of Los Altos 2022a).

Electricity and natural gas service in Los Altos is supplied by SVCE and PG&E, with SVCE being the main provider. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).

The City is currently updating its Reach Code, which, if adopted, would require all-electric construction for all building types along with additional EV-charging infrastructure. The Reach Code would also prohibit extension of gas service lines to new outdoor appliances and equipment such as pool and spa equipment or barbecues.

Impact Analysis

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources releases criteria air pollutant and GHG emissions into the atmosphere. The environmental impacts of air pollutant and GHG emissions associated with the project's energy consumption are discussed in detail in Section 3, *Air Quality*, and Section 8, *Greenhouse Gas Emissions*, respectively.

Los Altos demonstrates its commitment to energy efficiency and renewable energy via implementation of CALGreen and State-mandated Energy Efficiency Requirements for new development and retrofits. The proposed HEU would facilitate development of projects to encourage housing on vacant or underutilized sites, as well as rezoning to allow for higher residential densities. When proposed, individual projects would be required, pursuant to the requirements of CALGreen, to comply with the zero-net energy requirements, where new development combines energy efficiency and renewable energy generation to consume only as much energy as can be produced on-site through renewable resources over a specified period. However, development under the proposed HEU would consume energy during construction and operation, using petroleum fuel, natural gas, and electricity, as discussed below.

Energy use during construction associated with future development under the proposed HEU would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during the construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. Construction contractors would be required to demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities associated with reasonably foreseeable development under the proposed HEU would be required to utilize fuel-efficient equipment consistent with federal and State regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, individual projects would be required to comply with construction waste management practices to divert at least 65 percent of construction and demolition debris pursuant to LAMC Chapter 6.14. These practices would result in efficient use of energy during construction of future development under the proposed HEU. Furthermore, in the interest of both environmental awareness and cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, future construction activities associated with development under the proposed HEU would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Long-term operation of future development under the proposed HEU would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. Electricity and natural gas service in Los Altos is supplied by SVCE and PG&E, with SVCE being the main provider. Development facilitated by the proposed HEU would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (CALGreen, Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. Furthermore, the 2019 Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC such as installing PV systems on all low-rise residential structures up to three stories equal to the expected electricity usage. CALGreen sets targets for energy efficiency, water consumption, dual plumbing systems for potable and recyclable water, diversion of construction waste from landfills, and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. These standards for new buildings are designed for energy efficient performance, using clean electricity, so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. Additionally, pursuant to the City's Reach Code, future new development would be required to be all-electric and would not include natural gas.

The housing inventory sites are located in the Downtown as well as near or adjacent to transportation corridors, which would reduce trip distances and encourage the use of alternative modes of transportation such as bicycling and walking. These factors would minimize the potential of the proposed project to result in the wasteful or unnecessary consumption of vehicle fuels. As a result, operation of development projects under the proposed HEU would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Several State plans as well as the City's adopted General Plan include energy conservation and energy efficiency strategies intended to enable the State and the City to achieve GHG reduction and energy conservation goals. A full discussion of the proposed project's consistency with GHG reduction plans is included in Section 8, *Greenhouse Gas Emissions*. As shown in Table 10, the project would be consistent with applicable State renewable energy and energy efficiency plans.

Table 10 Consistency with State Renewable Energy and Energy Efficiency Plans

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
Assembly Bill 2076: Reducing Dependence on Petroleum. Pursuant to AB 2076, the CEC and CARB prepared and adopted a joint-agency report, Reducing California's Petroleum Dependence, in 2003. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT. One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand.	**Consistent.** The project would facilitate development of housing within the city's Downtown, as well as the Sherwood Gateway Specific Plan Area and near or adjacent to transportation corridors currently served by bus stops and Class II and Class III bicycle lanes, which supports Policy 1.2, Programs under Goal 1, and Program 4.J of the proposed HEU which aims to promote mixed uses to reduce VMT. All housing units constructed under the proposed HEU would be subject to the requirements of the most recent iteration of CALGreen and locally adopted amendments, which include provisions for electric vehicle charging infrastructure, reducing dependence on gasoline powered vehicles.
2019 Integrated Energy Policy Report. The 2019 report highlights the implementation of California's innovative policies and the role they have played in establishing a clean energy economy, as well as provides more detail on several key energy policies, including decarbonizing buildings, increasing energy efficiency savings, and integrating more renewable energy into the electricity system.	**Consistent.** Development facilitated by the project would be required to comply with the LAMC Chapter 12.22, which mandates the implementation of Title 24. Compliance would include complying with the most updated rooftop solar requirements at the time of construction. Future development would also be required to comply with the City's Reach Code which is currently being revised, but would require all-electric construction for all newly constructed buildings. Electricity would be provided either by Silicon Valley Clean Energy (SVCE) or PG&E, which are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022). Additionally, Policies 7.1 and 7.2 aim to ensure the inclusion of energy efficiency measures in future development.
California Renewable Portfolio Standard. California's RPS obligates investor-owned utilities, energy service providers, and community choice aggregators to procure 33 percent total retail sales of electricity from renewable energy sources by 2020, 60 percent by 2030, and 100 percent by 2045.	**Consistent.** Electricity for future development would be provided either by Silicon Valley Clean Energy (SVCE) or PG&E, which are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).
Energy Action Plan. In the October 2005, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the State's ongoing actions in the context of global climate change. The nine major action areas in the EAP include energy efficiency, demand	**Consistent.** Future development facilitated by the proposed project would be required to be constructed in accordance with the latest iteration of CALGreen, the California Energy Code, and any locally adopted amendments, which include requirements for the use of energy-efficient design and technologies as well as provisions for incorporating renewable energy resources into building design. Additionally, Policies 7.1 and 7.2 would ensure implementation of energy efficiency measures in all development facilitated under the project. Electricity would be provided by SVCE, which sources 50 percent of electricity from renewable energy sources and 50

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
response, renewable energy, electricity adequacy/reliability/infrastructure, electricity market structure, natural gas supply/demand/infrastructure, transportation fuels supply/demand/infrastructure, research/development/demonstration, and climate change.	percent from carbon-free sources under their GreenStart program. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022). Given these features, the project would facilitate implementation of the nine major action areas in the EAP.
AB 1007: State Alternative Fuels Plans. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality. Bioenergy Action Plan, EO S-06-06. The EO establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050.	**Consistent.** The project would not interfere with or obstruct the production of biofuels in California. Vehicles used by future residents would be fueled by gasoline and diesel fuels blended with ethanol and biodiesel fuels as required by CARB regulations. Pursuant to the City's Reach Code, new multi-family residences with less than or equal to 20 dwelling units would be required to install at least one Level 2 EV Ready space for each dwelling unit. For multi-family residences with more than 20 units, 25 percent of the dwelling units with parking spaces must include at least one Level 2 EV Ready space, and each remaining dwelling unit with parking spaces must include one Level 1 EV Ready space. Future development would also be required to comply with LAMC Chapter 12.22, which mandates the implementation of the most current version of Title 24. Title 24 contains requirements for EV spaces in new construction. Future development facilitated by the project would be required to comply with the most updated EV requirements in both the City's Reach Code and Title 24 at the time of construction.
Title 24, CCR – Part 6 (Building Energy Efficiency Standards) and Part 11 (CALGreen). The 2019 Building Energy Efficiency Standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less. The CALGreen Standards establish green building criteria for residential and nonresidential projects. The 2019 Standards include the following: increasing the number of parking spaces that must be prewired for electric vehicle chargers in residential development; requiring all residential development to adhere to the Model Water Efficient Landscape Ordinance; and requiring more appropriate sizing of HVAC ducts.	**Consistent.** Development facilitated by the project would be required to comply with the LAMC Chapter 12.22, which mandates the implementation of Title 24.

Furthermore, the City's General Plan and Climate Action Plan (CAP) also contains goals and policies related to energy efficiency and renewable energy. As discussed under Table 15 in Section 8, *Greenhouse Gas Emissions*, the proposed project would be consistent with recommended goals, policies, and actions in the City's CAP related to energy efficiency and renewable energy. Table 11 summarizes the project's consistency with the applicable General Plan policy. As shown therein, the proposed project would be consistent with the applicable General Plan policy and therefore would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This impact would be less than significant.

Table 11 Project Consistency with Applicable General Plan Policies

Policies	Project Consistency
Natural Environment and Hazards Element	
Policy 8.1: Support the principles of reducing air pollutants through land use, transportation, and energy use planning.	**Consistent**: Future development facilitated by the proposed project would be required to be constructed in accordance with the latest iteration of CALGreen, the California Energy Code, and any locally adopted amendments, which include green building practices. Future development would also be required to comply with the City's Reach Code which would require all-electric construction for all newly constructed buildings. Additionally, Policies 7.1 and 7.2 would ensure implementation of energy efficiency measures in all development facilitated under the project.

Source: City of Los Altos 2002

LESS THAN SIGNIFICANT IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	■
2. Strong seismic ground shaking?	☐	☐	☐	■
3. Seismic-related ground failure, including liquefaction?	☐	☐	☐	■
4. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	■
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	■
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	■	☐	☐

Environmental Setting

Regional and Local Geology

The City of Los Altos is part of the Coast Ranges geomorphic province. A geomorphic province is a naturally defined geologic region that displays a distinct landscape or landform according to its geology, faults, topographic relief and climate (Department of Conservation [DOC] 2002). The Coast Ranges are Northwest trending mountain ranges and valleys, running subparallel to the San Andreas Fault. They are composed of thick Mesozoic and Cenozoic sedimentary strata (DOC 2002).

The City of Los Altos is located in the northwest portion of Santa Clara County, approximately five miles west of San Francisco Bay at the southern end of the peninsula. The City's boundaries extend from Mountain View and Palo Alto to the north, Sunnyvale to the east, Cupertino to the south, and the town of Los Altos Hills to the west. The city spans an area of around 6.5 square miles, and has relatively low topography, with rolling terrain only in the southwest portion of the city.

Fault Zones

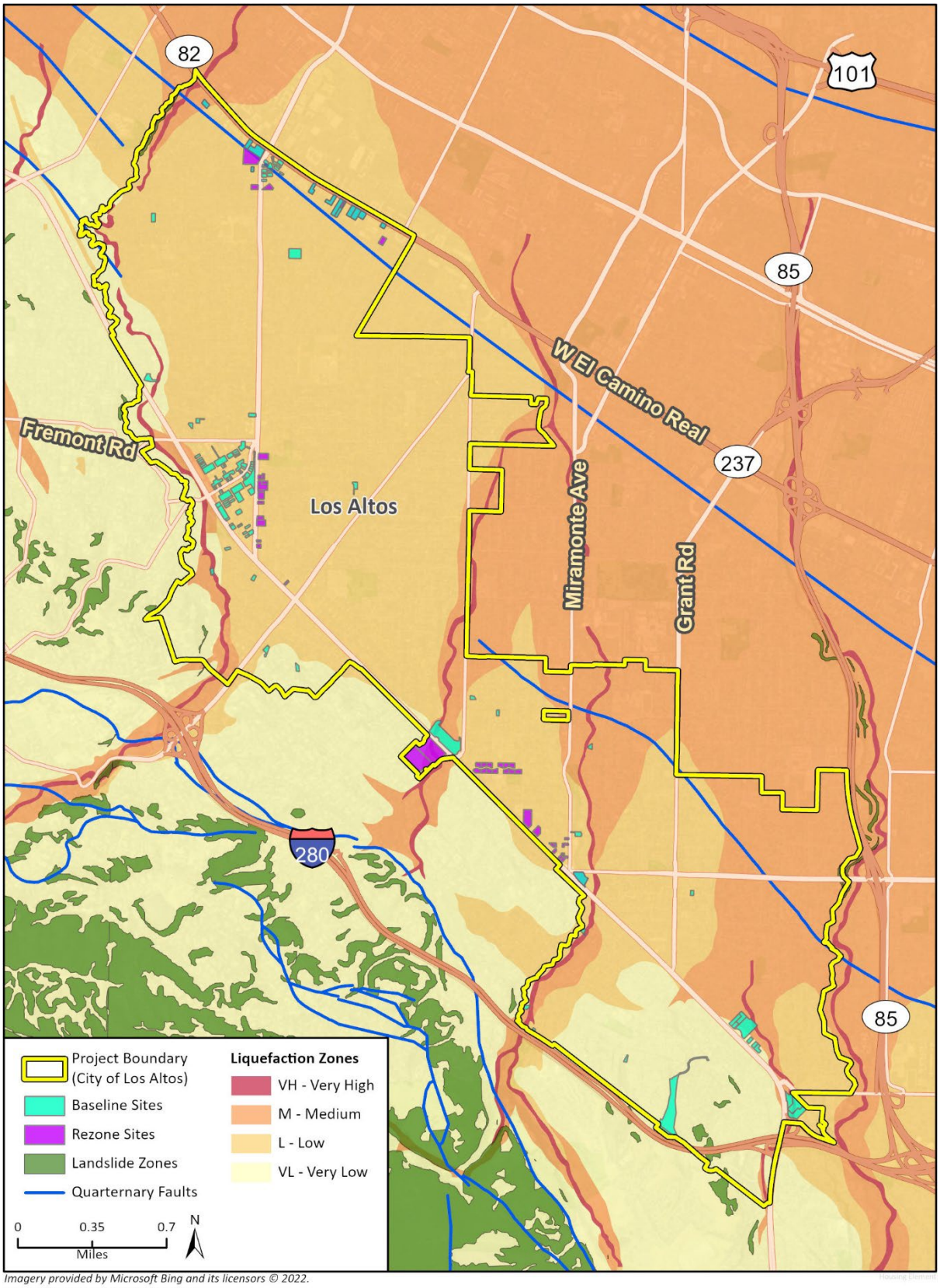
Similar to much of California, Los Altos is located in a seismically active region. The USGS defines Holocene-active faults as those that are likely to have moved one or more times (surface displacement) in the last 10,000 years (USGS, n.d.), while inactive faults have not had surface displacement within that period. Several faults are located near Los Altos. These major faults and fault zones include:

- The San Andreas Fault: Located around 5 miles west of Los Altos. The San Andreas Fault is the primary surface boundary between the Pacific and the North American plates. There have been numerous historic earthquakes along the San Andreas Fault, and it generally poses the greatest earthquake risk to California. The probability of experiencing a Magnitude 6.7 or greater earthquake along the San Andreas Fault within the next 30 years is 22 percent (Office of Emergency Services 2017).
- The Hayward Fault: Located around 16 miles east of Los Altos. The Hayward Fault is part of the wide plate boundary between the Pacific and the North American plates. The probability of experiencing a Magnitude 6.7 or greater earthquake along the Hayward Fault in the next 30 years is 33 percent (Office of Emergency Services 2017).
- The Calaveras Fault: Located around 23 miles Northeast from the City of Los Altos. The probability of experiencing a Magnitude 6.7 or greater earthquake along the Calaveras Fault in the next 30 years is 26 percent (Office of Emergency Services 2017).

In addition to primary hazards like surface fault ruptures, earthquakes also result in secondary hazards and impacts such as ground shaking, landslides, and liquefaction, which could cause widespread damage. No part of Los Altos is located within an identified earthquake fault zone as delineated on the Alquist-Priolo Earthquake Fault Zoning Map (DOC 2022a). An inactive quaternary fault[9] runs parallel to El Camino Real, as shown in Figure 6.

[9] A Quaternary fault is one that has been recognized at the surface and that has moved in the past 1.6 million years. That places fault movement within the Quaternary Period, which covers the last 2.6 million years (United States Geological Survey [USGS] 2022).

Figure 6 Faults, Landslide Zones, and Liquefaction Zones in Los Altos



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Additional data provided by CGS, 2022.

Ground Shaking

Seismically induced ground shaking covers a wide area and is greatly influenced by the distance of the site to the seismic source, soil conditions, and depth to groundwater. The USGS and Associated Bay Area Governments (ABAG) have worked together to map the likely intensity of ground-shaking throughout the Bay Area under various earthquake scenarios. The most intense ground-shaking scenario mapped in the vicinity assumes a 8.2 magnitude earthquake on the San Andreas Fault system (northern and peninsula segments). The predicted ground-shaking level from such an earthquake would be "severe shaking" throughout the city (ABAG 2022).

Liquefaction and Seismically Induced Settlement

Liquefaction is defined as the sudden loss of soil strength due to a rapid increase in soil pore water pressure resulting from seismic ground shaking. Liquefaction potential is dependent on such factors as soil type, depth to ground water, degree of seismic shaking, and the relative density of the soil. When liquefaction of the soil occurs, buildings and other objects on the ground surface may tilt or sink, and lightweight buried structures (such as pipelines) may float toward the ground surface. Liquefied soil may be unable to support its own weight or that of structures, which could result in loss of foundation bearing or differential settlement. Liquefaction may also result in cracks in the ground surface followed by the emergence of a sand-water mixture.

Los Altos sits on the very deep alluvial soils of the Santa Clara Valley floor, the soils of which contains silt, clay, sand, and gravel deposits, extending up to a depth of 4,000 to 5,000 feet throughout most of the city. Therefore, most of the city has low risk for liquefaction. According to the DOC, only a small portion of the western portion of the city near Foothill Expressway and University Avenue is subject to liquefaction (DOC 2022). As shown in Figure 6, one site in the northwestern portion of the city as well as several sites in the southern portion of the city and near Hale Creek and Permanente Creek are located on medium and very high liquefaction zones.

Seismically induced settlement occurs in loose to medium dense unconsolidated soil above groundwater. These soils compress (settle) when subject to seismic shaking. The settlement can be exacerbated by increased loading, such as from the construction of buildings. Settlement can also result solely from human activities including improperly placed artificial fill, and structures built on soils or bedrock materials with differential settlement rates.

Landslides

Landslides result when the driving forces that act on a slope (i.e., the weight of the slope material, and the weight of objects placed on it) are greater than the slope's natural resisting forces (i.e., the shear strength of the slope material). Slope instability may result from natural processes, such as the erosion of the toe of a slope by a stream, or by ground shaking caused by an earthquake. Slopes can also be modified artificially by grading, or by the addition of water or structures to a slope. Development that occurs on a slope can substantially increase the frequency and extent of potential slope stability hazards.

Areas susceptible to landslides are typically characterized by steep, unstable slopes in weak soil/bedrock units which have a record of previous slope failure. There are numerous factors that affect the stability of the slope, including: slope height and steepness, type of materials, material strength, structural geologic relationships, ground water level, and level of seismic shaking.

As shown in Figure 6, there are minimal landslide zones located within Los Altos. No housing inventory sites are located in a landslide zone.

Expansive Soils

Expansive soils can change dramatically in volume depending on moisture content. When wet, these soils can expand; conversely, when dry, they can contract or shrink. Sources of moisture that can trigger this shrink-swell phenomenon include seasonal rainfall, landscape irrigation, utility leakage, and/or perched groundwater. Expansive soil can develop wide cracks in the dry season, and changes in soil volume have the potential to damage concrete slabs, foundations, and pavement. Special building/structure design or soil treatment are often needed in areas with expansive soils. Expansive soils are typically very fine-grained with a high to very high percentage of clay. The clay minerals present typically include montmorillonite, smectite, and/or bentonite. Linear extensibility is used to determine the shrink-swell potential of soils. The shrink-swell potential or expansivity is low if the soil has a linear extensibility of less than 3 percent; moderate if 3 to 6 percent; high if 6 to 9 percent; and very high if more than 9 percent. Figure 7 shows soil types within the city and Table 12 lists those soil types and describes their expansivity.

Table 12 Los Altos Soil Parameters

Map Unit #	Name	Expansivity[1]
130	Urban Land Still-Complex, 0 to 2 percent slopes	Moderate
131	Urban Land Elpaloalto Complex, 0 to 2 percent slopes	Moderate to Very High
135	Urban Land-Stevenscreek Complex, 0 to 2 percent slopes	Moderate
136	Urban Land-Stevenscreek Complex, 2 to 9 percent slopes	Moderate
140	Urban Land-Flaskan Complex, 0 to 2 percent slopes	Low to Moderate
141	Urban Land-Flaskan Complex, 2 to 9 percent slopes	Low to Moderate
170	Urban-Landelspark Complex, 0 to 2 percent slopes	Low
175	Urbanland-Botella Complex, 0 to 2 percent slopes	Low
317	Urbanland-Cropley Complex, 0 to 2 percent slopes	High
320	Literr-Merbeth Complex, 15 to 30 percent slopes	Moderate to High
327	Literr-Urbanland-Merbeth Complex, 9 to 15 percent slopes	Moderate to High
330	Montavista Clay Loam, 15 to 30 percent slopes	Low to Moderate
331	Urbanland-Montavista Complex, 15 to 30 percent slopes	Moderate to High
332	Urbanland-Montavista Complex, 2 to 9 percent slopes	Moderate to High
334	Urban Land-Montavista-Togasara Complex, 9 to 15 percent slopes	Moderate to High
337	Urban Land-Togasara-Montavista Complex, 2 to 9 percent slopes	Moderate to High

[1] Low expansivity: <3% linear extensibility

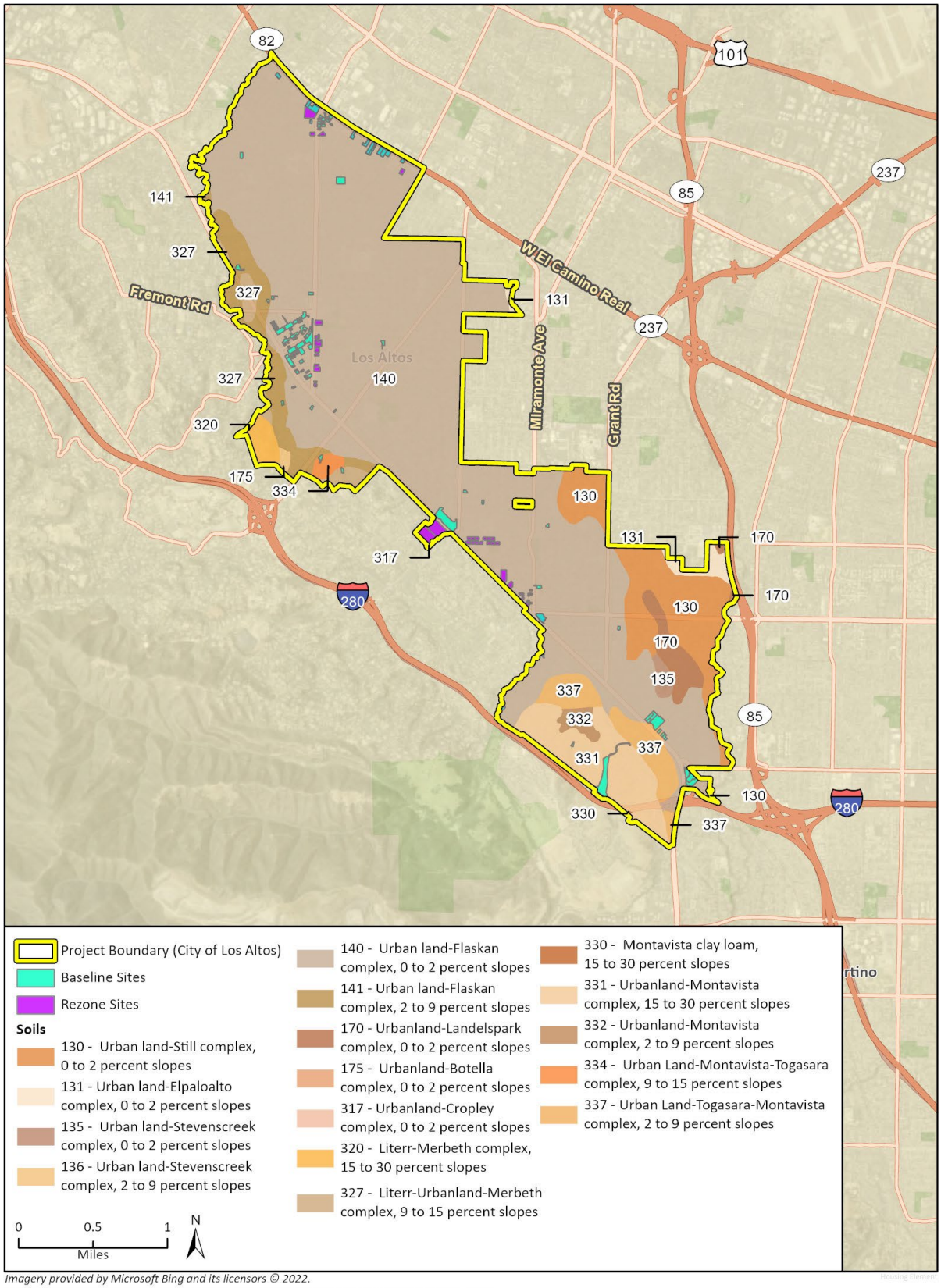
Moderate expansivity: 3-6% linear extensibility

High expansivity: 6-9% linear extensibility

Very high expansivity: >9% linear extensibility

Sources: USDA 2022, UC Davis 2022

Figure 7 Soils Types in Los Altos



Imagery provided by Microsoft Bing and its licensors © 2022.
Additional data provided by Natural Resource Conservation Service Soil Survey Geographic , 2022.

