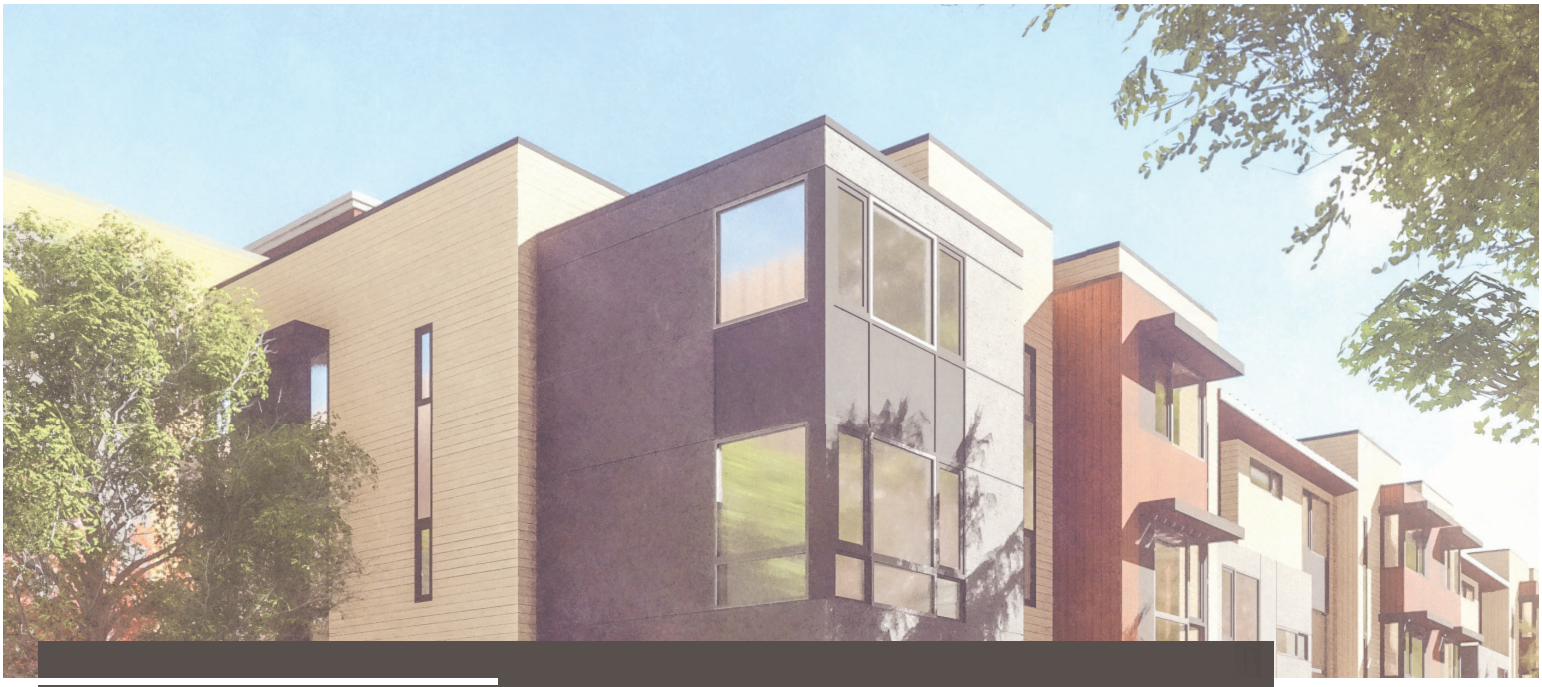

Initial Study/Mitigated Negative Declaration

5150 El Camino Real Residential Development

Prepared by

CITY OF LOS ALTOS • CALIFORNIA • INCORPORATED DECEMBER 1-1952

In Consultation with

DAVID J. POWERS & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS & PLANNERS

July 2019

Project Renderings from STUDIO T-SQUARE

City of Los Altos

MITIGATED NEGATIVE DECLARATION

5150 El Camino Real Residential Development

The City Council of the City of Los Altos has considered the project identified below and has adopted the following Mitigated Negative Declaration pursuant to the California Environmental Quality Act:

Proposed Project: New 196-unit Condominium and Townhouse Development

Location: 5150 El Camino Real, Los Altos, County of Santa Clara.

Finding: The proposed project will not have a significant effect on the environment.

Reasons Supporting the Finding:

- An Initial Study of Environmental Effects has been prepared that identified no potentially significant impacts.
- The proposed project conforms to the City's General Plan and Zoning Ordinance.
- Because of its in-fill location, new public services and utilities are not required.
- The project will not adversely impact fish and wildlife resources or their habitats.

Mitigation Measures Included in the Project: The following mitigation measures are included in the project to avoid potentially significant effects.

- **Air Quality**

  MM AIR-2: The project shall implement the following measures, in accordance with BAAQMD best management practices:

  - All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day;

  - All haul trucks transporting soil, sand, or other loose material off-site shall be covered;

- 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;

- All vehicle speeds on unpaved roads shall be limited to 15 mph;

- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible;

- Vegetation in disturbed areas shall be planted as quickly as possible;

- Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used;

- 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 [CCR]). Clear signage shall be provided for construction workers at all access points;

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation;

- Post a publicly visible sign with the telephone number and person to contact at the City of Los Altos regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

MM AIR-3: The project shall develop a plan demonstrating that the off-road equipment used on-site to construct the project would achieve a fleet-wide average 93-percent reduction in DPM exhaust emissions or greater. One feasible plan to achieve this reduction would include the following:

- All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall, at a minimum, meet EPA particulate matter emissions standards for Tier 4 engines. Equipment that is electrically powered or uses non-diesel fuels would meet this requirement.

- Cranes and generators set used during construction should be electrically powered.

- Portable equipment (i.e. air compressors and welders) should also be electrically powered.

- **Biological Resources**

MM BIO-1.1: Construction activities shall be scheduled to avoid the nesting season. The nesting season for most birds in Santa Clara County extends from February 1st through August 30th). If construction activities are scheduled to take place outside of the nesting season, impacts on nesting birds protected by the MBTA and/or CDFW will be avoided.

MM BIO-1.2: If it is not possible to schedule construction activities between September 1 and January 31, then preconstruction surveys for nesting birds shall be conducted to identify active nests that may be disturbed during project implementation. Projects that commence construction between February 1st and April 30th (inclusive) shall conduct pre-construction surveys for nesting birds within 14 days of construction onset. Projects that commence construction between May 1st and August 31st (inclusive) shall conduct preconstruction surveys within 30 days of construction onset. Pre-construction surveys shall be conducted by a qualified biologist or ornithologist for nesting birds within the on-site trees as well as all mature trees within 250 feet of the site. If the survey does not identify any nesting birds that would be affected by construction activities, no further mitigation is required.

MM BIO-1.3: If an active nest is found in or close enough to the construction area to be disturbed by these activities, the qualified biologist or ornithologist, in consultation with CDFW, shall determine the extent of a construction-free buffer zone around the nest, typically 250 feet for raptors and 100 feet for non-raptors around the nest, to ensure that raptor or migratory bird nests shall not be disturbed during project construction. The buffer shall remain in place until the breeding season has ended or a qualified biologist or ornithologist has determined that the nest is no longer active. The ornithologist/biologist shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the Director of Community Development prior to the issuance of grading permits.

MM BIO-1.4: If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (i.e., prior to February 1st).

- **Cultural Resources**

MM CUL-2.1: In the event that prehistoric or historic resources are encountered during excavation and/or grading of the site, all activity within a 50-foot radius of the find shall stop, the Director of Community Development shall be notified, and an archaeologist designated by the City shall assess the find and make appropriate recommendations, if warranted. Recommendations could include avoidance, if feasible, preservation in place, or collection, recordation, and analysis of any significant cultural materials. Construction within a radius specified by the archaeologist shall not recommence until the assessment is complete. A report of findings documenting any data recovery would be submitted to the Director of Community Development. The project applicant shall ensure all construction personnel receive cultural resource awareness training that includes information on the possibility of encountering archaeological and/or historical materials during construction.

MM CUL-2.2: Pursuant to Health and Safety Code § 7050.5 and Public Resources Code § 5097.94 of the State of California, in the event that human remains are discovered during excavation and/or grading of the site, all activity within a 50-foot radius of the find will be stopped. The Santa Clara County Coroner will be notified and shall make a determination as to whether the remains are of Native American origin. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission (NAHC) immediately. Once NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to state law, then the landowner shall re-inter the human remains and items associated with Native American burials on the property in a location not subject to further subsurface disturbance.

- **Hazards and Hazardous Materials**

MM HAZ-2.1: All PCB-containing ballasts shall be removed and disposed of in accordance with state and local laws.

MM HAZ-2.2: All potentially friable asbestos-containing materials shall be removed in accordance with National Emissions Standards for Hazardous Air Pollutants (NESHAP) guidelines prior to building demolition or renovation that may disturb the materials.

MM HAZ-2.3: All demolition activities will be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than one percent asbestos are also subject to BAAQMD regulations.

MM HAZ-2.4: During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, California Code of Regulations 1532.1, including employee training, employee air monitoring and dust control. Any debris or soil containing lead-based paint or coatings will be disposed of at landfills that meet acceptance criteria for the waste being disposed.

- **Noise**

MM NOI-1.1: Prior to the issuance of building permits, mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City's requirements. A qualified acoustical consultant shall be retained by the project applicant to review mechanical noise as the equipment systems are selected in order to determine whether the proposed noise reduction measures sufficiently reduce noise to comply with the City's 50 dBA Leq residential noise limit at the shared property lines, and with the 45 dBA Leq noise limit at residential patios adjoining the site. Noise reduction measures that would accomplish this reduction include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers such as enclosures and parapet walls to block the line of sight between the noise source and the nearest receptors.

MM NOI-2.1: Modification, placement, and operation of construction equipment are possible means for minimizing the impact of construction noise on existing sensitive receptors. Construction equipment shall be well-maintained and used judiciously to be as quiet as possible. Additionally, construction activities for the proposed project shall include the following best management practices to reduce noise from construction activities near sensitive land uses:

- Noise generating construction activities shall be limited to the hours between 7:00 a.m. and 5:30 p.m., Monday through Friday, and on Saturdays between 9:00 a.m. and 3:00 p.m., in accordance with the City's Municipal Code. Construction is prohibited on Sundays and holidays, unless permission is granted with a development permit or other planning approval.

- Use of the concrete saw within 50 feet of any shared property line shall be limited.

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.

- Unnecessary idling of internal combustion engines in construction equipment with a horsepower rating of 50 or more shall be strictly prohibited, and limited to five minutes or less, consistent with BAAQMD best management practices.

- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors (residences). If they must be located near sensitive receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.

- Utilize "quiet" air compressors and other stationary noise sources where technology exists.

- A temporary noise control blanket barrier could be erected, if necessary, at the property line or along building facades facing construction sites. This measure would only be necessary if conflicts occurred that were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected.

- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.

- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities and shall send a notice to neighbors with the construction schedule.

- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g. bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post the telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

MM NOI-3.1: A construction vibration-monitoring plan shall be implemented to document conditions at the structure located within 20 feet of proposed construction prior to, during, and after vibration generating construction activities. All plan tasks shall be completed under the direction of a

State of California licensed Professional Structural Engineer and be in accordance with industry accepted standard methods. The construction vibration monitoring plan shall include the following tasks:

- Identification of sensitivity to groundborne vibration of the structure located within 20 feet of construction.

- Performance of a photo survey, elevation survey, and crack monitoring survey for the structure located within 20 feet of construction. Surveys shall be performed prior to, in regular intervals during, and after completion of vibration generating activities and shall include internal and external crack monitoring in the structure, settlement, and distress and shall document the condition of the foundation, walls and other structural elements in the interior and exterior of said structure. Interior inspections would be subject to property owners' permission.

- Conduct a post-survey on the structure where monitoring has indicated damage. Make appropriate repairs or provide compensation where damage has occurred as a result of construction activities

- Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site.

Initial Study Prepared by: City of Los Altos

I, Jon Biggs, hereby certify that this Mitigated Negative Declaration was prepared in accordance with the provisions of the California Environmental Quality Act of 1970, as amended, and all applicable State and City Guidelines.

By: _____ Date: _____

Jon Biggs
Community Development Director

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SECTION 1.0 INTRODUCTION AND PURPOSE

1.1 PURPOSE OF THE INITIAL STUDY

The City of Los Altos, as the Lead Agency, has prepared this Initial Study (IS) and Mitigated Negative Declaration (MND) for the proposed residential project in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of Los Altos, California.

1.2 PUBLIC REVIEW PERIOD

Publication of this IS and MND marks the beginning of a 30-day public review and comment period. During this period, the IS and MND will be available to local, state, and federal agencies and to interested organizations and individuals for review. Written comments concerning the environmental review contained in this Initial Study during the 30-day public review period should be sent to:

Zachary Dahl, AICP
City of Los Altos
Community Development Department
One North San Antonio Road
Los Altos, CA 94022

1.3 CONSIDERATION OF THE INITIAL STUDY AND PROJECT

Following the conclusion of the public review period, the City of Los Altos will consider the adoption of the MND for the project at a regularly scheduled public meeting. The City shall consider the IS and MND together with any comments received during the public review process. Upon adoption of the MND, the City may proceed with project approval actions.

1.4 NOTICE OF DETERMINATION

If the project is approved, the City of Los Altos will file a Notice of Determination (NOD), which will be available for public inspection and posted at the County Clerk Recorder's Office for 30 days. Filing the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15075(g)).

SECTION 2.0 PROJECT INFORMATION

2.1 PROJECT TITLE

5150 El Camino Real Residential Development

2.2 LEAD AGENCY CONTACT

Zachary Dahl, AICP
City of Los Altos
Community Development Department
One North San Antonio Road
Los Altos, CA 94022

2.3 PROJECT APPLICANT

Dutchints Development LLC.
289 South San Antonio Road, Suite 204
Los Altos, CA 94022

2.4 PROJECT LOCATION

The project site is located at 5150 El Camino Real, which is on the west side of El Camino Real, opposite Rengstorff Avenue, in northern Los Altos. The project location is shown on the following Regional Map (Figure 2.4-1), Vicinity Map (Figure 2.4-2), and Aerial Photograph and Surrounding Land Uses (Figure 2.4-3) exhibits.

2.5 ASSESSOR'S PARCEL NUMBER

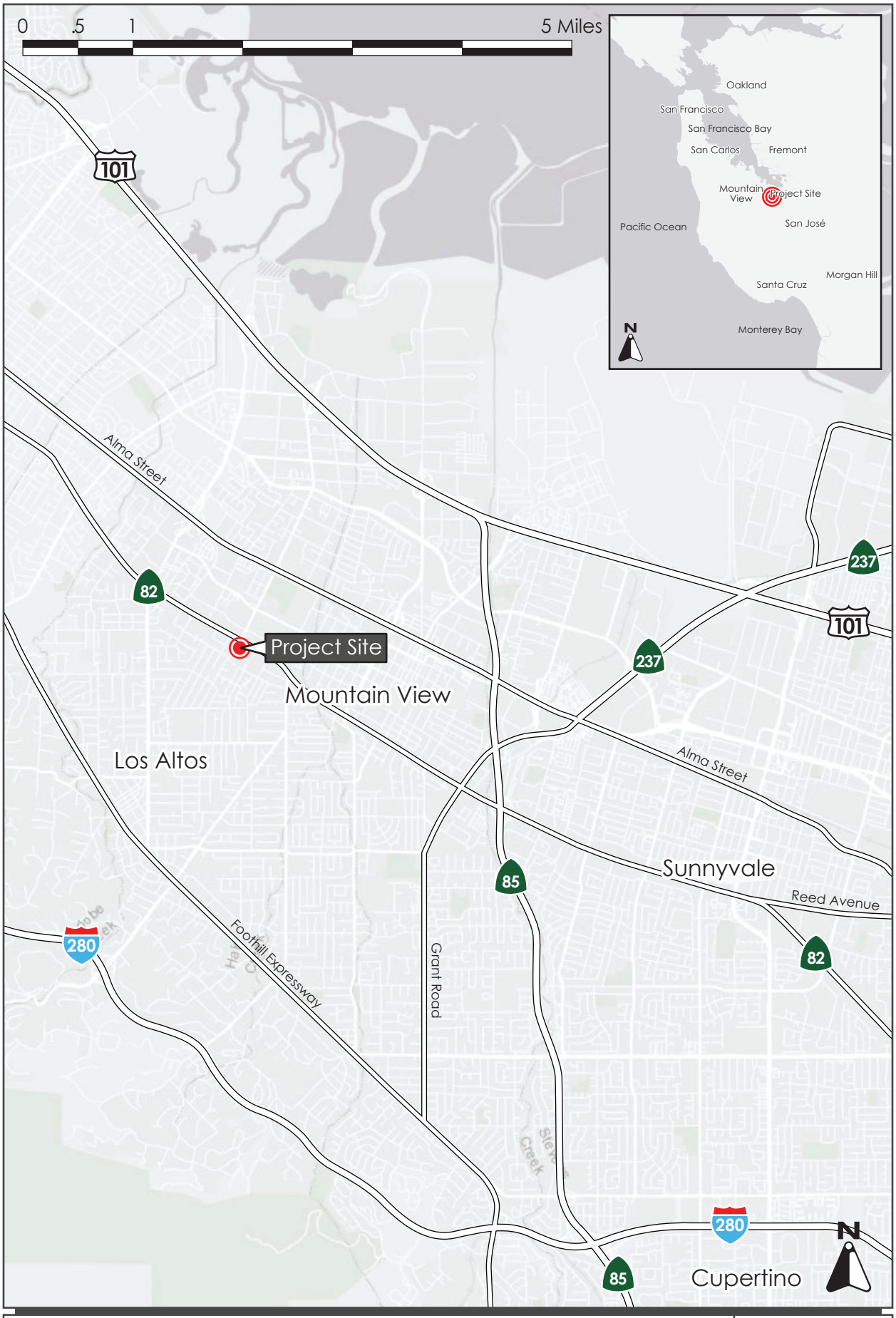
170-04-066

2.6 GENERAL PLAN DESIGNATION AND ZONING DISTRICT

The project site has a General Plan designation of *Thoroughfare Commercial* and a zoning designation of *CT (Commercial Thoroughfare).*

2.7 PROJECT-RELATED APPROVALS, AGREEMENTS, AND PERMITS

- Multiple-Family Design Review
- Conditional Use Permit
- Vesting Tentative Tract Map
- Density Bonus and Development Incentives
- Building Permits



REGIONAL MAP | FIGURE 2.4-1

VICINITY MAP | FIGURE 2.4-2

AERIAL PHOTOGRAPH AND SURROUNDING LAND USES | FIGURE 2.4-3

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The approximately 3.8-acre project site is located on the south side of El Camino Real (California State Highway 82), opposite Rengstorff Avenue, in northern Los Altos. The project site is currently developed with an approximately 78,950 square-foot office building and accompanying paved surface parking and landscaping.

The project proposes to demolish the existing office building on-site and redevelop the site with two five-story condominium buildings above one level of below-grade parking, two three-story townhome buildings with individual garages, surface visitor parking, and associated on-site improvements and landscaping. In total, the project would provide 196 residential units. The condominium buildings would provide 172 residential units and contain a mix of one- and two-bedroom units. The condominium buildings would front on El Camino Real along the northern (front) portion of the project site, reaching a maximum height of 56 feet above grade and providing approximately 183,650 square feet of residential space. The townhome buildings would provide 24 residential units and would be located at the southern (rear) portion of the project site. The townhome buildings would reach a maximum height of 30 feet above grade and provide approximately 45,200 square feet of residential space. The site plan for the proposed project is shown on Figure 3.1-1.

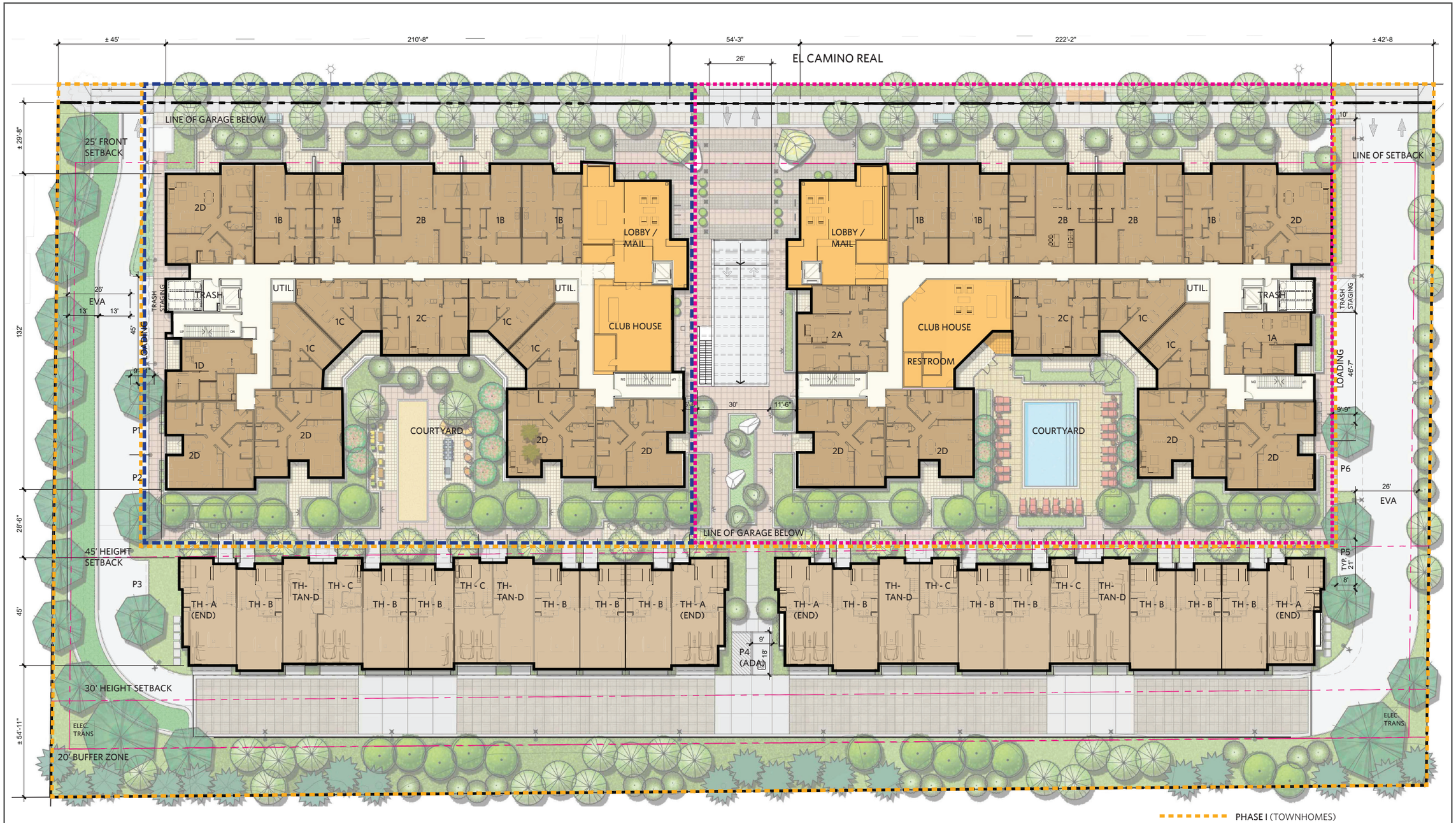
3.2 PROJECT DESCRIPTION

On-Site Amenities and Landscaping

The proposed project includes various amenities for residents, including a pool, bocce ball court, club house, outdoor grill area, residential lobbies and courtyards. A landscaped paseo would connect the two condominium buildings and allow for pedestrian circulation throughout the site. A play area with climbing stones and soft surfacing would be located in between the two condominium buildings. Trellised seating areas would be provided at the condominium buildings' frontages on El Camino Real.

