



MEMORANDUM

Date: February 28, 2023
To: James Sandoval, Public Works Director, City of Los Altos
From: Demetri Loukas, Principal Project Manager, David J. Powers & Associates, Inc.
Subject: NOE Justification – Los Altos Emergency Operations Center Project

Background and Project Description

The City of Los Altos (City) proposes to incorporate a code compliant Emergency Operations Center (EOC) into the existing Los Altos Community Center. The Los Altos Community Center is located at 97 Hillview Avenue in the City of Los Altos. The community center consists of a one-story building with twelve multipurpose/meeting rooms, a lobby, hallway, courtyard, restrooms, and a surface parking lot. No trees would be removed by the project. Construction activity associated with the proposed project would include the following:

- installation of radio and satellite equipment (e.g., rooftop antennas and dish),
- replacement of existing HVAC system equipment with a new system equipped with more robust filters and connections to emergency power system, and
- installation of an emergency back-up generator structure adjacent to the Bus Barn Theater within a small enclosure.

Following construction, operation of the EOC would be limited to essential city functions during emergency and natural disasters.

Environmental Review

The City, serving as Lead Agency under the California Environmental Quality Act (CEQA), is completing the required environmental review for the project pursuant to CEQA.

Categorical Exemption

Article 19, Categorical Exemptions, Sections 15300 to 15333 of the CEQA Guidelines lists classes of projects that have been determined not to have a significant effect on the environment and, therefore, are exempt from the provisions of CEQA.

One or more of the following Categorical Exemptions are applicable to the proposed project:

Class 1 - Section 15301. Existing Facilities: Operation, repair, maintenance, or minor alterations to a public facility involving no or negligible expansion of existing or former use.

Class 2 - Section 15302. Replacement or Reconstruction: Replacement or reconstruction of structures and facilities where the new structure will be located on the same site for substantially the same purpose.

Class 3 – Section 15303. New Construction or Conversion of Small Structures: Construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.

Class 4 - Section 15304. Minor Alterations to Land: Minor public or private alterations in the condition of land, water, and/or vegetation that do not involve the removal of healthy, mature, scenic trees.

Class 11 - Section 15311. Accessory Structures: Construction or replacement of minor structures accessory to existing commercial, industrial, or institutional facilities including on-premises signs.

Exceptions

This section documents that none of the exceptions in CEQA Guidelines Section 15300.2 would disqualify the project from being found categorically exempt. These exceptions (a through f) are discussed below:

- (a) Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The proposed EOC would be located at the existing Los Altos Community Center. The Los Altos Community Center is located at 97 Hillview Avenue in the City of Los Altos. There are no environmental resources of hazardous or critical concern within the project area. Therefore, the project would not impact an environmental resource of hazardous or critical concern and this exception is not applicable.

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

The project involves construction and operations of an EOC within an existing community center building. No emergency operations centers are currently located on-site. Upon construction, operation of the EOC would occur with no additional EOCs developed in the future. For these reasons, a significant cumulative impact from successive projects of the same type in the same place, over time would not occur.

- (c) Significant Effect.** A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

There are no unusual circumstances associated with the proposed project. The EOC would be constructed within an existing community center building that is located in an urban area surrounded by residential uses and public uses. EOCs are commonly located within community centers. The construction activities associated with the proposed EOC are typical and similar to construction activities recently completed by the City in the project area (e.g., Hillview Park and Hillview Community Center). For these reasons, the proposed project would not result in a significant effect on the environment due to an unusual circumstance.

- (d) Scenic Highways.** A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.

The nearest state designated scenic highway is Interstate 280, which is located approximately 6.4-miles northwest of the project site.¹ The project, therefore, would not damage scenic resources within a designated state scenic highway.

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

¹ California Department of Transportation. "California State Scenic Highways".
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>
Accessed January 26, 2023.

The project site is not included on list compiled pursuant to Section 65962.5 of the Government Code (i.e., Cortese List).² Therefore, this exception does not apply to the project.

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

The proposed EOC would be located within the existing Los Altos Community Center building, which was constructed in 2021. There are no historic resources located within the project site.^{3,4,5} Two historic resources⁶ are located within the vicinity of the project site. The proposed project would not result in direct impacts to these resources. Additionally, except for the installation of new rooftop antennas, a small satellite dish, and emergency generator, and modifications to the existing HVAC system, all project components would occur within the existing building interiors and would not be visible from or affect the significance of these nearby historic resources. The antennas would be located on the rooftop of the community center above the lobby, sequoia, and cedar rooms. Views of the antennas from nearby historic resources would be partially obscured by the rooftop of the community center, other existing structures, and mature trees. The emergency generator would be located within an enclosed structure adjacent to the west side of the Bus Barn Theater. At this location, while visible, views of the generator structure from the nearby historic resources would be partially obscured by existing landscaping and exterior finishes of the enclosure would be designed to complement the adjacent structures. For these reasons, the project would not impact nearby historic resources.

Conclusion

The proposed Los Altos EOC project, as described above under Background and Project Description, meets the criteria for a Class 1 Existing Facilities exemption and other exemptions (e.g., Class 3 New Construction or Conversion of Small Structures). None of the exceptions to the exemptions set forth in CEQA Guidelines Section 15300.2 apply to the project. For these reasons, the project is exempt from the provisions of CEQA.

² California Environmental Protection Agency. "Cortese List Data Resources". Accessed January 26, 2023. <https://calepa.ca.gov/sitecleanup/corteselist/>

³ National Parks Service. "National Register Database and Research". Accessed January 26, 2023. <https://www.nps.gov/subjects/nationalregister/database-research.htm#table>.

⁴ California Office of Historic Preservation. "California Historic Resources". Accessed January 26, 2023. <https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=43>.

⁵ City of Los Altos. "Historic Inventory". Accessed January 26, 2023.

<https://www.losaltosca.gov/historicalcommission/page/historic-inventory>.

⁶ The J. Gilbert Smith House (Los Altos History Museum) and Civic Center Orchard are located approximately 140 feet and 890 feet north of the project site and are listed as Historic Landmarks on the City's Historic Inventory. Source: Ibid.