Erosion

Erosion is the wearing away of the soil mantle by running water, wind or geologic forces. It is a naturally occurring phenomenon and ordinarily is not hazardous. However, excessive erosion can contribute to landslides, siltation of streams, undermining of foundations, and ultimately the loss of structures. Removal of vegetation tends to heighten erosion hazards.

Regulatory Setting

California Building Code

The California Building Code (CBC), Title 24, Part 2 provides building codes and standards for the design and construction of structures in California. It requires, among other things, seismically resistant construction and foundation and soil investigations prior to construction. The CBC also establishes grading requirements that apply to excavation and fill activities and requires the implementation of erosion control measures. The City is responsible for enforcing the CBC within Los Altos. Chapter 12.08 of the LAMC enforces the adoption of the California Building Code (Title 24, Part 2).

The referenced codes and standards include requirements for evaluations of geologic conditions at future project sites and design and construction standards to address geologic hazards. Geotechnical investigations are performed to identify the geologic conditions at a site and to evaluate whether a proposed project is feasible given the existing geological conditions. The Geotechnical report must be completed by a California licensed professional and must provide recommendations for foundation and structural design to address any geologic hazards. Such reports are required under the following conditions:

- New structures designed under the California Building Code in accordance with CBC 1803.5.11 and CBC 1803.5.12.
- New structures designed under the California Residential Code and located in a seismic hazard zone in accordance with CRC R401.4. This requirement does not apply to new accessory structures including utility sheds, garages and accessory dwelling units.
- New structures within a delineated earthquake fault zone:
- A single-family wood-frame or steel-frame dwelling exceeding two stories or when any dwelling is part of a development of four or more dwellings. Public Resources Code Chapter 7.5
- Multi-family and commercial of any kind.
- Alterations or additions to any structure within a seismic hazard zone which exceed either 50 percent of the value of the structure or 50 percent of the existing floor area of the structure. Public Resources Code Chapter 7.8
- In accordance with CBC 1803.5.2 and CRC R401.4.1 where design values exceed the presumptive values or the classification, strength or compressibility of the soil is in doubt.
- Where deep foundations will be used, a geotechnical investigation shall be conducted in accordance with CBC 1803.5.5.
- For new structures assigned to Seismic Design Category C, D, E or F, a geotechnical investigation shall be conducted in accordance with CBC 1803.5.11

Los Altos General Plan

The Natural Environment and Hazards Element of the Los Altos General Plan includes the following goals and policies related to geologic hazards:

Goal 1: Minimize risks of personal injury and property damage associated with seismic activity, landslides, and other geologic hazards.

- **Policy 1.1:** Update acceptable levels of risk/life safety standards when necessary, and see that buildings are brought up to those standards, consistent with state law.
- **Policy 1.2:** Avoid placement of critical facilities and high occupancy structures in areas known to be prone to ground failure during an earthquake.
- **Policy 1.3:** Require soil analysis and erosion mitigation for all development proposed on sites known to be prone to erosion or ground failure.

Impact Analysis

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

There are no earthquake fault zones as delineated on the Alquist-Priolo Earthquake Fault Zoning Map in Los Altos (DOC 2021a). The closest active fault is the San Andreas Fault which is located approximately 5 miles west of the city. As a result, the likelihood of surface rupture occurring from active faulting that would affect future development under the proposed HEU is remote. No impact would occur.

NO IMPACT

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. Therefore, a project would not have a significant environmental effect involving strong seismic ground shaking unless the project would increase the risk of harm to surrounding properties from such ground shaking. Any such impacts from any development project facilitated by the HEU is unlikely, not currently known, and wholly speculative at this time based upon available evidence. Therefore, the project would not have any known environmental impact involving strong seismic ground shaking.

Even if CEQA were concerned with impacts of the environment on projects, the impact would be less than significant. As with any site in the Bay Area region, development under the proposed HEU is susceptible to strong seismic ground shaking in the event of a major earthquake. Nearby faults include the San Andreas Fault, the Hayward Fault and the Calaveras Fault. These faults are capable of producing strong seismic ground shaking in the city.

Although nothing can ensure that residences and infrastructure do not fail under seismic stress, proper engineering can minimize the risk to life and property. Accordingly, building standards have been developed for construction in areas subject to seismic ground-shaking. Development facilitated by the proposed HEU would be required to comply with standards established by LAMC

Chapter 12.08 and 12.10, which adopts the California Building Code and the California Residential Code, respectively. The requirements of the California Building Code ensure that new habitable structures are engineered to withstand the expected ground acceleration at a given location. Further, California Building Code Chapter 18 requires that actions recommended in a site-specific soil investigation are incorporated into the construction of each structure. Additionally, the project would promote infill development, which may involve replacing older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects of strong ground shaking. Although the risk of sustaining an earthquake with higher ground accelerations can never be completely eliminated, compliance with all applicable provisions of the California Building Code and the LAMC would ensure that potential impacts from ground-shaking would be minimized to the extent possible.

Conformance with the requirements of the California Building Code, the California Residential Code, and LAMC would reduce impacts related to seismic ground shaking.

NO IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. Therefore, a project would not have a significant environmental effect involving seismic-related ground failure, including liquefaction, unless the project would increase the risk of harm to surrounding properties from such geologic hazards. Any such impacts from any development project facilitated by the HEU is unlikely, not currently known, and wholly speculative at this time based upon available evidence. Therefore, the project would not have any known environmental impact involving seismic-related ground failure, including liquefaction.

Even if CEQA were concerned with impacts of the environment on projects, the impact would be less than significant. As shown on Figure 6, although the majority of inventory sites are not located in liquefaction zones, some would be located on high to very high liquefaction zones within the City. However, future development facilitated by the proposed HEU would be subject to applicable policies within the Natural Environment and Hazards Element of the Los Altos General Plan, specifically Policy 1.3, requires soil analysis and erosion mitigation for all development proposed on sites know to be prone to erosion or ground failure. In addition, LAMC Section 13.20.070 (Required Soil Report) requires preparation of a preliminary soils report to identify soil problems which would lead to structural defects and incorporate corrective actions to prevent structural damage. Policy 1.3 and LAMC Section 13.20.070 would require preparation of a soils analysis, which would identify potentially liquefiable soils on the housing sites. Chapter 18 of the California Building Code also requires that actions recommended in a site-specific soil investigation are incorporated into the construction of each structure. Compliance with State and City requirements would reduce seismic ground shaking impacts with current engineering practices and the project would not exacerbate liquefaction potential in the area. As such, the proposed HEU would not directly or indirectly cause substantial adverse effects from liquefaction risk.

NO IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

As shown in Figure 6, no proposed housing sites are located on or in proximity to landslide-prone areas. Also, development facilitated by the proposed HEU would be required to comply with the Public Resources Code (PRC) Section 2690-2699.6, *Seismic Hazards Mapping Act,* Chapter 12.08 and 12.10 of the LAMC, which adopts the California Building Code (CBC) and the California Residential Code, respectively, and the City's design review process, which regulates and provides requirements for development on steeper slopes. Furthermore, development facilitated by the proposed HEU would be required to adhere to Policy 1.3 of the Natural Environment and Hazards Element of the Los Altos General Plan and LAMC Section 13.20.070 which would require soil analysis and erosion mitigation and would reduce impacts to landslides to a less than significant level. Therefore, the impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

The proposed HEU would mostly include infill development in undeveloped and underutilized areas and rezoning to allow for increased density. Demolition and construction activities would be required to comply with CBC, Appendix Section J110, Erosion Control Standards, pursuant to Chapter 12.08 of the LAMC, which ensures appropriate erosion and stormwater pollution control during grading and construction activities.

Construction activities that occur on more than one acre are required to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit. NPDES requires the development of a storm water pollution prevention plan (SWPPP), which includes best management practices (BMP) to reduce erosion and topsoil loss from stormwater runoff. BMP examples generally include an effective combination of erosion and sediment controls, which include barriers such as silt fences, hay bales, drain inlet protection, or gravel bags.

As discussed under checklist questions (a.3), (a.4), and (c) above, development facilitated under the proposed HEU would also be required to comply with Policy 1.3 of the Natural Environment and Hazards Element of the Los Altos General Plan, which would require soil analysis and erosion mitigation in order to prevent excessive erosion and runoff. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. Therefore, a project would not have a significant environmental effect involving landslides, lateral spreading, subsidence, liquefaction, or collapse, unless the project would increase the risk of harm to surrounding properties from such geologic hazards. Any such impacts from any development project facilitated by the HEU is unlikely, not currently known, and wholly speculative at this time based upon available evidence. Therefore, the project would not have any known environmental impact involving landslides, lateral spreading, subsidence, liquefaction, or collapse.

Moreover, as shown in Figure 6, no proposed housing sites are located on or in proximity to landslide-prone areas. Development facilitated by the proposed HEU would be required to comply with the Public Resources Code (PRC) Section 2690-2699.6, *Seismic Hazards Mapping Act,* Chapter 12.08 and 12.10 of the LAMC, which adopts the California Building Code (CBC) and the California Residential Code, respectively, and the City's design review process, which regulates and provides requirements for development on steeper slopes. The project would also facilitate development that would replace older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects associated with unstable soils and liquefaction. Furthermore, development facilitated by the proposed HEU would be required to adhere to Policy 1.3 of the Natural Environment and Hazards Element of the Los Altos General Plan and LAMC Section 13.20.070 which would require soil analysis and erosion mitigation and would reduce impacts to landslides, lateral spreading, subsidence, liquefaction, and collapse.

NO IMPACT

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Soils that volumetrically increase (swell) or expand when exposed to water and contract when dry (shrink) are considered expansive soils. The potential for soil to shrink and swell depends on the amount and types of clay in the soil. Highly expansive soils can cause structural damage to foundations and roads without proper structural engineering and are less suitable or desirable for development than non-expansive soils because of the necessity for detailed geologic investigations and costlier grading applications.

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. Therefore, a project would not have a significant environmental effect involving expansive soils unless the project would increase the risk of harm to surrounding properties from such geologic hazards. Any such impacts from any development project facilitated by the HEU is unlikely, not currently known, and wholly speculative at this time based upon available evidence. Therefore, the project would not have any known environmental impact involving expansive soils.

Even if CEQA were concerned with impacts of the environment on projects, the impact would be less than significant. As shown in Table 12, only map unit 130 (Urban Land Elpaloalto Complex, 0 to 2 percent slopes) has moderate to very high soil expansivity. As shown in Figure 7, no housing sites are located on map unit 130. Table 12 also shows moderate to high soil expansivity in map units 320 (Literr-Merbeth Complex, 15 to 30 percent slopes), 327 (Literr-Urbanland-Merbeth Complex, 9 to 15 percent slopes), 331 (Urbanland-Montavista Complex, 15 to 30 percent slopes), 332 (Urbanland-Montavista Complex, 2 to 9 percent slopes), 334 (Urban Land-Montavista-Togasara Complex, 9 to 15 percent slopes), and 337 (Urban Land-Togasara-Montavista Complex, 2 to 9 percent slopes). According to Figure 7, only three housing sites are located on map unit 327, two housing sites on map unit 331, and one housing site on map unit 334. Future development would be required to comply with the Natural Environment and Hazards Element of the Los Altos General Plan, which includes goals and policies designed to address potential geologic impacts. Consistent with Section 1803 of the CBC, Policy 1.3 of the Los Altos General Plan would require soil analysis and erosion mitigation which would identify areas of expansive soils and require corrective action to reduce impacts to a less than significant level. Further, LAMC Section 13.20.070 (Required Soil Report) requires preparation of a preliminary soils report to identify the presence of expansive soils which would lead to structural defects and incorporate corrective actions to prevent structural damage.

The CBC also includes requirements to address soil-related hazards. Typical measures to treat hazardous soil conditions involve removal of soil or fill materials, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. This would ensure that the potential for projects to occur on expansive soils such that substantial direct or indirect risks to life or property to occur would be reduced.

NO IMPACT

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Los Altos is served by the City's established wastewater system. The proposed HEU would facilitate development on undeveloped or underutilized sites and would rezone sites to allow for increased density. These sites are and would continue to be served by the City's wastewater system. The project would not include the use of septic tanks or alternative wastewater disposal systems. There would be no impact.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). Paleontological resources are not found in "soil" but are contained within the geologic deposits or bedrock that underlies the soil layer. Typically, fossils are greater than 5,000 years old (i.e., older than middle Holocene in age) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP] 2010). Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. It is possible to evaluate the potential for geologic units to contain scientifically important paleontological resources, and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they are discovered during construction of a development project.

Rincon Consultants evaluated the paleontological sensitivity of the geologic units that underlie the project site to assess the project's potential for significant impacts to scientifically important paleontological resources. The analysis was based on the results of a paleontological locality search and a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the project site. According to the SVP (2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the project site. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

According to the geologic map of Brabb et al. (2000) and as shown on Figure 8, the City of Los Altos is underlain by five geologic units: Quaternary stream channel deposits, Quaternary natural levee deposits, Quaternary (Holocene) alluvial fan and fluvial deposits, Quaternary (Pleistocene) alluvial fan and fluvial deposits, and the Santa Clara Formation.

Quaternary stream channel deposits underlie the various creeks in Los Altos including Stevens Creek, Permanente Creek, Hale Creek, and Adobe Creek. Quaternary stream channel deposits consist of poorly to well-sorted silt, sand, or sandy gravel with some cobbles and are Holocene in age (Brabb et al. 2000). Quaternary stream channel deposits are too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary stream channel deposits have low paleontological sensitivity.

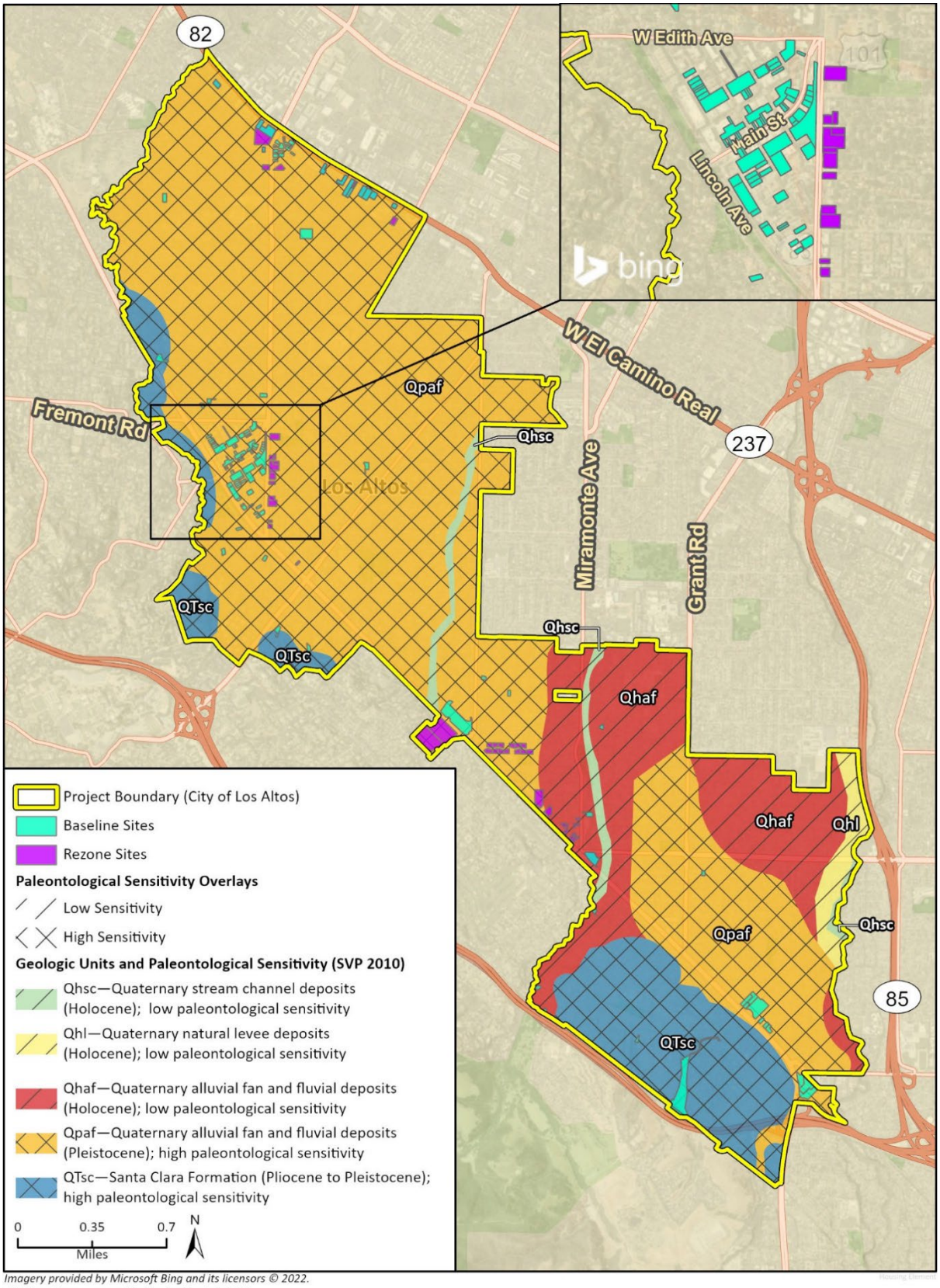
Quaternary natural levee deposits are found along Stevens Creek in eastern Los Altos. Quaternary natural levee deposits consist of loose, moderately to well-sorted sandy silt grading upward to silty clay and are Holocene in age (Brabb et al. 2000). Quaternary natural levee deposits are too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary natural levee deposits have low paleontological sensitivity.

Quaternary (Holocene) alluvial fan and fluvial deposits underlie much of eastern Los Altos. Quaternary (Holocene) alluvial fan and fluvial deposits consist of brown or tan, sand or gravel that grades upward to sandy or silty clay and are Holocene in age (Brabb et al. 2000). Fossil discoveries in areas mapped as Holocene alluvial sediments in Santa Clara County demonstrate that Holocene-aged alluvial fan and fluvial deposits may be as thin as 9 feet in some areas and are underlain by Pleistocene-aged sediments (Maguire and Holroyd 2016). Quaternary (Holocene) alluvial fan and fluvial deposits are too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary (Holocene) alluvial fan and fluvial deposits have low paleontological sensitivity.

Quaternary (Pleistocene) alluvial fan and fluvial deposits underlie large portions of Los Altos. Quaternary (Pleistocene) alluvial fan and fluvial deposits consist of brown, gravelly or clayey sand that grades upward into sandy clay and are Pleistocene in age (Brabb et al. 2000). Pleistocene alluvial sediments have produced significant vertebrate fossils throughout Santa Clara County, including mammoth (*Mammuthus*), ground sloth (*Paramylodon*), camel (*Camelops*), peccary (*Platygonus*), pronghorn (*Capromeryx*), rabbit, rodents, and reptiles (Jefferson 2010; Maguire and Holroyd 2016; Paleobiology Database [PBDB] 2022; University of California Museum of Paleontology [UCMP] 2022). Given this fossil-producing history, Quaternary (Pleistocene) alluvial fan and fluvial deposits have high paleontological sensitivity.

The Santa Clara Formation underlies portions of southern and western Los Altos. The Santa Clara Formation consists of gray to reddish-brown, moderately consolidated, conglomerate, sandstone, and mudstone arranged in irregular and lens-like beds and is Pleistocene to Pliocene in age (Brabb et al. 2000). The Santa Clara Formation contains several significant paleontological resources in Santa Clara County yielding taxa such as American cheetah (*Miracinonyx*), bison (*Bison*), horse (*Equus*), deer (Cervidae), fish, plants, and invertebrates (PBDB 2022; UCMP 2022). Given this fossil, producing history, the Santa Clara Formation has high paleontological sensitivity.

Figure 8 Geologic Map and Paleontological Sensitivity of Los Altos



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Additional imagery provided by Brabb et al. 2000

Ground disturbance in previously undisturbed sediments with high paleontological sensitivity may result in significant impacts to paleontological resources. However, potentially significant impacts to paleontological resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the individual project site conditions (e.g., presence of previously disturbed sediments or artificial fill) and the characteristics of the proposed ground disturbance (e.g., depth, total volume, type of construction). Ground disturbing activities associated with construction facilitated by this project, particularly in areas that have not previously been developed with urban uses, have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in areas of high paleontological sensitivity. Consequently, damage to or destruction of fossils could occur due to development under the proposed HEU. This impact would be potentially significant.

Mitigation Measures

The following mitigation measure is required:

GEO-1 Protection of Paleontological Resources

The City shall establish the following Standard Condition of Approval for projects requiring approval in areas of high paleontological sensitivity (Quaternary (Pleistocene) alluvial fan and fluvial deposits and Santa Clara Formation) and that involve ground disturbance below the level of past disturbance:

PALEONTOLOGICAL RESOURCES ASSESSMENT

Prior to initial ground disturbance, the applicant shall retain a Qualified Professional Paleontologist, as defined by the SVP (2010), to conduct a paleontological resources assessment (PRA). The PRA shall determine the age and paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP (2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area.

If underlying formations are found to have a high potential for paleontological resources, the Qualified Professional Paleontologist shall create a Paleontological Mitigation and Monitoring Program, which will be approved by the City and contain the following elements:

PALEONTOLOGICAL WORKER ENVIRONMENTAL AWARENESS PROGRAM (WEAP)

Prior to the start of construction, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and procedures for notifying paleontological staff should fossils be discovered by construction staff.

PALEONTOLOGICAL MONITORING

Full-time paleontological monitoring shall be conducted during ground disturbing construction activities (i.e., grading, trenching, foundation work) in sediments assigned a high paleontological sensitivity. Paleontological monitoring shall be conducted by a qualified Paleontological Resources Monitor, as defined by the SVP (2010). The duration and timing of the monitoring will be determined by the Qualified Professional Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City. If the Qualified Professional Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations

has been reached, they may recommend that monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Professional Paleontologist at that time. In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Professional Paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil is scientifically significant, then it shall be salvaged, identified to the lowest possible taxonomic level, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps.

Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would ensure procedures are in place to avoid destruction of paleontological resources. Impacts would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	■	☐

Environmental Setting

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations. GHGs are emitted by natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are usually by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (U.S. EPA 2021). Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (IPCC 2021).[10]

In 2018, Los Altos generated approximately 1,128 MT CO_2e from government activities, and 110,192 MT CO_2e from community activities, for a total of 111,320 MT CO_2e. For the community sector, on-road motor vehicles were the largest source of GHG emissions within Los Altos, generating approximately 65 percent of total community GHG emissions. Residential energy was the second largest GHG emission source, generating approximately 32 percent of total community GHG emissions. Commercial energy contributed approximately 7 percent, while solid waste and water

[10] The Intergovernmental Panel on Climate Change's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWPs from the Fourth Assessment Report.

and wastewater represented the smallest GHG emissions sources at 2 percent and 1 percent, respectively. Table 13 provides a summary of the 2018 government and community GHG emissions inventory results by GHG emission sector.

Table 13 2018 Community GHG Emissions Inventory Results by Sector

GHG Emissions Sector	GHG Emissions (MT CO_2e)	Percent of GHG Emissions Totals
Government	**1,128**	**100%**
Employee Commute	445	39%
Vehicle Fleet	351	31%
Solid Waste Facilities	172	15%
Buildings and Facilities	134	12%
Process and Fugitive Emissions	21	2%
Water and Wastewater Treatment Facilities	5	<1%
Community	**110,192**	**100%**
Transportation and Mobile Sources	71,531	65%
Residential Energy	35,661	32%
Commercial Energy	7,535	7%
Solid Waste	2,653	2%
Water and Wastewater	1,063	1%

MT CO_2e = metric tons of carbon dioxide equivalent

Totals may not add due to rounding.