Density Bonus

The proposed project would have a density of 52 dwelling units per acre (du/ac), which exceeds the density allowed by the CT Zone District (38 du/ac), which allows for 145 units. The proposed condominium buildings also would have a maximum height of 56 feet, which exceeds the maximum height limit of 45 feet allowed by the CT Zone District. The project includes a total of 28 below market rate (affordable) units: 12 units affordable at the Moderate income level and 16 units affordable at the Very-Low income level. The provision of affordable housing makes the project eligible for the proposed 35 percent density bonus and two incentives/concessions, and additional waivers, under California Government Code 65915 and Los Altos Municipal Code Chapter 14.28 (Multiple-Family Affordable Housing), allowing for the 196 residential units proposed by the project. The two incentives/concessions requested by the project include an increase in the maximum height limit from 45 feet to 56 feet and reduced parking stall widths, from nine feet to 8.5 feet. The project is also requesting a waiver to reduce the 50 percent front yard landscaping requirement to 34 percent.



SITE PLAN | FIGURE 3.1-1

Project Construction

Project construction would be completed in three phases, with an anticipated beginning in January of 2021. Phase I would construct the at-grade, three-story townhomes and would last approximately nine months. Phase II would construct the five-story condominium building on the northeastern end of the project site, and the northeastern half of the below-ground parking garage. Phase II is anticipated to begin in May of 2021 and last approximately 18 months. Phase III would construct the final five-story condominium building at the northwestern end of the site and the northwestern half of the parking garage. Phase III is anticipated to begin in December of 2021 and last approximately 18 months. Overall, project construction is estimated to take approximately 2.5 years to complete.

Parking and Access

Three driveways onto El Camino Real (i.e., a western, central, and eastern driveway) would provide vehicular access to the project site. The western and eastern driveways would connect to the perimeter road, providing access to the townhome building's garages and visitor parking. The eastern driveway (adjacent to the City of Mountain View) would provide both ingress and egress and the western driveway (adjacent to the 5100 El Camino Real) would provide only egress (i.e., only right turn out). The perimeter access road also functions as an emergency vehicle access for the site. The central driveway functions as the southern leg of the Rengstorff Avenue and El Camino Real signalized intersection and would provide access to the below-ground parking structure. The project also proposes to construct a new 17-foot wide public sidewalk on the El Camino frontage.

The project would provide a total of 290 parking spaces. One level of below-grade parking would provide 236 parking spaces for residents of the proposed condominiums. Each townhome would include an attached garage at ground level with two parking spaces, amounting to a total of 48 spaces. Six surface parking spaces would be provided for guests and two larger spaces would be provided for loading and deliveries. The project would also provide a total of 98 bicycle parking spaces, primarily located in the belowground parking garage. The total vehicular parking provided by the project exceeds the 122 parking spaces required by the City of Los Altos Municipal Code for projects that are eligible for a density bonus and incentives (§14.28.040(G)).

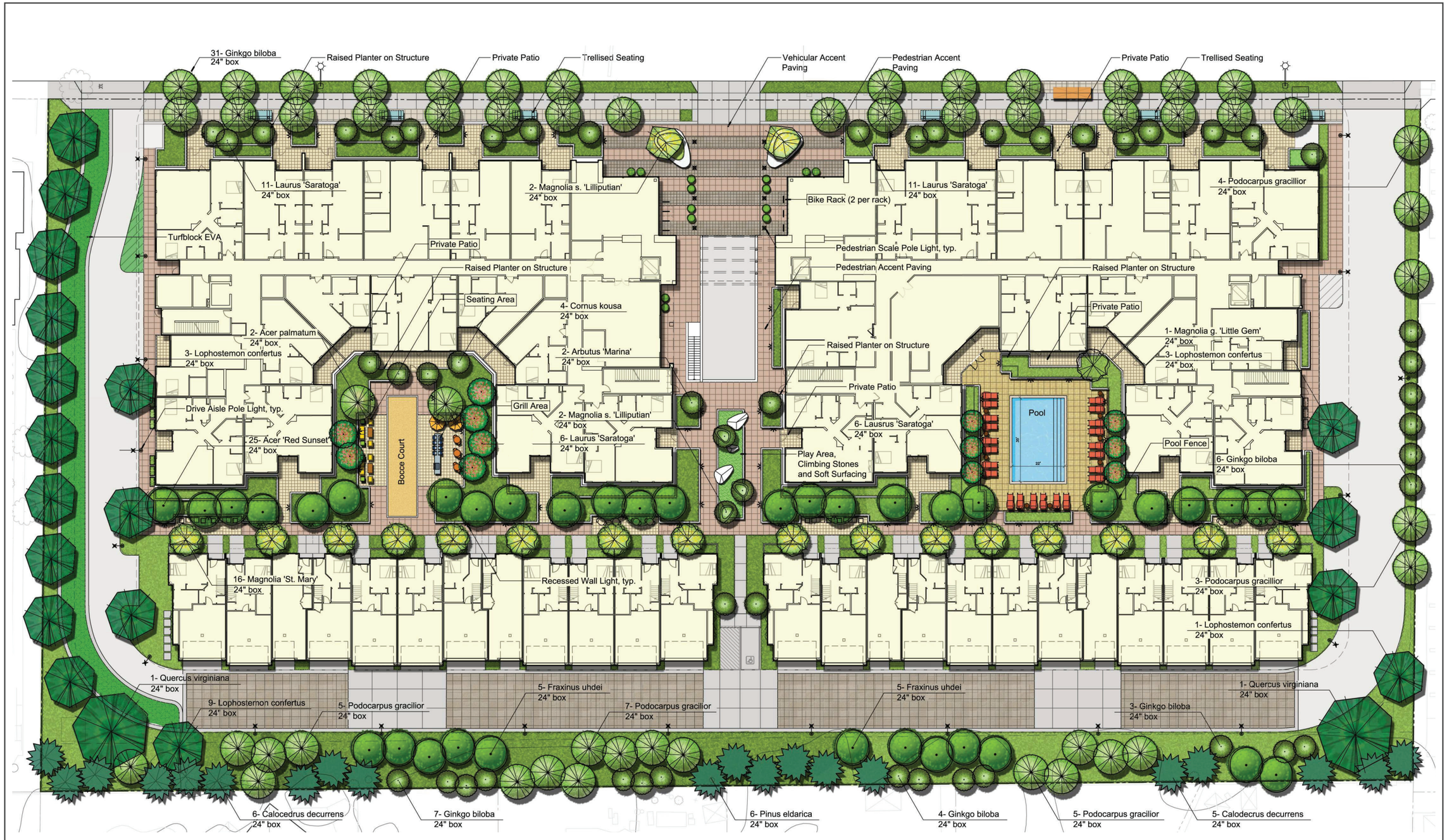
Building Architecture

The condominium buildings would reach 56 feet in height and be designed in a modern style with strong vertical massing, contrasting colors and materials, and contemporary details that would articulate the buildings' appearance. The exterior materials and design would differ between the two buildings but would predominantly consist of composite wood and fiber cement sidings, exterior plaster, metal awnings and railings, and vinyl windows. Board and batten siding and horizontal siding would be used to differentiate the two buildings, in addition to the placement of railings, awnings, and parapets. The townhome buildings would reach 30 feet in height and would be designed to be architecturally compatible with the adjacent condominium buildings.

Landscaping

The proposed project would remove most of the 87 trees on the site and replace them with approximately 196 new trees. The recently planted evergreen trees along the southern (rear) property line adjacent to the single-family properties on Casita Way will be preserved to the greatest extent

feasible, with new evergreen trees planted to replace those that have to be removed. Landscape trees and shrubs would be included throughout the entirety of the project site and would distinguish the condominium buildings from El Camino Real, the townhome buildings from the condominium buildings and provide a buffer to the adjacent land uses along the perimeter of the site. Most plants proposed for the new landscape have low and medium water use requirements. Raised, flow-through planters and turf areas would be included as a component of the proposed landscaping plan and function to management stormwater generated on-site. The proposed landscaping plan is shown on Figure 3.2-1.



LANDSCAPE PLAN | FIGURE 3.2-1

SECTION 4.0 ENVIRONMENTAL SETTING, CHECKLIST, AND IMPACT DISCUSSION

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

4.1	Aesthetics	4.12	Mineral Resources
4.2	Agriculture and Forestry Resources	4.13	Noise
4.3	Air Quality	4.14	Population and Housing
4.4	Biological Resources	4.15	Public Services
4.5	Cultural Resources	4.16	Recreation
4.6	Energy	4.17	Transportation
4.7	Geology and Soils	4.18	Tribal Cultural Resources
4.8	Greenhouse Gas Emissions	4.19	Utilities and Service Systems
4.9	Hazards and Hazardous Materials	4.20	Wildfire
4.10	Hydrology and Water Quality	4.21	Mandatory Findings of Significance
4.11	Land Use and Planning		

The project site is an infill site that is located in a transit priority area (TPA). Public Resources Code section 21099 states, "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Therefore, this document discusses aesthetics and parking for informational purposes only. In addition, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion is not considered a significant impact on the environment pursuant to CEQA in TPAs.

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.
- **Impact Discussion** – This subsection 1) includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts and 2) discusses the project's impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. "Mitigation measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered to correspond to the checklist question being answered. For example, Impact BIO-1 answers the first checklist question in the Biological Resources section. Mitigation measures are also numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.

4.1 AESTHETICS

4.1.1 Environmental Setting

4.1.1.1 *Regulatory Framework*

State

Scenic Highways Program

The California Scenic Highway Program is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. State laws governing the Scenic Highway Program are found in the Streets and Highway Code, Sections 260 through 263.

In Santa Clara County, the one state-designated scenic highway is State Route (SR) 9 from the Santa Cruz County line to the Los Gatos City Limit. Eligible State Scenic Highways (not officially designated) include: SR 17 from the Santa Cruz County line to SR 9, SR 35 from Santa Cruz County line to SR 9, Interstate 280 from the San Mateo County line to SR 17, and a segment of SR 152 in southern Santa Clara County.[1] The proposed project is not located near a state scenic highway or County-designated scenic highway.

Local

City of Los Altos General Plan

The following General Plan policies are found in the Community Design and Historic Resources Element and pertain to the aesthetic impacts of the proposed project.

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 1.5: Continue to protect the privacy of neighbors and minimize the appearance of bulk in new homes and additions to existing homes.

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.

Policy 1.8: Consider neighborhood desires regarding the character of future development through the establishment of development or design regulations.

Policy 1.11: Develop attractive gateways to the City that emphasize the unique characteristics of Los Altos that distinguish it from surrounding cities, including enhanced landscape.

[1] California Department of Transportation. California Scenic Highway Mapping System, Santa Clara County. Accessed November 29, 2018. http://www.dot.ca.gov/design/lap/livability/scenic-highways/index.html

Policy 4.2: Evaluate site development and design to ensure consistency in site design.

Policy 4.3: Evaluate development applications to ensure compatibility with residential neighborhoods south of the El Camino Real corridor.

4.1.1.2 *Existing Conditions*

On-Site

The approximately 3.8-acre project site is in a highly developed area of the City of Los Altos. A 78,950 square-foot office building and paved surface parking lot currently occupy the site. The building setback along the El Camino Real frontage consists of manicured lawns and landscape trees. Trees and shrubs border the entirety of the project site, and the parking lot on-site includes two landscaped parking medians. The existing site is shown in Photos 1 through 8 on the following pages.

Off-Site

Surrounding uses include high-density residential development to the west (5100 El Camino Real), a KinderCare and TaekwonKids (daycare) facility to the east (within Mountain View city limits), and six single-family homes on Casita Way to the south. Across El Camino Real to the north there are a variety of single-story commercial buildings, located within the Mountain View city limits. In both directions along El Camino Real, the land uses consist predominantly of commercial uses, with high-density residential uses intermixed. There is an adjacent multiple-family residential building to the west at 5100 El Camino Real that is approximately 40 feet in height, similar in height to the existing office building on the project site. Single-family residences are the predominant land use to the south of the project site.

The City of Los Altos has not identified scenic view corridors or scenic resources within the City limits; the proposed project is not located in a designated scenic view corridor and is not near any scenic vistas. The San Francisco Bay is not visible from the site. As discussed above, there are no officially designated state scenic highways near the site. Views of the site are limited to immediate surrounding parcels and roadways. The site is not located near a state scenic highway or County-designated highway.[2] The project site and surrounding area are flat. As a result, existing development in the project area limits views of the site to the immediate vicinity.

[2] California Department of Transportation. California Scenic Highway Mapping System, Santa Clara County. Accessed November 29, 2018. http://www.dot.ca.gov/design/lap/livability/scenic-highways/index.html

Photo 1: Viewing south towards the site from Rengstorff Avenue, opposite the site.

Photo 2: View of the existing office building from the center of the site.

PHOTOS 1 AND 2

Photo 3: Viewing northwest towards the western property line from the rear of the property.

Photo 4: Viewing east along the rear property line.

PHOTOS 3 AND 4

Photo 5: Viewing northwest towards the eastern property line from the rear of the property.

Photo 6: View of the adjacent property to the east of the site.

PHOTOS 5 AND 6

Photo 7: Viewing west along the site frontage on El Camino Real.

Photo 8: Viewing east along the site frontage on El Camino Real.

PHOTOS 7 AND 8

4.1.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views[3] of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Note: The project is located on an infill site in a transit priority area (TPA); therefore, evaluation of aesthetic impacts is not required. (Public Resources Code Section 21099). The discussion of aesthetics below is included for informational purposes only.

Impact AES-1: The project would not have a substantial adverse effect on a scenic vista. **(No Impact)**

The proposed project is not located within a designated scenic view corridor or scenic vista. The project site is located on relatively flat terrain in the Santa Clara Valley. Implementation of the proposed project will not obstruct or impede the views of any scenic vistas in the vicinity of the project site. **(No Impact)**

Impact AES-2: The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. **(No Impact)**

The project site contains 87 trees and is otherwise developed, with no other features present that would be considered scenic resources. Most of the 87 trees would be removed and replaced in accordance with the City's Tree Protection Ordinance and Municipal Code Chapter 11.08.090 (refer to *Section 4.4, Biological Resources*). Further, the site is not located within a state scenic highway and would not impact scenic resources within one. **(No Impact)**

[3] Public views are those that are experienced from publicly accessible vantage points.

Impact AES-3:	The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The project, which is located in an urbanized area, would not conflict with applicable zoning and other regulations governing scenic quality. **(No Impact)**

The project is located in an urban area and would not conflict with the applicable zoning and other regulations governing scenic quality. Aesthetic values are subjective by nature. Viewpoints as to what constitutes an adverse visual impact will differ among individuals. The discussion below, therefore, focuses on change in visual character and views, without placing value on the aesthetic quality of a condition.

The proposed condominium buildings would front El Camino Real and the townhome buildings would be located to the rear of the site, between the existing single-family residences on Casita Way and the proposed townhome buildings. Although the townhome buildings would result in new on-site development that is approximately 20 feet closer to the single-family residences than the existing office building, the townhomes would be reduced in height (maximum 30 feet) and would be screened from the residences by a 20-foot landscape buffer on the south side, which is consistent with the CT Zone District's requirement. The townhomes would have a setback of at least 45 feet from the property line, whereas a minimum setback of 40 feet is required by the Zoning Code, which would reduce the visual intrusion on nearby residential neighborhoods. The proposed townhomes would provide a transition from the lower density residences on Casita Way to the higher density condominium buildings, which have a height of 56 feet and a setback of at least 119 feet from the property line. The minimum setback required by the Zoning Code for the taller condominium buildings is 100 feet.

Surrounding land uses to the north, east, and west consist primarily of single-story commercial buildings and multiple-family residential development. The proposed project would be generally compatible, in terms of size and scale, with the surrounding uses. The multiple-family residential building immediately west of the site at 5100 El Camino Real has three stories and is approximately 40 feet tall, and there are numerous two-, three-, and four-story buildings within ½ mile of the site in both directions on El Camino Real. Approximately 1/3 mile to the north on El Camino Real, in the City of Mountain View, is a grouping of four buildings that are between six to ten stories tall. While the existing office building on-site would be demolished, the appearance of the site upon project implementation would not differ substantially from what exists currently. Although the project includes the removal of existing landscaping and mature trees, the project includes the planting of many new trees, hedges, shrubs, and groundcovers, which is consistent with the City's landscaping and street tree requirements. For these reasons, the proposed project would not substantially degrade the existing visual character of the site and its surroundings.

The final design of the proposed project would be subject to the City's Multiple-Family Design Review process, which includes compliance with the design controls in the CT District and positive design review findings. While the project would result in minor changes to the visual character of the area, the final building design and exterior materials would be reviewed by the City prior to project approval to ensure that it is consistent with applicable zoning and other regulations governing scenic quality. For these reasons, the proposed project would not result in significant impacts to visual character and quality. **(No Impact)**

Impact AES-4:	The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. **(No Impact)**

The project would include on-site security lighting, along walkways, driveways, and entrance areas and within the parking garage. The security lighting would be comparable in brightness to the existing ambient lighting on the site and in the surrounding area. Exterior lighting, as required by the Building Code, would be installed at all balcony spaces, and the building interiors would also be lit.

As a condition of approval, the project will be required to demonstrate that all exterior lighting above the ground floor is shielded and/or downward facing to ensure that it does not unnecessarily illuminate or substantially interfere with the use or enjoyment of nearby properties, and respects the privacy of neighbors by avoiding direct and reflected illumination onto adjacent properties. This Zoning Code requirement will ensure that the project would not create a substantial new source of light or glare that would adversely affect the visual quality of the area. Therefore, the proposed project would not result in a substantial new source of light and glare. **(No Impact)**

4.2 AGRICULTURE AND FORESTRY RESOURCES

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is called Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.[4]

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.[5]

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (Cal Fire) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.[6] Programs such as Cal Fire's Fire and Resource Assessment Program (FRAP) and are used to identify whether forest land, timberland, or timberland production areas that could be effected are located on or adjacent to a project site.[7]

4.2.1.2 *Existing Conditions*

The project site is in a developed, urban area of Los Altos and is surrounded by residential, office and commercial land uses. The *Santa Clara County Important Farmlands 2016 Map* designates the project site as "Urban and Built-Up Land", defined as land with at least six structures per 10 acres. Common examples of "Urban and Built-Up Land" are residential, institutional, industrial,

[4] California Department of Conservation. "Farmland Mapping and Monitoring Program". http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.
[5] California Department of Conservation. "Williamson Act". http://www.conservation.ca.gov/dlrp/lca.
[6] *Forest land* is land that can support 10 percent native tree cover and allows for management of one or more forest resources, including timber, fish, wildlife, and biodiversity (California Public Resources Code Section 12220(g)); *Timberland* is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing a crop of trees used to produce lumber and other forest products, including Christmas trees (California Public Resources Code Section 4526); and *Timberland Production* is land devoted to and used for growing and harvesting timber and other compatible uses (Government Code Section 51104(g)).
[7] Cal Fire. "FRAP". http://frap.fire.ca.gov/

commercial, landfill, golf course, airports, and other utility uses.[8] There are no forest lands on or adjacent to the project site. There are no Williamson Act parcels on or in the vicinity of the project site.[9]

4.2.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
2) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
3) 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))?	☐	☐	☐	☒
4) Result in a loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
5) 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?	☐	☐	☐	☒

Impact AG-1: The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. **(No Impact)**

The proposed project would redevelop a site that is designated as "Urban and Built-Up Land" on maps prepared by the California Resources Agency for Santa Clara County. Therefore, no farmland would be converted to non-agricultural use as a result of project implementation. **(No Impact)**

[8] California Natural Resources Agency. *Santa Clara County Important Farmland 2016.* Accessed November 30, 2018. https://www.conservation.ca.gov/dlrp/fmmp/Pages/SantaClara.aspx

[9] County of Santa Clara. "Williamson Act and Open Space Easement". September 17, 2018. Accessed March 21, 2019. https://www.sccgov.org/sites/dpd/programs/wa/pages/wa.aspx

Impact AG-2:	The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. **(No Impact)**

The project site is zoned *CT (Commercial Thoroughfare).* The project site is not under a Williamson Act contract. Therefore, the project will not conflict with existing zoning for an agricultural use or a Williamson Act contract. **(No Impact)**

Impact AG-3:	The project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

The project site is not zoned, or adjacent to land zoned, for forest land, timberland, or Timberland Production. Therefore, the project would not conflict with existing zoning or require rezoning of forest land or timberland uses. **(No Impact)**

Impact AG-4:	The project would not result in a loss of forest land or conversion of forest land to non-forest use. **(No Impact)**

The project site is in an urbanized area of the City and is developed with an office building. Therefore, no forest land would be lost as a result of the project. **(No Impact)**

Impact AG-5:	The project would not 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. **(No Impact)**

The proposed residential development would occur in an urban area of the City. The project would not result in impacts to agricultural lands or forest lands in the surrounding region. **(No Impact)**

4.3 AIR QUALITY

The following discussion is based on an air quality emissions assessment prepared for the project by *Illingworth & Rodkin, Inc.* A copy of the report is included in Appendix A of this Initial Study.

4.3.1 Environmental Setting

4.3.1.1 *Regulatory Framework*

Federal and State

Air Quality Overview

Federal, state, and regional agencies regulate air quality in the San Francisco Bay Area Air Basin, within which the proposed project is located. At the federal level, the US Environmental Protection Agency (EPA) is responsible for overseeing implementation of the federal Clean Air Act and its subsequent amendments. The California Air Resources Board (CARB) is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act.

Regional and Local Criteria Pollutants

The federal Clean Air Act requires the EPA to set national ambient air quality standards for six common air pollutants (referred to as "criteria pollutants"): particulate matter (PM); ground-level ozone; carbon monoxide; sulfur oxides; nitrogen oxides; and lead. The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate.

Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant. "Attainment" status for a pollutant means that a given Air District meets the standard set by the EPA and/or CARB. The Bay Area, as a whole, does not meet state or federal ambient air quality standards for ground level ozone and fine particulate matter ($PM_{2.5}$), nor does it meet state standards for respirable particulate matter (PM_{10}). The Bay Area is considered in attainment or unclassified for all other pollutants.

Toxic Air Contaminants and Fine Particulate Matter (Local Community Risks)

Toxic Air Contaminants (TACs) are a broad class of compounds known to cause morbidity or mortality, usually because they cause cancer. TACs are found in ambient air, especially in urban areas, and are released by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. CARB has adopted regulations for stationary and mobile sources to reduce emissions of diesel exhaust and diesel particulate matter (DPM). Several of these regulatory programs affect medium and heavy-duty diesel trucks, which represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles

are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).[10]

Fine Particulate Matter ($PM_{2.5}$) is a complex mixture of substances that includes elements such as carbon and metals, compounds such as nitrates, organics, and sulfates, and mixtures such as diesel exhaust and wood smoke. Because of their small size (particles are less than 2.5 micrometers in diameter), $PM_{2.5}$ can lodge deeply into the lungs. According to the Bay Area Air Quality Management District (BAAQMD), $PM_{2.5}$ is the air pollutant most harmful to the health of Bay Area residents.

Common stationary sources of TACs and $PM_{2.5}$ include gasoline stations, dry cleaners, and diesel backup generators. The other more significant common mobile source is motor vehicles on roadways and freeways. Unlike regional criteria pollutants, local risks associated with TACs and $PM_{2.5}$ are evaluated on the basis of risk to human health rather than comparison to an ambient air quality standard or emission-based threshold.

Regional

2017 Clean Air Plan

BAAQMD is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how state and federal air quality standards would be met. BAAQMD's most recently adopted plan is the *Bay Area 2017 Clean Air Plan* (2017 CAP). The 2017 CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how BAAQMD would continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. The City of Los Altos and other jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality Impacts developed by BAAQMD within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

[10] CARB. "Overview: Diesel Exhaust and Health." Accessed: January 10, 2019. Available at: https://www.arb.ca.gov/research/diesel/diesel-health.htm.

Local

City of Los Altos Climate Action Plan

The City of Los Altos has developed a *Climate Action Plan* (LA CAP). The LA CAP includes a goal to improve communitywide emissions efficiency by 15 percent over 2005 levels by 2020. The reduction measures included in this plan are a diverse mix of incentives, education, and regulations applicable to both new and existing development. The measures are designed to reduce emissions from each source to avoid relying on any one strategy or sector to achieve the target.

City of Los Altos General Plan

The City of Los Altos General Plan addresses air quality in the Natural Environment and Hazards Element. Policies under Goal 8: Maintain or improve air quality in Los Altos, as listed in the Los Altos General Plan, are designed to achieve desired improvements to air quality through proper planning for land use and transportation. Policies relevant to this project include the following:

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.

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.

4.3.1.2 *Existing Conditions*

Air quality and the amount of a given pollutant in the atmosphere are determined by the amount of a pollutant released and the atmosphere's ability to transport and dilute the pollutant. The major determinants of transport and dilution are wind, atmospheric stability, terrain, and for photochemical pollutants, sunshine.

The Bay Area typically has moderate ventilation, frequent inversions that restrict vertical dilution, and terrain that restricts horizontal dilution. These factors give the Bay Area relatively high atmospheric potential for pollution.

Sensitive Receptors

BAAQMD defines sensitive receptors as facilities where sensitive receptor population groups (children, the elderly, the acutely ill and the chronically ill) are likely to be located. These land uses include residences, school playgrounds, childcare centers, retirement homes, convalescent homes, hospitals and medical clinics. The nearest sensitive receptors to the project site include the single-family residences south of the site on Casita Way, the multi-family residential building west of the site at 5100 El Camino Real, and the Mountain View KinderCare facility to the east of the site at

2065 West El Camino Real. Additionally, the Mountain View-Los Altos Montessori Children's Center is located approximately 350 feet northwest of the project site at 2246 West El Camino Real.

4.3.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
2) 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?	☐	☐	☒	☐
3) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
4) Result in other emissions (such as odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.2.1 *Thresholds of Significance*

Impacts from the Project

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The City of Los Altos has considered the air quality thresholds updated by BAAQMD in May 2017 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The BAAQMD CEQA Air Quality thresholds used in this analysis are identified in Table 4.3-1.

Table 4.3-1: BAAQMD Air Quality Significance Thresholds			
Pollutant	**Construction Thresholds**	**Operation Thresholds**	
	Average Daily Emissions (pounds/day)	**Annual Daily Emissions (pounds/year)**	**Annual Average Emissions (tons/year)**
Criteria Air Pollutants			
ROG, NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust-Control Measures/Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources (within a 1,000-foot Zone of Influence)			
Health Hazard	**Single Source**	**Combined Cumulative Sources**	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental Annual $PM_{2.5}$	0.3 $\mu g/m^3$	0.8 µg/m3 (average)	
Notes: ROG = reactive organic gases, NO_x = nitrogen oxides, PM_{10} = course particulate matter with a diameter of 10 micrometers (µm) or less, and $PM_{2.5}$ = fine particulate matter with a diameter of 2.5 µm or less.			

Impact AIR-1: The project would not conflict with or obstruct implementation of the applicable air quality plan. **(Less than Significant Impact)**

BAAQMD recommends that the agency approving a project where an air quality plan consistency determination is required analyze the project with respect to the following questions:

1) Does the project support the primary goals of the LA CAP?
2) Does the project include applicable control measures from the LA CAP?
3) Does the project disrupt or hinder the implementation of any LA CAP control measures?

The proposed residential project would support the primary goals of the LA CAP, which are to attain air quality standards, reduce population exposure and protect public health, and reduce greenhouse gas emissions and protect the climate. This is evidenced by the project's consistency with the BAAQMD thresholds of significance. As discussed below and shown in Tables 4.3-4 and 4.3-5, the project would not exceed the BAAQMD thresholds for ozone precursor pollutant (ROG, NOx) and exhaust (PM_{10}, $PM_{2.5}$) emissions during construction or operational periods. In addition, the

implementation of standard dust and exhaust control measures, listed below, would reduce potential air quality impacts to a less than significant level.

The 2017 CAP contains a control strategy intended to complement efforts to improve air quality and protect the climate being made by other partner agencies at the state, regional and local levels. The strategy is based on the following four key priorities and identifies 85 individual control measures to reduce pollutant emissions.

- Reduce emissions of criteria pollutants and TACs from all key sources.
- Reduce emissions of "Super GHGs" such as methane, black carbon, and fluorinated gases.
- Decrease demand for fossil fuels.
- Decarbonize our energy system.

The control measures are organized into the following economic sector categories: Stationary Sources; Transportation; Energy; Buildings; Agriculture; Natural and Working Lands; Waste Management; Water; and Super GHG Pollutants. None of the 85 specific control measures are directly applicable to the proposed residential project. The proposed project (i.e., high-density, transit-oriented infill development with bicycle parking, CALGreen energy efficient features and on-site tree planting), however, would be considered consistent with the measures related to bicycle and pedestrian access, land use strategies, green building, reduction of energy demand, urban heat island mitigation, recycling and waste reduction, water conservation and urban tree planting. The project would not cause the disruption of, delay or otherwise hinder the implementation of any of the control measures.

The project would be consistent with certain control measures of the 2017 CAP and with the General Plan by developing a high-density, transit-oriented infill development, installing energy efficient features, and planting trees on-site. The project by itself, therefore, would not result in a significant impact related to consistency with the Bay Area 2017 CAP. In addition, the project would not exceed the BAAQMD thresholds for operational criteria air pollutant emissions, as discussed below. For these reasons, the project would not conflict with or obstruct implementation of the 2017 CAP. **(Less than Significant Impact)**

Impact AIR-2:	The project would not 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. **(Less than Significant Impact with Mitigation Incorporated)**

The Bay Area, as a whole, does not meet state or federal ambient air quality standards for ground level ozone (O_3), state standards for PM_{10}, and federal standards for $PM_{2.5}$. As part of an effort to attain and maintain ambient air quality standards for ozone and PM_{10}, BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for ozone precursor pollutants (ROG and NO_X), PM_{10}, and $PM_{2.5}$ and apply to both construction period and operational period impacts.

Construction

Project construction would occur in three phases. Phase I is estimated to last 12 months, Phase II is estimated to last 13 months, and Phase III is estimated to take 12 months. Construction emissions for both on-site and off-site construction activities were modeled using the California Emissions Estimator Model (CalEEMod). The land use inputs used to model construction emissions are shown in Table 4.3-3 below. Phase I is estimated to last 12 months, Phase II is estimated to last 13 months, and Phase III is estimated to take 12 months.

Table 4.3-3: CalEEMod Land Use Inputs by Phase

	Phase I	Phase II	Phase II
Residential	24 Townhome Units and 46,684 square feet	86 Condominiums and 166,728 square feet	86 Condominiums and 155,446 square feet
Parking	Six parking spaces entered as "Parking Lot"	122 parking spaces entered as "Enclosed Parking with an Elevator"	117 parking spaces entered as "Enclosed Parking with an Elevator"
Other	1.11 acres of "Other Asphalt Surface" to represent driveways that would be constructed during Phase I 79,000 square feet of building demolition 52 one-way trips estimated for pavement hauling during demolition	Construction phases included were grading, trenching, building construction, paving, and architectural coating	Construction phases included were grading, trenching, building construction, paving, and architectural coating

Average daily emissions were computed by dividing the total construction emissions by the number of construction days. Table 4.3-4, below, shows the average daily ROG, NO_x, PM_{10} exhaust, and $PM_{2.5}$ exhaust emissions during all three phases of construction.

Table 4.3-4: Construction Period Emissions

Scenario	**ROG**	**NOx**	**PM_{10}**	**$PM_{2.5}$**
2021 Construction Emissions (includes Phase I and Phase II construction)	0.77 tons	3.61 tons	0.17 tons	0.16 tons
2022 Construction Emissions (includes Phase II and Phase III construction)	2.65 tons	3.19 tons	0.15 tons	0.14 tons
Total construction emissions	3.41 tons	6.80 tons	0.32 tons	0.31 tons
Average daily emissions (pounds)	**13.55 lbs/day**	**26.98 lbs/day**	**1.28 lbs/day**	**1.21 lbs/day**
BAAQMD Thresholds (pounds/day)	*54* lbs.	*54* lbs.	*82* lbs.	*54* lbs.

Table 4.3-4: Construction Period Emissions				
Exceed Threshold?	No	No	No	No

As shown in Table 4.3-4, project construction would not exceed the BAAQMD construction thresholds. Although significant construction period emissions would not occur, construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site could deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant if best management practices are implemented to reduce these emissions.

Mitigation Measures: The following mitigation measures would be implemented by the project to reduce construction emissions to a less than significant level:

MM AIR-2: The project shall implement the following measures, in accordance with BAAQMD best management practices:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day;
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered;
- 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;
- All vehicle speeds on unpaved roads shall be limited to 15 mph;
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible;
- Vegetation in disturbed areas shall be planted as quickly as possible;
- Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used;
- 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 [CCR]). Clear signage shall be provided for construction workers at all access points;
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation;
- Post a publicly visible sign with the telephone number and person to contact at the City of Los Altos regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Implementation of the mitigation measures listed above would reduce the potential for air quality and fugitive dust-related impacts to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Operation

Operational air emissions resulting from the proposed project are primarily attributable to automobiles driven by future residents. Evaporative emissions from architectural coatings and maintenance products are also typical emissions from residential uses. CalEEMod was used to estimate emissions from operation. The same land uses as were input into CalEEMod for construction emissions calculations and shown in Table 4.3-3 were used to determine operational emissions. Emissions associated with vehicle travel were based on the earliest possible year the project could be constructed and begin operating (2024). Emissions from vehicle travel to and from the site were calculated using information from the project traffic analysis.

Table 4.3-5, below, shows the net annual emissions resulting from operation of the proposed project.

Table 4.3-5: Operational Emissions

Scenario	ROG	NOx	PM_{10}	$PM_{2.5}$
2024 Project Operational Emissions (*tons/year*)	2.05 tons	1.27 tons	1.23 tons	0.35 tons
2024 Existing Use Emissions (*tons/year*)	0.45 tons	0.48 tons	0.38 tons	0.11 tons
Net Annual Emissions (*tons/year*)	1.60 tons	0.79 tons	0.85 tons	0.11 tons
BAAQMD Thresholds (tons /year)	*10 tons*	*10 tons*	*15 tons*	*10 tons*
Exceed Threshold?	**No**	**No**	**No**	**No**
2021 Project Operational Emissions (*lbs/day*)[1]	8.75 lbs.	4.34 lbs.	4.66 lbs.	1.34 lbs.
BAAQMD Thresholds (pounds/day)	*54* lbs.	*54* lbs.	*82* lbs.	*54* lbs.
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes: [1] Assumes 365-day operation.

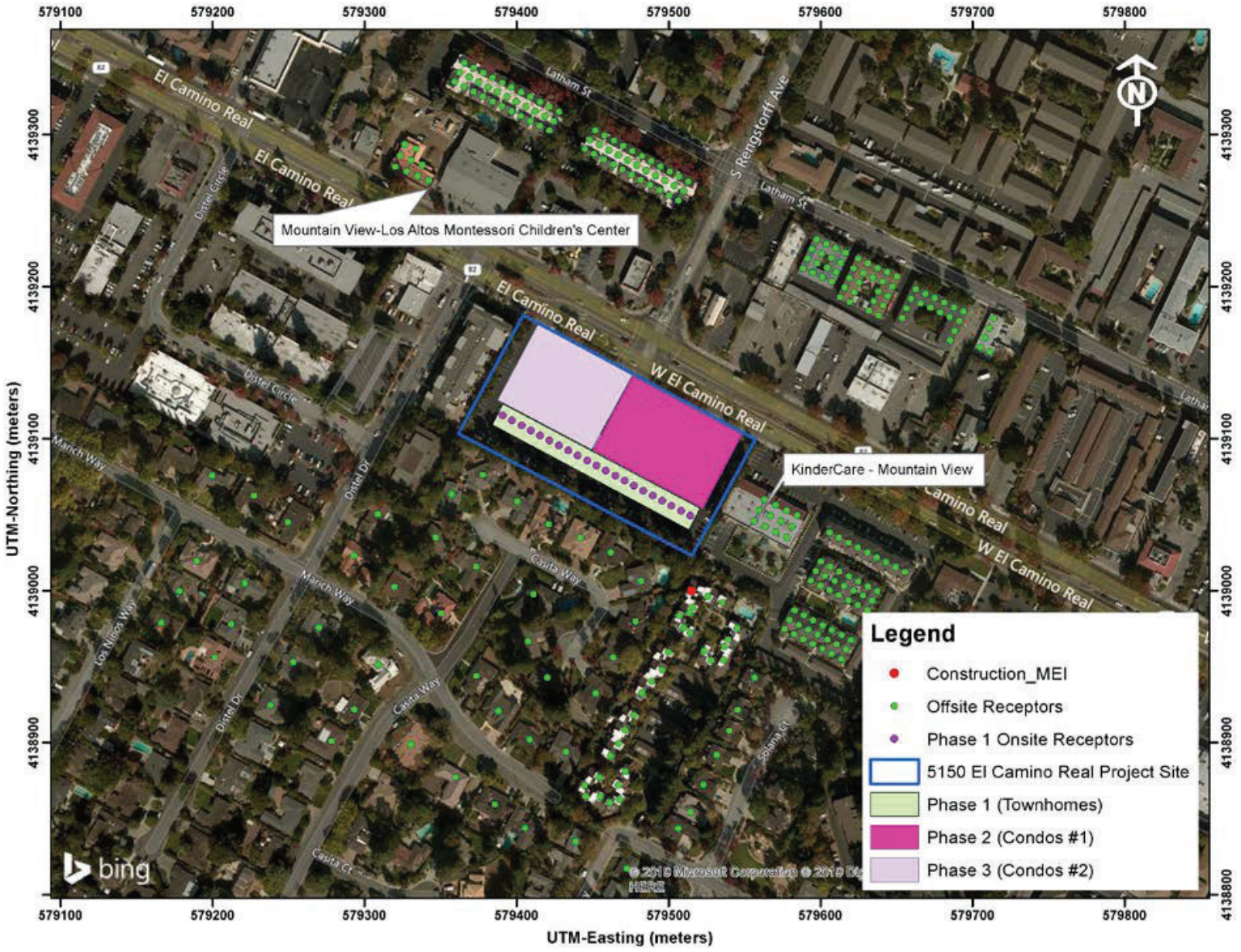
As shown above, the project would not exceed BAAQMD operational thresholds. Therefore, the project would result in a less than significant operational air quality impact.
(Less than Significant Impact)

Impact AIR-3:	The project would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact with Mitigation Incorporated)**

Community Health Risk Impacts from Construction

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC source. While project construction exhaust air pollutant emissions are not expected to contribute substantially to a decline in local or regional air quality conditions, construction exhaust

emissions may still pose community health risks for nearby sensitive receptors, including the residential uses immediately south and west of the project site. Construction of the proposed project would expose nearby sensitive receptors to TACs emitted during demolition, excavation, grading, and construction activities at the project site. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. A health risk assessment of the project construction activities was completed to evaluate possible health effects to nearby sensitive receptors from construction emissions of DPM and $PM_{2.5}$. This assessment included dispersion modeling to predict the off-site and on-site concentrations resulting from project construction, so that lifetime cancer risks and non-cancer health effects could be evaluated. The health risk impacts from construction were modelled at four different receptor locations, which are discussed below and shown in Figure 4.3-1. The results of the models run for each of the four locations is shown in Table 4.3-6.



PROJECT CONSTRUCTION SITE AND LOCATIONS OF SENSITIVE RECEPTORS | FIGURE 4.3-1

Table 4.3-6: Single-Source Impacts from Construction			
Maximally Exposed Individual			
Project Construction	**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Hazard Index**
Unmitigated	**148.6 (infant)**	**0.85**	0.13
Mitigated	3.0 (infant)	0.05	<0.01
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>0.1***
Exceed Threshold? (Unmitigated)	***Yes***	***Yes***	***Yes***
Exceed Threshold? (Mitigated)	*No*	*No*	*No*
KinderCare Mountain View			
Project Construction	**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Hazard Index**
Unmitigated	**106.2 (infant)**	**0.65**	0.09
Mitigated	2.0 (infant)	0.05	<0.01
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>0.1***
Exceed Threshold? (Unmitigated)	***Yes***	***Yes***	*No*
Exceed Threshold? (Mitigated)	*No*	*No*	*No*
Mountain View-Los Altos Montessori Children's Center			
Project Construction	**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Hazard Index**
Unmitigated	**2.0 (infant)**	**0.05**	**0.01**
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>0.1***
Exceed Threshold? (Unmitigated)	*No*	*No*	*No*
Phase I Residents (Townhomes)			
Project Construction	**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Hazard Index**
Unmitigated	**161.6 (infant)**	**1.59**	0.20
Mitigated	5.0 (infant)	0.21	0.01
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>0.1***
Exceed Threshold? (Unmitigated)	***Yes***	***Yes***	***Yes***
Exceed Threshold? (Mitigated)	*No*	*No*	*No*

Construction Impacts to the Maximally Exposed Individual

As shown on Figure 4.3-1, the maximum concentrations of DPM and $PM_{2.5}$ would occur on the first floor (1.5-meter receptor breathing height) of an existing apartment residence located adjacent to the

southeast corner of the project site (2800 Marich Way, Apt. 18, Mountain View). The maximum increased cancer risk at the location of the maximally exposed individual (MEI) was calculated using the BAAQMD-recommended methods and the maximum annual modeled DPM concentration. The cancer risk calculations are based on applying the BAAQMD-recommended age sensitivity factors to the TAC concentrations. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing TACs. Infant and adult exposures were assumed to occur at all residences through the entire construction period. As shown in Table 4.3-6, the maximum cancer risk, $PM_{2.5}$, and HI would exceed BAAQMD single-source thresholds.

KinderCare Mountain View

The KinderCare Mountain View school is adjacent to the eastern project boundary and approximately 70 feet away. A receptor height of 1.0 meter (3.3 feet) was used to represent the breathing height of the infants and children at the school. The exposure parameters for infants between the ages of zero to two years old were used to calculate the maximum cancer risk. As shown in Table 4.3-6, the cancer risk and maximum $PM_{2.5}$ concentration exceed their respective BAAQMD single-source thresholds at this location.

Mountain View-Los Altos Montessori Children's Center

Mountain View-Los Altos Montessori Children's Center is located approximately 350 feet northwest of the project. The same breathing height was used as for the KinderCare facility, but child exposure parameters were used to calculate the maximum cancer risk instead of infant exposure parameters since the school is for preschoolers and kindergarteners. As shown in Table 4.3-6, risk values would not exceed the BAAQMD single-source significance threshold for annual cancer risk, $PM_{2.5}$ concentration, or HI at this location.

Project Sensitive Receptors

Due to the phased approach to construction, it is assumed that the townhomes constructed in Phase I would be occupied with new sensitive receptors. Therefore, the construction health risks to these on-site receptors during Phase II and III were calculated. The results showed that the maximum cancer risk and $PM_{2.5}$ concentrations would exceed BAAQMD single-source thresholds at the on-site townhomes.

Mitigation Measures: The following mitigation measures would be implemented by the project to reduce construction emissions to a less than significant level.

MM AIR-3 The project shall develop a plan demonstrating that the off-road equipment used on-site to construct the project would achieve a fleet-wide average 93-percent reduction in DPM exhaust emissions or greater. One feasible plan to achieve this reduction would include the following:

- All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall, at a minimum, meet EPA particulate matter emissions standards for Tier 4 engines. Equipment that is electrically powered or uses non-diesel fuels would meet this requirement.

- Cranes and generators set used during construction should be electrically powered.

- Portable equipment (i.e. air compressors and welders) should also be electrically powered.