Source: City of Los Altos 2022a

Impact Analysis

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

In response to climate change, California implemented AB 32, the "California Global Warming Solutions Act of 2006." AB 32 requires the reduction of statewide GHG emissions to 1990 emissions levels (essentially a 15 percent reduction below 2005 emission levels) by 2020 and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. On September 8, 2016, the Governor signed SB 32 into law, extending AB 32 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program and the Low Carbon Fuel Standard, and implementation of recently adopted policies and legislation, such as SB 1383 (aimed at reducing short-lived climate pollutants including methane, hydrofluorocarbon gases, and anthropogenic black carbon) and SB 100 (discussed further below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends local governments adopt policies and locally appropriate quantitative thresholds consistent with a statewide per capita goal of 6 metric tons MT CO_2e by 2030 and 2 MT

CO_2e by 2050 (CARB 2017). On September 10, 2018, the Governor signed Executive Order (EO) B-55-18, which identifies a new goal of carbon neutrality by 2045 and supersedes the goal established by EO S-3-05.[11] CARB has been tasked with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update which is currently being drafted.

BAAQMD recently adopted updated thresholds for evaluating the significance of climate impacts from plan-level projects on April 20, 2022. The updated thresholds state that a plan-level project must either meet the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

The City of Los Altos adopted its Climate Action and Adaptation Plan (CAAP) in March 2022 as an update to the 2013 Climate Action Plan (CAP), which aims to achieve carbon neutrality by 2035. Although the City's CAAP includes a GHG emissions inventory; a reduction target of 67,000 MT CO_2e by 2035; forecast projected emissions for activities covered by the CAAP; reduction measures in the form of strategies, goals, and actions; and a monitoring and reporting process, it was not adopted in following comprehensive environmental review and therefore conservatively does not consider it to be a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b) for the purpose of this analysis. However, the CAAP outlines guidance to reduce the emissions in Los Altos by approximately 67,000 MT CO_2e by 2035 in order to reach the goal of carbon neutrality by 2035. Therefore, the CAAP is consistent with the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045, and the project would result in a less than significant impact if it would be consistent with the City's CAAP. As shown below under checklist question (b), the proposed HEU would be consistent with applicable CAAP strategies and actions. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

Potential Emissions Generated by the Proposed HEU

For informational purposes, GHG emissions associated with development under the proposed HEU are shown in Table 14. Since the city's Reach Code requires all-electric units in future construction, it was assumed that the natural gas demand estimated for the project would instead be supplied by electricity to account for increased electricity usage. As shown in the table, annual emissions from full buildout of the project's envisioned increase of 1,648 dwelling units over existing conditions would be 8,011 MT of CO_2e per year. With a project increase in population of 4,582 over existing conditions, this would result in an increase of 1.7 MT of CO_2e per service population per year. This analysis is provided for informational purposes only because the BAAQMD significance thresholds are based on consistency with the City's CAAP, as discussed above.

[11] Executive Order (EO) S-3-05, signed by Governor Arnold Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the EO established total GHG emission targets for the state. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

Table 14 Operational GHG Emissions

Emission Source	Annual Emissions (MT of CO_2e)
Operational	
Area	20
Energy	3
Mobile	7,481
Waste	439
Water	67
Operational Total	**8,011**
Project Population Increase	4,582
MT of CO_2e per Service Population	**1.7**

Source: See Appendix C for modeling results. Trip generation information provided by Hexagon Transportation Consultants, Inc.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As discussed under checklist question (a) above, the City of Los Altos adopted its Climate Action and Adaptation Plan (CAAP) in March 2022 as an update to the 2013 Climate Action Plan (CAP), which aims to achieve carbon neutrality by 2035. Table 15 shows the project's consistency with applicable CAAP strategies and actions. As shown in Table 15, the proposed HEU would be consistent with applicable goals and actions from the City's CAAP. This impact would be less than significant.

Table 15 Project Consistency with Applicable Climate Action and Adaptation Plan Actions

Recommended Actions	Project Consistency
Transportation	
Action 1.2A: Support transit-oriented development. Require increased residential and commercial density and diversity along main corridors and commercial areas, including affordable multi-family housing and mixed-use developments. Encourage Transit-Oriented Development along major bus routes within and outside of the City to attract new employers and better serve the daily needs of residents and employees. Set a target of at least a 20% increase in the percent of the city's population living in high-density Transit-Oriented Development by 2035. Integrate with the City's Housing Element (ensure meeting RHNA commitments encourages high-density & affordable housing in transit-accessible/walkable areas).	**Consistent:** The project would facilitate development of housing in the Downtown, near commercial areas, and near or adjacent to transportation corridors currently served by bus stops and Class II and Class III bicycle lanes.

Recommended Actions	Project Consistency
Action 1.5A: Increase the number of available Level 2 EV charging stations in workplace, commercial and multifamily areas. Increase the number of available Level 2 EV charging stations at businesses with >50 employees, multifamily homes of >10 units, and in commercial areas. Adopt an Electric Vehicle Supply Equipment Master Plan to identify number and location of EVSE.	**Consistent:** Pursuant to the City's Reach Code, new multi-family residences with less than or equal to 20 dwelling units would be required to install at least one Level 2 EV Ready space for each dwelling unit. For multi-family residences with more than 20 units, 25 percent of the dwelling units with parking spaces must include at least one Level 2 EV Ready space, and each remaining dwelling unit with parking spaces must include one Level 1 EV Ready space. Future development would also be required to comply with LAMC Chapter 12.22, which mandates the implementation of the most current version of Title 24. Title 24 contains requirements for EV spaces in new construction. Future development facilitated by the project would be required to comply with the most updated EV requirements in both the City's Reach Code and Title 24 at the time of construction.
Action 1.6A: Phase out off-road fossil fuel engines such as landscaping equipment. Accelerate phase-out of small off-road fossil fuel engines such as landscaping equipment through bans, replacement ordinances, and/or incentives for electric alternatives. Work to reduce construction-related emissions. Form an Environmental Commission subcommittee to develop rules and/or ordinances.	**Consistent:** Pursuant to LAMC Section 6.16.070, residents of new future development are prohibited from using gasoline-powered leaf blowers. Additionally, as discussed in Section 6, *Energy*, construction activities associated with reasonably foreseeable development under the proposed HEU would be required to utilize fuel-efficient equipment consistent with federal and State regulations, which would reduce the usage of energy and emittance of GHG.
Energy	
Action 2.1B: Increase residential and commercial energy efficiency. Develop a program to increase energy efficiency in existing residential buildings including wall and ceiling insulation, roof replacements, new ducting and windows, lighting upgrades, and outdoor amenities upgrades. Identify outside funding to perform upgrades identified in energy audits performed under action 2.1 A, and ensure eligible residents and businesses take advantage of all available energy efficiency incentive programs.	**Consistent.** Development facilitated by the project would be required to comply with the LAMC Chapter 12.22, which mandates the implementation of Title 24. Compliance would include complying with the most updated rooftop solar requirements at the time of construction. Future development would also be required to comply with the City's Reach Code which is currently being revised, but would require all-electric construction for all newly constructed buildings. Electricity would be provided either by Silicon Valley Clean Energy (SVCE) or PG&E, which are required to generate electricity that would increase renewable energy resources to 60 percent by 2030 and 100 percent by 2045. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which currently sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).
Action 2.5A: Increase community solar capacity. Increase solar panel requirements in new construction from 4kW to 6kW minimum, and add solar panel requirement for large additions and remodels (>4kW). Ensure residents and businesses are aware of and take advantage of incentive programs for solar panels.	**Consistent.** Pursuant to Title 24, most residences would be required to include rooftop solar systems. LAMC Chapter 12.70 serves to expedite and streamline the solar permitting process for small residential rooftop solar systems in order to incentivize new construction to include solar.

Recommended Actions	Project Consistency
Resource Conservation	
Action 3.1A: Increase the landfill diversion rate. Increase landfill diversion rate to 90% by 2030 and 95% by 2035, negotiated in the next Franchise Agreement. Launch an education and awareness campaign for residents and businesses to help promote best practices.	**Consistent**: In accordance with LAMC Section 6.12.050, multi-family residences with five or more units would be required to provide recycling service for tenants. Future residents would also be required to recycle organics pursuant to SB 1383.
Action 3.1C: Reduce waste from demolition, construction and building materials. Develop an ordinance requiring the deconstruction of old buildings instead of demolition and the recycling/re-use of materials. Provide incentives to builders for the use of environmentally friendly construction materials.	**Consistent**: Pursuant to Chapter 6.14 of the LAMC, future projects would be required to comply with construction waste management practices to divert at least 65 percent of construction and demolition debris.
Action 3.2A: Increase communitywide water efficiency. Increase education and awareness of water efficiency programs through Calwater and other organizations. Continue to support implementation of the 2015 UWMP through enforcement of the 2015 Model Water Efficient Landscape Ordinance. Develop an ordinance requiring conversion of grass lawns to low-water landscaping. Consider an update to the building code prohibiting new grass lawns.	**Consistent:** Future development that needs new or expanded water service would be required to comply with the California Water Service Company's and CALGreen's water efficiency regulations, and the state's Model Water Efficiency Landscape Ordinance to reduce indoor and outdoor water use.
Climate Risk	
Action 6.1C: Expand green infrastructure program to reduce impermeable surface areas and capture runoff from paved areas. Implement porous paving in sidewalks, parking lots and driveways, and other water percolation methods like bioswales to reduce stormwater runoff to streets.	**Consistent:** Future development facilitated by the proposed HEU would be required to comply with stormwater pollution prevention measures outlined in Chapter 10.16 of the LAMC, which would reduce stormwater runoff to streets.

Source: City of Los Altos 2022a

LESS THAN SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	■	☐	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	■	☐	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	■	☐

Regulatory Setting

Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA)

These acts established a program administered by the USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

U.S. Department of Transportation Regulations

DOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers that transport hazardous waste on public roads. The Secretary of the DOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in in 49 U.S. Code (U.S.C.) Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of 49 U.S.C. The Pipeline and Hazardous Materials Safety Administration, formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 of the CFR Parts 100-180. Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any 'person' in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any 'person' of hazardous materials in commerce.

Department of Toxic Substances Control

As a department of the California Environmental Protection Agency, the DTSC is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code.

The DTSC also administers the California Hazardous Waste Control Law (HWCL) to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the USEPA approves the California program, both state and federal laws apply in California. The HWCL lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the State Water Resources Control Board, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies

and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

California Occupational Safety and Health Act – California Labor Code, Section 6300 et seq.

The California Occupational Safety and Health Act of 1973 addresses California employee working conditions, enables the enforcement of workplace standards, and provides for advancements in the field of occupational health and safety. The Act also created CalOSHA, the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. CalOSHA's standards are generally more stringent than federal regulations. Under the former, the employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure. The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. At sites known or suspected to be contaminated by hazardous materials, workers must have training in hazardous materials operations and a Site Health and Safety Plan must be prepared, which establishes policies and procedures to protect workers and the public from exposure to potential hazards at the contaminated site.

California Code of Regulations, Title 22, Hazardous Waste Management

At the State level, under Title 22, Division 4.5 of the CCR, DTSC regulates hazardous waste in California primarily under the authority of the Federal RCRA and the California Health and Safety Code. The HWCL, under CCR 22, Chapter 30, establishes regulations that are similar to RCRA but more stringent in their application and empowers the DTSC to administer the State's hazardous waste program and implement the federal program in California. The DTSC is responsible for permitting, inspecting, ensuring compliance, and imposing corrective action programs to ensure that entities that generate, store, transport, treat, or dispose of potentially hazardous materials and waste comply with federal and State laws. The DTSC defines hazardous waste as waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment. The DTSC shares responsibility for enforcement and implementation of hazardous waste control laws with the SWRCB and, at the local level, the LARWQCB, and city and county governments.

California Code of Regulations Title 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b)

CCR 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b) pertains to water quality aspects of waste discharge to land. The regulation establishes waste and site classifications as well as waste management requirements for waste treatment, storage, or disposal in landfills, surface impoundments, waste piles, and land treatment facilities. Requirements are minimum

standards for proper management of each waste category, which allows regional water boards to impose more stringent requirements to accommodate regional and site-specific conditions. In addition, the requirements of CCR 23, Chapter 15 applies to cleanup and abatement actions for unregulated hazardous waste discharges to land (e.g., spills).

Environmental Setting

The assessment of potential to encounter hazardous materials in soil and groundwater in the city is generally based on a search of federal, State, and local regulatory databases that identify permitted hazardous materials uses, environmental cases, and spill sites. The Department of Toxic Substances Control (DTSC) EnviroStor database contains information on properties in California where hazardous substances have been released or where the potential for a release exists. The California State Water Resources Control Board (SWRCB) GeoTracker database contains information on properties in California for sites that require cleanup, such as LUST sites, which may impact, or have potential impacts, to water quality, with emphasis on groundwater.

According to databases of hazardous material sites maintained by the DTSC (EnviroStor) and the SWRCB (GeoTracker), Los Altos has five active cleanup sites and one active school cleanup site (DTSC 2021; SWRCB 2021). As shown in Figure 9, these sites are mostly located along Foothill Expressway.

Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

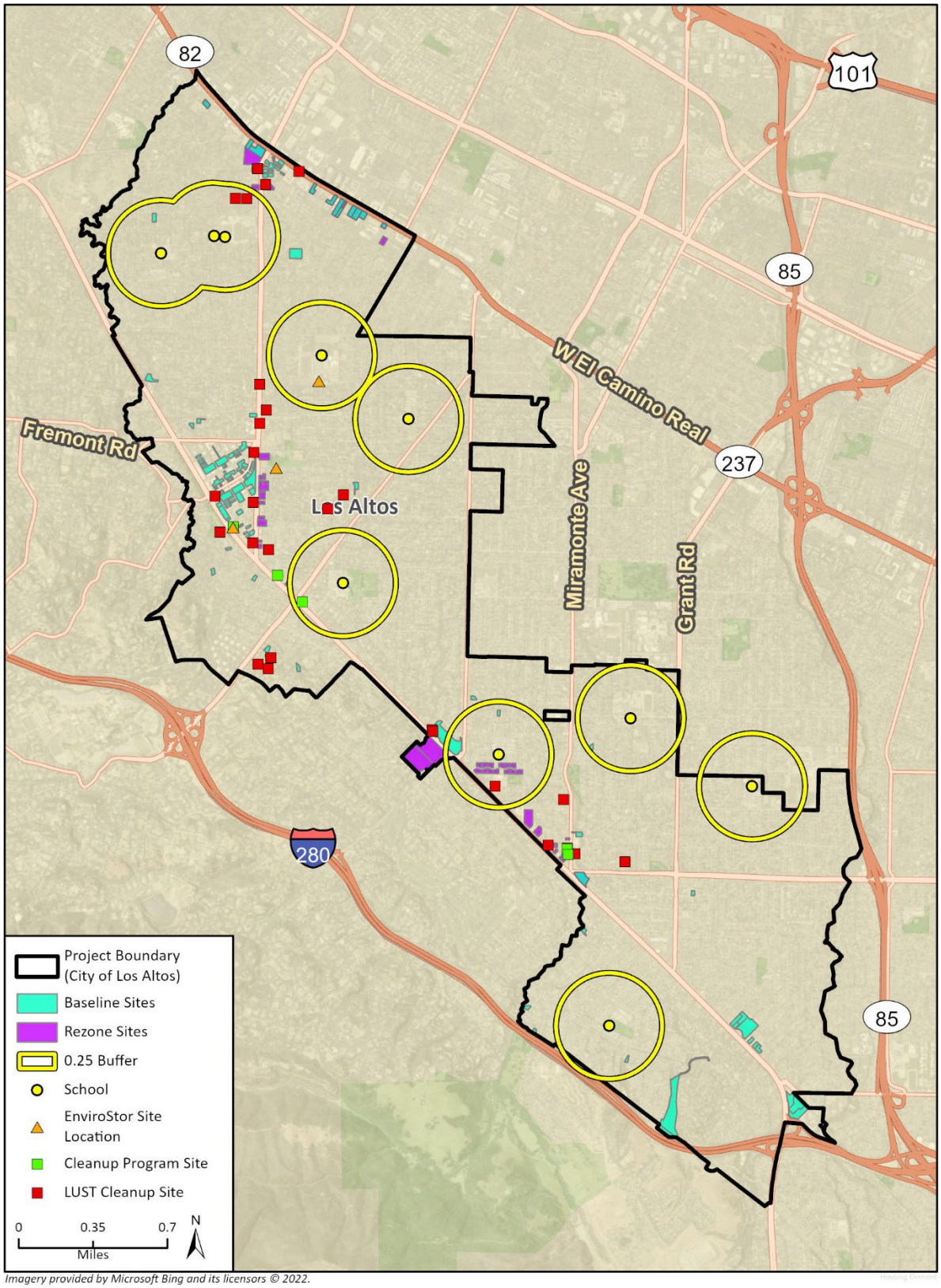
Construction Activities

Construction associated with future development under the proposed HEU may include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, State, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Specifically, as discussed under Regulatory Setting, DOT regulations would regulate the transportation process of hazardous materials and reduce the risk of accidental release into the environment.

Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction.

In addition, grading or excavation on sites with existing contamination may result in the transport and disposal of hazardous materials if they are unearthed and removed from the site. Potential health and environmental concerns related to contaminated groundwater and soil may occur during excavation and dewatering for new construction. However, future development under the project would be subject to regulatory programs such as those listed in the Regulatory Setting and overseen by the RWQCB and the DTSC.

Figure 9 Known Hazardous Sites and Hazardous Sites Located Within 0.25 Mile of a School



Imagery provided by Microsoft Bing and its licensors © 2022.
Additional data provided by Geotracker, 2022; EnviroStor, California School Campus Database (CSCD) 2022.

These agencies require applicants for development of potentially contaminated properties to perform investigation and cleanup if the properties are contaminated with hazardous substances. The removal, transport, storage, use, or disposal of hazardous materials would be subject to federal, state, and local regulations pertaining to the transport, use, storage, and disposal of hazardous materials.

Los Altos contains numerous residential and commercial buildings that, due to their age, may contain asbestos and/or lead-based paint. Structures built before the 1970s typically contained asbestos containing materials. Demolition or redevelopment of these structures could result in health hazard impacts to workers if not remediated prior to construction activities. Future development would be required to adhere to BAAQMD Regulation 11, Rule 2, which governs the proper handling and disposal of asbestos containing materials for demolition, renovation, and manufacturing activities in the Bay Area, and California Occupational Safety and Health Administration (CalOSHA) regulations regarding lead-based materials. The California Code of Regulations, Section 1532.1, requires testing, monitoring, containment, and disposal of lead-based materials, such that exposure levels do not exceed CalOSHA standards. Therefore, with adherence to State and local regulations listed in the Regulatory Setting, risk of public exposure to hazardous materials would be greatly reduced, and impacts related to hazards and hazardous materials during construction would be less than significant.

Operation

The proposed HEU is intended to expand housing capacity and would not facilitate the establishment of uses that would sell, use, store, transport, or release substantial quantities of hazardous materials such as industrial, warehouse, auto-service, or manufacturing uses. Residential uses do not typically use hazardous materials other than small amounts for cleaning and landscaping. These materials would not be different from household chemicals and solvents already in wide use throughout the Los Altos. Residents are anticipated to use limited quantities of products routinely for periodic cleaning, repair, and maintenance or for landscape maintenance/pest control that could contain hazardous materials. Those using such products would be required to comply with all applicable regulations regarding the disposal of household waste. Therefore, operation of new residential uses poses little risk of exposing the public to hazardous materials, and impacts would be less than significant.

CEQA is concerned with the impacts of a project on the environment, and not the impacts of the environment on a project. However, for informational purposes, the effects of the location of new housing units is analyzed. Although the project would place new housing units in areas near major transportation corridors where hazardous materials may be transported, the DOT's Office of Hazardous Materials Safety regulates the transportation of hazardous materials, as described in Title 49 of the CFR, and implemented by Title 13 of the CCR, would reduce the chances of hazardous release during transport. Additionally, all new development that uses hazardous materials would be required to comply with the regulations, standards, and guidelines established by the USEPA, the State, and the City of Los Altos related to storage, use, and disposal of hazardous materials. Goal 3 and Policies 3.1 and 3.2 of the Natural Environment and Hazards Element of the Los Altos General Plan also aim to regulate the use, storage, transport, and disposal of hazardous materials. Therefore, with adherence to State and local regulations, impacts related to hazards and hazardous materials during operation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As discussed under checklist question (a) above, grading or excavation on sites with existing contamination may result in the transport, disposal, and release of hazardous materials if they are unearthed and removed from the site. However, future development under the project would be subject to regulatory programs such as those overseen by the RWQCB and the DTSC. These agencies require applicants for development of potentially contaminated properties to perform investigation and cleanup if the properties are contaminated with hazardous substances. Additionally, future development would be required to comply with Chapter 6.15 of the LAMC which requires building demolition permit applicants to conduct a screening assessment of polychlorinated biphenyls in priority building materials to reduce the risk of release into the environment. Therefore, impacts would be less than significant.

Residential uses do not typically use hazardous materials other than small amounts for cleaning and landscaping. These materials would not be different from household chemicals and solvents already in wide use throughout Los Altos. Residents and workers are anticipated to use limited quantities of products routinely for periodic cleaning, repair, and maintenance or for landscape maintenance/pest control that could contain hazardous materials. Those using such products would be required to comply with all applicable regulations regarding the disposal of household waste. Therefore, operation of new residential uses poses little risk of exposing the public to hazardous materials. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Several housing sites are located within a 0.25 mile of an existing school, such as Montclaire Elementary School; Loyola Elementary School; Santa Rita Elementary School; and Bullis Charter School, North Campus. The proposed HEU would not involve new industrial or manufacturing uses, or involve the use, storage, disposal, or transportation of significant quantities of hazardous materials. They may involve use and storage of some materials considered hazardous, though primarily these would be limited to solvents, paints, chemicals used for cleaning and building maintenance, and landscaping supplies. These materials would not be different from household chemicals and solvents already in general and wide use throughout the city. Development accommodated under the project therefore would not pose as a health risk to nearby schools or childcare facilities.

Additionally, as mentioned above under impacts a and b, construction activities associated with future development may include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. Specifically, demolition of existing buildings and grading and excavation activities associated with new construction may result in emissions and transport of hazardous materials within one-quarter mile of existing schools. As discussed under checklist question (d), two housing inventory sites overlap cleanup sites. One of these sites is within 0.25 mile of a school. Therefore, grading or excavation on a site included on a list of hazardous materials sites may expose contamination within proximity of a school. However, adherence to applicable requirements, including DOT and DTSC regulations, as well as implementation of mitigation measures HAZ-1, HAZ-2, and HAZ-3 below would reduce impacts to less than significant levels. Mitigation Measure HAZ-1 would require regulatory database review

and/or investigation, and HAZ-2 requires preparation of a Soil Management Plan (SMP) if impacted soils or wastes are discovered at a project site, which would require the establishment of remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. Mitigation Measure HAZ-3 would require conduction of additional analytical testing and recommendation of soil disposal methods or other remedial engineering controls in order to reduce impacts from hazardous soils and wastes. Compliance with existing applicable regulations and policies and mitigation measures would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Overall, impacts related to release of hazardous materials within 0.25 mile of an existing or proposed school would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As shown in Figure 9, above, there are five active cleanup sites in Los Altos, three of which are located within or adjacent to housing inventory sites. There are also closed LUST cleanup sites and EnviroStor sites that are located in proximity to housing sites. One housing inventory site (APN 18956014) would overlap two closed LUST cleanup sites and one housing inventory site (APN 16741007) would overlap an active cleanup site (Los Altos Cleaners). Development facilitated by the proposed HEU may involve ground disturbance on sites where soil, soil vapor, or groundwater contamination is present such that hazardous materials are released. This could expose construction workforce and or nearby occupants to hazardous materials, and impacts could potentially be significant. Implementation of mitigation measures HAZ-1, HAZ-2, and HAZ-3 would be required. Mitigation Measure HAZ-1 would require regulatory database review and/or investigation, and HAZ-2 would require preparation of a SMP if impacted soils or wastes are discovered at a project site, which would require the establishment of remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. Mitigation measure HAZ-3 would require conduction of additional analytical testing and recommendation of soil disposal methods or other remedial engineering controls in order to reduce impacts from hazardous soils and wastes.

Mitigation Measures

The following mitigation measures are required prior to development on sites listed on a hazardous materials database or where contamination may be present:

HAZ-1 Database Review and Investigation

The City shall establish the following Standard Condition of Approval for projects requiring approval:

> *Prior to issuance of a grading permit, the SWRCB's GeoTracker database and DTSC's EnviroStor database shall be consulted by City staff or consultant to determine whether or not the site to be graded is within 500 feet of an identified active hazardous material site.*

If the site is identified in the GeoTracker or EnviroStor databases within 500 feet of an identified active hazardous material site, or if the site to be graded is located on a site that:

- *Was currently and/or historically used for railroad, agricultural, or industrial uses.*
- *Was previously or is currently utilized to store, handle, and/or generate hazardous materials.*
- *Has unknown previous site uses; and/or*
- *Was previously or is currently utilized as a manufacturing facility, a gasoline station, automobile repair shop (or similar), or dry cleaner,*

The following process shall be followed prior to issuance of a grading permit:

- *The project applicant shall retain a qualified environmental professional (Professional Geologist or Professional Civil Engineer) to prepare a Phase I ESA in accordance with current ASTM standards.*
- *If the Phase I ESA identifies any potential contamination sources, the project applicant shall retain a qualified environmental consultant to prepare a Phase II ESA (subsurface investigation) to determine whether the identified potential sources have resulted in soil, groundwater, or soil vapor contamination exceeding regulatory action levels.*
- *If the Phase II ESA identifies contamination exceeding applicable regulatory screening levels for construction workers and future site users published by the Regional Water Quality Control Board (RWQCB), Department of Toxic Substances Control (DTSC), and/or Environmental Protection Agency (EPA), a Soil Management Plan shall be prepared (see HAZ-2).*
- *If the Phase II ESA identifies contamination exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), remediation shall be conducted (see HAZ-3).*

The project applicant shall provide written evidence of regulatory database review and investigation. The City of Los Altos shall ensure that evidence of regulatory database review and investigation has been provided by the project applicant prior to project approval.

HAZ-2 Soil Management Plan for Impacted Soils

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

If impacted soils or other impacted wastes are present at the project site, the project applicant shall retain a qualified environmental professional to prepare a Soil Management Plan (SMP) prior to construction. The SMP, or equivalent document, shall be prepared to address onsite handling and management of impacted soils or other impacted wastes and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:

- *Stockpile management including stormwater pollution prevention and the installation of BMPs*
- *Guidance regarding proper disposal procedures of contaminated materials*
- *Guidance regarding monitoring, reporting, and regulatory agency notification*

- *A health and safety plan (HASP) for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection*
- *The HASP shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.*

The project applicant shall prepare and implement a written Soil Management Plan and ensure that an appropriate regulatory oversight agency, such as Santa Clara County Department of Environmental Health, reviews and approves the development site Soil Management Plan, HASP, and remedial measures for impacted soils.

The City of Los Altos shall ensure that a written Soil Management Plan, HASP, and remedial measures for impacted soils has been prepared and approved prior to issuance of a grading permit.

HAZ-3 Remediation

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant shall retain a qualified environmental consultant (PG or PE), to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary.

The qualified environmental consultant shall use the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate.

The project applicant or their contractors shall provide evidence that remediation reduced contaminant levels to below applicable federal, State, and local regulations for human and environmental health, and below hazardous materials threshold concentrations. Evidence of compliance may include, but is not limited to, notifying the appropriate oversight agency (e.g., SCCDEH) of the contamination, hiring a qualified environmental professional to conduct the necessary assessments and abatement (including soil sampling, preparing a remediation plan to adequately abate the hazardous materials, and ultimately obtaining necessary clearance letters from the oversight agency), and issuance of a No Further Action letter, if applicable.

City of Los Altos shall ensure that evidence of remediation compliance has been provided by the project applicant, prior to issuing an occupancy permit.

Significance After Mitigation

Development of identified hazard sites would be preceded by investigation, remediation and cleanup under the supervision of the RWQCB or DTSC before construction activities could begin as currently required by federal, State, and local regulations. The agency responsible for oversight

would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. Compliance with federal, State, and local regulations would apply to development. Mitigation Measure HAZ-1 would address the onsite handling and management of impacted soils or other impacted wastes and would reduce hazards to construction workers and offsite receptors during construction. Where remediation of onsite soils or other impacted wastes is necessary, implementation of mitigation measure HAZ-2 would address the offsite removal and proper disposal of impacted soils or other impacted wastes. Therefore, implementation of mitigation measures HAZ-1 and HAZ-2 would identify, manage onsite, and/or remove hazardous material impacted soils prior to construction (demolition and grading) and would reduce exposure to hazards resulting from development of a potential hazardous materials site to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

There are no public or private airports within Los Altos. The nearest airport is the San Jose International Airport which is located 7 miles east of the City limits. The project would have no impact related to a safety hazard or excessive noise hazards within airport land use plan areas or in proximity to airports. There would be no impact.

NO IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City has adopted its Emergency Preparedness Plan (Los Altos PREPARES) implemented by the local police and fire departments, in conjunction with the Santa Clara County Office of Emergency Services. Los Altos PREPARES provides guidance for City response to emergency situations such as natural disasters and other large-scale incidents. Construction of housing development facilitated by the proposed HEU could interfere with implementation of the Los Altos PREPARES during a disaster event, as construction may involve lane closures. However, lane closures would be coordinated with the City prior to permit issuance, and land closures would be temporary. Therefore, the plan would not substantially impair an adopted emergency response or evacuation plan, and impacts would be less than significant.

The City has also identified primary North/South evacuation routes at Arastradero Road, West Fremont Road, San Antonio Road, South El Monte Avenue, Magdalena Avenue, South Springer Road, and Grant Road; and primary East/West evacuation routes at Foothill Expressway, El Camino Real, Cuesta Drive, Fremont Avenue, Interstate 280, and Highway 101 (City of Los Altos 2022b). Many of the housing sites are located along access and evacuation routes including North San Antonio Road, Springer Street, and Foothill Expressway. While traffic increases associated with the proposed project may affect streets within the city, North San Antonio Road, Springer Street, and Foothill Expressway would still serve as evacuation routes in case of emergency.

Additionally, Policy 5.3 of the Los Altos General Plan Natural Environment and Hazards Element aims to encourage key emergency personnel to live within the community by allowing development of mixed-use housing in the Downtown area and along El Camino Real, Foothill Plaza, and other appropriate commercial districts. The proposed HEU would facilitate development in the Downtown Land Use Plan Area and the Sherwood Gateway Specific Plan Area, providing more housing opportunities for emergency personnel and further reducing impacts to hazards and emergency response. Therefore, development facilitated by implementation of the proposed HEU would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Wildfire impacts are discussed in detail under Section 20, *Wildfire*. As discussed therein, the proposed HEU would result in less than significant impacts related to wildfire.

LESS THAN SIGNIFICANT IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	■	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	■	☐	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	■	☐	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	■	☐	☐
(iv) Impede or redirect flood flows?	☐	■	☐	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	■
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	■	☐

Environmental Setting

Los Altos is under the jurisdiction of the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), which is responsible for the preparation and implementation of the water quality control plan, also known as the Basin Plan, for the region. Four creeks are located within the City of Los Altos, including Adobe Creek, Stevens Creek, Permanente Creek, and Hale Creek as shown on Figure 5.

California Water Service Company (Cal Water) is the primary water provider within Los Altos Limits. Los Altos is located in Cal Water's Los Altos Suburban District. The Los Altos Suburban District sources water supply through a combination of groundwater from the Santa Clara Subbasin, recycled water, and purchased water from the Santa Clara Valley Water District (Cal Water 2021).

Regulatory Setting

Santa Clara Valley Water District

The Santa Clara Valley Water District (Valley Water) operates as the flood control agency for Santa Clara County. They manage creek restoration, pollution prevention efforts, and groundwater recharge. Permits for well construction and destruction work, most exploratory boring for groundwater exploration, and projects within Valley Water property or easements are required under Valley Water's Water Resources Protection Ordinance and District Well Ordinance.

Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction Impacts

Construction activities associated with development facilitated under the proposed HEU would have the potential to cause soil erosion from exposed soil, and accidental release of hazardous materials used for equipment such as vehicle fuels and lubricant, or temporary siltation from storm water runoff. Soil disturbance would occur during excavation for proposed building foundations, demolition of existing buildings, and grading for improvements to public spaces and landscaped areas or development projects. However, future development facilitated by the proposed project would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction. This includes compliance with the requirements of the SWRCB Construction General Permit and LAMC Section 10.08.430, which requires preparation and implementation of a SWPPP for projects that disturb one acre or more of land. The SWPPP must include erosion and sediment control BMPs that would meet or exceed measures required by the Construction General Permit, as well as those that control hydrocarbons, trash, debris, and other potential construction-related pollutants. Construction BMPs would include scheduling inlet protection, silt fencing, fiber rolls, stabilized construction entrances, stockpile management, solid waste management, and concrete waste management. Post-construction stormwater performance standards are also required to specifically address water quality and channel protection events. Implementation of these BMPs would prevent or minimize environmental impacts and ensure that discharges during the construction phase of new development facilitated by the proposed project would not cause or contribute to the degradation of water quality in receiving waters.

Should dewatering be necessary during construction, it may result in the discharge of potentially contaminated groundwater to surface water and may degrade the water quality of surrounding watercourses and waterbodies. However, future development projects would be subject to the San Francisco Bay Regional Water Quality Control Board Order No. R2-2012-0060, General Waste Discharge Requirements for Discharge or Reuse of Extracted Brackish Groundwater, Reverse Osmosis Concentrate Resulting from Treated Brackish Groundwater, and Extracted Groundwater from Structural Dewatering Requiring Treatment (Groundwater General Permit). The Groundwater General Permit requires dischargers to obtain an Authorization to Discharge, treat effluent to meet water quality-based effluent limitations, and comply with the Monitoring and Reporting Program. Pumped groundwater must be tested and if determined to be contaminated, the water must be collected and either treated or disposed of according to waste discharge requirements of Order No. R2-2012-0060. Future applicants are required to comply with all requirements of the Groundwater General Permit. Additionally, future development would be required to adhere to stormwater requirements for construction operations pursuant to LAMC Section 10.08.430. Therefore, construction-related water quality impacts would be less than significant.

Operational Impacts

Los Altos is urbanized, and the majority of housing sites are almost entirely covered with impervious surfaces except for landscaped areas. Development under the proposed HEU would involve infill and redevelopment of existing sites. Future development would be required to be implemented in compliance with existing programs and permits, including the LAMC, the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), and the Municipal Regional Stormwater NPDES Permit (No. CAS612008). Development design would include BMPs to avoid adverse effects associated with stormwater runoff quality. Specifically, future development facilitated by the proposed project would be required to implement LID Measures and on-site infiltration, as required under the C.3 provisions of the Municipal Regional Stormwater Permit (MRP) and SCVURPPP (SCVURPPP 2016). Implementation of LID measures would reduce water pollution from stormwater runoff as compared to existing conditions. For example, on-site infiltration would improve the water quality of stormwater prior to infiltration or discharge from the site.

The City of Los Altos is responsible for enforcing the requirements of the MRP. Compliance with the MRP must include operational and maintenance control measures, or BMPs and construction-related BMPs. Provisions specified in the MRP that affect construction projects generally include but are not limited to Provision C.3 (New Development and Redevelopment), Provision C.6 (Construction Site Control), and Provision C.15 (Exempted and Conditionally Exempted Discharges). Provision C.3 of the MRP addresses post-construction stormwater requirements for new development and redevelopment projects that add and/or replace 10,000 square feet or more of impervious area or special land use categories that create and/or replace 5,000 square feet of impervious surfaces, such as auto service facilities, retail gas stations, restaurants, and uncovered parking lots. These “regulated” projects are required to meet certain criteria: 1) incorporate site design, source control, and stormwater treatment measures into the project design; 2) minimize the discharge of pollutants in stormwater runoff and non-stormwater discharge; and 3) minimize increases in runoff flows as compared to pre-development conditions. Additionally, future development would be required to comply with Chapter 10.16 of the LAMC which outlines the requirements for permanent stormwater pollution prevention measures, hydromodification management measures, and site design measures.

Compliance with the MRP and LAMC would increase infiltration of stormwater, decrease stormwater runoff, and would reduce the risk of water contamination from operation of new developments to the maximum extent practicable, and the project would reduce water pollution from stormwater runoff as compared to existing conditions. Therefore, the proposed project would not violate water quality standards or waste discharge requirements, would not significantly contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and would not substantially degrade water quality. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Cal Water supplies water to the Los Altos, and its 2020 Los Altos Suburban District Urban Water Management Plan (UWMP) anticipates future growth in the city through 2045. The Los Altos Suburban District currently pumps groundwater from the Santa Clara Subbasin (DWR Basin No.2-009.02) of the Santa Clara Valley Basin. The Santa Clara Subbasin is not considered by DWR to be critically over drafted; however, the Santa Clara Subbasin has been prioritized by DWR as "high" priority. Cal Water coordinates with the Valley Water Groundwater Sustainability Agency (GSA), which manages the Santa Clara Subbasin, to protect and maintain the sustainability of the Basin. The GSA completed an Alternative Groundwater Sustainability Plan in December 2016 per the Sustainable Groundwater Management Act. According to the UWMP, available groundwater supplies are expected to be sufficient to meet the projected future demands of the Los Altos Suburban District in normal and multiple dry year periods through 2045.

Development facilitated by the proposed HEU may increase the amount of impervious surfaces on individual development sites throughout Los Altos which may incrementally affect groundwater recharge on these sites. However, future projects would not include installation of new groundwater wells or use groundwater from existing wells. As discussed under checklist question (a) above, development would be required to comply with Provision C.3 requirements of the MRP as well as Chapter 10.16 of the LAMC, which outlines the requirements for permanent stormwater pollution prevention measures, hydromodification management measures, and site design measures. Compliance with the MRP and LAMC would increase absorption of stormwater runoff and the potential for groundwater recharge. Water that does not recharge into the groundwater would be released into the City's existing storm drain system.

Los Altos is under the jurisdiction of the SFBRWQCB, which is responsible for preparing the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. The Basin Plan serves as the basis for the SFBRWQCB's regulatory programs and incorporates an implementation plan for achieving water quality objectives. With adherence to the State and local water quality standards discussed above, the project would not have an adverse effect on water quality and would not interfere with the objectives and goals in the Basin Plan.

Therefore, development under the proposed HEU would not result in a net deficit in aquifer volume or a lowering of the groundwater table and would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction

Construction activities would involve stockpiling, grading, excavation, paving, and other earth-disturbing activities, which may result in the alteration of existing drainage patterns. As described under checklist question (a) above, compliance with the NPDES Construction General Permit, NPDES MS4 General Permit, and the LAMC would reduce risk of short-term erosion and increased runoff resulting from drainage alterations during construction. Therefore, construction related impacts would be less than significant.

Operation

As discussed in Section 4, *Biological Resources,* several inventory sites are located on or adjacent to creeks. Future development would be required to comply with Chapter 6.32 of the LAMC, which outlines watercourse protection regulations and prohibits modification and pollution of the creeks. Section 6.32.030 prohibits residents of properties through which a watercourse passes from polluting the specific part of the watercourse and prohibits residents from removing healthy vegetation on or adjacent to the watercourse bank, and Section 6.32.040 outlines setback requirements along Adobe Creek. Additionally, Chapter 10.16 of the LAMC details requirements for stormwater pollution prevention measures which would reduce stormwater runoff from polluting the creeks. This would reduce the potential for modifications to the waterways that would prohibit wildlife movement or affect riparian habitat or sensitive species. Additionally, housing sites near creeks and streams would be subject to the Santa Clara Valley Water Resources Protection Collaborative's (Water Collaborative) Guidelines and Standards for Land Use Near Streams manual during the City's development review process (Water Collaborative 2007), which are designed to protect creeks and riparian habitats. Nonetheless, mitigation measures BIO-4 and BIO-5 are requires to prevent impacts to creeks.

Development could potentially alter the exiting drainage patterns at the future development sites through the introduction of new impervious surfaces and infrastructure. However, the future development sites and vicinities are generally urbanized and future development would be required to implement stormwater pollution prevention measures which would reduce erosion and stormwater pollutants. The introduction of impervious surfaces on these sites would not substantially affect the drainage patterns of the area or stormwater runoff volumes due to the relatively minor change in impervious surface area in the larger context. Although site-specific drainage pattern alterations could occur with development facilitated by the proposed project, such alterations would not result in substantial adverse effects. The inventory sites are mostly covered with impervious surfaces, and development under the proposed project would not introduce new impervious areas to the extent that the rate or amount of surface runoff would substantially increase. Development that could be facilitated by the proposed project would not introduce substantial new surface water discharges and would not result in flooding on- or off-site. Overall drainage patterns, including direction of flow and conveyance to stormwater infrastructure, would not be modified by the project, and the runoff volume and rate from the project would be reduced compared to existing conditions. Furthermore, MRP-regulated projects would be required must treat 80 percent or more of the volume of annual runoff for volume-based treatment measures. Projects that create or replace 2,500 square feet or more, but less than 10,000 square feet, of

impervious surface must implement site design measures to reduce stormwater runoff. All future development that satisfies Provision C.3 of the SCVURPPP would be required to implement post-construction stormwater controls into the design of the project. Compliance with State and local regulations as well as the LAMC would increase infiltration of stormwater and reduce stormwater runoff from operation of new developments to the extent practicable. Additionally, future development facilitated under the proposed HEU would be required to comply with Policy 3.3 of the Infrastructure and Waste Disposal Element of the Los Altos General Plan, which aims to minimize the amount of impervious surfaces in areas of new development and maximize on-site infiltration of stormwater runoff.

Therefore, with compliance with existing regulations and implementation of mitigation measures BIO-4 and BIO-5, development that could be facilitated by the proposed HEU would not substantially alter the existing drainage pattern of the site or area or alter the course of any stream or river in a manner that would substantially increase the rate or amount of surface runoff in a manner which would result in substantial erosion or siltation on- or off-site. This impact would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

For the same reasons outlined above under checklist question (c.i), with compliance with existing regulations and implementation of mitigation measures BIO-4 and BIO-5, development that could be facilitated by the proposed HEU would not substantially alter the existing drainage pattern of the site or area or alter the course of any stream or river in a manner which would result in flooding on- or off-site. This impact would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

For the same reasons outlined above under checklist question (c.i), with compliance with existing regulations and implementation of mitigation measures BIO-4 and BIO-5, development that could be facilitated by the proposed HEU would not substantially alter the existing drainage pattern of the site or area or alter the course of any stream or river in a manner which would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This impact would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

For the same reasons outlined above under checklist question (c.i), with compliance with existing regulations and implementation of mitigation measures BIO-4 and BIO-5, development that could be facilitated by the proposed HEU would not substantially alter the existing drainage pattern of the site or area or alter the course of any stream or river in a manner which would impede or redirect flood flows. This impact would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Los Altos does not contain large surface water bodies that would result in seiches and is not located in a tsunami zone (DOC 2022b). The Federal Emergency Management Agency (FEMA) establishes base flood elevations (BFE) for 100-year and 500-year flood zones and establishes Special Flood Hazard Areas (SFHA). SFHAs are those areas within 100-year flood zones or areas that will be inundated by a flood event having a one percent chance of being equaled or exceeded in any given year. The 500-year flood zone is defined as the area that could be inundated by the flood which has a 0.2 percent probability of occurring in any given year, or once in 500 years, and is not considered an SFHA. As shown in Figure 5, almost the entire City and all the housing sites under the proposed HEU are located in a 500-year flood zone, with the exception of two housing sites which are located in a 100-year flood zone on Permanente Creek. Development in flood zones is regulated through Chapter 12.60 of the LAMC, which outlines requirements for management of and development in flood hazard areas, such as obtaining permits for floodplain development, elevation requirements, and using flood damage-resistant materials for new construction. Therefore, development under the proposed HEU on these sites would be designed to withstand flooding hazards, including FEMA-designated Flood Hazard Areas. Additionally, the development facilitated by the proposed project would be required to adhere to existing federal, State, and local laws and regulations that address the management and control of pollutants, including regulations addressing the proper disposal, transportation, storage, and handling of potentially hazardous materials, including the California Health and Safety Code and Division 7 of the California Water Code. Adherence to existing regulations would reduce the risk of the release of pollutants. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed under checklist question (b), Cal Water's Los Altos Suburban District currently pumps groundwater from the Santa Clara Subbasin (DWR Basin No.2-009.02) of the Santa Clara Valley Basin. Cal Water coordinates with the Valley Water Groundwater Sustainability Agency (GSA), which manages the Santa Clara Subbasin, to protect and maintain the sustainability of the Basin. The GSA completed an Alternative Groundwater Sustainability Plan in December 2016 and a Groundwater Management Plan (GWMP) for the Santa Clara and Llagas Subbasin in 2021 (Valley Water 2021) per the Sustainable Groundwater Management Act.

Los Altos is under the jurisdiction of the SFBRWQCB, which is responsible for preparing the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. The Basin Plan serves as the basis for the SFBRWQCB's regulatory programs and incorporates an implementation plan for achieving water quality objectives.

As discussed under checklist question (b), future development would not include installation of new groundwater wells or use groundwater from existing wells. Additionally, with adherence to the State and local water quality standards such as Provision C.3 requirements of the MRP as well as Chapter 10.16 of the LAMC, development under the proposed HEU would not interfere with the objectives and goals in the GWMP or the Basin Plan. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	■	☐

a. Would the project physically divide an established community?

The proposed HEU would not divide a community; rather, it is designed to meet the City's RHNA and includes implementation programs that would promote the development of existing vacant, underdeveloped, or underutilized properties, as well as implement a rezoning program to increase allowed density and height, thereby locating people closer to existing employment, goods and services within an established community. The proposed HEU involves policies and programs that would increase the potential number of dwelling units in Los Altos and intensify development in existing urban areas. The proposed HEU does not involve the construction of barriers, such as new roads or other linear development or infrastructure, that would divide the existing communities or neighborhoods. Existing roadways would not be permanently blocked, and temporary construction would not limit access to a community or restrict movement within a community. No impact related to dividing an established community would occur.

NO IMPACT

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed HEU would provide a framework for introducing new housing at all levels of affordability that is within access to transit, jobs, services, and open spaces. Through its identification of sites for future development and implementation of housing programs, the project would encourage development of up to 1,648 new residential units, which would address the City's fair share housing needs as quantified in the RHNA.

The proposed HEU would also include zoning ordinance and zoning map amendments to increase permitted densities in the CN, CT, OA, and PCF districts and height in the CT district

The following analysis discusses the project's consistency with applicable policies in the Los Altos General Plan, presented in Table 16, and the LAMC.

City of Los Altos General Plan

As shown in Table 16, the project would be consistent with the goals, policies, and actions within the Los Altos General Plan. As noted under Government Code Section 65589.5(a), the Legislature has concluded that "the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California." More specifically, the Legislature's stated intent is "to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal…to assure that counties and cities will prepare and implement housing elements which…will move toward attainment of the state housing goal" (Government Code Section 65581). The project would help meet the City's RHNA allocation, as well as efficiently utilize vacant, underutilized, and underdeveloped lots within Los Altos to increase the supply of housing. The project would encourage development of housing, which is supportive of the City's goal and policies.

Table 16 Project Consistency with Relevant General Plan Goals and Policies

General Plan Policy	Proposed HEU Project Consistency
Community Design and Historic Resources Element	
Policy 1.6: Continue to provide for site planning and architectural design review within the City, with a focus on mass, scale, character, and materials. **Policy 1.7:** Enhance neighborhood character by promoting architectural design of new homes, additions to existing homes, and residential developments that is compatible in the context of surrounding neighborhoods.	**Consistent.** Future development facilitated by the project would be subject to the City's existing general development standards (Title 14 of the LAMC, also known as the Zoning Code), to ensure that buildings are compatible with neighboring land uses, architectural design, and scale. Future development would also be required to undergo the City's design review process, where applicable, in order to ensure compatibility with surrounding property and use.
Downtown **Policy 3.3:** Encourage pedestrian and bicycle-oriented design in the Downtown.	**Consistent.** The proposed HEU would facilitate development within the City's Downtown Area in proximity to transit, which would encourage bicycling and walking to jobs and services. Development would be required to comply with the Downtown Design Guidelines, where applicable, as listed in Appendix II of the Downtown Land Use Plan.
Policy 3.3: Encourage the development of affordable housing above the ground floor throughout the Downtown.	**Consistent.** The proposed HEU would increase the number of market-rate and affordable housing within the city and in the Downtown Area. As discussed under Program 1.H of the proposed HEU, City-owned Downtown Parking Plazas 7 and 8 would be used to accommodate affordable housing.
El Camino Real Commercial Corridor **Policy 4.2:** Evaluate site development and design to ensure consistency in site design.	**Consistent.** Future individual projects located along the El Camino Real Commercial Corridor would be required to undergo the City's design review process, where applicable, in order to ensure compatibility with surrounding property and use.
Land Use Element	
Policy 2.2: Encourage a variety of residential housing opportunities by allowing residential uses with adequate parking in appropriate commercial areas, including sections of the Downtown area, Foothill Plaza and along El Camino Real.	**Consistent.** As shown in Figures 3 and 4 of the Project Description, the proposed HEU would facilitate development on undeveloped or underutilized sites and increase allowed density and height on housing sites located within or adjacent to the Downtown area, Foothill Plaza area, and El Camino Real Corridor.