Implementation of the above mitigation measures would reduce the exposure of sensitive receptors to substantial concentrations of air pollutants during construction of the project. **(Less than Significant Impact with Mitigation Incorporated)**

Impact AIR-4:	The project would not result in other emissions (such as odors) adversely affecting a substantial number of people. **(Less than Significant Impact)**

The project is a residential development. The proposed project would not include land uses that are likely to generate a substantial odor that would cause complaints from surrounding uses. Currently, the site is not exposed to substantial odor sources. Localized odors, mainly resulting from diesel exhaust and construction equipment on-site, would be created during the construction phase of the project. These odors would be temporary and not likely be noticed beyond the project site's boundaries. The proposed project would, therefore, result in less than significant odor impacts. **(Less than Significant Impact)**

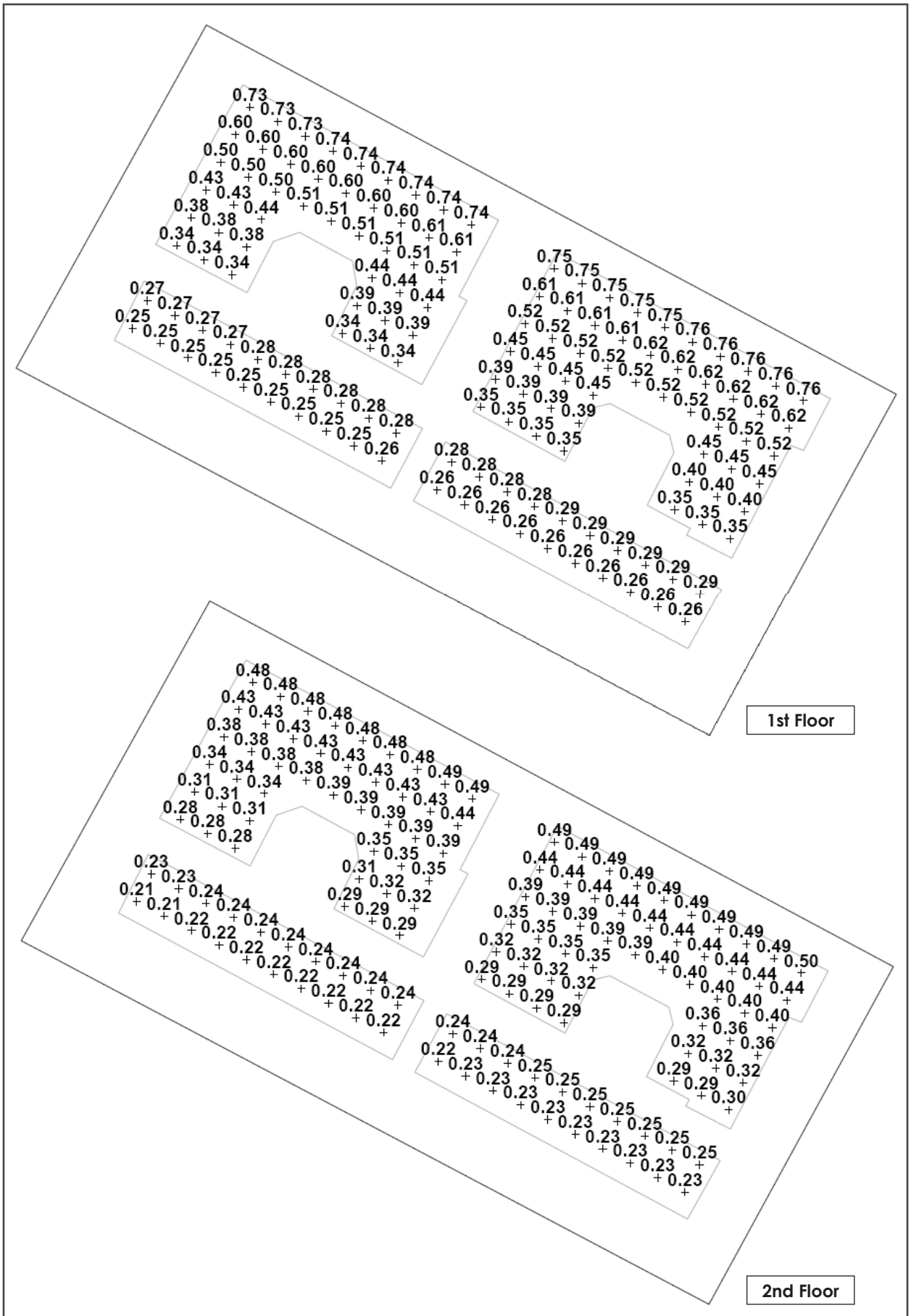
4.3.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 *(BIA v. BAAQMD)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only.

An on-site health risk assessment was completed for the proposed project using BAAQMD screening tools. The level of TACs future residents of the project would be exposed to was calculated and compared to BAAQMD thresholds. No nearby stationary sources of TACs were identified using BAAQMD's *Stationary Source Risk & Hazard Analysis Tool.* Mobile sources of TACs within 1,000 feet of the project site include segments of El Camino Real.

Single-Source Health Risk Assessment

The on-site health risk assessment calculated the maximum increased lifetime cancer risk, annual $PM_{2.5}$ concentrations, and Hazard Index for new residents at the first through third floors, due to vehicle emissions from El Camino Real. The closest receptors to El Camino Real, and most affected, are those at the first floor. The locations of the most affected receptors and their respective $PM_{2.5}$ concentration exposure are shown in Figure 4.3-2, and the results of the health risk assessment are shown in Table 4.3-7.



1st and 2nd Floor Maximum $PM_{2.5}$ Concentrations ($\mu g/m^3$) in Residential Areas | FIGURE 4.3-2

Table 4.3-7: Maximum Health Risk Impacts from El Camino Real Traffic			
Source/Receptor Locations	**Maximum Cancer Risk (per million)**	**Maximum Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Maximum Hazard Index**
1st Floor Level	3.3	**0.76**	<0.01
2nd Floor Level	2.4	**0.50**	<0.01
3rd Floor Level and above	1.3	0.25	<0.01
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Significant?	*No*	***Yes***	*No*

As shown in Table 4.3-7, residents on the first and second floors would be exposed to $PM_{2.5}$ concentrations from El Camino Real that exceed BAAQMD single-source thresholds. While not a significant impact resulting from the project, future residents would be exposed to TAC concentrations that pose a health risk. The following Conditions of Approval are recommended for consideration by the City to be implemented by the project to reduce these risks.

Conditions of Approval: The project shall include the following measures to minimize long term TAC and annual $PM_{2.5}$ exposure for new project occupants:

The project shall install air filtration at residential units exposed to annual $PM_{2.5}$ exposure above 0.3 $\mu g/m^3$. To ensure adequate health protection to sensitive receptors, a ventilation system is proposed to meet the following minimal design standards:

- Install air filtration in residential buildings. Air filtration devices shall be rated MERV13 or higher for portions of the site that have annual $PM_{2.5}$ exposure above 0.3 $\mu g/m^3$. The ventilation system, whether mechanical or passive, shall filter all fresh air circulated into the dwelling units.

- As part of implementing this measure, an ongoing maintenance plan for the buildings' heating, ventilation, and air condition (HVAC) air filtration system shall be required.

- Ensure that the use agreement and other property documents: (1) require cleaning, maintenance, and monitoring of the affected buildings for air flow leaks, (2) include assurance that new owners or tenants are provided information on the ventilation system, and (3) include provisions that fees associated with owning or leasing a unit(s) in the building include funds for cleaning, maintenance, monitoring, and replacements of the filters, as needed.

A properly installed and operated ventilation system with MERV13 rated air filtration would achieve an 80 percent reduction in TAC exposure. The maximum annual $PM_{2.5}$ concentration of 0.76 $\mu g/m^3$ would be reduced to 0.23 $\mu g/m^3$ upon application of the measures discussed above. This would be below the BAAQMD single-source threshold for $PM_{2.5}$ exposure.

Cumulative Impact on Off-Site Construction MEI

The emissions from construction activities of the project in combination with vehicular traffic on El Camino Real were calculated and compared to BAAQMD cumulative source thresholds. The impacts

were assessed relative to the MEI, an existing apartment residence to the southeast of the site (refer to Figure 4.3-1). The results of the analysis are shown in Table 4.3-8 below.

Table 4.3-8: Impact from Combined Sources at Off-Site MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Construction			
Unmitigated	**148.6** (infant)	**0.85**	**0.13**
Mitigated	3.0 (infant)	0.05	<0.01
El Camino Real	11.1	0.11	0.01
Combined Sources			
Unmitigated	**159.7** (infant)	**0.96**	0.14
Mitigated	14.1(infant)	0.16	<0.02
BAAQMD Cumulative Source Threshold	***>100***	***>0.8***	***>10.0***
Significant?			
Unmitigated	**Yes**	**Yes**	No
Mitigated	No	No	No

When considering the combined emissions of TACs from El Camino Real and project construction, BAAQMD cumulative source thresholds would be exceeded. The mitigation measures discussed previously (**MM AIR-3**) would reduce the cumulative risk of air pollutant exposure to the MEI to a less than significant level.

4.4 BIOLOGICAL RESOURCES

The following discussion is based, in part, upon an arborist report prepared for the project site by *Kielty Arborist Services, LLC.* The report is attached to this Initial Study as Appendix B.

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Special Status Species

Individual plant and animal species listed as rare, threatened or endangered under state and federal Endangered Species Acts are considered "special status species." Federal and state "endangered species" legislation has provided the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project will result in the "take" of a species listed as threatened or endangered. To "take" a listed species, as defined by the State of California, is "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill" said species. "Take" is more broadly defined by the federal Endangered Species Act to include "harm" of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Section 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, are considered for environmental review per the CEQA Guidelines. These may include plant species of concern in California listed by the California Native Plant Society and CDFW listed "Species of Special Concern."

Migratory Bird and Birds of Prey Protections

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, possessing, or trading in migratory birds except in accordance with regulations prescribed by the Secretary of the Interior, which in April 2018 issued a memo clarifying that the MBTA applies to only actions taken to intentionally harm protected species. Several states and non-governmental organizations have challenged this interpretation in federal court, and the outcome of the lawsuit is pending. The MBTA's prohibitions apply to whole birds, parts of birds, and bird nests and eggs. Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment, which under the 2018 guidance would not result in a violation of the MBTA because any harm would be pursuant to activities, the purpose of which is not to intentionally harm birds. Nesting birds are considered special-status species and are protected by the USFWS.

The CDFW also protects migratory and nesting native and non-game birds under California Fish and Game Code (CFGC) Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance. While both the USFWS and CDFW similarly define "take" as to pursue, hunt, shoot, wound kill, trap, capture or collect, the CFGC further states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird (except as otherwise provided by this code or any regulation made pursuant thereto).

Local

City of Los Altos General Plan

The Los Altos General Plan contains the following biological resource policy, included in the Community Design and Historic Resources Element, which is applicable to the proposed project:

Policy 1.1: Preserve trees, especially heritage and landmark trees, and trees that protect privacy in residential neighborhoods.

Los Altos Municipal Code

The City of Los Altos has adopted a Tree Protection Ordinance in Section 11.08 of the Municipal Code. The Tree Protection Ordinance prescribes measures for removal and replacement of trees in the City, in addition to protective actions to be taken to avoid damage to existing trees. The Tree Protection Ordinance defines a "protected tree" as:

- Any tree that is 48 inches or more in circumference measured at 48 inches above grade;
- Any tree designated by the historical commission as a heritage tree or any tree under official consideration by the historical commission for heritage tree designation;
- Any tree which was required by the city to be either saved or planted in conjunction with a development review application.

Trees may be designated as "heritage trees" upon application by the owner of the property on which the tree is located, a study of the proposed tree by the historical commission, and a determination of designation based on the criteria outlined in Section 12.44.030 of the Municipal Code.

4.4.1.2 *Existing Conditions*

The project site is in an urbanized area and is developed with one office building and associated paved surface parking and landscaping. There are no wetlands, streams or riparian habitat on or adjacent to the site. The nearest waterway, Permanente Creek, is located approximately 2,800 feet east of the site.

Habitats in developed areas are extremely low in species diversity. The wildlife species most often associated with developed areas are those that are most tolerant of periodic human disturbances, including several introduced species such as European starlings, rock doves, house mice, and Norway rats. Native species able to utilize these habitats include western fence lizards, American robins, Brewer's blackbirds, northern mockingbirds, mourning doves, house finches, and squirrels, and some species of bats.

There are no sensitive habitats or wetlands on or adjacent to the project site. Due to the lack of sensitive habitats and the human disturbance of the project site, special-status plant and animal species are not expected to occur on the project site.

Trees

There are 87 trees on the project site, including Monterey pine, privet, carob, London plane, liquidambar, Chinese pistache, and coast live oak. All on-site trees are non-native except for the one coast live oak. Most trees on-site are in fair to good condition, with the exception of Monterey pines that are afflicted with pine pitch canker and bark beetle. There are 24 trees present on-site that meet the City's definition of a "protected tree"; no trees on-site have been identified as "heritage trees".

4.4.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) 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 (CDFW) or United States Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐
2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	☐	☐	☐	☒
3) 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?	☐	☐	☐	☒
4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites?	☐	☐	☐	☒
5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Impact BIO-1:	The project would not 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 CDFW or USFWS. **(Less than Significant Impact with Mitigation)**

Special Status Species

The project site is in an urban area and is developed with an office building, a paved surface parking lot, and landscaping. The site does not contain sensitive habitats or wetlands and is disturbed by human use; therefore, the presence of special status plant or animal species on-site is unlikely. Additionally, the site does not contain abandoned buildings or buildings with structural voids (the spaces between exterior and interior envelopes of a building) or large trees with cavities which could provide roosting habitat for special status bat species.

Nesting Raptors and Migratory Birds

Migratory birds and/or raptors could nest in the mature trees on or near the site. Construction activities during the nesting season (February 1-August 30), including equipment noise and tree removal, may result in the loss of fertile eggs or nestlings, or otherwise lead to nest abandonment.

Mitigation Measures: The following mitigation measures would be implemented during construction to reduce impacts to nesting birds to a less than significant level:

MM BIO-1.1: Construction activities shall be scheduled to avoid the nesting season. The nesting season for most birds in Santa Clara County extends from February 1st through August 30th). If construction activities are scheduled to take place outside of the nesting season, impacts on nesting birds protected by the MBTA and/or CDFW will be avoided.

MM BIO-1.2: If it is not possible to schedule construction activities between September 1 and January 31, then preconstruction surveys for nesting birds shall be conducted to identify active nests that may be disturbed during project implementation. Projects that commence construction between February 1st and April 30th (inclusive) shall conduct pre-construction surveys for nesting birds within 14 days of construction onset. Projects that commence construction between May 1st and August 31st (inclusive) shall conduct preconstruction surveys within 30 days of construction onset. Pre-construction surveys shall be conducted by a qualified biologist or ornithologist for nesting birds within the on-site trees as well as all mature trees within 250 feet of the site. If the survey does not identify any nesting birds that would be affected by construction activities, no further mitigation is required.

MM BIO-1.3: If an active nest is found in or close enough to the construction area to be disturbed by these activities, the qualified biologist or ornithologist, in consultation with CDFW, shall determine the extent of a construction-free

buffer zone around the nest, typically 250 feet for raptors and 100 feet for non-raptors around the nest, to ensure that raptor or migratory bird nests shall not be disturbed during project construction. The buffer shall remain in place until the breeding season has ended or a qualified biologist or ornithologist has determined that the nest is no longer active. The ornithologist/biologist shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the Director of Community Development prior to the issuance of grading permits.

MM BIO-1.4: If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (i.e., prior to February 1st).

With implementation of the mitigation measures listed above, the proposed project would not result in significant impacts to sensitive species. **(Less than Significant Impact with Mitigation Incorporated)**

Impact BIO-2:	The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. **(No Impact)**

The project site is in an urban area. There are no streams, creeks, waterways, or wetlands located on or adjacent to the project site. The nearest waterway (i.e., Permanente Creek) is located approximately 2,800 feet east of the site. Therefore, the proposed project would not result in substantial impacts to riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. **(No Impact)**

Impact BIO-3:	The project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. **(No Impact)**

The proposed project would redevelop an existing site in an urbanized area of Los Altos. There are no wetlands on the project site; therefore, the proposed project would not have a significant impact on federally protected wetlands. **(No Impact)**

Impact BIO-4:	The project would not 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. **(Less than Significant Impact with Mitigation Incorporated)**

Migratory movements of animal species are most often associated with riparian corridors, and the project site is not located in the vicinity of any streams or waterways. Development of the project, therefore, would not substantially interfere with the movement of any native resident or migratory

fish or wildlife species. Additionally, the site does not contain abandoned buildings or buildings with structural voids (the spaces between exterior and interior envelopes of a building) or large trees with cavities which could provide roosting habitat for bat species. As discussed above, migratory birds and/or raptors could nest in the mature trees on or near the site. Implementation of mitigation measure MM BIO-1 would reduce impacts to nesting birds to a less than significant level. For these reasons, the project would not 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. **(Less than Significant Impact with Mitigation Incorporated)**

Impact BIO-5:	The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. **(Less than Significant Impact)**

There are 87 trees on the project site, 24 of which meet the City's definition of a "protected tree" (i.e., measure 48 inches or greater in circumference at 48 inches above grade). All on-site trees would be removed by the project. The City's Tree Protection Ordinance requires a tree removal permit to be obtained prior to removal of protected trees. According to Los Altos Municipal Code (Chapter 11.08.090), tree removal permit conditions of approval may require that replacement trees be planted and the City often uses a 1:1 ratio, but the Code does not specifically mandate a replacement ratio. project proposes to plant approximately 196 new trees on-site. As designed, the project would achieve a tree replacement ratio of approximately 2:1, which would meet or exceed the standards outlined in the City's Tree Preservation Ordinance.

The project would not conflict with General Plan Policy 1.1, the intent of which is to protect privacy in residential neighborhoods by preserving significant trees. The project would remove existing mature trees that are adjacent to apartment and single-family properties: however, none of the proposed trees to be removed are heritage trees, and the existing trees are sparsely distributed along the residential interfaces. The project proposes to plant a significant number of replacement trees with rows of large evergreen species that will provide dense screening along the residential property lines.

Therefore, project tree impacts would be less than significant. **(Less than Significant Impact)**

Impact BIO-6:	The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **(No Impact)**

The project site is not located within an approved local, State, or national habitat conservation plan area. Thus, there would be no impact. **(No Impact)**

4.5 CULTURAL RESOURCES

The following discussion is based, in part, on an Archaeological Literature Search conducted for the project by *Holman and Associates*. A copy of the report, dated January 17, 2019, is available for review by qualified persons at the City of Los Altos Planning Department during normal business hours.

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966 (as amended) is the primary federal law dealing with historic preservation. Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consult with the Advisory Council on Historic Preservation to consider the effects of their undertakings on historic properties.

National Register of Historic Places

The National Historic Preservation Act is the primary federal law dealing with historic preservation. The historic significance of a building, structure, object, site, or district for listing is assessed based upon the criteria in the National Register of Historic Places (NRHP). A resource is considered eligible for the NRHP if the quality of significance in American history, architecture, archaeology, engineering, and culture is present and if the resource includes integrity of location, design, setting, materials, workmanship, feeling, and association and:

- Is associated with events that have made a significant contribution to the broad pattern of our history; or
- Is associated with the lives of persons significant to our past; or
- Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possessed high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

The Secretary of the Interior Standards for Rehabilitation

The 1995 U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties outlines specific standards and guidelines for the preservation, rehabilitation, restoration, and reconstruction of historic properties. Each set of standards provides specific recommendations for the proper treatment of specific building materials, as well as parts of building construction. CEQA references these standards relative to consideration of the significance of project impacts, or lack thereof, on historic resources.

State

California Register of Historical Resources

The California Register of Historical Resources (CRHR) was created to identify resources deemed worthy of preservation and was modeled closely after the NRHP. The criteria are nearly identical to those of the NRHP, which includes resources of local, state, and regional and/or national levels of significance. A CRHR-eligible resource generally must be greater than 50 years old and significant at the local, state, or national level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. It is associated with the lives of persons important to local, California, or national history.
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or important creative individual or possesses high artistic values.
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Properties of local significance designated under a local preservation or identified in a local historical resources inventory may be eligible for listing in the CRHR and are presumed to be historical resources for the purposes of CEQA unless a preponderance of evidence indicates otherwise.

Cultural and Paleontological Resources

Archaeological, paleontological, and historical sites are protected by several state policies and regulations under the California Public Resources Code, California Code of Regulations (Title 14 Section 1427), and California Health and Safety Code. California Public Resources Code Sections 5097.9-5097.991 require notification of discoveries of Native American remains and provides for the treatment and disposition of human remains and associated grave goods.

Local

City of Los Altos Historical Preservation Ordinance

The City of Los Altos has adopted a Historical Preservation Ordinance (Chapter 12.44 of the Municipal Code) for the primary purposes of ensuring protection of irreplaceable historic resources, enhancing visual character through architectural compatibility, and encouraging appreciation of the City's past. The ordinance identifies the process and qualifications for the designation of a historic resource or landmark.

City of Los Altos General Plan

The City of Los Altos General Plan Community Design and Historic Resources Element contains the following cultural resource policies that are applicable to the proposed project:

Policy 6.3: Work with property owners to preserve historic resources within the community, including the orchard, or representative portion thereof, on the civic center site.

Policy 6.4: Preserve archaeological artifacts and sites found in Los Altos or mitigate disturbances to them, consistent with their intrinsic value.

Policy 6.5: Require an archaeological survey prior to the approval of significant development projects near creeksides or identified archaeological sites.

4.5.1.2 *Existing Conditions*

Historic Resources

The City of Los Altos contains historic resources from the early twentieth century. There are a variety of historic buildings in the City's Downtown that were constructed prior to 1940. There are also several historic residential structures located between Foothill Expressway and Adobe Creek. The City contains approximately 22 officially designated historic landmarks, located primarily in and around Downtown.[11] [12] The project site is entirely developed, consisting of a three-story, 78,950-sqaure-foot office building with a surface parking lot and landscaping that was constructed in the early 1980s. The project site is not identified in the City of Los Historic Resources Inventory and is technically not eligible for a designation since it was constructed less than 50 years ago.

Historic-era maps of the project area were examined by *Holman and Associates* to identify the potential for historic archaeological resources to be present on the project site. Based on their review of historical land use patterns, it was determined that there is a low potential for specific historic archaeological deposits within the project site.

Prehistoric Resources

In the project area, Native American sites have been identified adjacent to springs or within a half-mile of the two major waterways: Coyote Creek and the Guadalupe River and their major tributaries. Other sensitive locations include the base of the hills near waterways, at the original bayshore, and on terraces adjacent to naturally flowing waterways. The project site is located on a large valley terrace approximately 2,800 feet west of Permanente Creek. The Ohlone and Muwekma Indian tribes previously inhabited several creekside locations in the Los Altos area.

The Archaeological Literature Search conducted for the project by *Holman and Associates* included a records search at the Northwest Information Center of the California Historical Resources Information System (CHRIS). All records of identified archaeological resources within a quarter mile, and all archaeological resources reports for projects within 50 meters of the project site were reviewed.

Two linear studies have been completed near the project site. In 1978, Caltrans completed a study for the widening of El Camino Real widening from four to six lanes in Los Altos and Mountain View. In 2002, field surveys were done for the installation of a buried fiber optic cable system along El Camino Real. No archaeological resources or historic-era buildings were identified within the project site during these studies, and no known cultural resources were identified within the site as part of the CHRIS records search.