General Plan Policy	Proposed HEU Project Consistency
Policy 2.3: Continue to conduct design review of residential and nonresidential development applications to ensure compatibility with surrounding property and neighborhoods.	**Consistent.** Future development facilitated by the project would be subject to the City's existing general development standards (Title 14 of the LAMC, also known as the Zoning Code), to ensure that buildings are compatible with neighboring land uses, architectural design, and scale. Future development would also be required to undergo the City's design review process, where applicable, in order to ensure compatibility with surrounding property and use.
Downtown **Policy 3.1:** Encourage residential development above the ground floor that includes affordable housing units.	**Consistent.** The proposed HEU would increase the number of market-rate and affordable housing within the Los Altos and in the Downtown. As discussed under Program 1.H of the proposed HEU, City-owned Downtown Parking Plazas 7 and 8 would be used to accommodate affordable housing.
Policy 3.5: Continue to review development plans to ensure compliance with the Downtown Urban Design Plan.	**Consistent.** Future development located within the Downtown area would be required to comply with design guidelines listed in the Downtown Urban Design Plan, where applicable. Additionally, projects in a non-single-family district may be subject to design review approval pursuant to Chapter 14.78 of the LAMC (City of Los Altos 2022c).
El Camino Real **Policy 4.3:** Encourage residential development on appropriate sites within the El Camino Real corridor. **Policy 4.4:** Encourage the development of affordable housing.	**Consistent.** The proposed HEU would increase the number of market-rate and affordable housing within the city and in the El Camino Real area. Program 1.B of the 2023-2031 Housing Element Update aims to facilitate higher density housing in the Commercial Thoroughfare (CT) Zone located along El Camino Real and Program 1.F aims to rezone the Village Court parcel at 4546 El Camino Real to CT.
Policy 4.6: Continue to review development proposals to ensure a balance between development rights and impact on surrounding residential neighborhoods.	**Consistent.** Future development located within or along the El Camino Corridor would be subject to the City's design review process, where applicable, in order to ensure compatibility with surrounding property and use.
Circulation Element	
Policy 2.4: Require development projects to mitigate their respective traffic and parking impacts by implementing practical and feasible street improvements. **Policy 2.5:** Ensure that new development or redevelopment projects provide adequate property dedication to accommodate future roadway improvements at key intersections and other problem areas. **Policy 2.6:** Implement and require developers to implement street improvements that accommodate and encourage the use of non-automobile travel modes including walking, bicycling, and transit.	**Consistent.** The proposed HEU would facilitate development within the Downtown Land Use Plan Area and the Sherwood Gateway Specific Plan Area, as well as along transportation corridors, which would encourage the use of non-automobile travel and encourage walking and bicycling. Future development would be required to mitigate their respective traffic and parking impacts and provide the appropriate dedication of property for future roadway improvements.

LAMC Consistency

As current zoning would not be able to deliver the level of deed-restricted affordable housing and economic and geographic diversity that the project aims to achieve, the proposed HEU would contain implementation programs and zoning policies to encourage additional housing, especially affordable housing that would support a diversity of income levels and household types. Additionally, under the proposed HEU, CN, CT, OA, and PCF districts are anticipated to increase in allowed density and CT district in height to facilitate increased development. All future development under the project would be required to comply with zoning requirements as described in Title 14, *Zoning*, of the LAMC.

Upon adoption of the proposed HEU and the associated zoning and General Plan amendments, the project would comply with the land use requirements set forth by the Los Altos General Plan and the LAMC, and therefore, would result in less than significant adverse physical land use impacts.

LESS THAN SIGNIFICANT IMPACT

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Los Altos does not have significant mineral resources or active mining sites within its boundaries. No mineral resources are identified in the City's General Plan (City of Los Altos 2002). The proposed HEU applies to an urban area which is not compatible with, identified for, or used for mineral extraction. Development under the proposed HEU would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. Therefore, there would be no impacts related to mineral resources.

NO IMPACT

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

For the same reasons outlined above under checklist question (a), development under the proposed HEU would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan or other land use plan. Therefore, there would be no impacts related to mineral resources.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	■	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	■	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■

Environmental Setting

Overview of Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

HUMAN PERCEPTION OF SOUND

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease (Caltrans 2013).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Caltrans 2013).

SOUND PROPAGATION AND SHIELDING

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in the noise level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line), the path the sound will travel, site conditions, and obstructions.

Sound levels are described as either a "sound power level" or a "sound pressure level," which are two distinct characteristics of sound. Both share the same unit of measurement, the dB. However, sound power (expressed as L_{pw}) is the energy converted into sound by the source. As sound energy travels through the air, it creates a sound wave that exerts pressure on receivers, such as an eardrum or microphone, which is the sound pressure level. Sound measurement instruments only measure sound pressure, and noise level limits are typically expressed as sound pressure levels.

Noise levels from a point source (e.g., construction, industrial machinery, air conditioning units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to noise as well. The FHWA's guidance indicates that modern building construction generally provides an exterior-to-interior noise level reduction of 10 dBA with open windows and an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011).

NOISE DESCRIPTORS

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. The noise descriptors used for this study are the equivalent noise level (L_{eq}), and the Day-Night Average Level (DNL; may also be symbolized as L_{dn}).

L_{eq} is one of the most frequently used noise metrics; it considers both duration and sound power level. The L_{eq} is defined as the single steady-state A-weighted sound level equal to the average sound energy over a period. When no period is specified, a 1-hour period is assumed. The L_{max} is the highest noise level within the sampling period, and the L_{min} is the lowest noise level within the measuring period. Normal conversational levels are in the 60 to 65-dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (DNL or L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.).[12] The relationship between the peak-hour L_{eq} value and the L_{dn} depends on the distribution of noise during the day, evening, and night. Quiet suburban areas typically have L_{dn} noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60+ dBA L_{dn} range (FTA 2018).

Overview of Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent buildings or structures and vibration energy may propagate through the buildings or structures. Vibration may be felt, may manifest as an audible low-frequency rumbling noise (referred to as groundborne noise), and may cause windows, items on shelves, and pictures on walls to rattle. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants at vibration-sensitive land uses and may cause structural damage.

Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean squared (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used as it corresponds to the stresses that are experienced by buildings (Caltrans 2020).

High levels of groundborne vibration may cause damage to nearby building or structures; at lower levels, groundborne vibration may cause minor cosmetic (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation. As shown in Table 17 and Table 18, the Caltrans *Transportation and Construction Vibration Guidance Manual* (2020) identifies guideline impact criteria for damage to buildings and additional impact criteria for annoyance to humans from transient and continuous/frequent sources.

[12] Because DNL is typically used to assess human exposure to noise, the use of A-weighted sound pressure level (dBA) is implicit. Therefore, when expressing noise levels in terms of DNL, the dBA unit is not included.

Table 17 Building Vibration Damage Potential

Structure and Condition	Maximum PPV (in./sec.)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient mountains	0.12	0.08
Fragile buildings	0.20	0.10
Historic and similar old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020

Table 18 Vibration Annoyance Potential

Human Response	Maximum PPV (in./sec.)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.90	0.10
Severe	2.00	0.40

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

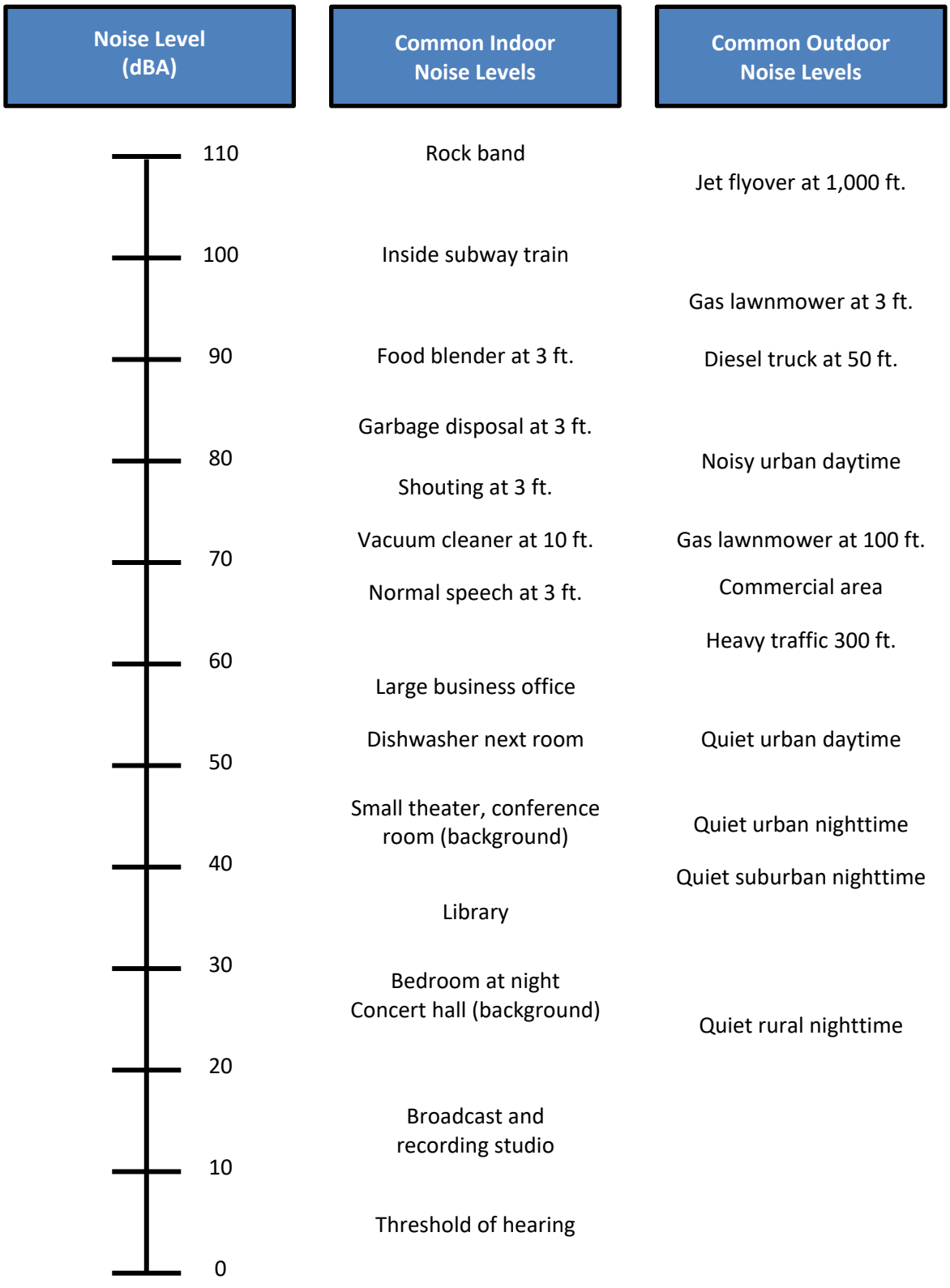
PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020

Noise in Los Altos

Noise in Los Altos is primarily generated by vehicular traffic from cars and trucks. The greatest contributor to noise is traffic on I-280, El Camino Real, and Foothill Expressway. Other surface streets that experience significant increases in ambient noise levels include San Antonio Road, Fremont Avenue, Grant Road, and Springer Road. Land uses adjacent to these roadways in Los Altos are affected by motor vehicle-generated noise. Secondary sources of noise in Los Altos include construction, landscaping activities, and mechanical and stationary equipment. As shown in Figure 10, noisy urban areas or commercial areas (e.g., commercial districts with major arterial roadways and transit routes) can commonly reach noise levels between 60 dBA L_{eq} and 80 dBA L_{eq} during the daytime, whereas a common outdoor noise level associated with a quiet urban area (e.g., residential neighborhood with local or collector streets) is 50 dBA L_{eq} during the daytime. These noise levels typically decrease during nighttime hours as traffic activity slows, such that quiet urban areas commonly experience nighttime noise levels of 40 dBA L_{eq}.

Figure 10 Examples of Typical Noise Levels



Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise-sensitive land uses are those that may be subject to stress and/or interference from excessive noise. Noise-sensitive land uses include residential uses, schools and daycare facilities, hospitals, and institutional uses such as places of worship and museums. Vibration sensitive receivers are similar to noise-sensitive receivers and also include historical, fragile buildings.

Potential sensitive receivers that may be impacted by development facilitated by the proposed HEU would primarily be residential uses and schools. Residential uses would mainly include single- or multi-family residences near or adjacent to housing inventory sites, and schools would include the Almond Elementary School, Covington Elementary School, Gardner Bullis School, Loyola Elementary School, Oak Avenue School, Santa Rita Elementary School, Springer Elementary School, Blach Intermediate School, and Egan Junior High School.

Regulatory Setting

City of Los Altos General Plan

The Natural Environment & Hazards Element of the City of Los Altos' General Plan contains Noise and Land Use Compatibility Standards policies that are applicable to the project. Residential land uses are considered “normally acceptable” when sites are exposed to noise levels below 60 dBA L_{dn}, “conditionally acceptable” when exposed to noise levels between 60 and 70 dBA L_{dn}, “normally unacceptable" when exposed to noise levels of between 70 and 75 dBA L_{dn} and “clearly unacceptable” when exposed to noise levels above 75 dBA L_{dn}.

City of Los Altos Municipal Code

The City’s Noise Control Ordinance was adopted to control unnecessary, excessive, and annoying noise and vibration within Los Altos. Specifically, Chapter 6.16.50 of the Los Altos Municipal Code establishes exterior noise limits for various zoning districts, as shown in Table 19. The City also has interior noise standards for multi-family residential dwellings at 45 dBA from 7 a.m. to 10 p.m. and 35 dBA from 10 p.m. to 7 a.m.

Table 19 City of Los Altos Municipal Code Exterior Noise Limits by Zone

Zone	Time	Exterior Noise Limit (dBA) (levels not to be exceeded more than 30 minutes every hour)
All R1 Zoning Districts	10 PM to 7 AM 7 AM to 10 PM	45 55
All R3 and PCF Zoning Districts	10 PM to 7 AM 7 AM to 10 PM	50 55
All OA Zoning Districts	10 PM to 7 AM 7 AM to 10 PM	55 60
All C Zoning Districts	10 PM to 7 AM 7 AM to 10 PM	60 65

Source: LAMC Section 6.16.050

The LAMC prohibits the production of noise on one property that would (i) exceed the noise standard on any other property for a cumulative period of more than thirty minutes in any hour; (ii) exceed the noise standard plus five dB on any other property for a cumulative period of more than fifteen minutes in any hour; (iii) exceed the noise standard plus 10 dB on any other property for a cumulative period of more than five minutes in any hour; (iv) exceed the noise standard plus 15 dB on any other property for a cumulative period of more than one minute in any hour; or (vi) exceed the noise standard plus 20 dB or the maximum measured ambient on any other property for any period of time. The LAMC also states that if the measured ambient level exceeds the maximum permissible noise level within any of the first four noise limit categories, the allowable noise exposure standard shall be increased in five dB increments in each category as appropriate to encompass or reflect such ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level. If the noise measurement occurs on a property adjacent to a zone boundary, the noise level limit applicable to the lower noise zone, plus five dB is the applicable noise limit.

To ensure that unnecessary or excessive noise disturbances from specific activities and equipment are avoided, the Noise Control Ordinance sets noise thresholds for musical instruments, loudspeakers, loading and unloading, construction and demolition, and air-conditioning equipment (LAMC Section 6.16.070). Exceeding those thresholds is considered a prohibited act and would constitute a violation of the Ordinance.

LAMC Section 6.16.070 establishes allowable hours of construction within residentially zoned properties. In these areas, construction is permitted between 7:00 a.m. and 5:30 p.m. Monday through Friday and between 9:00 a.m. and 3:00 p.m. on Saturdays. Construction in all other zoning districts (excluding single-family districts) is permissible between 7:00 a.m. and 7:00 p.m. Monday through Friday and 9:00 a.m. and 6:00 p.m. on Saturdays. Construction activities are not permitted on Sundays or the City observed holidays of New Year's Day, Memorial Day, Independence Day, Labor Day, Veterans' Day, Thanksgiving Day and Christmas Day.

In addition, according to LAMC Section 6.16.070(6)(b), where technically and economically feasible, maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment should not exceed those levels listed in Table 20 and maximum noise levels for the respectively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment should not exceed noise levels listed in Table 21.

Table 20 City of Los Altos Maximum Mobile Equipment Noise Levels

	All R1 Zoning Districts (dBA)	All PCF and R3 Zoning Districts (dBA)	All OA and C Zoning Districts (dBA)
Daily, except Sundays and legal holidays 7:00 a.m. — 7:00 p.m.	75	80	85
Daily, 7:00 p.m. — 7:00 a.m. and all day Sundays and legal holidays	50	55	60

Source: Table 3 in LAMC Chapter 6.16.070

Table 21 City of Los Altos Maximum Stationary Equipment Noise Levels

	All R1 Zoning Districts (dBA)	All PCF and R3 Zoning Districts (dBA)	All OA and C Zoning Districts (dBA)
Daily, except Sundays and legal holidays 7:00 a.m. — 7:00 p.m.	75	80	85
Daily, 7:00 p.m. — 7:00 a.m. and all day Sundays and legal holidays	50	55	60

Source: Table 4 in LAMC Chapter 6.16.070

Impact Analysis

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Noise

Future construction activity would require the use of a variety of noise-generating equipment that would result in temporary increases in ambient noise levels on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receiver, and presence or absence of noise attenuation barriers. Typical noise levels at 50 feet from various types of equipment that may be used during construction are listed in Table 22. The loudest noise levels are typically generated by impact equipment (e.g., pile drivers) and heavy-duty equipment (e.g., cranes, scrapers, and graders). Construction noise would occur intermittently throughout construction, and in some instances, multiple pieces of equipment may operate simultaneously, generating overall noise levels that are incrementally higher than what is shown in Table 22.

Table 22 Construction Equipment Noise Levels

Equipment	Typical Noise Level (dBA) at 50 Feet from Source
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Jackhammer	88
Loader	80
Paver	85
Pile-driver (Impact)	101
Pile-driver (Sonic)	95
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Scarifier	83
Scraper	85
Shovel	82
Truck	84

Source: FTA 2018

Sensitive receivers are located throughout Los Altos and could be exposed to noise associated with construction activities from reasonably foreseeable development under the proposed Housing Element Update. As discussed in the Environmental Setting, sensitive receivers in Los Altos mainly consist of residences and schools. Based on the location of sites shown on Figures 3 and 4 of the Project Description, this analysis assumes that construction activities for most projects under the proposed HEU would occur within 50 feet of sensitive receivers. As shown in Table 22, sensitive receivers would be exposed to noise levels ranging from 76 to 88 dBA at 50 feet from typical construction equipment and could reach as high as 101 dBA through the use of pile drivers.

However, a typical construction day includes the operation of multiple pieces of equipment at once with noise levels averaged over the construction day. For assessment purposes, a construction noise level at 50 feet from the source was estimated using RCNM and was based on an excavator, dozer, and jackhammer operating simultaneously. In addition, a separate scenario was also analyzed with these pieces of equipment and an impact pile driver. These pieces of equipment generate some of the highest noise levels during demolition and grading phases of construction. As shown in Table 23,

the combined noise level (dBA Leq) from these pieces of equipment is estimated at 84 dBA Leq at 50 feet without a pile driver, and 95 dBA Leq at 50 feet with a pile driver.

Table 23 Typical Construction Noise Level at 50 Feet

Equipment	dBA Leq at 50 Feet
Excavator, Dozer, Jackhammer *without* Impact Pile Driver	84
Excavator, Dozer, Jackhammer *with* Impact Pile Driver	95

See Appendix D for RCNM results.

Construction noise levels would vary depending on the type of equipment, the duration of use, the distance to receivers, and the potential for pile driving. Engine noise reduction technology, including silencers, continues to improve, but heavy construction equipment still generates noise exceeding ambient levels that could cause intermittent annoyance to nearby receivers. Noise associated with construction of most development under the proposed HEU would be typical of residential construction in urban areas.

However, construction noise could exceed the 75 or 80 dBA L_{eq} standard for maximum construction noise levels for residential districts shown in Table 20 and Table 21. These standard are included in the LAMC and are required when technically and economically feasible. Future development would be required to comply with construction and demolition noise limits for mobile and stationary equipment pursuant to Section 6.16.070(B)(6) of the LAMC, as well as allowed construction hours of 7 a.m. to 7 p.m. on weekdays and 9 a.m. to 6 p.m. on Saturdays for all zoning districts excluding single-family zoning districts, and 7 a.m. to 5:30 p.m. on weekdays and 9 a.m. to 3 p.m. on weekends for single-family zoning districts pursuant to Chapter 6.16 of the LAMC. Nonetheless, construction noise impacts could still be potentially significant and mitigation is required.

Operational Noise

ON-SITE OPERATIONAL NOISE

Noise generated by on-site activities for new development would be subject to the City's exterior noise limits listed in Table 19. On-site operational noise for residential uses would include air conditioning (HVAC) equipment, stationary heating, ventilation, on-site vehicle movement (e.g., trash handling), and outdoor activities. To analyze potential HVAC noise impacts, a typical to larger-sized residential condenser such as a Carrier 38HDR060 split system condenser was used. The manufacturer's noise data lists the unit as having an A-weighted sound power level of 72 dBA and a sound pressure level of 57 dBA at a distance of 5 feet (Carrier 2011). For large buildings, such units are typically located on the roof, where operational noise is greatly reduced by distance and the intervening building itself; however, for smaller buildings including smaller multi-family residential units, large HVAC units are often placed at ground level on a concrete pad adjacent to the building. Existing noise sensitive receivers could be affected by operational noise occurring on-site at properties developed under proposed HEU. However, noise levels from HVAC equipment associated with the proposed HEU would be comparable to noise levels of HVAC equipment associated with the existing urban environment. Additionally, future development would be required to comply with Table 6 of LAMC Section 6.16.070(B)(12) which lists noise limits for HVAC equipment. Therefore, operation of HVAC equipment would have a less than significant noise impact.

Future residential development may increase the number of delivery and trash hauling trucks traveling through the city to individual development sites. Increased delivery and trash hauling

trucks could intermittently expose various sensitive receivers to increased truck noise. Section 23130 of the California Motor Vehicle Code establishes maximum sound levels of 86 dBA L_{eq} at 50 feet for trucks operating at speeds less than 35 miles per hour. While individual delivery truck and/or loading or trash pick-up operations would likely be audible at properties adjacent to individual development, such operations are already a common occurrence in the urban environment. In addition, solid waste pick-up operations are typically scheduled during daytime hours when people tend to be less sensitive to noise. Furthermore, these noise events from trucks are typically transient and intermittent, and do not occur for a sustained period of time. Therefore, the project would not result in a substantial permanent increase in ambient noise levels from trash and delivery trucks due their prevalence in the city, resulting in a less than significant impact.

Housing developments would generate noise from conversations, music, television, or other outdoor sound-generating equipment (e.g., leaf blowers), particularly in the event future residents maintain open windows or such activities take place on balconies. However, these noise-generating activities would be similar to those of the existing urban environment. Section 6.16.070(11) of the LAMC restricts operation of lawn and garden tools from 8 a.m. to 8 p.m. from Monday to Friday and 9 a.m. to 6 p.m. from Saturday to Sunday; and restricts the use of portable electric powered blowers from 9 a.m. to 5 p.m. from Monday to Sunday. Furthermore, Section 6.16.070(B)(15)(b) of the LAMC prohibits the use of portable gasoline-powered leaf blowers which would further reduce noise levels within Los Altos. Additionally, Section 12.10.010 of the LAMC includes the 2019 California Residential Code, as adopted in Title 24 Part 2.5 of the California Code of Regulations. Required compliance with code enforcement would reduce operational noise impacts related to conversations and sound-generating equipment to a less than significant level.

Off-Site Operational Noise

The project allows for higher density/intensity land uses in some areas of Los Altos than currently permitted, leading to additional vehicle trips on area roadways. Under full buildout of the project, an estimated 1,648 new units would be added to Los Altos. By generating new vehicle trips, new development would incrementally increase the exposure of land uses along roadways to traffic noise.