[11] City of Los Altos. *General Plan – Community Design and Historic Resources Element*. November 2002.
[12] City of Los Altos, Historical Commission. "Historic Inventory". Accessed December 7, 2018. https://www.losaltosca.gov/historicalcommission/page/historic-inventory

Based on the results of the Archaeological Literature Review completed for the project site, the site has low potential for containing subsurface archaeological resources. This is due to the lack of recorded cultural resource studies and the lack of evidence of prehistoric occupation on the project site.

4.5.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☐	☒
2) Cause a substantial adverse change in the significance of an archaeological resource as pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
3) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Impact CUL-1: The project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. **(No Impact)**

The project site is developed with a three-story office building, surface parking lot, and landscaping that was constructed in the early 1980s. The site is not identified in the City of Los Historic Resources Inventory. According to the records search by *Holman and Associates*, no historic resources or properties listed on federal, state or local inventories are located on or adjacent to the project site. A structure would be considered eligible for designation as a historic resource under the City's Historic Preservation Ordinance if it satisfies each of the three criteria identified in the Ordinance - Age, Determination of Integrity, and Historic Significance. Because the existing building on the site was constructed in 1983, it would not satisfy the Age criterion and would not be eligible as for designation as a historic resource. For these reasons, development of the proposed project would not have an impact on historic resources. **(No Impact)**

Impact CUL-2: The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact with Mitigation Incorporated)**

Based on the results of the Archaeological Literature Search, *Holman and Associates* concluded that there is a low potential for Native American and historic-era archaeological deposits and cultural materials to be present at the project site. Nevertheless, demolition and construction activities on the site could uncover yet unrecorded subsurface resources.

Mitigation and Avoidance Measures: The following mitigation measures would be implemented during project demolition and construction activities to avoid significant impacts to unknown subsurface cultural resources:

MM CUL-2.1: In the event that prehistoric or historic resources are encountered during excavation and/or grading of the site, all activity within a 50-foot radius of the find shall stop, the Director of Community Development shall be notified, and an archaeologist designated by the City shall assess the find and make appropriate recommendations, if warranted. Recommendations could include avoidance, if feasible, preservation in place, or collection, recordation, and analysis of any significant cultural materials. Construction within a radius specified by the archaeologist shall not recommence until the assessment is complete. A report of findings documenting any data recovery would be submitted to the Director of Community Development. The project applicant shall ensure all construction personnel receive cultural resource awareness training that includes information on the possibility of encountering archaeological and/or historical materials during construction.

MM CUL-2.2: Pursuant to Health and Safety Code § 7050.5 and Public Resources Code § 5097.94 of the State of California, in the event that human remains are discovered during excavation and/or grading of the site, all activity within a 50-foot radius of the find will be stopped. The Santa Clara County Coroner will be notified and shall make a determination as to whether the remains are of Native American origin. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission (NAHC) immediately. Once NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to state law, then the landowner shall re-inter the human remains and items associated with Native American burials on the property in a location not subject to further subsurface disturbance.

With implementation of these measures, impacts to unknown subsurface prehistoric and historic archaeological resources would be less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

Impact CUL-3:	The project would not disturb any human remains, including those interred outside of dedicated cemeteries. **(Less than Significant Impact with Mitigation Incorporated)**

It is possible that construction activities associated with the proposed project could disturb as-yet undiscovered human remains at the project site. The mitigation measures described above (**MM CUL-2.2**) ensure that an appropriate process is followed in the event of accidental discovery of human remains during project construction. By following the process set forth in these mitigation

measures, the proposed project would not result in a significant impact to human remains. **(Less than Significant Impact with Mitigation Incorporated)**

4.6 ENERGY

4.6.1 Environmental Setting

4.6.1.1 *Regulatory Framework*

Federal

At the federal level, energy standards set by the U.S. Environmental Protection Agency (EPA) apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

State

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard (RPS) Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. In 2008, Executive Order S-14-08 was signed into law requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Building Codes

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years, and the 2016 Title 24 updates went into effect on January 1, 2017.[13] The 2019 Title 24 updates will go into effect on January 1, 2020. Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[14]

The California Green Building Standards Code (CALGreen) establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. The 2016 update to CALGreen went into effect on January 1, 2017, and covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality. The 2019 update to CALGreen goes into effect on January 1, 2020 and covers the same topics.

[13] California Building Standards Commission. "Welcome to the California Building Standards Commission". Accessed February 20, 2019. http://www.bsc.ca.gov/.
[14] California Energy Commission (CEC). "2016 Building Energy Efficiency Standards". Accessed February 20, 2019. http://www.energy.ca.gov/title24/2016standards/index.html.

Local

City of Los Altos General Plan

The City of Los Altos General Plan contains several policies pertaining to energy efficiency in new development. The following policies are contained in the 2015-2023 Housing Element and are applicable to the proposed project:

Policy 7.1: The City will encourage energy and water conservation measures to reduce energy and water consumption in residential, governmental, and commercial buildings.

Policy 7.2: The City will continue to implement building and zoning standards to encourage energy and water efficiency.

Los Altos Climate Action Plan

In 2013, the City prepared and adopted the Los Altos Climate Action Plan (CAP) to comprehensively reduce local sources of greenhouse gas emissions. Many of the CAP measures and actions have the added benefit of reducing household transportation and utility costs, thus increasing housing affordability, by promoting programs and incentives to improve energy efficiency or promote alternative modes of travel.[15]

4.6.1.2 *Existing Conditions*

Electricity in Santa Clara County in 2017 was consumed primarily by the commercial sector (76 percent), followed by the residential sector consuming 24 percent. In 2017, a total of approximately 17,190 gigawatt hours (GWh) of electricity was consumed in Santa Clara County. [16]

Total energy usage in California was approximately 7,830 trillion Btu in the year 2016, the most recent year for which this data was available. Out of the 50 states, California is ranked 2nd in total energy consumption and 48th in energy consumption per capita. The breakdown by sector was approximately 18 percent (1,384 trillion Btu) for residential uses, 19 percent (1,477 trillion Btu) for commercial uses, 24 percent (1,853 trillion Btu) for industrial uses, and 40 percent (3,116 trillion Btu) for transportation.[17] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

The community-owned Silicon Valley Clean Energy (SVCE) is the electricity provider for the City of Los Altos.[18] SVCE sources the electricity and Pacific Gas and Electric Company delivers it to customers over their existing utility lines. Customers are automatically enrolled in the GreenStart plan, which generates its electricity from 100 percent carbon free sources; with 50 percent from solar and wind sources, and 50 percent from hydroelectric. Customers have the option to enroll in the

[15] City of Los Altos. *Housing Element 2015-2023.* May 2014.
[16] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed June 3, 2019. http://ecdms.energy.ca.gov/elecbycounty.aspx.
[17] United States Energy Information Administration. *State Profile and Energy Estimates, 2016.* Accessed February 20, 2019. https://www.eia.gov/state/?sid=CA#tabs-2.
[18] SVCE. "Frequently Asked Questions". Accessed February 21, 2019. https://www.svcleanenergy.org/faqs.

GreenPrime plan, which generates its electricity from 100 percent renewable sources, such as wind and solar.

Natural Gas

PG&E provides natural gas services within the City of Los Altos. In 2017, approximately 10 percent of California's natural gas supply came from in-state production, while 90 percent was imported from other western states and Canada.[19] In 2016, residential and commercial customers in California used 29 percent, power plants used 32 percent, and the industrial sector used 37 percent. Transportation accounted for one percent of natural gas use in California. In 2017, Santa Clara County used approximately 3.5 percent of the state's total consumption of natural gas.[20]

Fuel for Motor Vehicles

In 2017, 15 billion gallons of gasoline were sold in California.[21] The average fuel economy for light-duty vehicles (autos, pickups, vans, and SUVs) in the United States has steadily increased from about 13.1 miles-per-gallon (mpg) in the mid-1970's to 24.9 mpg in 2018.[22] [23] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was subsequently revised to apply to cars and light trucks Model Years 2011 through 2020. [24,25] In 2012, the federal government raised the fuel economy standard to 54.5 miles per gallon for cars and light-duty trucks by Model Year 2025.[26]

In 2018, the EPA and the NHTSA proposed to amend certain existing Corporate Average Fuel Economy (CAFE) and greenhouse gas emissions standards for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026. Compared to maintaining the post-2020 standards now in place, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2–3 percent of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of one degree Celsius by 2100. [27] California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries

[19] California Gas and Electric Utilities. 2017 California Gas Report. Accessed February 21, 2019. https://www.socalgas.com/regulatory/documents/cgr/2017_California_Gas_Report_Supplement_63017.pdf
[20] CEC. "Natural Gas Consumption by County". Accessed February 21, 2019. http://ecdms.energy.ca.gov/gasbycounty.aspx.
[21] California Department of Tax and Fee Administration. Net Taxable Gasoline Gallons. Accessed February 21, 2019. http://www.cdtfa.ca.gov/taxes-and-fees/MVF_10_Year_Report.pdf.
[22] U.S. EPA. Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles. Accessed March 22, 2019. https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles.
[23] U.S. EPA. "Highlights of the Automotive Trends Report". Accessed May 30, 2019. https://www.epa.gov/automotive-trends/highlights-automotive-trends-report
[24] U.S. Department of Energy. Energy Independence & Security Act of 2007. Accessed February 21, 2019. http://www.afdc.energy.gov/laws/eisa.
[25] Public Law 110–140—December 19, 2007. Energy Independence & Security Act of 2007. Accessed February 21, 2019. http://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf.
[26] National Highway Traffic Safety Administration. *Obama Administration Finalizes Historic 54.5 mpg Fuel Efficiency Standards.* August 28, 2012. Accessed February 21, 2019. http://www.nhtsa.gov/About+NHTSA/Press+Releases/2012/Obama+Administration+Finalizes+Historic+54.5+mpg+Fuel+Efficiency+Standards.
[27] EPA Federal Register, Vol. 83, No. 165, August 24, 2018. https://www.govinfo.gov/content/pkg/FR-2018-08-24/pdf/2018-16820.pdf. Accessed May 22, 2019.

to implement global climate change initiatives. Thus, the timing and consequences of the 2018 federal proposal are speculative at this time.

Energy Use of Existing Development

The estimated annual amounts of electricity and natural gas used by the existing office building on the site are shown in Table 4.6-1.

Table 4.6-1: Estimated Annual Energy Use of Existing Development[1]

Development	Electricity Use (kWh)	Natural Gas Use (kBtu)
General Office Building – 79,000 square feet	1,372,910	1,260,490

Notes: [1] Illingworth & Rodkin, Inc. *5150 El Camino Real Air Quality and Greenhouse Gas Assessment.* March 6, 2019.

As shown in the table above, the existing office building on-site uses approximately 1,372,910 kWh of electricity per year and 1,260,490 kBtu of natural gas per year.

4.6.2 Impact Discussion

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

Impact EN-1: The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation. **(Less than Significant Impact)**

Operational Energy Demand

The project would demolish the existing 78,950 square-foot office building and construct a 196-unit condo/townhouse residential project with surface and below-ground parking. The proposed project would intensify of use of the site by introducing residential uses and increasing the size and scale of development. In doing so, the project would increase energy demand at the project site and in the City as a whole. The project proposes four multi-family residential buildings, which inherently would place less demand per capita on the grid when compared to a single-family home. Additionally, the proposed project is an infill development and would require less energy than development of a

greenfield site. While the nature of the project as an infill residential development contributes to a reduction of its overall energy usage compared to a single-family home, the project would still result in a net increase in energy usage relative to the existing use of the site. It is assumed that the project would be built out over a period of 40 months (in three phases). Operation of the proposed project would consume energy (in the form of electricity and natural gas) primarily for building heating and cooling, lighting, cooking, and water heating. Energy would also be consumed in the form of gasoline from residential vehicle trips. Table 4.6-2 below shows the estimated annual energy use of the proposed development.

Table 4.6-2: Estimated Annual Energy Use of Proposed Development[1]

Development	Electricity Use (kWh)	Natural Gas Use (kBtu)
Condo/Townhouse - 196 units and 368,858 square feet of floor surface area	988,904	3,669,712
Enclosed Parking with Elevator – 236 spaces and 95,600 square feet of floor surface area	560,216	0
Parking Lot – six spaces and 2,400 square feet of floor surface area	840	0
Total:	**1,549,960**	**3,669,712**

Notes: [1] Illingworth & Rodkin, Inc. *5150 El Camino Real Air Quality and Greenhouse Gas Assessment.* March 6, 2019.

The project would result in a net increase in electricity use of 177,050 kWh, and a net increase in gas use of 2,409,222 kBtu. Using the EPA fuel economy estimates, the gross annual gasoline consumption as a result of the project is estimated to be approximately 129,416 gallons. [28]

The energy use increase is likely overstated because the estimates for energy use do not take into account the efficiency measures incorporated into the project. The project would be built to the most recent CALGreen requirements and Title 24 energy efficiency standards, which would improve the efficiency of the overall project. Additionally, the community-owned Silicon Valley Clean Energy (SVCE) is the electricity provider for the City of Los Altos.[29] SVCE sources the electricity and the Pacific Gas and Electric Company delivers it to customers over their existing utility lines. Customers are automatically enrolled in the GreenStart plan, which generates its electricity from 100 percent carbon free sources; with 50 percent from solar.

Due to population increases, it is estimated that future demand in California for electricity will grow at approximately one percent each year through 2027, and that 319,256 GWh of electricity would be utilized in the State in 2027.[30] The proposed project would increase annual electricity use by approximately 177,050 kWh and would not result in a substantial increase in demand on electrical energy resources. In 2017, California used approximately 2,110,829 million cubic feet [31]

[28] 3,222,456 annual vehicle miles traveled/24.9 miles per gallon = 129,416 gallons
[29] SVCE. "Frequently Asked Questions". Accessed May 23, 2019. https://www.svcleanenergy.org/faqs.
[30] California Energy Commission. California Energy Demand Updated Forecast, 2017-2027. Accessed: February 6, 2019. Available at: http://docketpublic.energy.ca.gov/PublicDocuments/16-IEPR05/TN214635_20161205T142341_California_Energy_Demand_Updated_Forecast.pdf.
[31] U.S. EIA. "Natural Gas." Accessed: May 23, 2019. Available at: https://www.eia.gov/dnav/ng/ng_sum_lsum_dcu_SCA_a.htm.

(2,110,829,000 kBtu) of natural gas.[32] Based on the relatively small increase in natural gas demand from the project (3,669,712 kBtu annually) compared to the growth trends in natural gas supply and the existing available supply in California, the proposed project would not result in a substantial increase in natural gas demand relative to projected supplies.

Implementation of the project would result in a gross increase in annual gasoline demand of approximately 129,416 gallons. New automobiles purchased by future occupants of the proposed project would be subject to fuel economy and efficiency standards applied throughout the state of California, which means that over time the fuel efficiency of vehicles associated with the project site would improve. The project site is located within a designated Transit Priority Area as delineated in the Plan Bay Area 2040, with the nearest bus stops located along and across the street from the project frontage on El Camino Real, allowing easy access to transit for the future occupants. The proposed project would comply with all applicable General Plan policies intended to promote the use of transit and non-vehicular modes of travel (bicycling and walking). As a result, implementation of the proposed project would not result in a substantial increase on transportation-related energy uses. **(Less than Significant Impact)**

Energy Efficiency

Construction

The anticipated construction schedule assumes that the project would be built over a period of approximately 40 months. The project would require demolition, site preparation, grading, trenching, building construction, paving, and building interior. The overall construction schedule and process is designed to be efficient in order to avoid excess monetary costs. That is, equipment and fuel would not be used wastefully on the site because of the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for future efficiency gains during construction are limited. The project does, however, include several measures that would improve the efficiency of the construction process. Implementation of the mitigation measures detailed in *Section 4.3, Air Quality*, would restrict equipment idling times to five minutes or less and would require the applicant to post signs on the project site reminding workers to shut off idle equipment.

Energy is consumed during construction because the use of fuels and building materials are fundamental to construction of new buildings. However, energy would not be wasted or used inefficiently by construction equipment and waste from idling would be reduced with implementation of the Mitigation Measures AIR-2 outlined in *Section 4.3, Air Quality*. The project would be required to prepare a Construction and Demolition Waste Plan to recycle and/or reuse construction waste, which would further reduce energy expenditures during the construction phase. Therefore, construction of the proposed project would not consume energy in a manner that is wasteful, inefficient, or unnecessary. **(Less than Significant Impact)**

[32] Kyle's Converter. "Convert Cubic Feet of Natural Gas to British Thermal Units." Accessed: February 6, 2019. Available at: http://www.kylesconverter.com/energy,-work,-and-heat/cubic-feet-of-natural-gas-to-british-thermal-units#2110829

Operation

The project would be built to the most recent CALGreen requirements, which includes insulation and design provisions to minimize wasteful energy consumption. The project proposes photovoltaic panels on the roofs of the townhome and condominium buildings which would marginally reduce the expected energy demand of the project.

The City does not have its own requirements for on-site bicycle parking, but instead relies on the. VTA's Bicycle Technical Guidelines to set a recommended threshold. For this project, the Guidelines recommend a minimum of 80 bicycle parking spaces (66 Class I and 14 Class II). The project is proposing to provide at least 98 bicycle spaces (84 Class I and 14 Class II), thus exceeding the minimum recommended by the Guidelines. The inclusion of bicycle parking and proximity to transit would incentivize the use of alternative methods of transportation to and from the site, which could result in a reduction of fuel consumption.

The project includes extensive landscaping, including the planting of approximately 196 trees along the perimeter of the site and within the open space interior areas. This will have the effect of providing shade and reducing the heat island effect, thus reducing the energy demand of the proposed buildings. The use of accent pavers in pedestrian walkways and open space areas and turfblock for the proposed EVA lane (versus traditional concrete and asphalt paving materials) would further contribute to the reduction in heat island effect. Therefore, operation of the proposed project would not consume energy in a manner that is wasteful, inefficient, or unnecessary. **(Less than Significant Impact)**

Impact EN-2:	The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

The Los Altos Climate Action Plan (CAP) includes several focus areas where GHG emissions reductions can be achieved. Each focus area includes specific reduction measures, which are a diverse mix of incentives, education, and regulations applicable to both new and existing development. One focus area in the CAP is energy; reduction measures in this focus area include promoting effective energy conservation strategies (Measure 2.1), increasing energy efficiency (Measure 2.2), and increasing renewable energy (Measure 2.3). Each reduction measure in the CAP is accompanied by implementing actions to support it.

While the CAP is primarily focused on reducing GHG emissions, it serves the dual purpose of promoting energy conservation and renewable energy availability in the City. The proposed residential project would not conflict with the CAP. Measure 2.1 would primarily be implemented by the City through outreach and education programs for renewable energy and conservation programs. The proposed project would comply with the 2019 CALGreen Code, thereby ensuring that it satisfies Measure 2.2. The proposed project includes photovoltaic panels on the roofs of both condominium buildings and the townhomes, thereby ensuring that it satisfies Measure 2.3. The project would, therefore, not conflict with renewable energy and energy efficiency measures included in the CAP. **Less than Significant Impact)**

4.7 GEOLOGY AND SOILS

The following is based, in part, on a preliminary geotechnical report prepared for the project site by *ENGEO, Inc.* The report, dated March 9, 2018, is included in this Initial Study as Appendix C.

4.7.1 Environmental Setting

4.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act ensures public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction.

Seismic Hazards Mapping Act

Following the 1989 Loma Prieta earthquake, the Seismic Hazards Mapping Act (SHMA) was passed. The SHMA directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. It also requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the identified hazard is present and requires the inclusion of measures to reduce earthquake-related hazards.

California Building Standards Code

The California Building Standards Code (CBC) contains the regulations that govern the construction of buildings in California and prescribes standards for constructing safer buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared by a licensed professional for proposed developments to evaluate seismic and geologic conditions that may affect a project, such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years; the current version is the 2016 CBC. The CBC is in the process of being updated and the 2019 CBC will take effect on January 1, 2020.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Paleontological Resources Regulations

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These are valued for the information they yield about the history of the earth and its past ecological settings. The California Public Resources Code (Section 5097.5) specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it will disturb or destroy a unique paleontological resource or site or unique geologic feature.

Local

City of Los Altos General Plan

The City of Los Altos General Plan addresses geologic hazards in its Natural Environment and Hazards Element. The following General Plan policies related to geology and soils are applicable to the proposed project:

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.

4.7.1.2 *Existing Conditions*

Geology and Soils

The project site is located within the Coast Ranges geomorphic province of California, an area characterized by a series of northwest-trending mountain ranges that have been folded and faulted by tectonic activity. The project site is in the broad, north-south trending, alluvial-filled Santa Clara Valley. The Santa Clara Valley was formed when sediments derived from the surrounding mountain ranges were exposed by tectonic uplift and regression of the inland seas which previously inundated the area.

The project site is underlain by Pleistocene-age alluvial fan and fluvial deposits. Near-surface soil samples indicate that the upper 20 feet of the site is underlain by clay and silty clay with relatively thin intermittent layers of sand and silty sand. The site is further underlain with interbedded layers of medium dense to dense sand, and stiff clay to the bottom of exploratory borings at 45 feet below ground surface (bgs). The soils underlying the project site have a moderate to high expansion potential.[33] Expansive soils have a high shrink-swell potential and can impact the structural integrity of buildings. Expansive soils swell when the water content is increased and shrink when it decreases. This shrink-swell action can rupture utility lines, damage building foundations, and result in structural instability.

[33] Engeo. *5150 El Camino Real, Los Altos, California – Preliminary Geotechnical Exploration.* March 9, 2018.

Liquefaction

Soil liquefaction can be defined as ground failure or loss of strength that causes otherwise solid soil to take on the characteristics of a liquid. Soils generally most susceptible to liquefaction are clean, loose, saturated, uniformly graded, fine-grained sands that lie within roughly 50 feet of the ground surface. This phenomenon is triggered by earthquake or ground shaking that causes saturated or partially saturated soils to lose strength, potentially resulting in the soil's inability to support structures. Liquefaction can result in adverse impacts to human and building safety and must be addressed in the project design. Lateral spreading is a type of ground failure related to liquefaction. It consists of the horizontal displacement of flat-lying alluvial material toward an open area, such as a steep bank of a stream channel. The project site is located on relatively flat, stable terrain. The site is not located within a liquefaction hazard zone, a compressible soil hazard zone, or a landslide hazard zone.[34]

Seismicity and Seismic Hazards

The project site is located within the seismically-active San Francisco Bay Area. The site is approximately 3.3 miles east of the Monte-Vista Shannon Fault, 5.9 miles east of the North San Andreas Fault, 13.2 miles south of the Hayward-Rodgers Creek Fault, 16.5 miles west of the Calaveras Fault, and 17.6 miles east of the San Gregorio Fault. The project site is not located within a designated Alquist-Priolo Earthquake Fault Zone and no known surface expression of active faults is believed to exist within the site.

The U.S. Geological Survey's 2014 Working Group on California Earthquake Probabilities has compiled the earthquake fault research for the San Francisco Bay Area in order to estimate the probability of fault segment rupture. They have determined that the overall probability of a magnitude 6.7 or greater earthquake occurring in the San Francisco Region during the next 30 years (starting from 2014) is 72 percent. The highest probabilities are assigned to the Hayward Fault, Calaveras Fault, and the northern segment of the San Andreas Fault. These probabilities are 14.3, 7.4, and 6.4 percent, respectively. During a major earthquake on a segment of one of the nearby faults, strong to very strong ground shaking is expected to occur at the project site. The ground shaking intensity felt at the project site will depend on the size of the earthquake (magnitude), the distance from the site to the fault source, the directivity (focusing of earthquake energy along the fault in the direction of the rupture), and the site-specific soil conditions.

Groundwater

A preliminary geotechnical exploration performed by *ENGEO* in 2018 did not encounter groundwater within the maximum depth explored of 45 feet bgs. However, previous subsurface investigations conducted at the project site encountered groundwater at a depth of approximately 35 to 47 feet bgs.[35] Groundwater levels at the site may fluctuate with time due to seasonal conditions, rainfall, and irrigation practices.

[34] Santa Clara County. *Santa Clara County Geologic Hazard Zones Map.* October 2012.
[35] Partner Engineering and Science, Inc. *Phase I Environmental Site Assessment Report, Los Altos Plaza.* February 22, 2018.

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) 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 (refer to Division of Mines and Geology Special Publication 42)?	☐	☐	☐	☒
– Strong seismic ground shaking?	☐	☐	☐	☒
– Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
– Landslides?	☐	☐	☐	☒
2) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
3) Be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
4) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2016), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
5) 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?	☐	☐	☐	☒
6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☐	☒	☐

Impact GEO-1: The project would not 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides. **(No Impact)**

Fault Rupture

The project site is not located within an Alquist-Priolo Earthquake Fault Zone and no active faults are known to cross the site, making fault rupture at the site unlikely. While existing faults are located within approximately 10 miles of the site (Monte-Vista Shannon and North San Andreas Faults), the proposed project is outside of the fault rupture zones of these faults, and significant impacts from fault ruptures are not anticipated to occur. **(No Impact)**

Seismic Ground Shaking

The project site is located within the seismically active San Francisco Bay region. The faults in this region can generate earthquakes of magnitude 7.0 or higher. During an earthquake, very strong ground shaking could occur at the project site, which could damage buildings and other proposed structures and threaten residents and occupants of the proposed development and surrounding areas.

The project would be required to adhere to the 2016 California Building Code and recommendations in the site-specific geotechnical report prepared for the project, prior to permit issuance. Additionally, the project would be required to utilize standard engineering techniques to increase the likelihood that the project could withstand minor earthquakes without damage and major earthquakes without collapse. In this manner, the proposed project would not expose people or property to impacts associated with seismically-induced ground failures or other geologic conditions on-site. The project also would not directly or indirectly cause seismic ground shaking. **(No Impact)**

Liquefaction and Lateral Spreading

The project site was analyzed for its liquefaction potential in the preliminary geotechnical investigation prepared by *ENGEO.* The analysis indicated that there are layers of medium dense sand and clay that will settle to approximately two inches due to liquefaction and cyclic softening. Methods to account for differential settlement of structures include the use of post-tensioned or traditional reinforced mat foundations. The project would be required by the City to adhere to the 2016 California Building Code and recommendations in the site-specific geotechnical report prepared for the project, prior to permit issuance. The site-specific geotechnical report would refine the liquefaction analysis and expand on the recommendations of the preliminary geotechnical investigation using additional subsurface geotechnical data. Adhering to the recommendations of the design-level geotechnical report would ensure that liquefaction hazards on the project are adequately addressed. The project site is not located in the vicinity of any open faces or steep embankments that indicate a risk of lateral spreading. The project would not directly or indirectly cause liquefaction or lateral spreading. Therefore, the proposed project would have no impact in relation to liquefaction and lateral spreading. **(No Impact)**

Landslides

The project site is not located in a landslide hazard zone on County or State geologic hazard maps. The project site is relatively flat and is not located in the vicinity of steep embankments that could increase the risk of landslides affecting the site. Therefore, the proposed project is not susceptible to future landslides, on or off the site. The project also would not directly or indirectly cause landslides. Therefore, the project would have no impacts related to landslides. **(No Impact)**

Impact GEO-2:	The project would not result in substantial erosion or the loss of topsoil. **(Less than Significant Impact)**

Ground disturbance on the project site would result from the demolition of the existing three-story office building, excavation to construct the below-grade parking garage, trenching for utilities, and construction of the four proposed buildings. Transportation of construction materials and equipment to and from the site can also result in disturbance of the soils at the site. These activities would increase exposure of soil to wind and water erosion and increase sedimentation. The following erosion control measures required under Provision C.3 of the Municipal Regional Stormwater Permit and will reduce potential construction-related erosion impacts:

- All excavation and grading work would be scheduled in dry weather months or construction sites would be weatherized[36] to withstand or avoid erosion;
- Stockpiles and excavated soils would be covered with secured tarps or plastic sheeting;
- Vegetation in disturbed areas would be replanted as quickly as possible.

Implementation of the identified erosion control measures would ensure that erosion and sedimentation impacts are reduced to less than significant. **(Less than Significant Impact)**

Impact GEO-3:	The project would not 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. **(Less than Significant Impact)**

The preliminary geotechnical investigation completed for the project site indicates that non-engineered fill and liquefaction hazards are present at the site.

Disturbed native and non-engineered fills can undergo excessive settlement, especially under new fill or building loads. Non-engineered soils are prone to settlement under new structural loads or may exhibit volume loss when compacted during grading. To address these concerns, it is recommended that the non-engineered fill materials are removed and recompacted. Specific recommendations for fill compaction are included in the preliminary geotechnical report and should be adhered to in order to mitigate the risk of building or structural settlement.

As mentioned previously, medium dense sand and clay layers underlying the project site are prone to settlement of approximately two inches due to cyclic softening and liquefaction. The required design-level geotechnical investigation will prescribe appropriate measures to be incorporated into the final building and site design that address the potential for settlement of underlying soils. These measures could include the use of post-tensioned or traditional reinforced mat foundations. Adherence to the recommendations of the design-level geotechnical report would ensure that the risk of liquefaction occurring on-site is mitigated to an acceptable level. **(Less than Significant Impact)**

[36] Weatherized refers to measures that would protect exposed soils from rain and stormwater runoff.

Impact GEO-4:	The project would not be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code, creating substantial direct or indirect risks to life or property. **(Less than Significant Impact)**

The preliminary geotechnical exploration performed at the project site indicates that underlying soils have a moderate to high expansion potential. Expansive soils can be addressed by tailoring fill placement specifications to the expansive characteristics of the soil and/or use of a mat foundation. A design-level geotechnical investigation would be prepared for the proposed project which would provide foundation recommendations based on subsurface geotechnical data and the building layout and type. Conformance to the recommendations of the design-level geotechnical investigation would ensure that the proposed project is designed and built to reduce hazards from expansive soils underlying the site. **(Less than Significant Impact)**

Impact GEO-5:	The project would not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water. **(No Impact)**

The project site is located within an urban area of Los Altos where sanitary sewer systems are available to dispose of wastewater from the project site. Therefore, the project site would not need to support septic tanks or alternative wastewater disposal systems. **(No Impact)**

Impact GEO-6:	The project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. **(Less than Significant Impact)**

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. Most of the City is situated on alluvial fan deposits of Holocene age that have a low potential to contain significant nonrenewable paleontological resources. The proposed residential development includes two three-story townhome buildings and two five-story condominium buildings above one level of below-grade parking.

Although it is improbable that paleontological resources would be discovered on-site given its prior disturbance and the low potential for such resources, construction activities could result in the disturbance and/or accidental destruction of paleontological resources.

Standard Measures

The following standard measures, in accordance with City regulatory programs, would avoid and/or reduce potential construction-related paleontological resources impacts to a less than significant level.

- The project proponent shall ensure all construction personnel receive paleontological resources awareness training that includes information on the possibility of encountering fossils during construction; the types of fossils likely to be seen, based on past finds in the project area; and proper procedures in the event fossils are encountered. Worker training shall be prepared and presented by a qualified paleontologist. The applicant shall provide the Community Development

Director with documentation showing the training has been completed by all required construction personnel prior to issuance of grading permits.

- If vertebrae fossils are discovered during construction, all work within 50 feet of the discovery shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate treatment. Treatment may include avoidance, if feasible, preservation in place, or preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds.

Because the proposed project would comply with the applicable City policies and regulatory programs related to paleontological resources, including the standard measures above, implementation of the proposed project would have a less than significant paleontological resources impact. **(Less than Significant Impact)**

4.8 GREENHOUSE GAS EMISSIONS

The following discussion is based in part on a greenhouse gas emissions assessment prepared for the proposed project by *Illingworth & Rodkin, Inc.* The report, dated March 2019, is included in Attachment A to this Initial Study.

4.8.1 Environmental Setting

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO_2 and N_2O are byproducts of fossil fuel combustion.
- N_2O is associated with agricultural operations such as fertilization of crops.
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and sulfur hexafluoride emissions are commonly created by industries such as aluminum production and semi-conductor manufacturing.

Each GHG has its own potency and effect upon the earth's energy balance. This is expressed in terms of a global warming potential (GWP), with CO_2 being assigned a value of 1 and sulfur hexafluoride being several orders of magnitude stronger. In GHG emission inventories, the weight of each gas is multiplied by its GWP and is measured in units of CO_2 equivalents (CO_2e).

An expanding body of scientific research supports the theory that global climate change is currently affecting changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

4.8.1.1 *Regulatory Framework*

State

Global Warming Solutions Act

Under the California Global Warming Solution Act, also known as Assembly Bill (AB) 32, the California Air Resources Board (CARB) established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHG, and adopted a comprehensive

plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources.

In 2016, Senate Bill (SB) 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of carbon dioxide equivalent (MMTCO2e). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 MMTCO2e.

Senate Bill 375

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light truck sectors for 2020 and 2035, as compared to 2005 emissions levels. The per-capita GHG emissions reduction targets for passenger vehicles in the San Francisco Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission partnered with the Association of Bay Area Governments, BAAQMD, and Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area. Plan Bay Area establishes a course for reducing per-capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs) and Transit Priority Areas (TPAs). The project site is not located within a PDA but is located in a TPA.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing (criteria) pollutants and GHG emissions into a single coordinated set of requirements for model years 2015 through 2025. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.[37]

Regional

Bay Area 2017 Clean Air Plan

Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how state and federal air quality standards would be met. BAAQMD's most recently adopted plan is the *Bay Area 2017 Clean Air Plan* (2017 CAP). The 2017 CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of methane and other super-

[37] CARB. "The Advanced Clean Cars Program". Accessed January 10, 2019. https://www.arb.ca.gov/msprog/acc/acc.htm.

GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. The City of Los Altos and other jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing GHG impacts developed by BAAQMD within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

Local

City of Los Altos Climate Action Plan

The *City of Los Altos Climate Action Plan* (LA CAP) was adopted in 2013. The LA CAP outlines the strategy for reducing the community's greenhouse gas emissions and is consistent with AB 32, which directed public agencies in California to support the statewide goal of reducing GHG emissions to 1990 levels by 2020. It is anticipated that the City will update the LA CAP in the next 12 to 18 months to address emission reductions beyond 2020 and the setting of a 2030 reduction target.

The LA CAP includes a range of incentives, education, and regulations within five focus areas, Transportation, Energy, Resource Conservation, Green Community and Municipal Operations, to achieve GHG emission reductions. The LA CAP's reduction measures are applicable to new and existing development. Most emissions reductions come from the Transportation and Energy focus areas, which correspond to the City's largest sources of emissions. Implementation of the reduction measures contained in the LA CAP would reduce the City's 2020 emissions by 15,640 metric tons of CO2e, which would help the City achieve a 17 percent reduction in GHG emissions by 2020. The LA CAP also requires development projects to demonstrate compliance with all applicable best management practices contained in the Plan.

4.8.1.2 *Existing Conditions*

The existing office development on the site contributes greenhouse gases to the regional environment, as a result of energy consumption, solid waste generation, water usage, and vehicle trips to and from the site. In total, the existing on-site office development is estimated to generate 839 metric tons of CO2e annually.

4.8.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
2) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	☐	☐	☒	☐

Impact GHG-1: The project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. **(Less than Significant Impact)**

GHG emissions associated with development of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal. Emissions for the proposed project are discussed below and were analyzed using the methodology recommended in the BAAQMD CEQA Air Quality Guidelines.

CalEEMod was used to predict GHG emissions from operation of the site assuming full build-out of the project. The project land use types and size and other project-specific information were input to the model.

Construction Emissions

GHG emissions associated with construction were computed to be 1,158 MT of CO_2e for the total construction period. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions, though BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. BAAQMD also encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable.

Operational Emissions

The CalEEMod model, along with the project vehicle trip generation rates, was used to estimate daily emissions associated with operation of the fully-developed site under the proposed project. As shown in Table 4.8-1, below, annual net emissions resulting from operation of the proposed project are predicted to be 899 MT of CO_2e for the year 2024 and 739 MT of CO_{2e} for the year 2030. The 2030 emissions would exceed the 2030 "Substantial Progress" threshold of 660 MT of CO_2e/yr. The Service Population Emissions for the year 2024 would be 2.6 MT CO_2e/year/service population and 2.3 MT CO_2e/year/service population for the year 2030. To be considered significant, the project

must exceed both the GHG significance threshold in metric tons per year and the service population significance threshold. Neither the 2024 nor the 2030 Service Population Emissions exceed the "Substantial Progress" efficiency metric of 2.6 MT CO_2e/year/service population. Therefore, the project would have a less than significant impact regarding GHG emissions. **(Less than Significant Impact)**

Table 4.8-1: Annual Project GHG Emissions

Source Category	Existing in 2024	Proposed Project in 2024	Proposed Project in 2030
Area	<1	18	18
Energy Consumption*	88	218	218
Mobile	368	1,113	953
Solid Waste Generation	37	45	45
Water Usage	22	21	21
Total	516	1,415	1,255
Net New Emissions		**899 MT CO_{2e}/year**	**739 MT CO_{2e}/year**
Significance Threshold			*660 MT CO_2e/year*
Service Population Emissions (MT CO2e/year/service population)		**2.6**	**2.3**
Significance Threshold			*2.8 in 2030*
Significant (Exceeds both thresholds)?		***No***	***No***
****Assumes SVCE carbon-free electricity with 10 percent opt out for PG&E provided electricity***			

Impact GHG-2: The project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. **(Less than Significant Impact)**

City of Los Altos Climate Action Plan

The LA CAP outlines the strategy for reducing the community's greenhouse gas emissions and is consistent with AB 32, which directed public agencies in California to support the statewide goal of reducing GHG emissions to 1990 levels by 2020. While the construction and operation of this project would not be completed prior to 2020, the project would comply with all applicable best management practices required by the City to ensure project consistency with the LA CAP.

To be considered consistent with the LA CAP, a proposed project must be consistent with the Los Altos General Plan, must be anticipated within the GHG emissions forecasts identified in Chapter 2 of the LA CAP, and must incorporate all BMPs identified in the checklist applicable to the project type based on proposed land use, size, location, and other factors. The project's compliance with applicable LA CAP BMPs is shown in Table 4.8-2, below.

Table 4.8-2: New Development Climate Action Plan Checklist		
Best Management Practice	**Applicable To**	**Project Compliance**
1.3 Provide Alternative-Fuel Vehicle Infrastructure		
Comply with parking standards for electric vehicle (EV) pre-wiring and/or charging stations.	New and substantially remodeled residential units. Nonresidential projects greater than 10,000 square feet.	The project would meet, and likely exceed, the 2016 CALGreen Code requirement of three percent of the total number of parking spaces (nine spaces) to be electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.
2.2 Increase Energy Efficiency		
Install higher-efficiency appliances.	All new construction	***Consistent.*** The project would incorporate high-efficiency appliances where applicable. The project will be constructed in accordance with 2016 CALGreen and the most recent building energy efficiency standards. The project will also include photovoltaic panels on the condominium and townhome building rooftops, which would increase the overall energy efficiency of the project by generating electricity on-site.
Install high-efficiency outdoor lights.	All new construction	***Consistent.*** All outdoor lighting would be high-efficiency fixtures. Light pollution would be controlled through the selection and placement of site lighting fixtures.
Comply with the Green Building Ordinance.	All new construction	***Consistent.*** The project would be constructed to meet the 2016 CALGreen standards.
3.1 Reduce and Divert Waste		
Develop and implement a Construction and Demolition (C&D) waste plan.	All new projects	***Consistent.*** The project would be required to adhere to the City's Solid Waste Collection and Recycling Ordinance and Municipal Code Chapter 6.14. Compliance with these policies would ensure that at least 75% of construction waste would be recycled and/or reused.
3.2 Conserve Water		
Reduce turf area and increase native plant landscaping.	All new projects	***Consistent.*** The project includes water efficient landscaping and would be required to comply with the City's Water Efficient Landscape Ordinance.
3.3 Use Carbon-Efficient Construction Equipment		

Table 4.8-2: New Development Climate Action Plan Checklist		
Best Management Practice	**Applicable To**	**Project Compliance**
Implement applicable BAAQMD construction site and equipment best management practices.	All new projects	***Consistent.*** As discussed in *Section 4.3, Air Quality*, the proposed project would implement the BAAQMD Basic Construction Mitigation Measures as a standard measure and, as described under mitigation measure **MM AIR-1**, the project would develop a plan demonstrating that the off-road equipment used on-site to construct the project would achieve a fleet-wide average 93-percent reduction in DPM exhaust emissions or greater.
4.1 Sustain a Green Infrastructure System and Sequester Carbon		
Create or restore vegetated common space.	Projects over 10,000 square feet	***Consistent.*** The proposed project would include open space areas for residents and vegetation throughout the site.
Establish a carbon sequestration project or similar off-site mitigation strategy.	Projects over 10,000 square feet	***Consistent.*** The project does not have a GHG impact that requires off-site mitigation, such as the purchase of carbon credits.
Plant at least one well-placed shade tree per dwelling unit.	New residential projects	***Consistent.*** The project proposes approximately196 new trees, which is the same number of trees as dwelling units proposed (196).

Source: City of Los Altos, 2014.

The City of Los Altos updated its Water Efficient Landscape Ordinance in December 2015 to increase water efficiency standards for new and rebuilt landscapes through more efficient irrigation systems, encourage the use of greywater systems and on-site storm water capture, and to limit the amount of new turf area installed. The proposed project will be required to comply with this Ordinance and will be required to submit a landscape documentation package to the City during building permit review to verify compliance.

Overall, the project would be consistent with the requirements of the LA CAP and would not prevent the City from meeting its GHG reduction goals through 2020.

Association of Bay Area Governments Final Plan Bay Area 2040

ABAG's Plan Bay Area is the RTP/SCS for the San Francisco Bay Area. Plan Bay Area establishes GHG emissions goals for automobiles and light-duty trucks, a potent source of GHG emissions attributable to land use development. As previously described, ABAG was tasked by CARB to achieve a seven percent per capita reduction in mobile-source GHG emissions compared to 2005 vehicle emissions by 2020 and a 15 percent per capita reduction by 2035. Plan Bay Area 2013-2040 establishes an overall mechanism to achieve these GHG targets for the project region consistent with

both the target date of AB 32 (2020) and the post-2020 GHG reduction goals of SB 32. CARB has confirmed the project region will achieve its GHG reduction targets by implementing Plan Bay Area (CARB 2014).

The RTP/SCS identifies 200 "Priority Development Areas," which are areas focused for growth and development. Priority Development Areas are defined by the RTP/SCS as existing neighborhoods that are served by public transit and have been identified as appropriate for additional, compact development. While the project site is located just outside of a Priority Development Area, it is located in a Transit Priority Area along a high-quality transit corridor (El Camino Real) in the vicinity of local and regional transit connections. Furthermore, the project is a modernization of land uses within a built environment (infill development), resulting in an increase of land use densification on the project site. The project would increase density in the vicinity over current conditions. Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies such as enhanced transit services.

For these reasons, the project is consistent with Plan Bay Area and it can be assumed that regional mobile emissions will decrease in line with the goals of Plan Bay Area with implementation of the proposed project. Implementing ABAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, and the proposed project will not obstruct the achievement of Plan Bay Area's emission reduction targets.

In addition, the proposed project would not result in a substantial increase in GHG emissions. Therefore, the proposed project would not conflict with the City's CAP. The proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. **(Less than Significant Impact)**

4.9 HAZARDS AND HAZARDOUS MATERIALS

The following discussion is based in part on a Phase I Environmental Site Assessment (Phase I ESA) prepared for the project site by *Partner Engineering and Science, Inc.* The report, dated February 2018, is attached to this Initial Study as Appendix D.

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Federal and State

Hazardous Materials Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. Federal regulations and policies related to development include the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, and the Resource Conservation and Recovery Act (RCRA). In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies including the Santa Clara County Fire District have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. The California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Cortese List (Government Code Section 65962.5)

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by the state, local agencies, and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC), State Water Resources Control Board (SWRCB), and CalRecycle.

Asbestos-Containing Material and Lead Paint Regulations

Friable asbestos is any asbestos containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl asbestos floor tiles, and transite siding made with cement. Use of friable asbestos products was banned in 1978. National Emission Standards for

Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodel that may disturb the ACMs.

The U.S. Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by Cal/OSHA Lead in Construction Standard, Title 8, California Code of Regulations 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead based paint is peeling, flaking, or blistered, it is required to be removed prior to demolition.

4.9.1.2 *Existing Conditions*

The 3.8-acre project site is in an urbanized area developed with a mix of residential and commercial uses, and is developed with a 78,950-square foot, two- and three-story office building, paved surfaced parking, paved walkways, and landscaping. Adjacent uses consist of commercial properties to the northeast across El Camino Real, commercial property to the southeast, residential condominiums to the northwest, and commercial and residential properties to the southwest.

Site History

According to available historical resources, the project site was undeveloped as early as 1897. Residential and/or commercial buildings occupied the site between 1948 and 1953, multiple buildings associated with an auto dealership occupied the site between 1956 and 1982, and the site was developed with the existing office building in 1983.