Development facilitated by the project would increase vehicle trips and VMT in Los Altos, depending on the location and intensity of individual projects. As discussed under Section 3, *Air Quality*, the proposed HEU would increase residential VMT from 2015 conditions by 17 percent. It is unlikely that a VMT growth of 17 percent would result in a 100 percent increase in traffic volumes on a given roadway segment. As discussed in the Environmental Setting, a 3 dBA increase is considered noticeable. A 40 percent increase in trips equates to a noise increase of less than 1.5 decibels. A 1.5 dBA increase in noise would not be perceptible, and the increase in traffic volumes on any given roadway segment is expected to be below 40 percent. A doubling of traffic volumes would be required to reach the threshold of noticeability (a 3-dba increase in noise levels). A doubling of traffic volumes on a roadway (i.e., a 100 percent increase) is not anticipated under the project, considering VMT is only anticipated to increase by 17 percent.

Traffic volumes on streets would not increase by 40 percent on average, and therefore increases in traffic noise would be less than perceptible. Increases in roadway noise would be less than significant.

Mitigation Measures

The following mitigation measure is required:

NOI-1 Construction Noise Reduction Measures

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

For development projects involving construction within 50 feet of sensitive receivers, the applicant shall develop a site-specific Construction Noise Reduction Program prepared by a qualified acoustical consultant to reduce construction noise impacts to the maximum extent feasible, subject to review and approval of the Planning Director in advance of issuance of building permits. The following measures to minimize exposure to construction noise shall be included:

1. ***Mufflers**. During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.*
2. ***Air compressors**. Utilize "quiet" models of air compressors and other stationary noise sources to the greatest extent practicable. Select hydraulically or electrically powered equipment and avoid pneumatically powered equipment where feasible.*
3. ***Pile driving**. If pile driving is required, pre-drill foundation pile holes to minimize the number of impacts required to seat the pile. Examine whether the use of sonic pile driving is feasible and quieter. If so, utilize that method.*
4. ***Stationary Equipment**. All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers. Construct temporary noise barriers or partial enclosures to acoustically shield such equipment to the maximum extent feasible.*
5. ***Equipment Staging Areas**. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers.*
6. ***Smart Back-up Alarms**. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.*
7. ***Perimeter Noise Reduction.** Construct solid plywood fences around construction sites adjacent to operational business, residences or other noise-sensitive land uses where the noise control plan analysis determines that a barrier would be effective at reducing noise.*
8. ***Signage**. For the duration of construction, the applicant or contractor shall post a sign in a construction zone that includes contact information for any individual who desires to file a noise complaint.*

Significance After Mitigation

Implementation of mitigation measure NOI-1 would reduce construction noise levels by an estimated 10-20 dBA. Temporary noise barriers would provide up to 10 dBA of noise reduction and eliminating traditional back-up alarms, locating stationary equipment as far as possible or within an

enclosure, shielding impact tools, and limiting idling time would provide an additional 5-10 dBA reduction. Therefore, with mitigation, impacts would be reduced to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

It is not anticipated that operation of residential housing development would involve activities that would result in substantial vibration levels, such as use of heavy equipment or machinery. Operational groundborne vibration in the vicinity of development associated with the proposed HEU would be primarily generated by vehicular travel on the local roadways. According to the FTA *Transit Noise and Vibration Impact Assessment* (2018) guidance document, rubber tires and suspension systems dampen vibration levels from trucks to a level that is rarely perceptible. Therefore, traffic vibration levels associated with the expected additional trips from the proposed HEU would not be perceptible by sensitive receivers. Impacts related to operational groundborne vibration would be less than significant. The remainder of this analysis focuses on impacts relate to construction activities associated with future housing development.

Construction activities associated with housing development accommodated by the proposed HEU would result in varying degrees of groundborne vibration depending on the equipment and methods employed. Construction equipment causes vibration that spreads through the ground and diminishes in strength with distance. Buildings with foundations in the soil in the vicinity of a construction site respond to these vibrations with varying results ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight damage at the highest levels. Construction vibration is a localized event and is typically only perceptible to a receiver that is in close proximity to the vibration source.

Construction for housing development would require heavy equipment, particularly development with certain geologic conditions that may require pile driving. Pile driving would be required if the project engineer determined that it was necessary and pile driving alternatives were not feasible. Pile driving more often occurs for buildings with subterranean parking garages or tall buildings (e.g., six or more stories). Such heavy equipment could potentially operate within 25 feet of nearby buildings when accounting for equipment setbacks. As shown in Table 24, general construction equipment such as a vibratory roller would generate vibration levels up to 0.21 in./sec. PPV at 25 feet, while more intensive equipment such as pile driving could generate a vibration level of approximately 0.64 in./sec. PPV at 25 feet.

Table 24 Typical Construction Equipment Vibration Levels

Equipment	PPV (in./sec.)				
	25 Feet	50 Feet	75 Feet	100 Feet	125 Feet
Pile Driver (Impact)	**0.644**[1,2,3,4]	**0.300**[1,4]	**0.192**[1]	**0.140**[1]	**0.110**[1]
Pile Driver (Sonic)	**0.170**[1]	0.079	0.051	0.037	0.029
Vibratory Roller	**0.210**[1]	0.098	0.063	0.046	0.036
Hoe Ram	0.089	0.042	0.027	0.019	0.015
Large Bulldozer	0.089	0.042	0.027	0.019	0.015
Caisson Drilling	0.089	0.042	0.027	0.019	0.015
Loaded Truck	0.076	0.036	0.023	0.017	0.013
Jackhammer	0.035	0.016	0.011	0.008	0.006
Small Bulldozer	0.003	0.001	<0.001	<0.001	<0.001

Notes: Vibration levels shown in bolded and underlined text exceed one or more of the Caltrans criteria shown in Table 4.11-1 and Table 4.11-2. Superscripts specify the threshold exceeded by each piece of equipment.

[1] Exceeds the 0.1 in./sec. Caltrans damage threshold for historic sites (and other critical locations).

[2] Exceeds the 0.5 in./sec. Caltrans damage threshold for historic and other/similar old buildings.

[3] Exceeds the 0.5 in./sec. Caltrans damage threshold for older residential structures.

[4] Exceeds the 0.25 in./sec. Caltrans human annoyance threshold.

Sources: FTA 2018; Caltrans 2020

The City has not adopted a significance threshold to assess vibration impacts during construction and operation. Therefore, the Caltrans Transportation and Construction Vibration Guidance Manual (2020) was used to evaluate potential construction vibration impacts related to both potential building damage and human annoyance. Construction vibration impacts from housing development would be significant if vibration levels exceed the Caltrans criteria shown in Table 17 and Table 18, using the lower range of the thresholds. For example, impacts would normally be significant if vibration levels exceed 0.2 in./sec. PPV for residential structures and 0.5 in./sec. PPV for commercial structures. This is the limit where minor cosmetic (i.e., non-structural) damage may occur to these buildings. However, groundborne vibration would also have the potential to impact structures with historic significance at much lower levels. Therefore, for a conservative analysis of potential impacts to such buildings, construction vibration impacts would be significant if vibration levels exceed 0.12 in./sec. PPV for extremely fragile historic buildings, as shown in Table 17. In addition, construction vibration impacts would cause human annoyance at nearby receivers if vibration levels exceed 0.25 in./sec. PPV, which is the limit where vibration becomes distinctly perceptible to most humans, as shown in Table 18. Vibration levels shown in bolded and underlined text in Table 24, exceed one or more of the Caltrans criteria shown in Table 17 and Table 18.

As shown in Table 24, groundborne vibration from hoe rams, bulldozers, caisson drilling, loaded trucks, and jackhammers would not exceed the 0.12 in./sec. PPV threshold. While groundborne vibration from vibratory rollers would only exceed the threshold for building damage for historic sites at 25 feet from the source, vibration levels from pile driving would exceed one or more of the building damage thresholds shown in Table 17 for historic sites, general old buildings, and older and newer residential structures. Furthermore, vibration levels associated with pile driving would also exceed the threshold of 0.25 in./sec. PPV for human annoyance at various distances up to 75 feet, as shown in Table 24. Therefore, vibration impacts could be potentially significant and mitigation measure NOI-2 would be required.

Mitigation Measure

The following mitigation measure is required:

NOI-2 Vibration Control Plan

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

For projects involving vibratory rollers within 25 feet of a historic structure, and/or the use of pile drivers, the applicant shall prepare a Vibration Control Plan prior to the commencement of construction activities. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to:

- *Use of drilled piles or similar method (e.g., cast-in-place systems) rather than pile driving*
- *Use of resonance-free vibratory pile drivers/rollers*
- *Avoiding the use of vibrating equipment when allowed by best engineering practices*

The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions of buildings within a 50-foot radius as well as at potentially affected extremely fragile buildings/historical resources and/or residential structures within the vicinity of the construction site. The condition of existing potentially affected properties shall be documented by photos and description of existing condition of building facades, noting existing cracks. The survey letter shall provide a shoring design to protect such buildings and structures from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer hired by the applicant shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).

A Statement of Compliance signed by the applicant and owner is required to be submitted to the City Building Department at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above, shall be documented by a qualified structural engineer, and shall be provided to the City upon request. A Preservation Director shall be designated, and this person's contact information shall be posted in a location near the project site that it is clearly visible to the nearby receivers most likely to be disturbed. The Director will manage complaints and concerns resulting from activities that cause vibrations. The severity of the vibration concern should be assessed by the Director, and if necessary, evaluated by a qualified noise and vibration control consultant.

Significance After Mitigation

Implementation of Mitigation Measure NOI-2 would require a vibration control plan to reduce impacts associated with vibration from vibratory rollers or pile driving to below thresholds. With mitigation, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT WITH MITIGATION

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The City of Los Altos is not located within 2 miles of a public airport or a private airstrip. The closest airport is the San Jose International Airport, located approximately 7 miles east of the City limits. Development facilitated under the proposed HEU would not increase exposure of residents to excessive noise levels from an airport and there would be no impacts related to aviation-related noise exposure.

NO IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	■
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

Environmental Setting

Table 25 provides 2022 estimates of population and housing for Los Altos. Los Altos has an estimated 2022 population of 31,526 people and 11,841 housing units, with an average household size of 2.78 people (California Department of Finance 2022).

Table 25 Current Population and Housing Stock for Los Altos

	City of Los Altos	Santa Clara County
Population (# of people)	31,526	1,894,783
Average Household Size (persons/household)	2.78	2.81
Total Housing Units (# of units)	11,841	696,489
Vacant Housing Units	578 (4.9%)	34,855 (5.0%)

Source: California Department of Finance 2022

Plan Bay Area 2050 is the most recent regional long-range plan and regional growth forecast for the Bay Area (ABAG and MTC 2021). Though it does not include projections by city, it does include employment and housing projections for Northwest Santa Clara County which includes Los Altos Hills, Los Altos, part of Palo Alto, and part of Mountain View. These projections are shown in Table 26.

Table 26 2050 Plan Bay Area Population, Housing, and Employment Projections for Northwest Santa Clara County

	2015	2050 (Projected)	Projected Growth (Percent Increase)
Housing (# of units)	74,000	102,000	28,000 (38%)
Employment (# of jobs)	180,000	207,000	27,000 (15%)

Source: ABAB and MTC 2021

Impact Analysis

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

For the purposes of this analysis, buildout under the proposed HEU would add up to 1,648 additional residential units to the city by the year 2031. Based on an estimated number of 2.78 residents per household as shown in Table 25, this additional housing would lead to an increase of approximately 4,582 residents in the city during the housing element cycle 2023 to 2031 assuming all of the estimated 1,648 units are built.

In the unlikely event that all potential buildout that is proposed in the HEU occurs, and assuming the growth is all new and not already accounted for under existing projections, the total population of the city in 2031 would be 36,108 (31,526 current population + 4,582 new residents), or a population increase of approximately 14.5%. In addition, the total housing of units in Los Altos would be an estimated 13,489 (11,841 current housing units + 1,648 units), or a housing increase of approximately 13.9 percent. The proposed project would be consistent with State requirements for the RHNA and would be within the growth forecasts for Northwest Santa Clara County in Plan Bay Area 2050, which projects a 38 percent increase in housing for Northwest Santa Clara County.

Further, growth under the proposed HEU would be concentrated in locations where such development is encouraged by adopted plans due to their proximity to transit and transportation corridors. All the baseline units are proposed in areas that are currently used for residential purposes and are therefore connected to commonly used transportation corridors. Additionally, the rezoned sites are mostly centered around the Downtown and major transportation corridors.

In addition, the State requires that all local governments adequately plan to meet the housing needs of their communities. Given that the State is currently in an ongoing housing crisis due to an insufficient housing supply, the additional units under the proposed project would further assist in addressing the existing crisis and meeting the housing needs of the City's communities. Furthermore, the proposed HEU would first be submitted to the HCD for review and approval to ensure that it would adequately address the housing needs and demands of the city. Approval by the HCD would ensure that population and housing growth under the 2023-2031 Housing Element would not be substantial or unplanned.

Lastly, this analysis is conservative because it assumes a maximum buildout scenario and includes sites already planned for development and maximum buildout under the proposed zoning changes. The project's actual contribution to population growth may be less than estimated. In addition, the project would not involve the extension of roads or other infrastructure that could indirectly lead to population growth. The city is mostly developed and is supported by existing public services and infrastructure which are sufficient to serve the additional housing units. Therefore, the project would not result in substantial unplanned population growth, either directly or indirectly. There would be no impact.

NO IMPACT

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

"Substantial" displacement would occur if the proposed project would displace more residences than would be accommodated through growth facilitated by the project. The goal of the proposed project is to accommodate and encourage new residential development in Los Altos. A portion of the housing units would be developed at a density range that could accommodate low and very low-income housing as required to meet the 6th Cycle RHNA. Development under the proposed HEU could result in up to an estimated 1,648 new housing units developed by 2031. The proposed buildout, in addition to existing and planned housing projects, would result in an overall increase in available housing which exceeds the City's RHNA requirements. Therefore, overall, the proposed HEU would add to the City's housing stock to meet housing goals.

On an individual site basis, it is possible that some redevelopment projects could result in displacement of current residents. However, the proposed HEU includes policies and programs to reduce displacement impacts. For example, Program 5.C. restricts commercial use in residential areas to protect residents against displacement. Further, the HEU includes Program 6.E. which outlines the City's plan to produce and distribute anti-displacement information in multiple languages to ensure residents are educated on their rights and connect them to relevant resources. Distributing this information in multiple languages through community organizations and local groups will allow the city to reach those groups that may be at the greatest risk of displacement. Additionally, the HEU includes Policy 6.4 which implements anti-displacement measures in accordance with Government Code §66300(d)(2)(D)(ii).

In summary, the proposed project would facilitate the development of 1,648 additional dwelling units throughout Los Altos. Proposed residential units would provide additional housing opportunities in excess of the RHNA requirement for residents and there are policies in place to reduce displacement resulting from the proposed project. Therefore, the proposed project would not result in the net loss or displacement of housing necessitating the construction of replacement housing elsewhere. There would be no impact.

NO IMPACT

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15 Public Services

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	1 Fire protection?	☐	☐	■	☐
	2 Police protection?	☐	☐	■	☐
	3 Schools?	☐	☐	■	☐
	4 Parks?	☐	☐	■	☐
	5 Other public facilities?	☐	☐	■	☐

Regulatory Setting

Los Altos General Plan

The Open Space, Conservation, and Community Facilities Element of the Los Altos General Plan includes the following goals and policies related to public services:

Goal 6.0: Ensure an adequate level of fire protection and police protection within Los Altos.

Policy 6.1: Promote community order by preventing criminal activity, enforcing laws, and meeting community service demands.

Policy 6.2: Provide community-oriented policing services that are responsive to citizen needs.

Policy 6.3: Provide response times for police and fire protection services emergencies that are comparable to similar jurisdictions in Santa Clara County.

Policy 6.4: Continue cooperative mutual aid agreements with nearby jurisdictions to ensure rapid and sufficient response to emergency situations.

Policy 6.5: Prevent or mitigate hazardous situations.

Goal 7.0: Work with local school districts and other educational organizations to ensure a high-quality public education system.

Policy 7.1: Continue to work with the Los Altos and Cupertino Union Elementary School Districts, Mountain View-Los Altos Union and Fremont Union High School Districts, and Foothill and De Anza Community College to provide a high-quality educational system to residents.

Methodology

This analysis considers the *CEQA Guidelines* Appendix G thresholds in determining whether the proposed HEU, including future development accommodated by the proposed HEU, would result in impacts related to the provision of public services. Public services information was acquired through review of relevant documents and communications with City staff and public service providers. The determination that the proposed HEU would or would not result in "substantial" adverse effects concerning public services considers the relevant policies and regulations established by local and regional agencies, the proposed HEU's compliance with such policies, and whether the HEU would create the need for new or expanded facilities, the construction of which could result in environmental impacts.

In *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, the Court of Appeal held that significant impacts under CEQA consist of adverse changes in the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate: "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city. (Cal. Const., art. XIII, § 35, subd. (a)(2) ["The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services."].) Thus, the need for additional fire and police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

Impact Analysis

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The City of Los Altos contracts with the Santa Clara County Fire District for fire and emergency medical services. There are two fire stations in Los Altos: Almond Fire Station located at 10 Almond Avenue; and Loyola Fire Station located at 765 Fremont Avenue.

The proposed HEU would not expand the current fire service area but would result in an increased population within the existing service area, as described in Section 14, *Population and Housing*. Currently, the Santa Clara Fire District has response time goals of 5 minutes 30 seconds for urban areas and 7 minutes 30 seconds for rural areas (SCCFD 2020). The increase in residents associated with the project could increase demand for fire protection and emergency medical services such that additional staff, equipment or facilities would be needed to meet these response time goals.

The continued implementation of policies and actions in the Los Altos General Plan would allow the fire protection facilities to serve this future development. Los Altos Open Space, Conservation, and

Community Facilities Implementation Program 10 (OCC 10) calls for promoting fire prevention including continuing to provide fire protection services, increasing fire prevention education, and coordinating with local water districts to ensure there is an adequate amount of water available to fight fire. Additionally, Policy 6.3 and 6.4 of the Open Space, Conservation, and Community Facilities Element ensure there is an adequate level of fire protection for all residents of Los Altos.

Further, under the proposed HEU future development would be required to comply with Chapter 12.24 of the Los Altos Municipal Code, which includes minimum fire safety and fire prevention standards. Future development under the proposed HEU would also be required to comply with abatement of fire-related hazards and pre-fire management prescriptions as outlined under the California Health and Safety Code and the California Fire Plan. A list of fire-related requirements included in these codes and that would apply to typical residential projects allowed by the proposed HEU includes:

a. Adequate marking of exterior building openings
b. Openings and fire escape stairs and balconies
c. Internal access, including via hallways and doorways
d. Manual and automatic fire alarm systems
e. Fire Fighter Air Replenishment Systems
f. Internal building sprinkler systems
g. New fire hydrants
h. External fire protection (setbacks, fire-resistant materials, etc.)

New residential projects allowed by the proposed HEU would be reviewed for compliance with these requirements and compliance with other building and safety regulations several times during different phases of project development. Compliance with these safety standards would reduce the demand for fire protection services and thereby reduce the need for new fire stations.

Should the County determine that new or expanded facilities are needed to provide fire protection services to Los Altos, it is not known where such facilities would be located. No location has been identified for a new fire station as part of the proposed HEU. Nonetheless, this IS-MND analyzes the impact associated with development on vacant and underutilized sites throughout the city. A potential future facility would likely be developed on the same site as the current fire station or as infill development on one of the inventory sites. As infill development, it is not anticipated that the construction of a new fire station would cause additional significant environmental impacts beyond those identified in this IS-MND. The environmental effects of constructing a fire station would be consistent with the impacts determined in other sections of this IS-MND, which would be less than significant or less than significant with mitigation. When the Fire Department proposes a new station and identifies an appropriate site and funding, the city will conduct a complete evaluation of the station's environmental impacts under CEQA. Therefore, the proposed HEU would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered fire protection facilities. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Police protection services for the project site are provided by the Los Altos Police Department, headquartered at 1 North San Antonio Road. The Department has 32 sworn officers and 17 professional civilian staff (City of Los Altos 2019)

The Police Department has a goal to maintain a ratio of 2 officers per 1,000 residents. Currently, the officer ratio is approximately 1 officer per 1,000 residents. As described in Section 2, *Population and Housing*, implementation of the proposed HEU would increase the population served by the Los Altos Police Department to 36,107 people. To meet the departments' goal would require an increase of 40 officers. Policies in the City's General Plan such as OCC 10 aim to ensure that there are adequate budget allocations for staffing and crime prevention programs. Police protection service levels would continue to be evaluated and maintained by Los Altos PD in accordance with existing policies, procedures and practices as development occurs over the lifetime of the HEU.

While police protection services are not typically "facility-driven," meaning such services are not as reliant on facilities in order to effectively patrol a beat, the Police Department has indicated that expanded facilities would be needed should the department provide full staffing to meet the department's ratio of 2 officers per 1,000 residents. The Los Altos Police Department has not gone through a facility planning process and no location has been identified for a new police station as part of the proposed HEU (Chief Angela Averiett 2022). Nonetheless, this IS-MND analyzes the impact associated with development on vacant and underutilized sites throughout the city. A potential future facility would likely be developed on the same site as the current police station or as infill development on one of the inventory sites. As infill development, it is not anticipated that the construction of a new police station would cause additional significant environmental impacts beyond those identified in this IS-MND. The environmental effects of constructing a police station would be consistent with the impacts determined in other sections of this IS-MND, which would be less than significant or less than significant with mitigation. When the Police Department proposes a new station and identifies an appropriate site and funding, the city will conduct a complete evaluation of the station's environmental impacts under CEQA.

Therefore, the proposed HEU would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered police protection facilities. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Los Altos is served by five school districts: Los Altos Elementary School District, Cupertino Union Elementary School District, Mountain View-Los Altos Union High
School District, and Fremont Union High School District.

Development under the proposed project could generate new students entering all five districts serving Los Altos. These students would be distributed throughout the schools that serve Los Altos

depending on their grade level and on their location. Although the proposed HEU would result in an increase in enrollment at schools that serve the city, most of the districts report net declines in enrollment projected over the next 10 years.

Cupertino Union Elementary School District reports a projected decline in enrollment for all grade levels over the next 10 years even when accounting for increased housing development occurring over the same time period. Therefore, there is no planned improvements or expansions to schools in this district (CUSD Annual Enrollment Projection Report 2022).

Mountain View-Los Altos Union High School District reports a projected increase in enrollment and then a subsequent decline by the 2025-2026 school year. To accommodate the initial significant increase in enrollment that is projected, the district is advised to increase facility capacity and add additional classrooms to existing schools. The plan to expand these facilities is not included in the proposed HEU and would undergo an independent CEQA review (MVLASD Demographic Analysis and Enrollment Projections 2017).

Most schools in the Fremont Union High School District report there is a decline in enrollment which is projected to decline further through 2024. The projected increase in enrollment from new housing developments such as those proposed by the HEU would not be sufficient to substantially offset the reduction in enrollment from existing dwellings. The district has no plans to expand or build new facilities (FUHSD Forecast Report 2019).

The only district serving Los Altos that projects a steady net increase in enrollment is the Los Altos Elementary School District. The district reports that it has experienced a 23 percent increase in public school enrollment over the last decade and many schools in the district area at or near peak enrollment. They expect enrollment will continue to increase into the future. Because of the LASD Board's desire to keep schools close to neighborhoods and to keep enrollment at each school in the district below 600 students, the Superintendent's Enrollment Growth Task Force identified a need for two additional school sites, one for Bullis Charter School which operates outside the Los Altos School District and the other to support Los Altos Elementary School District students. While a specific site for these facilities has not been chosen, the Enrollment Growth Task Force recommended that sites near the El Camino Corridor or otherwise in the center of the District be chosen due to the increase in housing in these areas. In 2018, four sites were selected for further review (LASD 2013).

As discussed in Regulatory Setting, to offset a project's potential impact to schools Government Code 65995 (b) establishes the base amount of allowable developer fees a school district can collect from development projects located within its boundaries. The fees obtained by school districts that serve Los Altos are used for construction or reconstruction of school facilities. Future development facilitated by the proposed project would be required to pay school impact fees which, pursuant to Section 65995 (3) (h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), are "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization."