Environmental Conditions

<u>On-site</u>

The Phase I ESA did not identify any recognized environmental conditions (REC) on the site. A REC refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property; due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

The Phase I ESA also did not identify any control recognized environmental conditions (CREC) on the site. A CREC refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

The Phase I ESA identified that the former use of the project site as an auto dealership, and the associated past storage of petroleum waste products in one 1,000-gallon gasoline underground storage tank (UST), one 500-gallon UST, and three waste oil USTs of unknown capacity on-site, qualifies it for consideration as a historical recognized environmental condition (HREC). A HREC refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The USTs on-site were reportedly removed, and their previous locations are occupied by building footings and an existing storm water trench drain. A soil and

groundwater investigation was completed in 1989 to assess the potential for tanks to be present and determine if any contamination resulted from the tanks. The results of a laboratory analysis of groundwater and soil samples determined that no detectable concentrations of petroleum hydrocarbons were present at the project site. Further, a geophysical survey conducted at the project site in 1995 did not identify any existing tanks on-site.

Partner Engineering and Science, Inc. identified two environmental issues at the project site in the Phase I ESA. Environmental issues are environmental concerns that, while not qualifying as RECs, warrant further discussion. The environmental issues identified at the project site are discussed below.

- The project site is equipped with one dual sump pump located under a cabinet inside the kitchenette of Suite A-20 in the existing building on-site. This sump pump is utilized to pump stormwater into the municipal sanitary sewer system. The sump pump was installed in the early 1990s and is automatically engaged by an electronic control system. Based on the nature of use, the dual sump pump is not expected to represent a significant environmental concern.
- Four test wells are located throughout the project site. The test wells are related to the subsurface investigation completed in 1989.

Off-site

An adjacent property reconnaissance was completed during the Phase I ESA, which consisted of observing the adjacent properties from the premises of the project site. No items of environmental concern were identified on the adjacent properties during the Phase I ESA, including hazardous substances, petroleum products, ASTs, USTs, evidence of releases, PCBs, strong or noxious odors, pools of liquids, sumps or clarifiers, pits or lagoons, stressed vegetation, or any other potential environmental hazards.

A review of relevant databases was conducted to determine potential storage, disposal, or release of hazardous materials in the vicinity of the project site. The results of the review indicate two properties which are listed on hazardous materials regulatory databases. The two properties are discussed below.

- The property located at 2080 El Camino Real is located adjacent to the project site, northeast across El Camino Real, and is used as a car wash. That property is included on the RCRA-SQG (Small-Quantity Generator), FINDS (Facility Index System), and ECHO (Enforcement and Compliance History Online) databases. The adjacent property is permitted to operate as a generator of small quantities of hazardous waste from at least 1996 and is historically reported as a large quantity generator circa 1985. The property is not identified in any other regulatory government database listing indicative of any violations or releases. The property is located hydrologically cross- to down-gradient of the project site. Due to the nature of the adjacent property's listing, expected direction of groundwater flow, lack of documentation, and no reported violations or releases, this listing is not expected to represent a significant environmental concern.

- The property located at 1710 Villa Street is located approximately 0.72-mile to the northeast of the project site, across El Camino Real, and is included on the NPL (Superfund – National Priorities List), SEMS (Superfund Enterprise Management System), RCRA-SQG, US ENG CONTROLS (Institutional and Engineering Controls Summary), US INST CONTROL, ROD (Reporting Obligations Database), and PRP (Potentially Responsible Parties) databases. The property is located hydrologically down-gradient of the project site.

  Based on available information, the property at 1710 Villa Street has formulated chemical products on-site since 1976. In 1983, the Regional Water Quality Control Board was alerted to potential dumping of solvents occurring at the property and required that groundwater be monitored at the property to determine potential levels of contamination. Groundwater and soil were found to be contaminated at the property, potentially as a result of an underground tank farm, two dry wells used for disposal of stormwater run-off from the roof and paved portions of the site, and a drain that discharges surface run-off at the rear of the site. Regulatory actions have been taken at the property to determine the extent of contamination and prevent further migration of existing contaminants. The regulatory status of the site is reported as 'currently on the Final NPL. This regulatory status indicates preparation of the Final Close Out Report is underway (which precedes the Notice of Intent to Delete), as discussed in the EPA's 2011 guidance *Close Out Procedures for National Priorities List Sites.*[38]

  Due to the regulatory status of the property, the expected direction of groundwater flow, and distance to the project site, this listing is not expected to represent a significant environmental concern to the project site. The project would not have any direct or indirect impact on the 1710 Villa Street property related to hazardous substances.

Wildland Fires

The project site is not located within an identified Very High Fire Hazard Severity Zone in a State Responsibility Area (SRA) or a Local Responsibility (LRA).[39] [40] The project site is not adjacent to any wildlands that could present a fire hazard.

4.9.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

[38] U.S. EPA. Office of Superfund Remediation and Technology Innovation. *Close Out Procedures for National Priorities List Sites.* May 2011.
[39] CAL FIRE. *Santa Clara County Fire Hazard Safety Zone Map – State Responsibility Area*. November 2007.
[40] CAL FIRE. *Santa Clara County Fire Hazard Safety Zone Map – Local Responsibility Area.* October 2008.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
2) 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?	☐	☒	☐	☐
3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, will it create a significant hazard to the public or the environment?	☐	☐	☐	☒
5) 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, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
6) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Impact HAZ-1: The project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**

Operation of the proposed project would not result in hazardous materials being transported, used, or disposed of in quantities that would pose a significant hazard to the public. Operation of the proposed project would include the on-site use and storage of cleaning supplies and maintenance chemicals in small quantities (oil, paint, pesticides, etc.). These small quantities of cleaning supplies and materials would not pose a risk to site users or adjacent land uses. **(Less than Significant Impact)**

Impact HAZ-2: The project would not 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. **(Less than Significant Impact with Mitigation)**

As discussed above, the project site is not a source of hazardous material contamination, and off-site hazardous material use is not expected to have contaminated the soil or groundwater beneath the site. The existing office building on-site was constructed in 1983. The U.S. Consumer Product Safety Commission banned the use of friable asbestos and lead paint in building materials in 1978; however, use of these materials continued for several years after the ban. It is also possible that the fluorescent light fixtures within the existing office building may include PCB-containing ballasts.

Mitigation Measures: The following mitigation measures would be implemented by the project to reduce impacts related to ACMs, lead-based paint, and PCB containing ballasts:

MM HAZ-2.1: All PCB-containing ballasts shall be removed and disposed of in accordance with state and local laws.

MM HAZ-2.2: All potentially friable asbestos-containing materials shall be removed in accordance with National Emissions Standards for Hazardous Air Pollutants (NESHAP) guidelines prior to building demolition or renovation that may disturb the materials.

MM HAZ-2.3: All demolition activities will be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than one percent asbestos are also subject to BAAQMD regulations.

MM HAZ-2.4: During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, California Code of Regulations 1532.1, including employee training, employee air monitoring and dust control. Any debris or soil containing lead-based paint or coatings will be disposed of at landfills that meet acceptance criteria for the waste being disposed.

Demolition of the existing on-site office development and construction of the proposed residential development, with implementation of the mitigation measures MM 2.1 through MM 2.4, would not 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. **(Less than Significant Impact with Mitigation Incorporated)**

Impact HAZ-3:	The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **(No Impact)**

There are no schools within a quarter-mile of the project site, and the proposed project would not emit hazardous emissions or handle hazardous materials or substances. The nearest schools to the project site include Almond Elementary School (0.7 miles south of the site), Los Altos High School (0.7 miles southwest of the site), and Egan Junior High School (0.8 miles west of the site). **(No Impact)**

Impact HAZ-4:	The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment. **(No Impact)**

As discussed previously, the project site is not listed on any regulatory databases for hazardous materials. Therefore, the proposed project would not create a significant hazard to the public or the environment as a result of being listed on a hazardous material site. **(No Impact)**

Impact HAZ-5:	The project would not be 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. The project would not result in a safety hazard or excessive noise for people residing or working in the project area. **(No Impact)**

The project site is not located within an airport land use plan. Moffett Federal Airfield, a joint civil-military airport, is located approximately three miles east of the project site. Palo Alto Airport, a general aviation facility, is located approximately 4.2 miles north of the project site. Norman Y. Mineta San José International Airport is located approximately 10 miles east of the project site. Therefore, the proposed project would not result in safety hazard or noise impacts due to airport activities. **(No Impact)**

Impact HAZ-6:	The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. **(Less than Significant Impact)**

The City has an adopted Emergency Preparedness Plan identifying potential risks, facilities and resources relied upon in the event of a catastrophe, and persons responsible for implementation. While the proposed residential project would incrementally increase demand on emergency responders in Los Altos, the proposed project would not impair implementation of or physically interfere with the Emergency Preparedness Plan. **(Less than Significant Impact)**

Impact HAZ-7:	The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. **(No Impact)**

The project site is not located within a Very High Fire Hazard Severity Zone as delineated on CalFire SRA and LRA maps. The project site is in an urban area and is not located near wildland areas that would be susceptible to fire. For these reasons, implementation of the proposed project would not expose people or structures to wildland fires. **(No Impact)**

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Federal, State, and Regional

Water Quality Overview

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality. Regulations set forth by the U.S. Environmental Protection Agency (EPA) and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the water quality control boards. The project site is within the jurisdiction of the San Francisco Bay Regional Water Quality Control Board (RWQCB).

Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan or "Basin Plan". The Basin Plan lists the beneficial uses that the RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Statewide Construction General Permit

The SWRCB has implemented a NPDES Construction General Permit for the State of California. For projects disturbing one acre or more of soil, a Notice of Intent (NOI) and Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction. The Construction General Permit includes requirements for training, inspections, record keeping, and for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Municipal Regional Stormwater NPDES Permit (MRP)/C.3 Requirement

The San Francisco Bay RWQCB has issued a Municipal Regional Stormwater NPDES Permit (MRP) that covers the project area. Under provisions of the MRP, redevelopment projects that create or replace 10,000 square feet or more of impervious surface area are required to design and construct on-site stormwater treatment controls utilizing Low Impact Development (LID) practices to treat post-construction stormwater runoff. The MRP also requires regulated projects to incorporate site design and pollutant source control measures to maintain or restore the site's natural hydrologic functions and reduce the pollutants loads of post-construction runoff. The MRP requires that stormwater treatment measures are properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires all new and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration. Such hydromodification is likely to cause increased erosion, silt pollutant generation or other impacts to beneficial uses of local rivers, streams, and creeks. Projects may be deemed exempt from the permit requirements if they do not meet the size threshold, drain into tidally influenced areas or directly into the Bay, drain into hardened channels, or are infill projects in subwatersheds or catchments areas that are greater than or equal to 65 percent impervious. The project is located within a subwatershed or catchment area that is greater than or equal to 65 percent impervious.[41]

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) in order to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRM) that identify Special Flood Hazard Areas (SFHA). An SFHA is an area that will be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Dam Safety

Dam failure is the uncontrolled release of impounded water behind a dam. Flooding, earthquakes, blockages, landslides, lack of maintenance, improper operation, poor construction, vandalism, and terrorism can all cause a dam to fail.[42] Because dam failure that results in downstream flooding may affect life and property, dam safety is regulated at both the federal and state level. In accordance with the state Dam Safety Act, dams are inspected regularly, and detailed evacuation procedures have been prepared for each dam.

Local

City of Los Altos General Plan

The following General Plan hydrology and water quality policies are contained in the Infrastructure and Waste Disposal Element and are applicable to the proposed project:

Policy 3.1: Control surface runoff water discharges into the stormwater system to comply with the National Pollutant Discharge Elimination System Permit and the receiving water limitations assigned by the California Regional Water Quality Control Board.

Policy 3.3: Minimize the amount of impervious surfaces and directly connected impervious surfaces in areas of new development and redevelopment and where feasible maximize on-site infiltration of storm water runoff.

[41] Santa Clara Valley Urban Runoff Pollution Prevention Program. *HMP Applicability Map - Cities of Los Altos and Los Altos Hills*. November 2010.
[42] State of California. *2013 State Hazards Mitigation Plan*. 2013. Accessed October 30, 2018. http://hazardmitigation.calema.ca.gov/plan/state_multi-hazard_mitigation_plan_shmp.

Policy 3.4: Implement pollution prevention methods supplemented by pollutant source controls and treatment. Use small collection strategies located at, or as close as possible to the source (i.e., the point where water initially meets the ground) to minimize the transport of urban runoff and pollutants offsite.

4.10.1.2 *Existing Conditions*

The project site is predominantly covered by impervious surfaces in the form of buildings and paved parking areas. Pervious areas on-site consist of landscaping located in parking lot planters and at the site frontage and perimeter. The project site is estimated to be 79 percent impervious.

Hydrology and Drainage

Four creeks are located within the City of Los Altos, including Adobe Creek, Stevens Creek, Permanente Creek, and Hale Creek. The closest creek to the project site is Permanente Creek, located approximately one half-mile to the east. The approximately 3.8-acre project site is in the Adobe drainage basin, an approximately 1.8 square mile area which drains to Adobe Creek via a network of connecting stormwater pipes.[43]

Stormwater from the project site is untreated and collected by on-site catchment basins and drop inlets and conveyed to a 15-inch storm drain in El Camino Real. Stormwater is then conveyed through the City's drainage system to a point north of the project site, where it is discharged into Adobe Creek. Adobe Creek flows to the San Francisco Bay.

Flooding and Other Hazards

The project site is not located in a 100-year floodplain. According to FEMA Flood Insurance Rate Maps for Santa Clara County, the project site is located in a Flood Zone X. Zone X is designated as areas of 0.2 percent annual chance flood, areas of one percent annual chance flood with average depths of less than one foot or with drainage areas of less than one square mile, and areas protected by levees from one percent annual chance floods.[44]

The project site is not located within a dam failure inundation zone.[45] There are no landlocked bodies of water near the project site that would affect the site in the event of a seiche, and no bodies of water near the project site that would affect the site in the event of a tsunami. The project area is flat and there are no hillsides in proximity that would affect the site in the event of a mudflow.

[43] City of Los Altos. *Stormwater Master Plan.* April 2016.
[44] Federal Emergency Management Agency. *Flood Insurance Rate Map Number 06085C0038H.* May 18, 2009.
[45] Santa Clara County of Emergency Services. *Annex to 2010 Association of Bay Area Government Local Hazard Mitigation Plan.* December 2011.

4.10.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
3) 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;	☐	☐	☒	☐
– substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
– 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	☐	☐	☒	☐
– impede or redirect flood flows?	☐	☐	☒	☐
4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Impact HYD-1: The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. **(Less than Significant Impact)**

Construction Phase

Construction activities, such as grading and excavation, have the potential to result in temporary impacts to surface water quality in adjacent waterways. When disturbance to the soil occurs, sediments may be dislodged and discharged into the storm drainage system after surface runoff flows across the site. The proposed project would result in the disturbance of approximately 3.8 acres,

which is above the one-acre of disturbance threshold requiring compliance with the State of California Construction General Permit (Construction General Permit). In order to obtain coverage under the Construction General Permit, a Notice of Intent (NOI) must be filed with the RWQCB, and Storm Water Pollution Prevention Plan (SWPPP) must be developed by a certified Qualified SWPPP Developer (QSD) prior to commencement of construction.[46] The following standard measures (based on RWQCB recommendations) will be included as a condition of project approval to further reduce potential construction-related water quality impacts:

Standard Measures

- Burlap bags filled with drain rock shall be installed around storm drains to route sediment and other debris away from the drains. Silt sacks shall also be installed at all catch basins.
- Earthmoving or other dust-producing activities would be suspended during periods of high winds.
- All exposed or disturbed soil surfaces would be watered at least twice daily to control dust as necessary.
- Stockpiles of soil or other materials that can be blown by the wind would be watered or covered.
- All trucks hauling soil, sand, and other loose materials would be covered and all trucks would be required to maintain at least two feet of freeboard.
- All paved access roads, parking areas, staging areas and residential streets adjacent to the construction sites would be swept daily (with water sweepers).
- Vegetation in disturbed areas would be replanted as quickly as possible.
- A construction entrance shall be installed and maintained at all times to prevent sediment tracking.

With implementation of the identified construction measures and compliance with the Construction General Permit, construction of the proposed project would have a less than significant impact on water quality. **(Less than Significant Impact)**

Post-Construction Phase

As stated above, the project would add or replace more than 10,000 square feet of impervious surface area, thus requiring conformance with Provision C.3 of the MRP. A Stormwater Management Plan (SMP) has been prepared for the project that includes appropriate source control and LID-based treatment control measures to meet Provision C.3 requirements. The SMP will require third-party verification by a qualified stormwater consultant prior to implementation of the project. In addition, the project will be required to maintain all post-construction treatment control measures, as outlined below, throughout the life of the project.

[46] State Water Resources Control Board, "Construction Storm Water Program," https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed December 14, 2019.

Standard Measures

The following standard measures, based on the RWQCB Best Management Practices (BMPs), will be included in the proposed project as a condition of approval to ensure compliance with NPDES permit requirements to reduce post-construction water quality impacts:

- When the construction phase is complete, a Notice of Termination (NOT) for the Construction General Permit will be filed with the RWQCB. The NOT shall document that all elements of the SWPPP have been executed, construction materials and waste have been properly disposed of, and a post-construction stormwater management plan is in place as described in the SWPPP for the project site.
- All post-construction treatment control measures shall be installed, operated, and maintained by qualified personnel. On-site inlets will be cleaned out at a minimum of once per year, prior to the wet season.
- The property owner/site manager shall keep a maintenance and inspection schedule and record to ensure the Treatment Control Measures continue to operate effectively for the life of the project.

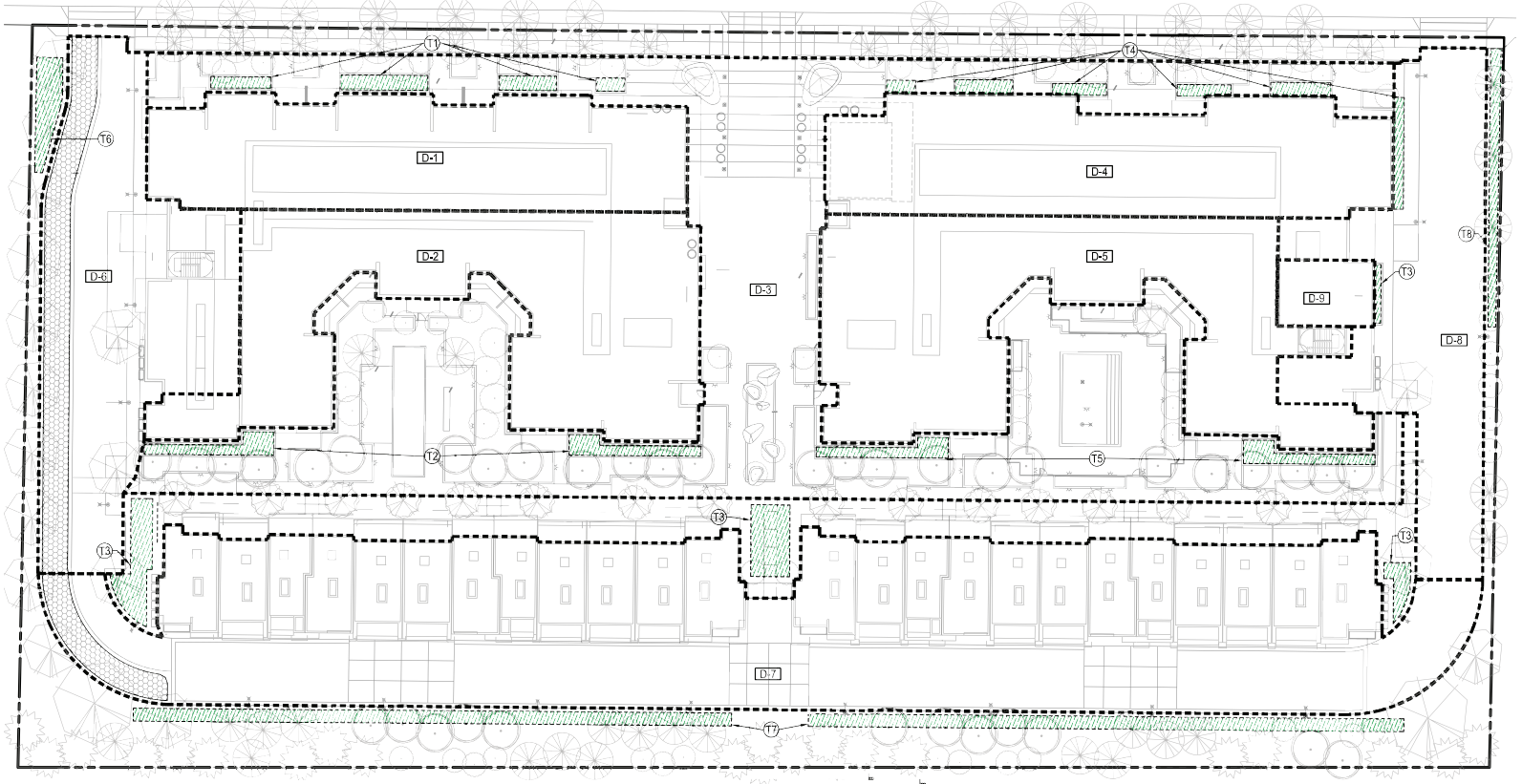
The proposed treatment control measures consist of flow-through planters and bioretention areas located throughout the project site (refer to Figure 4.10-1 for the Preliminary Stormwater Management Plan). The flow-through planters are adjacent to the buildings, below the downspout locations, and are designed to treat roof runoff from the building roofs. The bioretention areas are located within the perimeter landscaping and treat runoff from hardscape and paved ground surfaces. These LID-based treatment measures have been sized in accordance with Provision C.3 standards. Flow-through planters and bioretention areas would not only remove pollutants from storm water, but also help to reduce post-construction runoff rates.

The project applicant would be required to implement and monitor the project's Stormwater Control Plan (SWCP) to ensure compliance with the MRP requirements for reduction of post-construction water quality impacts. Therefore, by installing and maintaining the proposed stormwater treatment systems, the proposed project would have a less than significant impact on water quality. **(Less than Significant Impact)**

Impact HYD-2:	The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **(Less than Significant Impact)**

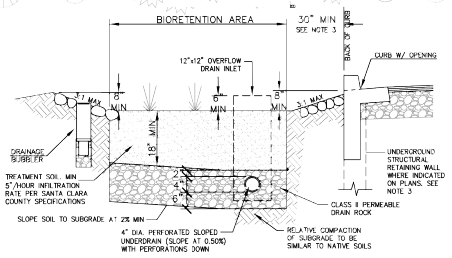
A subsurface investigation conducted at the project site encountered groundwater at a depth of approximately 35 to 47 feet below bgs. Groundwater flows beneath the project site towards the northeast, consistent with the topographic gradient. Groundwater levels at the project site may fluctuate with time due to seasonal conditions, rainfall, and irrigation practices.