For the facility expansions in Los Altos Elementary School District and Mountain View-Los Altos Union High School District the construction of facilities will require a project-specific environmental analysis under CEQA to address site-specific environmental concerns. As described above, existing laws and regulations require funding for the provision or expansion of new school facilities to offset impacts from new residential development and therefore impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

See Section 16, *Recreation.*

LESS THAN SIGNIFICANT IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impacts related to other public facilities such as water, wastewater, storm water systems, and landfills are addressed in Section 10, *Hydrology and Water Quality,* and Section 19, *Utilities and Service Systems*.

LESS THAN SIGNIFICANT IMPACT

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	■	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	■	☐

Environmental Setting

Los Altos is home to 18 parks and recreation facilities which make up approximately 47.5 acres of City land (Los Altos Facility and Parks 2020). Based on the current population of 31,526 (see Table 25), Los Altos currently maintains a ratio of 1.5 acres of City-owned parkland per 1,000 residents. In addition to the public open space managed by the City's Department of Recreation and Community Services, there are multiple County Parks and open space preserves such as Rancho San Antonio County Park & Open Space Preserve (165 acres of designated park space), Byrne Preserve (88 acres), and Foothills Nature Preserve (212 acres) near Los Altos. When considering parkland adjacent, the ratio of parkland per resident is approximately 16.3acres per 1,000 residents.

According to the Los Altos General Plan, the City has adopted a park dedication requirement for new subdivisions of 5.0 acres per 1,000 residents is implementing programs under its General Plan to increase purchase of land for parks as well as encouraging the development of parkland by public and private landowners.

Regulatory Setting

Los Altos General Plan

The Open Space, Conservation, and Community Facilities Element of the Los Altos General Plan includes the following goals and policies related to parks and recreation:

Goal 1.0: Preserve and expand the amount of open space in and around Los Altos.

Policy 1.1: Preserve existing parks and establish new neighborhood parks to enhance neighbor- hood identity within Los Altos.

Policy 1.2: Continue to identify and acquire additional land for parks and recreational uses.

Policy 1.3: Maintain dedicated parkland in public ownership.

Policy 1.4: Require Park dedication, public open space, or require fees in lieu thereof, for all new subdivisions and multi- family residential development in Los Altos.

Policy 1.5: Retain and update appropriate building regulations to preserve community identity.

Goal 3.0: Expand recreation programs and facilities for all ages using City and non- City sites.

Policy 3.1: Encourage development of a comprehensive Recreation Plan for existing and future park facilities and recreation services.

Policy 3.2: Continue to seek cooperative use of school facilities for recreation programs.

Policy 3.3: Provide and expand continuing support for children and teen facilities and programs.

Policy 3.4: Promote and provide programs and recreation facilities for seniors.

Policy 3.5: Ensure the availability of community pool facilities.

Goal 4.0: Ensure proper maintenance of parks, open space, and public facilities.

Policy 4.1: Provide adequate level of maintenance for City parks, open space, and public property to ensure safety, aesthetics, and recreational enjoyment for Los Altos residents.

Policy 4.2: Provide opportunity to create assessment districts for unique or maintenance needs.

Impact Analysis

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The proposed HEU does not include the provision of new parks or the physical alteration of existing parks or recreation centers. As described in Section 14, *Population and Housing*, full buildout under the proposed HEU would increase the population in Los Altos by 4,582 new residents by 2031, which would increase the demand and use of parks and recreational facilities. The additional demand could cause physical deterioration of existing parks and recreational facilities. With the proposed HEU, the ratio of parks to residents in the city would decrease from 1.5 acres of parkland per 1,000 residents to 1.3 acres of parkland per 1,000 residents. When considering the nearby parks and open space preserves, the ratio of parkland per resident would decrease to approximately 14.2 acres per 1,000 residents.

Policies and actions in Los Altos' Open Space, Conservation, and Community Facilities Element referenced above are designed to ensure that adequate parks and recreational facilities are provided to accommodate increases in new residents. In accordance with General Plan policies, the City continually evaluates and plans for expansion or renovations of parks and recreation facilities as need to accommodate demand. Policy 1.1-1.3 of the Open Space, Conservation, and Community Facilities Element of the General Plan ensure the City actively seeks to preserve and expand parks to meet the needs of Los Altos residents. Further, the City of Los Altos has established a Parkland Dedication Ordinance (Chapter 13.24.010 of the Municipal Code) along with policy 1.4 of the Open Space, Conservation, and Community Facilities Element of the General Plan requiring residential

subdivisions to dedicate land for park or recreational purposes, or pay a fee in-lieu thereof, as a condition of approval for the final subdivision or parcel map. The intent of these policies is to allow development to occur within the city in a manner that meets the city's parks and recreation goals. The city provides and maintains developed parkland and open space to serve its residents. Residents of Los Altos are served by community park facilities, neighborhood parks, playing fields and community centers. The City's Department of Recreation and Community Services is responsible for development, operation, and maintenance of all city park facilities. In accordance with the City of Los Altos Parkland Dedication Ordinance (Chapter 13.24.010 of the Municipal Code) and Policy 1.4, future project applicants will be required to pay the applicable parkland dedication in-lieu fee as a condition of project approval.

Adherence to City of Los Altos General Plan goals and policies as well as the LAMC would ensure that substantial physical deterioration of the city's parks and recreational facilities would not occur or be accelerated. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed under checklist question (a), policies and actions in the Open Space, Conservation, and Community Facilities Element of the city's General Plan as well as Chapter 13.24.010 of the LAMC would ensure that the city provides and maintains developed parkland and open space to serve its residents and that development would occur in a manner that meets the city's parks and recreation goals. Should future park or recreational facilities be identified for construction, it is not known where such facilities would be located. No location has been identified for new facilities of the proposed HEU. Nonetheless, this document analyzes the impact associated with development on vacant and underutilized sites throughout Los Altos. A potential future facility would likely be developed as infill development on one of the inventory sites. As infill development, it is not anticipated that the construction of facilities in would cause additional significant environmental impacts beyond those identified in this analysis. The environmental effects of constructing facilities would be consistent with the impacts determined in other sections of this document, which would be less than significant or less than significant with mitigation with the exception of impacts related to historical resources and construction noise. When and if the Parks Department proposes new facilities and identifies an appropriate site and funding, the City will conduct a complete evaluation of the station's environmental impacts under CEQA. Adherence to City of Los Altos General Plan goals and policies as well as the LAMC would ensure that impacts from construction of new parks and enhancements to existing parks are reduced to the extent feasible. Impacts to parks and recreation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	■	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	■	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	■	☐
d. Result in inadequate emergency access?	☐	☐	■	☐

Environmental Setting

Los Altos is immediately adjacent to I-280 and SR 85 and is served by two subregional facilities: Foothill Expressway and El Camino Real (SR 82). El Camino Real is a major arterial roadway within Los Altos, and San Antonio Road and El Monte Avenue are the minor arterials. The Santa Clara Valley Transportation Authority (VTA) operates bus, light rail transit, and paratransit throughout Santa Clara County. Bus transit service within Los Altos includes six fixed routes (Routes 22, 23, 34, 51, 52, and 300), and paratransit service (dial-a-ride service for qualified individuals). VTA light rail service can be accessed at the Downtown Mountain View Transit Center, and Caltrain provides heavy rail passenger service between Gilroy in Santa Clara County, through San Mateo County, to San Francisco. The closest Caltrain stations to Los Altos are located on Central Expressway near San Antonio Road and also near Castro Street at the Downtown Mountain View Transit Center. Los Altos also contains Class I, II, and III bicycle lanes on most transportation corridors such as San Antonio Road, Foothill Expressway, and University Avenue, as well as bicycle parking facilities scattered around the city.

Regulatory Setting

State Senate Bill 743

Senate Bill (SB) 743 was signed into law by Governor Brown in 2013 and tasked the State Office of Planning and Research (OPR) with establishing new criteria for determining the significance of transportation impacts under the California Environmental Quality Act (CEQA). SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states that alternative

measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. SB 743 requires the Governor's OPR to identify new metrics for identifying and mitigating transportation impacts within CEQA. In January 2018, OPR transmitted its proposed CEQA Guidelines implementing SB 743 to the California Natural Resources Agency for adoption, and in January 2019 the Natural Resources Agency finalized updates to the CEQA Guidelines, which incorporated SB 743 modifications, and are now in effect. SB 743 changed the way that public agencies evaluate the transportation impacts of projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (Public Resource Code, § 21099 (b)(2)). In addition to new exemptions for projects consistent with specific plans, the CEQA Guidelines replaced congestion-based metrics, such as auto delay and level of service (LOS), with VMT as the basis for determining significant impacts, unless the Guidelines provide specific exceptions.

Impact Analysis

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The city's Circulation Element of the Los Altos General Plan addresses circulation improvements needed to provide adequate capacity for future land uses. The Circulation Element uses level of service (LOS) as its performance criteria while analyzing the city's roadway system. However, as described in Regulatory Setting, to implement SB 743, the CEQA Guidelines have been updated to change the criteria for determining what constitutes a significant traffic related environmental impact to rely upon quantification of VMT instead of LOS. Nonetheless, the project would be consistent with the Circulation Element since it would place housing near transit, services, and jobs, which would reduce the usage of single-occupancy vehicles and encourage walking, bicycling, and using alternative modes of transportation.

Bicycling would be encouraged through the City's Bicycle Transportation Plan (City of Los Altos 2012) which aims to improve bicycling conditions and increase bicycling rates within Los Altos. Additionally, the City recently adopted its Complete Streets Master Plan (City of Los Altos 2022d) which aims to provide a long-term vision for improving walking and bicycling in Los Altos as well as access to transit, schools, and Downtown. Future residents would be able to benefit from goals, policies, and improvements associated with the Bicycle Transportation Plan and the Complete Streets Master Plan which would reduce VMT and reliance on single-occupancy vehicles.

Future multi-family development facilitated under the project would be subject to design and transportation review pursuant to LAMC Section 14.78.090 and would be assessed for potential project impacts to various modes of transportation such as bicycle, pedestrian, parking, traffic impacts on public streets, and/or public transportation. Development proposals for individual projects would be subject to adopted development guidelines, including standards that govern VMT, transportation, GHG, and associated issues. Impacts identified for development facilitated by the plan would be addressed through the project approval process, including design review specific to potential impacts of that project. Because the proposed HEU does not include modifications to the existing transportation network and individual future developments would be designed consistent with applicable bicycle and pedestrian facility requirements, the proposed HEU would

not conflict with the City's existing circulation, bicycle, or pedestrian plans. Impacts to transit, roadway, bicycle, and pedestrian facilities would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines Section 15064.3(b) require specific considerations of a plan or project's transportation impacts based on vehicle miles traveled (VMT). This implements SB 743, which eliminates level of service as a basis for determining significant transportation impacts under CEQA and requires a different performance metric: VMT. With this change, the State shifted the focus from measuring a plan or project's impact upon drivers (LOS) to measuring the impact of driving (VMT) on achieving its goals of reducing GHG emissions, encouraging infill development, and improving public health through active transportation.

Hexagon Transportation Consultants, Inc. prepared a transportation study (Appendix A) for the proposed HEU to conduct a VMT analysis consistent with CEQA guidelines to determine whether the proposed HEU project would generate a VMT impact. Given that the City of Los Altos has not formally adopted a local VMT policy, the HEU was analyzed according to the City's interim VMT policy. The Interim VMT Policy sets a threshold of significance for residential VMT per capita at 15 percent below the regional average of 13.95 VMT per capita. Therefore, the threshold is 11.86 daily VMT per capita. Any project above the threshold would need to mitigate its impacts to less than significant.

To determine whether a project would result in CEQA transportation impacts related to VMT, the Santa Clara Valley Transportation Authority (VTA) travel demand forecasting (TDF) model was used. VTA also has developed the Santa Clara County map-based VMT Evaluation Tool, based on the model forecasts, to streamline the analysis for development projects located within the County. The TDF model and the map based VMT evaluation tool were used to estimate VMT for the proposed housing sites and determine whether the location of the housing sites would result in significant VMT impacts. In addition to the location based VMT evaluation methodology using the County VMT Evaluation Tool, HEU sites planned for affordable housing or sites that generate or attract fewer than 110 trips per day (considered as small projects) would be screened out from further VMT analysis per the Office of Planning and Research (OPR) guidelines.

As discussed in Appendix A, of the housing inventory sites, 954 units within the sites are located in areas below the City's residential VMT threshold of 11.86 VMT per capita; 388 units are located on parcels with existing VMT between the City's residential threshold and the regional average of 13.95 VMT per capita; 292 units are located on parcels with existing VMT greater than the regional average; and 14 units are located on parcels with existing VMT greater than the residential threshold. Projects located in areas where the existing VMT is above the established threshold are referred to as being in "high-VMT areas." Projects in high-VMT areas are required to include a set of VMT reduction measures that would reduce the project VMT to the greatest extent possible. The VMT evaluation tool evaluates a list of selected VMT reduction measures that can be applied to a project to reduce the project VMT.

For the housing inventory sites that are located in areas with residential VMT over the 11.86 VMT per capita threshold, the proposed developments identified in these areas would likely be single-family or multi-family developments that would generate fewer than 110 daily vehicle trips. Pursuant to OPR guidelines, these housing sites would be screened out from further VMT analysis

and would be presumed to have a less than significant VMT impact. Further, it should be noted that most of these inventory sites are baseline sites that do not involve rezoning and could be built out to this density under current zoning.

However, two sites (APN #18956014 and #31801036) located on parcels with existing VMT between the City's residential threshold and the regional average of 13.95 VMT per capita and four sites (APN #31816022, #32601052, #32601053, and #33609018) located on parcels with existing VMT greater than the regional average are located in "high-VMT" areas and wound not be screened out and would need to implement further mitigation strategies. Therefore, this impact is potentially significant.

Hexagon Transportation Consultants also prepared a cumulative analysis that calculates the change in citywide VMT as a result of the proposed HEU (Table 1 in Appendix A). VMT forecasts were developed using the VTA Travel Demand Forecasting Model. Two future land use scenarios were evaluated: Cumulative (2040) No Project Conditions and Cumulative (2040) Conditions with the HEU. The Cumulative (2040) No Project scenario includes local and regional roadway improvements and land use projections consistent with ABAG Projections 2017 in the rest of the region but assumes no growth in housing units in Los Altos. The Cumulative (2040) conditions with the HEU assumes the addition of 1,648 residential units to the City's housing inventory. Table 27 presents the results of the VMT analysis. The table shows that the VMT per resident would decrease by 0.17, from 13.08 under cumulative (2040) no project conditions to 12.90 with the HEU. Since the HEU buildout year is 2031, the VMT forecasts for the cumulative (2031) no project and cumulative (2031) with HEU scenarios were extrapolated using the existing and cumulative 2040 VMT forecasts from the VTA model. As shown in Table 27, the VMT per resident under cumulative (2031) with HEU would decrease by 0.14, from 12.85 under cumulative (2031) no project conditions to 12.71 with the HEU resulting in a less-than-significant VMT impact. Therefore, this impact would be less than significant.

Table 27 Cumulative Vehicle Miles Traveled Analysis

Scenario	Residential VMT[1]	Housing Units	Population	VMT Per Resident[2]
Cumulative (2031) No Project	415,472	11,847	32,322	12.85
Cumulative (2031) Plus HEU	467,012	13,495	36,756	12.71
Cumulative (2040) No Project	424,782	11,905	32,478	13.08
Cumulative (2040) Plus HEU	476,322	13,553	36,912	12.90

[1] Residential VMT = daily home-based vehicle trips x travel distance

[2] VMT per resident = residential VMT/population

Source: Hexagon Transportation Consultants, Inc 2022 (Appendix A)

Mitigation Measures

The Santa Clara County VMT Evaluation Tool evaluates a list of selected VMT reduction measures that can be applied to a project to reduce the project VMT. There are four strategy tiers whose effects on VMT can be calculated with the VMT evaluation tool:

- ***Tier 1:*** *Project characteristics that encourage walking, biking, and transit uses.*
- ***Tier 2:*** *Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:*
  - *Increase bike access*

- *Improve connectivity by increasing intersection density*
- *Increase transit accessibility*
- *Traffic calming measures beyond the project frontage*
- *Pedestrian network improvements beyond the project frontage*

- ***Tier 3:*** *Parking measures that discourage personal motorized vehicle trips. These improvements include:*
  - *Limit parking supply*
  - *Provide bike facilities*

- ***Tier 4:*** *Transportation Demand Management (TDM) measures that provide incentives and services to encourage alternatives to personal motorized vehicle trips. These measures for residential developments include:*
  - *School pool programs*
  - *Bike share programs*
  - *Car share programs*
  - *Subsidized transit program*
  - *Unbundle parking costs from property costs*
  - *Voluntary travel behavior change program*

The first three strategies – land use characteristics, multimodal network improvements, and parking – are physical design strategies that can be incorporated into project design. TDM includes programmatic measures that aim to reduce VMT by decreasing personal motorized vehicle mode share and by encouraging more walking, biking, and riding transit. When required, TDM measures shall be enforced through annual trip monitoring to assess a project's status in meeting the VMT reduction goals.

TRA-1 Vehicle Miles Traveled (VMT) Reduction Mitigation for APN #18956014 and #31801036

The City shall require the following Standard Condition of Approval for projects on APN #18956014 and #31801036:

> *Prior to issuance of a building permit, the project applicant shall demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 3 VMT mitigation measures:*
>
> - ***Tier 1:*** *Project characteristics that encourage walking, biking, and transit uses.*
> - ***Tier 2:*** *Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:*
>   - *Increase bike access*
>   - *Improve connectivity by increasing intersection density*
>   - *Increase transit accessibility*
>   - *Traffic calming measures beyond the project frontage*
>   - *Pedestrian network improvements beyond the project frontage*

- ***Tier 3:*** *Parking measures that discourage personal motorized vehicle trips. These improvements include:*
  - *Limit parking supply*
  - *Provide bike facilities*

The City of Los Altos shall review project plans to ensure that the appropriate VMT mitigation measures are implemented prior to project approval.

TRA-2 VMT Reduction Mitigation for APN #31816022, #32601052, #32601053, and #33609018

The City shall require the following Standard Condition of Approval for projects on #31816022, #32601052, #32601053, and #33609018:

Prior to issuance of a building permit, the project applicant shall demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 4 VMT mitigation measures:

- ***Tier 1:*** *Project characteristics that encourage walking, biking, and transit uses.*
- ***Tier 2:*** *Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:*
  - *Increase bike access*
  - *Improve connectivity by increasing intersection density*
  - *Increase transit accessibility*
  - *Traffic calming measures beyond the project frontage*
  - *Pedestrian network improvements beyond the project frontage*
- ***Tier 3:*** *Parking measures that discourage personal motorized vehicle trips. These improvements include:*
  - *Limit parking supply*
  - *Provide bike facilities*
- ***Tier 4:*** *Transportation Demand Management (TDM) measures that provide incentives and services to encourage alternatives to personal motorized vehicle trips. These measures for residential developments include:*
  - *School pool programs*
  - *Bike share programs*
  - *Car share programs*
  - *Subsidized transit program*
  - *Unbundle parking costs from property costs*
  - *Voluntary travel behavior change program*

The City of Los Altos shall review project plans to ensure that the appropriate VMT mitigation measures are implemented prior to project approval. TDM measures shall be enforced through annual trip monitoring to assess the project's status in meeting the VMT reduction goals.

Significance After Mitigation

Implementation of mitigation measures TRA-1 and TRA-2 would reduce VMT in "high-VMT" areas to a less than significant level which would ensure consistency with the City's interim VMT policy.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

In the absence of specific project applications to review, analyzing impacts based on project design features would be wholly speculative. CEQA does not require public agencies to speculate. Adoption of the proposed HEU analyzes the amount of new housing units the City will accommodate during the 2023-2031 planning period and sets goals and policies for how this housing is implemented. It does not grant entitlements for any specific project or future development. Thus, the plan for new housing and the goals and policies needed to achieve that housing do not have a specific transportation safety impact or hazard. The proposed project would not include hazardous geometric design features or incompatible uses. Each housing application would be evaluated at the project specific level and undergo design review which would ensure design features would be in accordance with all applicable City standards to minimize design hazards. Furthermore, future projects facilitated would be infill projects or would include increasing density and height of existing sites, and therefore would not involve the creation of new roadways or intersections or incompatible uses within Los Altos. While new intersections of existing local streets with proposed new streets internal to these sites may be created if these sites would be developed, they would be subject to the project-level review processes described above to ensure hazards from design features or incompatible uses are not created. Therefore, impacts from hazardous design features or incompatible uses would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in inadequate emergency access?

Adoption of the proposed HEU analyzes the amount of new housing units the City will accommodate during the 2023-2031 planning period and sets goals and policies for how this housing is implemented. It does not grant entitlements for any specific project or future development. Thus, the plan for new housing and the goals and policies needed to achieve that housing do not have a specific emergency access impact. At the project specific level, future development would be required to comply with comply with basic building designs and standards for residential buildings as mandated by the Los Altos Fire Code, under LAMC Chapter 12.24. Future projects would be required to incorporate all applicable design and safety requirements as set forth in the most current adopted building codes and fire and life safety standards. Compliance with these standards is ensured through the City review and building plan check process. Additionally, as discussed under Section 9, *Hazards and Hazardous Materials*, the proposed HEU would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts related to emergency access would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	■	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐

Regulatory Setting

Assembly Bill 52 of 2014

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

California Senate Bill 18 of 2004

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill [SB] 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005); "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places." SB 18 refers to PRC Section 5097.9 and 5097.995 to define cultural places as:

- Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9)
- Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.995).

Consultation Results

As part of its tribal cultural resources consultation process under AB 52 and SB 18, the City of Los Altos sent letters via certified mail on March 9, 2022, to the following ten Native American tribes that that were identified by the NAHC as being traditionally and culturally affiliated with the geographic area:

- Amah Mutsun Tribal Band
- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Indian Canyon Mutsun Band of Costanoan
- Muwekma Ohlone Indian Tribe of the SF Bay Area
- North Valley Yokuts Tribe
- Rumsen Am:a Tur:ataj Ohlone
- Tamien Nation
- The Ohlone Indian Tribe
- Wuksache Indian Tribe/Eshom Valley Band

- The Confederated Villages of Lisjan

Under AB 52 and SB 18, Native American tribes typically have 30 days and 90 days, respectively, to respond and request further project information and formal consultation. To date, the City of Los Altos has not received any responses requesting consultation under AB 52 or SB 18 from the Tribes. Correspondence is included in Appendix E.

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

No specific tribal cultural resources were identified in the City of Los Altos as a result of consultation with the Tribes. Further, the proposed HEU does not involve physical development. Nonetheless, ground-disturbing activities associated with individual development projects during the planning period of the HEU could expose previously unidentified subsurface archaeological resources that may qualify as tribal cultural resources and could be adversely affected by construction.

Adherence to the requirements of AB 52 would require Tribal consultation with local California Native American Tribes prior to implementation of project activities subject to CEQA. AB 168 would require Tribal consultation with local California Native American Tribes prior to implementation of project activities subject to SB 35. In compliance with AB 52, a determination of whether project-specific substantial adverse effects on tribal cultural resources would occur along with identification of appropriate project-specific avoidance, minimization, or mitigation measures would be required. Due to the programmatic nature of the proposed HEU it is not possible to fully determine impacts of specific projects on specific sites; however, no tribal cultural resources were identified during consultation. Future projects subject to CEQA and SB 35 would require project-specific tribal cultural resource identification and consultation, and the appropriate avoidance, minimization, or mitigation would be incorporated. Project-specific tribal cultural resource consultation will occur when specific projects are implemented, and consultation conducted pursuant to the requirements of AB 52.

Nonetheless, tribal cultural resources are common throughout the San Francisco Bay Area, and their locations often are unknown or confidential. Projects associated with the proposed HEU therefore have the potential to significantly impact tribal cultural resources through ground disturbance. Implementation of Mitigation Measure TCR-1 would ensure that any unanticipated discoveries of tribal cultural resources are avoided or, where avoidance is infeasible, mitigated to a less than significant level.

Mitigation Measure

The following mitigation measure is required. Other mitigation may also be required for future projects as determined through the tribal consultation process.

TCR-1 Suspension of Work Around Potential Tribal Cultural Resources

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

In the event that archaeological resources of Native American origin are identified during implementation of the proposed project, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City of Los Altos, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City of Los Altos Community Development Director or designee shall review and approve the plan prior to implementation.

Significance After Mitigation

Implementation of Mitigation Measure TCR-1 would protect tribal cultural resources in the event of their discovery during implementation of the proposed project, reducing the potential impact on such resources to a less-than-significant level.

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b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

As described under checklist question (a), no specific tribal cultural resources were identified in the City of Los Altos as a result of consultation with the Tribes. Further, no tribal cultural resources have been identified by the lead agency. Nonetheless, tribal cultural resources are common throughout the San Francisco Bay Area, and their locations often are unknown or confidential. Projects associated with the proposed HEU therefore have the potential to significantly impact tribal cultural resources through ground disturbance. Implementation of Mitigation Measure TCR-1 would ensure that any unanticipated discoveries of tribal cultural resources are avoided or, where avoidance is infeasible, mitigated to a less than significant level. This impact would be less than significant with mitigation.

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	■
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	■	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	■	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	■	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	■	☐

Environmental Setting

Water

All domestic and commercial water in Los Altos is supplied by Cal Water, and financially supported by user fees. The City of Los Altos is part of Cal Water's Los Altos Suburban District. Cal Water's water supply is derived from purchased surface water from the Santa Clara Valley Water District (SCVWD), groundwater from the Santa Clara Subbasin, and small amounts of recycled water. Treated surface water is delivered to the Los Altos Suburban District from the Rinconada water treatment plant (WTP) through a large-diameter high pressure pipeline that runs through Cupertino and along Foothill Expressway (Cal Water 2021). When surface water supplies are scarce, SCVWD

imposes voluntary and mandatory reductions in the overall use of water. In addition, because surplus surface water supplies are stored underground by SCVWD directly or through in-lieu recharge, during shortages, the Los Altos Suburban District increases groundwater production and reduces its purchases from SCVWD (Cal Water 2021). According to Cal Water's Los Altos Suburban District 2020 UWMP, in the year 2020, Cal Water supplied 10,294 acre-feet (AF) of purchased or imported water from SCVWD, 2,729 AF of groundwater from the Santa Clara Subbasin, and 64 AF of recycled water from the Sunnyvale water pollution control plant (WPCP), for a total of 13,087 AF. The UWMP projects water supply to increase to 13,103 AF by 2030 and 14,197 AF by 2045, and water demand to increase to 13,103 AF by 2030 and 14,197 AF by 2045 (Cal Water 2021).

Wastewater

The City provides sanitary sewer services to most residents within Los Altos, with the exception of a few homes with septic systems. Wastewater is conveyed to the Palo Alto Regional Water Quality Control Plant (RWQCP) for treatment and disposal, which has a dry-weather capacity of 39 million gallons per day (mgd). The City has rights to discharge up to 3.6 million gallons per day average annual dry weather flow to the WPCP. The City owns and maintains the collection system within the City and its sphere of influence which includes approximately 140 miles of sewer pipes of which most is 6-inch and 8-inch vitrified clay pipe. The City's Sanitary Sewer Master Plan Update was prepared in February 2013 to improve hydraulic capacity and reliability of the sewer collection system (City of Los Altos 2013).

Stormwater

The City has adopted a Stormwater Master Plan in April 2016 to establish a capital improvement program to mitigate the impacts of stormwater runoff and reduce flooding impacts. According to the Stormwater Master Plan, the City has five major drainage areas based on the City's pipe network: Hale Creek (17.6 mile pipes), Adobe Creek (18.6 mile pipes), Permanente/Stevens Creek (14.3 mile pipes), Permanente Creek (2.9 mile pipes), and Stevens Creek (1.7 mile pipes) (City of Los Altos 2016). Runoff generated is conveyed through the City owned stormwater system that drains directly to four creeks (Hale, Permanente, Adobe, and Stevens), then to the San Francisco Bay. Portions of the City's watersheds drain directly to creek channels while a portion of the runoff ponds along rural streets. To create a rural aesthetic, many streets in Los Altos do not have traditional suburban curb and gutter, and instead have unpaved areas along the street shoulder. This layout allows some runoff to soak into the ground before it reaches a catch basin and enters a conventional storm drain system.

The City also adopted its Green Stormwater Infrastructure Plan on July 9, 2019, which aims to transform the City's traditional storm drainage infrastructure to green stormwater infrastructure, which uses plants and soils to mimic natural watershed processes, capture stormwater, and create healthier environments (City of Los Altos 2019).

Solid Waste

There are no existing or planned solid waste facilities in the City. Solid waste is collected by Mission Trail Waste Systems, a franchised hauler, which provides residential collection services for trash, recycling, and organics. Solid wastes are transferred to Newby Island landfill in San Jose, which has a remaining capacity of 16,400,000 cubic yards and a maximum permitted capacity of 57,500,000. The estimated cease operation date for the landfill is January 1, 2041 (CalRecycle 2019).

Electricity, Natural Gas, and Telecommunications

SVCE supplies electricity to Los Altos using transmission infrastructure operated and maintained by PG&E. PG&E also provides natural gas to the City. Natural gas and electricity are also addressed in Section 4.5, *Energy*. As the City's main electricity provider, SVCE enrolls new customers in their GreenStart program, which sources 50 percent of electricity from renewable energy sources and 50 percent from carbon-free sources. Customers have the option to upgrade to SVCE's GreenPrime program which sources 100 percent of electricity from renewable energy sources (SVCE 2022).

Telecommunications services in Los Altos are provided by private companies, including AT&T, Comcast Cable, and DISH, which provides internet, phone, and television.

Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

Construction activities associated with development under the proposed HEU would require recycled water for dust suppression, concrete manufacturing, and such activities as washing wheels and equipment. Temporary construction recycled water would be trucked to active construction sites or produced from existing fire hydrants near the applicable site(s), with City approval. As such, construction water demands would not require new connections or conveyance facilities, as existing or mobile facilities would be used.

New water supply connections and associated facilities would be required for future development accommodated under the proposed HEU to convey potable water supply. Such upgrades would occur within existing utility easements and would be located underground, primarily within existing roadways. Development under the proposed HEU would primarily be located on previously developed sites or infill sites within the city that are currently zoned for residential development; the HEU would also involve rezoning existing sites to increase allowed density and height. New water service connections would be consistent with utility connections in urbanized areas, such that minimal areas of new disturbance would occur. Developers are responsible for funding infrastructure improvements that are required to serve future projects and have not been previously identified as part of a capital improvement program covered by the development impact fees. Consistent with applicable State law, the City's development fees ensure that the developers pay the cost attributable to the increased demand for the affected public facilities reasonably related to the development project in order to refurbish the existing facilities to maintain the existing level of service and achieve an adopted level of service that is consistent with the City's General Plan (California Government Code Section 66001(g)).

Due to the existing built-up nature of the city, it is reasonably anticipated that future improvements for water supply and fire flow requirements would not disturb previously undisturbed areas and would be situated within existing utility rights-of-way such as, but not limited to, within public roadways. Therefore, the proposed project would not cause significant environmental effects associated with construction or relocation of new water infrastructure. No impact would occur.

The availability and reliability of water supply for the proposed project is addressed below, under checklist question (b). There would be no impacts related to relocation or construction of water supply facilities.

Wastewater

The Palo Alto RWQCP treats and disposes wastewater transported from Los Altos. As discussed below under Impact c, the RWQCP would have sufficient wastewater treatment capacity to accommodate the anticipated residential development, and the proposed HEU would not result in the need to expand the capacity of the RWQCP. Since development facilitated by the proposed HEU would be located in urbanized area served by existing wastewater infrastructure, the project would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction of which could cause significant environmental effects. There would be no impact.

Stormwater

Los Altos is an urbanized city that is currently developed and served by existing stormwater infrastructure. The 2023-2031 Housing Element would facilitate development of residential units within urban infill areas that are already developed or vacant and surrounded by development. Future development would be required to comply with the California Construction General Permit which requires the development and implementation of a SWPPP, the NPDES MRP, the SCVURPPP, and Section 10.16.030 of the LAMC which requires permanent stormwater pollution prevention measures to reduce stormwater pollution. Additionally, future development would be required to adhere to applicable policies within the Infrastructure and Waste Disposal Element of the Los Altos General Plan, such as Policy 3.3, which would require the minimization of impervious surfaces in new development and maximization of on-site infiltration of stormwater runoff; Policy 3.4, which would require the implementation of pollution prevention methods supplemented by pollutant source controls and treatment; and Policy 3.7, which would require the avoidance of development in areas susceptible to erosion and sediment loss. The City would continue to routinely maintain and improve deficiencies in the stormwater system, and developers would be responsible for funding infrastructure improvements that are required to serve future projects and have not been previously identified as part of a capital improvement program covered by the development impact fees. Therefore, the project would not require construction or expansion of stormwater drainage facilities and infrastructure, the construction of which would cause significant environmental effects. No impact would occur.

Telecommunications

Project implementation would require connections to existing adjacent utility infrastructure to meet the needs of site residents and tenants. Based on the availability of existing telecommunications infrastructure, construction of new telephone and cable lines would not be required, and all sites would be able to connect to existing infrastructure. Development facilitated by the project would be required to adhere to applicable laws and regulations related to the connection to existing telecommunication infrastructure. Therefore, there would be adequate telecommunications facilities to serve the development facilitated by the project. The proposed project would not result in the relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects. There would be no impact.

Electricity and Natural Gas

The project would require connections to existing electrical transmission and distribution systems to serve development facilitated by the project. This service would be provided in accordance with the rules and regulations of SVCE, and PG&E on file with and approved by CPUC. Based on the availability of existing electrical infrastructure, it is not anticipated that the construction of new electrical transmission and distribution lines would be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate electrical facilities to serve development facilitated by the project. The proposed project would not result in the relocation or construction of new or expanded electrical facilities, the construction or relocation of which could cause significant environmental effects. No impact would occur.

Development facilitated by the project would connect to existing natural gas infrastructure to meet the needs of site residents and tenants. Based on the availability of existing natural gas infrastructure, construction of new natural gas pipelines would not be required, and all sites would be able to connect to existing infrastructure. Therefore, there would be adequate natural gas facilities to serve the development facilitated by the project. The proposed project would not result in the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects. No impact would occur.

NO IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Los Altos is served by existing Cal Water facilities. According to the 2020 UWMP, Cal Water's Los Altos Suburban District anticipates adequate supply in normal years, single dry years, and multiple dry years (Cal Water 2021). As shown on Table 28, the additional 1,648 units facilitated by the proposed HEU would increase water demand by approximately 107,900 gallons per day or 145.2 acre-feet per year (AFY) in 2031 assuming full buildout. Therefore, overall, the project could increase demand in Los Altos by an approximately 1 percent over Cal Water's estimated 2030 normal-year water demand of 13,103 AFY.

Table 28 Estimated Water Use for the Proposed HEU

Potential Buildout Development/Land Use	Water Generation Factor (gpd/unit) [1]	Projected Number of Housing Units	Projected Water Demand in 2031 (gpd)	Projected Water Demand in 2031 (AFY)
Single-family residential	70	156[2]	10,920	14.7
Multi-family residential	65	1,492[2]	96,980	130.5
Total			**107,900**	**145.2**

[1] Per unit water demand factors from Cal Water are not available, therefore, this analysis is based water use factors provided by the East Bay Municipal Utilities District, 70 gpd/unit for a typical home and 65 gpd/unit for a low-rise apartment.

[2] Assumed 156 single-family residences and the rest multi-family consistent with the assumptions in the traffic analysis (Hexagon Transportation Consultants 2022)

gpd =gallons per day. AFY = acre-feet per year

According to the Cal Water UWMP, the combination of groundwater, recycled water, and purchased imported water supplies are expected to be sufficient to support the Los Altos Suburban District's projected water demands in all hydrologic conditions, including a five-year drought period, through 2045. The project's increase of 1 percent from the projected 2030 water demand in the UWMP would not substantially affect Cal Water's water supplies. Furthermore, future development would be required to comply with water conservation regulations and policies in order to maintain sufficient supplies. The California Code of Regulations (CCR) Title 24, Part 11 (CALGreen) requires a 20 percent reduction in residential indoor water use that would lower potential water demand. New development would be subject to the CCR concerning water-efficient landscapes (Division 2, Title 23, CCR, Chapter 2.7, Sections 490 through 495). Implementation of the WELO would encourage water conservation for new development and in landscaped areas. The WELO, which reinforces landscape irrigation and water conservation best practices also would encourage the use of drought-tolerant landscaping and low-flow irrigation systems. New development would also be subject to other green building and water conservation requirements described in the Water Supply Regulatory Setting. Therefore, sufficient water supplies are available to serve reasonably foreseeable development under the proposed HEU such that potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The Palo Alto RWQCP treats and disposes wastewater transported from Los Altos and has a dry-weather capacity of 39 mgd. The City has rights to discharge up to 3.6 mgd average annual dry weather flow to the WPCP. Assuming that wastewater generation is 80 percent of water use[13], the proposed HEU would increase wastewater generation by approximately 86,320 gallons per day. This would constitute approximately 2.4 percent of the City's daily discharge rights and would be within the remaining capacity of the RWQCP. Therefore, the plant's existing wastewater treatment capacity would be sufficient to accommodate the anticipated residential development under the proposed HEU. Development facilitated by the proposed project would not result in the need to expand the capacity of the RWQCP. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Projected buildout under the proposed HEU would be 1,648 additional residential units through 2031. CalRecycle estimates that multi-family residential uses generate an average of four pounds of solid waste per unit per day (CalRecycle 2022). As shown in Table 29, prior to implementation of State-mandated diversion requirements, development associated with the proposed HEU would generate an estimated 6,592 pounds per day of solid waste, which equates to 3.3 tons or 29.3 cubic yards per day. In accordance with California's Integrated Waste Management Act of 1989 (AB 939), cities and counties are required to divert 50 percent of all solid wastes from landfills. Additionally, pursuant to AB 341 adopted in 2012, all businesses that generate four cubic yards or more of

[13] 166 GPCD times 0.8 = 132.8 gpd.

commercial solid waste per week including multi-family dwelling that consists of five units or more would be required to divert 75 percent of all solid wastes. The City of Los Altos has achieved a diversion rate of 71 percent, which substantially exceeds AB 939 State requirement (City of Los Altos 2017). Assuming that this diversion rate continues to apply to new development on the project sites, implementation of the project would generate approximately 1 ton or 8.5 cubic yards per day of solid waste for disposal at landfills.

Table 29 Estimated Solid Waste Generation

Potential Buildout Development/ Land Use	Quantity	Units	Generation Rate[1]	Solid Waste (pounds per day)	Solid Waste (tons per day)	Solid Waste (cubic yards per day)[2]
Residential	1,648	dwelling units	4 pounds/ unit/day	6,592	3.3	29.3
Total Assuming 71% Diversion Rate				**1,912**	**1.0**	**8.5**

[1] CalRecycle 2022

[2] RecycleMania/USEPA 2022, assumes 225 pounds per cubic yard of residential waste

As discussed in the Solid Waste Setting, the Newby Island landfill in San Jose is an active landfill that can accommodate solid waste from Los Altos. This landfill has a combined remaining capacity of approximately 16.4 million cubic yards. With development facilitated by the proposed HEU, it is estimated that the project sites would generate approximately 8.5 cubic yards per day, or 3,103 cubic yards per year of solid waste disposal at landfills. This represents 0.0002 percent of the current total remaining landfill capacity.

Continued compliance with applicable regulations and policies 5.2 and 5.4 of the Los Altos General Plan Infrastructure and Waste Disposal Element would ensure that development facilitated by the project complies with federal, State, and local statutes and regulations related to solid waste and would lead to increased recycling and waste diversion. Development facilitated by the project would be required to comply with these policies, including paying a fair share for solid waste services and achieving greater diversion rates than required by AB 939. AB 939 requires the City to divert 50 percent of solid waste from landfills. Local infrastructure would have the capacity to accommodate solid waste generated by the project. Development facilitated by the project would also be required to demonstrate compliance with all applicable regulations. Therefore, anticipated rates of solid waste disposal from the proposed HEU would have a less than significant impact related to solid waste disposal facilities.

LESS THAN SIGNIFICANT IMPACT

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As discussed under checklist question (d) above, the project would be required to comply with applicable regulations and policies 5.2 and 5.4 of the Los Altos General Plan Infrastructure and Waste Disposal Element, which would ensure that development facilitated by the project complies with federal, State, and local statutes and regulations related to solid waste and would lead to increased recycling and waste diversion. Development facilitated by the project would be required to comply with these policies, including paying a fair share for solid waste services and achieving greater diversion rates than required by AB 939. AB 939 requires the City to divert 50 percent of solid waste from landfills. Local infrastructure would have the capacity to accommodate solid waste generated by the project. Additionally, future development would be required to comply with SB

1838 which would require mandatory organic waste recycling. Therefore, the project would comply with federal, State, and local regulations related to solid wastes, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	■
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	■
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

Environmental Setting

According to maps prepared by the California Department of Forestry and Fire Protection (CAL FIRE), Los Altos is not located in a state responsibility area (SRA) or local responsibility area (LRA) fire hazard severity zones (FHSZs) (CAL FIRE 2007). A small portion of the southwestern border is adjacent to a high fire hazard severity zone (HFHSZ), and the closest very high fire hazard severity zone is located approximately 1 mile southwest of the city.

Impact Analysis

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Los Altos is not located in or immediately adjacent to a VHFHSZ, with the closest VHFHSZ located approximately 1 mile southwest and separated by existing structures and natural landscape. The City of Los Altos is mainly urbanized with most natural vegetation isolated in small areas; therefore, wildfire hazards are not a major concern in the city. Future development facilitated under the proposed HEU would be required to be constructed in accordance with the City's Fire Code pursuant to Chapter 12.24 of the LAMC. Additionally, Program OCC 10 of the Los Altos General Plan's Open Space Element aims to promote fire prevention through fire hazard education and fire prevention program, and coordination with local water districts to ensure water pressure for new development is adequate for firefighting purposes. The City's Emergency Preparedness Plan and evacuation routes would also prepare future residents for emergencies and reduce impacts from wildfire to a less than significant level. Additionally, the proposed HEU would facilitate residential development primarily on infill sites, and would not require the construction of additional roads, power lines, or other utilities that would exacerbate existing fire risk. Housing sites that require utility connections would likely install underground connections, and development within underground utility districts would be required to install new utility connections underground. Therefore, the proposed HEU would not substantially impair an adopted emergency response plan or emergency evacuation plan and there would be no impact.

NO IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

For the same reasons outlined above under checklist question (a), with compliance with existing regulations, development that could be facilitated by the proposed HEU would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. There would be no impact.

NO IMPACT

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Development that could be facilitated by the proposed HEU would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. For the same reasons outlined above under checklist question (a), with compliance with existing regulations, there would be no impact.

NO IMPACT

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

For the same reasons outlined above under checklist question (a), with compliance with existing regulations, the project would not increase the risk of flooding or landslides, as site topography and designated flood zones would not be modified substantially from existing conditions. There would be no impact.

NO IMPACT

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21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	■	☐	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	■	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Construction activities associated with development facilitated by the proposed HEU could potentially degrade the quality of the environment, eliminate or threaten wildlife habitats, or eliminate important examples of the major periods of California history or prehistory. However, compliance with federal, State, and local regulatory requirements; Los Altos General Plan policies; and LAMC requirements would reduce impacts to status species, cultural resources, and tribal cultural resources. Additionally, as discussed in Sections 4, *Biological Resources*, 5, *Cultural Resources*, 7, *Geology and Soils*, and 18, *Tribal Cultural Resources,* implementation of mitigation

measures BIO-1 though BIO-5, CUL-1, CUL-2, GEO-1, and TCR-1 would ensure protection of special-status species, nesting birds, roosting bats, and State and federally protected waters and wetlands, as well as historical, paleontological, and tribal resources, and would reduce impacts to a less than significant level.

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b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis provides a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

This analysis is cumulative in nature in that it analyzes future development under the proposed HEU throughout Los Altos and takes into consideration the effects associated with development of multiple projects in the housing element cycle through 2031. For analyses that may have more localized or neighborhood implications (aesthetics, agriculture, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, recreation, utilities, tribal cultural resources, wildfire), the geographic scope for cumulative impacts includes the City of Los Altos. For these issue areas, generally, impacts are site specific and would not result in overall cumulative impacts. Future development projects would be reviewed by the City pursuant to CEQA to identify potential impacts to on a project-by-project basis. While there is the potential for significant cumulative impacts, it is anticipated that potential impacts associated with individual development projects would be addressed on a case-by-case basis and would be subject to the mitigation measures outlined in this IS-MND, City policies, and local and State regulations regarding the protection of such resources. With compliance with the existing policies and regulations, and mitigation measures, future development would be required to avoid or mitigate impacts. Therefore, the proposed project's incremental contribution to cumulative impacts associated with aesthetics, agriculture, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, recreation, utilities, tribal cultural resources, wildfire would not be cumulatively considerable, and cumulative impacts would be less than significant.

Some analyses including air quality, energy, greenhouse gas emissions, transportation, and population and housing, rely on much larger geographic areas such as the Bay Area region. For issues that may have regional cumulative implications, the cumulative impact analysis for this EIR is based on Plan Bay Area 2050, the Bay Area's most recent Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

As discussed in sections 3, *Air Quality,* the project would be consistent with the 2017 Clean Air Plan control measures as development facilitated by the project would comply with the latest Title 24 regulations and would increase density in urban areas in proximity to transit, allowing for greater use of alternative modes of transportation. Additionally, the increase in VMT would not exceed the

projected population increase per the BAAQMD *CEQA Air Quality Guidelines* for operational emissions from plans. Discussion of these impacts considers the cumulative nature of criteria pollutants in the region. Therefore, the project would not result in a cumulatively considerable contribution to an air quality impact.

As discussed in Section 6, *Energy,* development facilitated by the project would not result in a wasteful, inefficient, or unnecessary consumption of energy, and operation of the new residential structures would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Development facilitated by the project would be consistent with the energy-related goals, policies, and actions of the Statewide plans and the City's General Plan; therefore, the project would not make a cumulatively considerable contribution to a significant cumulative impact with respect to consistency with renewable energy and energy efficiency plans. Projects throughout the Bay Area are required to adhere to applicable renewable energy and energy efficiency laws, programs, and policies such as California's RPS, AB 2076, and Title 24 standards to avoid the wasteful, inefficient, or unnecessary consumption of energy.

As discussed in Section 8, *Greenhouse Gas Emissions,* the impact of GHG emissions generated by development facilitated by the proposed HEU is inherently cumulative. GHG emissions from one project cannot, on their own, result in changes in climatic conditions; therefore, the emissions from any project must be considered in the context of their contribution to cumulative global emissions, which is the basis for determining a significant cumulative impact. This is determined through the project's consistency with applicable GHG emission thresholds and applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. GHG emissions from development facilitated by the project would not exceed the BAAQMD interpolated 2031 plan-level threshold. In addition, development facilitated by the project would be consistent with the 2017 Scoping Plan, Plan Bay Area 2050, City General Plan, and the City CAP. Therefore, the project would not result in a significant cumulative impact related to GHG emissions.

As discussed in Section 14, *Population and Housing,* the proposed HEU would result in an housing increase in Los Altos of approximately 14 percent. The proposed project would be consistent with State requirements for the RHNA and would be within the growth forecasts for Northwest Santa Clara County in Plan Bay Area 2050, which projects a 38 percent increase in housing for Northwest Santa Clara County. Therefore, the project would not result in a cumulatively considerable contribution to a GHG impact.

As discussed in Section 17, *Transportation,* and shown in Table 27, the proposed HEU would not result in a significant cumulative VMT impact. Therefore, the project would not result in a cumulatively considerable contribution to a transportation impact.

Therefore, with implementation of mitigation measures included in this IS-MND, impacts of the proposed HEU would not be cumulatively considerable.

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c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

In general, impacts to human beings are associated with air quality, geologic hazards, GHGs, hazards and hazardous materials, noise, and traffic safety impacts. As discussed in this IS-MND, impacts related to the above-mentioned areas would all be less than significant or less than significant with incorporation of mitigation measures AQ-1 through AQ-3, NOI-1, and NOI-2. Therefore, the proposed project would not directly or indirectly cause substantial adverse effects on human beings, and impacts would be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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List of Preparers

Rincon Consultants, Inc. prepared this IS-MND under contract to the City of Los Altos. Persons involved in data gathering analysis, project management, and quality control are listed below.

RINCON CONSULTANTS, INC.

Abe Leider, AICP CEP, Principal
Karly Kaufman, MESM, Project Manager
Heather Dubois, Senior Air Quality Specialist
Bill Vosti, Program Manager – Air Quality, GHG Emissions, and Noise
JulieAnn Murphy, Architectural Historian
Leanna L. Flaherty, RPA, Archaeologist
Andrew McGrath, Ph.D., Paleontologist
Nichole Yee, Environmental Planner
Hannah Bireschi, Environmental Planner
Kat Castanon, GIS Analyst
Debra Jane Seltzer, Publishing Specialist

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