Development of the proposed project would include excavation to establish a one-level, below-ground parking structure to provide parking for future residents, as well as trenching for new utility connections. The excavation required to establish the parking structure would likely not require

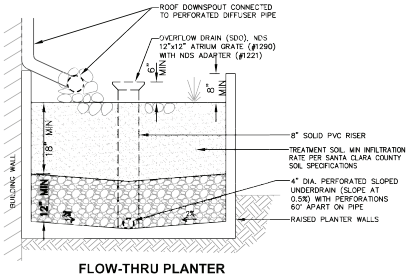


LEGEND:

- DRAINAGE AREA BOUNDARY
- BIORETENTION AREA
- PERVIOUS TURF BLOCK
- D-7 DRAINAGE MANAGEMENT AREA DESIGNATION
- T3 BIORETENTION AREA DESIGNATION



BIORETENTION AREA



FLOW-THRU PLANTER

Source: BKF, 9/21/2018.

PRELIMINARY STORMWATER MANAGEMENT PLAN

FIGURE 4.10-1

dewatering of groundwater; however, if groundwater is encountered during excavation, any construction dewatering that occurs would be required to follow local and regional requirements for safe transport and disposal of dewatered groundwater. Any construction dewatering that would occur would be temporary in nature and would not substantially reduce groundwater supplies or affect groundwater quality in the area.

The project site is not located within or adjacent to any groundwater recharge facilities used by the Santa Clara Valley Water District (SCVWD).[47] Groundwater recharge facilities are integral to the maintenance of groundwater levels in Santa Clara County because the amount of groundwater pumped far exceeds natural recharge.[48] The project, as designed, would reduce the overall amount of impervious surface area on the site from approximately 79 percent to approximately 72 percent, thereby slightly reducing the amount of runoff and increasing the infiltration potential of the site. The project proposes to incorporate bioretention areas into the landscaping, which will allow runoff to infiltrate into the native soils and potentially recharge groundwater in the local aquifer. The proposed project would not establish groundwater wells to supply the site, deplete groundwater supply, or interfere with groundwater recharge. Therefore, the project would not impede sustainable groundwater management of the basin. **(Less than Significant Impact)**

Impact HYD-3:	The project would not 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; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; 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 impede or redirect flood flows. **(Less than Significant Impact)**

As previously stated, the proposed project would incrementally reduce the overall imperviousness of the site. The project would include site design and post-construction treatment control measures in compliance with the MRP. Treatment control measures, including flow-through planters and bioretention areas, would reduce the rate, volume, and pollutant load of runoff leaving the site and entering the public storm drain system.

The project, as planned, would reduce runoff volumes when compared to the current development on the site and, therefore, is not expected to impact the capacity of the existing public storm drain system. The City's Stormwater Master Plan identifies areas of known drainage issues throughout the City, none of which would be exacerbated by the proposed development. The storm drain system would continue to provide adequate stormwater conveyance for a 10-year event following the implementation of the project and would not require upgrades or drainage pattern alterations to accommodate the project.

[47] SCVWD. *2016 Groundwater Management Plan*. Figure 1-3. 2016.
[48] Valley Water. "Groundwater Supply". https://www.valleywater.org/your-water/where-your-water-comes-from/groundwater/groundwater-supply Accessed June 4, 2019.

Adherence to the standard measures described above would ensure that the project reduces potential erosion and sedimentation during construction activities. Compliance with the MRP would ensure that stormwater flows generated at the project site would be reduced and treated to the maximum extent feasible using LID methods. In this manner, the proposed project would not result in significant storm drainage impacts. **(Less than Significant Impact)**

Impact HYD-4:	The project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. **(Less than Significant Impact)**

The project site is in a Flood Zone X, indicating an area of minimal flood hazard. The project site is not located within a dam failure inundation zones and is not proximate to bodies of water that could inundate the project in the event of a tsunami or seiche. Therefore, the proposed project does not risk release of pollutants due to inundation. **(Less than Significant Impact)**

Impact HYD-5:	The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

The SCVWD prepared a Groundwater Management Plan (GMP) for the Santa Clara and Llagas subbasins in 2016, describing its comprehensive groundwater management framework including objectives and strategies, programs and activities to support those objectives, and outcome measures to gauge performance. The GMP is the guiding document for how the SCVWD will ensure groundwater basins within its jurisdiction are managed sustainably. The project site is located within the Santa Clara subbasin, which has not been identified as a groundwater basin in a state of overdraft.

Implementation of the proposed project would not interfere with actions set forth by the SCVWD in its GMP in regards to groundwater recharge, transport of groundwater, and/or groundwater quality. The proposed project is located in an urban area served by existing water retailers and would not directly extract groundwater to meet its water demands. As discussed under HYD-2, the project site is not located in proximity to any recharge ponds or creeks managed by the SCVWD. Therefore, the proposed project would not preclude the implementation of the GMP. **(Less than Significant Impact)**

4.11 LAND USE AND PLANNING

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

Local

City of Los Altos General Plan

The City of Los Altos General Plan was adopted in November of 2002 and serves as the primary source of long-range planning and policy direction used to guide growth and preserve the quality of life within the City. Implementation of the General Plan ensures future development is consistent with the community's goals and that adequate urban services are available to meet the needs of new development. The General Plan is divided into eight different elements, each of which provide issues, goals, and policies related to the element topic. The eight elements include Community Design and Historic Resources, Land Use, Housing, Economic Development, Open Space, Conservation and Community Facilities, Circulation, Natural Environment and Hazards, and Infrastructure and Waste Disposal.

The Los Altos General Plan contains several policies that support the City's land use goals, including the following Land Use Element policies, which are applicable to the El Camino Real corridor and the proposed project:

Policy 4.1: Discourage projects, which are exclusively office use.

Policy 4.2: Encourage mixed-use projects with retail, housing, and/or lodging in addition to retail and office uses.

Policy 4.3: Encourage residential development on appropriate sites within the El Camino Real corridor.

Policy 4.4: Encourage the development of affordable housing.

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

City of Los Altos Municipal Code

The City of Los Altos Municipal Code contains provisions and laws adopted by the City Council to maintain a healthy and safe community and to preserve the quality of life in Los Altos. Included in the Code are Zoning and Building regulations as well as administrative regulations.

Title 14 of the Municipal Code contains the Zoning Code, where standards for growth and development in the City are codified. The Zoning Code is the primary tool for implementing the policies of the General Plan and addressing physical development standards and criteria for the City. Government Code Section 65860 requires municipalities to maintain consistency between their zoning ordinance and their adopted General Plan. One of the purposes of zoning is to implement the land use designations set forth in the General Plan. Although the two are distinct documents, the Los

Altos General Plan and Zoning Code are closely related, and state law mandates that zoning regulations be consistent with the General Plan maps and policies.

4.11.1.2 *Existing Conditions*

The existing General Plan land use designation of the project site is *Thoroughfare Commercial.* This designation provides for retail, service and office uses that typically rely on automobile traffic and attract customers from a citywide and/or regional trade area. The City allows commercial mixed-use with housing or residential-only development within this land use designation.[49] High-density all residential land uses that provide affordable housing are also encouraged within this designation.

The project site is zoned *CT (Commercial Thoroughfare).* Specific purposes of the *CT District* include encouraging a variety of residential developments (including affordable housing), promoting the economic and commercial success of Los Altos, buffering the impacts of commercial and multi-family land uses on neighboring residential properties and allowing for mixed-uses of commercial and residential. Multiple-family housing and single-room occupancy housing projects are conditional uses in this district. The maximum permitted residential density in the *CT District* is 38 dwelling units per net acre of land.

4.11.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Physically divide an established community?	☐	☐	☒	☐
2) 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?	☐	☐	☒	☐

Impact LU-1: The project would not physically divide an established community. **(Less than Significant Impact)**

The proposed project would redevelop the project site with multiple-family residential housing in the form of two condominium buildings and two townhome buildings. In total, the project would provide 196 residential units. Parking for the proposed project would be provided by a below-ground parking structure for residents of the condominiums and by two-car garages for residents of the townhomes. The surrounding land uses include single-family residences to the south along Casita Way, commercial uses across El Camino Real to the north in the City of Mountain View, a multiple-family residential building to the west at 5100 El Camino Real, and a daycare/preschool building to the east in the City of Mountain View. The use of the project site would change from office to residential upon implementation of the proposed project (both are allowed within the existing land use and zoning designations). However, this change would not involve the construction of substantial infrastructure, such as highways, freeways, or major arterial streets that would physically divide an

[49] City of Los Altos. *Draft 2015-2023 Housing Element.* 2015.

existing community. Movement of residents to and from the project area would not be inhibited by the proposed project. **(Less than Significant Impact)**

Impact LU-2:	The project would not 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. **(Less than Significant Impact)**

The proposed project would redevelop and intensify the land uses on the project site by providing high density housing on a site currently used for commercial purposes. The project site is located on the El Camino Real, a transportation corridor which has been identified in the General Plan Land Use Element as an area where redevelopment can be focused and where affordable housing can be provided. The proposed project would not conflict with General Plan goals or policies intended to avoid or mitigate environmental impacts, specifically regarding land use compatibility.
The project site has a General Plan land use designation of *Thoroughfare Commercial,* in which high-density residential land uses are encouraged. The project is entitled to a State Density Bonus (35 percent), in accordance with California Government Code 65915, for restricting 11 percent of its base density (16 units) to a price that is affordable to families making a very-low income. The project will also restrict 12 additional units to a price that is affordable to families making a moderate income. This will result in 19.3 percent of the project's base density (145 units) being designated as affordable, which will exceed the City's Affordable Housing Ordinance requirement of at least 15 percent.

The Zoning Code permits a maximum density of 38 dwelling units per acre, which results in an allowable base density of 145 units. But as noted above, the project is entitled to a 35 percent density bonus, resulting in the maximum density permitted on the project site being 52 dwelling units per acre (196 units), which is what the project proposes. The project requires a Conditional Use Permit (CUP) for multiple-family housing in the *CT District*. Obtaining a CUP is requisite for consistency with the current zoning. The project applicant has applied for a CUP as part of the development application that is under consideration.

The condominium buildings along El Camino Real would reach a maximum height of 56 feet and the townhomes near the rear property line would reach a maximum height of 30 feet. [50] The proposed height of 56 feet for the condominium buildings exceeds the CT District's allowable building height limit of 45 feet; therefore, the project proponent has requested an incentive to allow for the proposed building height of the condominium buildings. Pursuant to State Density Bonus law and the City's Affordable Housing Ordinance, the project is entitled to two incentives or concessions, additional waivers, and reduced on-site parking requirements.

Besides the two requested incentives and one waiver, the project would meet all required site standards, including setbacks and buffer zones between adjacent land uses. The City of Los Altos' design review process for Multiple-Family Residential developments would ensure that the final

[50] These heights are per the City's Zoning Code, which measures to the top of a building's roof deck. Rooftop mechanical equipment, PV panels, elevator overrun towers and parapet screening walls are allowed to exceed this height.

design and site layout of the project is consistent with all applicable design findings and *CT District*'s design controls.

The proposed residential use would be compatible with the adjacent multiple-family residential, single-family residential, and childcare uses, as well as nearby retail and office uses. The project would provide adequate vehicle access from the surrounding roadways and on-site parking in conformance with City standards. A landscape buffer containing evergreen tree plantings would separate the project from the adjacent properties. The project will be designed to comply with the City's noise regulations, as described in *Section 4.12 Noise and Vibration*. Therefore, implementation of the proposed project would be consistent with established local and regional plans and policies. **(Less than Significant Impact)**

4.12 MINERAL RESOURCES

4.12.1 Environmental Setting

4.12.1.1 *Existing Conditions*

The Santa Clara Valley was formed when sediments derived from the Santa Cruz Mountains and the Mount Hamilton-Diablo Range were exposed by continuous tectonic uplift and regression of the inland sea that had previously inundated the area. As a result of this process, the topography of the project area is relatively flat and there are no significant mineral resources. The project site is not located in an area containing known mineral resources.

4.12.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	☐	☐	☐	☒
2) 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?	☐	☐	☐	☒

Impact MIN-1:	The project 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. **(No Impact)**

The proposed project would redevelop a site that is not known to contain mineral resources of value to the region and residents of the state. The proposed project would not indirectly affect the availability of any mineral resources by restricting access to a resource recovery site or substantially depleting the reserves of any resources in the region. Therefore, the proposed residential development would not result in a significant impact to mineral resources. **(No Impact)**

Impact MIN-2:	The project would not result in the loss of availability of locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. **(No Impact)**

There are no identified mineral resource recovery sites located within or adjacent to the project site. The project site is in an urbanized area developed with a mix of residential and commercial uses and is developed with a 78,950-square foot office building, paved surfaced parking, paved walkways, and landscaping. Therefore, the development of the proposed residential project would not result in the loss of a mineral resource recovery site. **(No Impact)**

4.13 NOISE

The following discussion is based on a noise assessment prepared for the project site by *Illingworth & Rodkin, Inc.* A copy of the report, dated February 7, 2019, is attached to this Initial Study as Appendix E.

4.13.1 Environmental Setting

4.13.1.1 *Background Information*

Noise

Several factors influence sound as it is perceived by the human ear, including the actual level of sound, the period of exposure to the sound, the frequencies involved, and the fluctuation in the noise level during exposure. Noise is measured on a "decibel" scale which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness over a wide range of intensities. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are almost always expressed using one of several noise averaging methods, such as L_{eq}, DNL, or CNEL.[51] Using one of these descriptors is a way for a location's overall noise exposure to be measured, given that there are specific moments when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and specific moments when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One method is the Peak Particle Velocity (PPV). The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. In the *Illingworth & Rodkin* report, a PPV descriptor with units of mm/sec or in/sec is used to evaluate construction-generated vibration for building damage and human complaints.

Construction activities can cause vibration that varies in intensity depending on several factors. The use of pile driving and vibratory compaction equipment typically generates the highest construction related groundborne vibration levels. Because of the impulsive nature of such activities, the use of the PPV descriptor has been routinely used to measure and assess groundborne vibration and almost

[51] L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 p.m. and 7:00 a.m. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 p.m. and 10:00 p.m. As a general rule of thumb where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq}.

exclusively to assess the potential of vibration to cause damage and the degree of annoyance for humans.

The two primary concerns with construction-induced vibration, the potential to damage a structure and the potential to interfere with the enjoyment of life, are evaluated against different vibration limits. Human perception to vibration varies with the individual and is a function of physical setting and the type of vibration. Persons exposed to elevated ambient vibration levels, such as people in an urban environment, may tolerate a higher vibration level.

Structural damage can be classified as: 1) cosmetic only, such as paint flaking or minimal extension of cracks in building surfaces; 2) minor, including limited surface cracking; or 3) major, that may threaten the structural integrity of the building. Construction-induced vibration that can be detrimental to the building is very rare and has only been observed in instances where the structure is at a high state of disrepair and the construction activity occurs immediately adjacent to the structure.

4.13.1.2 *Regulatory Framework*

State

California Building Standards Code

The California Building Standards Code (CBC) establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources not exceed 45 dBA DNL or CNEL in any habitable room. Exterior windows must have a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA DNL noise contour for a freeway or expressway, railroad, industrial source or fixed-guideway noise source.

Local

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}.

The Natural Environment and Hazards Element of the General Plan also contains goals and policies that seek to minimize the amount of noise to which the community is exposed, and the amount of noise created by future development and urban activities. The following policies from the Natural Environment and Hazards Element are applicable to the proposed project:

Policy 7.1: Ensure that new development can be made compatible with the noise environment by utilizing noise/land use compatibility standards and the Noise Contours Map as a guide for future development decisions.

Policy 7.2: Enforce the following maximum acceptable noise levels for new construction of various noise-sensitive uses in an existing noise environment.

- 60 dBA CNEL is the maximum acceptable outdoor noise exposure level for single-family residential areas.
- 65 dBA CNEL is the maximum acceptable outdoor noise exposure level for multiple-family residential areas.
- 70 dBA CNEL is the maximum acceptable outdoor noise exposure level for schools (public and private), libraries, churches, hospitals, nursing homes, parks, commercial, and recreation areas. Excepted from these standards are golf courses, stables, water recreation, and cemeteries.

Policy 7.3: Work to achieve indoor noise levels not exceeding 45 dBA CNEL in the event that outdoor acceptable noise exposure levels cannot be achieved by various noise attenuation mitigation measures.

Policy 7.6: Consider noise attenuation measures to reduce noise levels to City-adopted acceptable levels for any development along roadways.

Policy 7.7: Require the inclusion of design features in development and reuse/revitalization projects to reduce the impact of noise on residential development.

Policy 7.8: Require an acoustical analysis for new construction and in areas with higher than established noise levels.

Policy 7.9: Minimize stationary noise sources and noise emanating from construction activities.

Policy 7.10: Publicize and enforce local noise regulations to reduce nuisance noises related to private developments and residences.

City of Los Altos Municipal Code

The City's Noise Control Ordinance (Chapter 6.16) was adopted to control unnecessary, excessive, and annoying noise and vibration within the city. Specifically, Chapter 6.16.50 of the Los Altos Municipal Code establishes exterior noise limits for various zoning districts, as shown on Table 4.13-1.

Table 4.13-1: Exterior Noise Limits (levels not to be exceeded more than 30 minutes in any hour)		
Receiving Land Use Category	**Time Period**	**Noise Level (dBA)**
All R1 Zoning Districts	10:00 p.m. – 7:00 a.m. 7:00 a.m. – 10:00 p.m.	45 55
All R3 Zoning Districts	10:00 p.m. – 7:00 a.m. 7:00 a.m. – 10:00 p.m.	50 55
All OA Zoning Districts	10:00 p.m. – 7:00 a.m. 7:00 a.m. – 10:00 p.m.	55 60
All C Zoning Districts	10:00 p.m. – 7:00 a.m. 7:00 a.m. – 10:00 p.m.	60 65
Source: City of Los Altos, 2017		

The Municipal Code 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.

If the measured ambient level exceeds that permissible 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 (Section 6.16.070). Exceeding those thresholds is considered a prohibited act and would constitute a violation of the Ordinance.

4.13.1.3 *Existing Conditions*

The project site is in an urbanized area developed with a mix of residential and commercial uses and is developed with an office building. A noise monitoring survey was performed to quantify and characterize noise levels at the site and in the project vicinity between Tuesday, January 22nd, 2019 and Friday, January 25th, 2019. The monitoring survey included two long-term noise measurements (LT-1 and LT-2) and three short-term noise measurements (ST-1, ST-2, and ST-3). The primary noise source at the site and in the vicinity is vehicular traffic on El Camino Real. The noise measurement locations are shown on Figure 4.13-1.

NOISE MEASUREMENT LOCATIONS | FIGURE 4.13-1

Long-term noise measurement LT-1 was made at the southwest corner of the project site, approximately 330 feet from the center of El Camino Real. Hourly average noise levels at this location, generated primarily from vehicular traffic on El Camino Real, typically ranged from 53 to 60 dBA L_{eq} during the day and from 46 to 57 dBA L_{eq} at night. The day-night average noise level at LT-1 was 59 dBA Ldn.

Long-term noise measurement LT-2 was made in front of 4906 El Camino Real, approximately 50 feet from the center of El Camino Real. This location was selected to quantify noise levels generated by traffic along El Camino Real. Long-term monitoring along El Camino Real at the project site was avoided due to local construction activity, which affected the noise environment. Hourly average noise levels at this location ranged from 71 to 75 dBA L_{eq} during the day and from 61 to 72 dBA L_{eq} at night. The day-night average noise level at LT-2 was 75 dBA Ldn.

Short-term measurement locations were selected to quantify ambient noise levels throughout the site. ST-1 was made at the front of 5150 El Camino Real, at a distance of about 45 feet from the edge of El Camino Real. The 10-minute average noise level measured at this location was 70 dBA L_{eq}. Short-term noise measurement ST-2 was made in the parking lot to the southeast of the existing on-site building, approximately 30 feet from the edge of El Camino Real. The 10-minute average noise level measured at this location was 73 dBA L_{eq}. Measurement ST-3 was made in the southeastern portion of the site and resulted in a 10-minute average noise level of 55 dBA L_{eq}. Table 4.13-2 summarizes the results of the short-term measurements.

Table 4.13-2: Short-Term Noise Measurement Data

Noise Measurement Location	*Measured L_{eq}*	*Calculated L_{dn}[1]*
ST-1: 45 feet from edge of El Camino Real (2:10 p.m. – 2:20 p.m.)	70	71
ST-2: 30 feet from edge of El Camino Real (3:20 p.m. – 3:30 p.m.)	73	74
ST-3: Southeast corner of site (3:50 p.m. – 4:00 p.m.)	55	59

[1]*Based on comparison of short-term and long-term noise monitoring results.*

4.13.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
1) 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?	☐	☒	☐	☐
2) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
3) 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?	☐	☐	☐	☒

4.13.2.1 *Significance Criteria*

The following criteria were used to evaluate the significance of environmental noise and vibration resulting from the project:

Temporary or Permanent Noise Increases in Excess of Established Standards

A significant impact would be identified if project construction or operations would result in a substantial temporary or permanent increase in ambient noise levels at sensitive receivers in excess of the local noise standards contained in the Los Altos General Plan or Municipal Code, as follows:

- **Operational Noise in Excess of Standards.** A significant noise impact would be identified if the project would expose persons to or generate noise levels that would exceed applicable noise standards presented in the General Plan or Municipal Code. The City of Los Altos limits sound levels generated by air-conditioning or air-handling equipment to 50 dBA at residential property lines. Other operational noise sources are limited to the levels specified in Table 4.13-1.

- **Permanent Noise Increase.** A significant impact would be identified if traffic or school activity noise generated by the project would substantially increase noise levels at sensitive receivers in the vicinity. A substantial increase would occur if: a) the noise level increase is five dBA L_{dn} or greater, with a future noise level of less than 60 dBA L_{dn}, or b) the noise level increase is three dBA L_{dn} or greater, with a future noise level of 60 dBA L_{dn} or greater.

- **Temporary Noise Increase.** A significant temporary noise impact would be identified if construction would occur outside of the hours specified in the Municipal Code or if construction noise levels were to exceed the City's construction noise limits at adjacent noise sensitive land uses. Construction occurring during allowable hours is limited to 75 dBA in single-family residential areas, 80 dBA in multi-family residential areas, and 85 dBA in commercial areas.

Generation of Excessive Groundborne Vibration

A significant impact would be identified if the construction of the project would generate excessive vibration levels. Groundborne vibration levels exceeding 0.3 in/sec PPV would be considered excessive as such levels would have the potential to result in cosmetic damage to buildings.

4.13.2.2 *Noise Impacts*

Impact NOI-1:	**The project would not 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. (Less than Significant Impact with Mitigation Incorporated)**

Operational Noise

Parking

Most parking would be provided in the underground garage. Parking activities occurring in the underground garage would not be anticipated to be audible outside of the parking structure. Noise associated with on-site circulation and parking for the townhomes would be similar to levels generated by use of the current parking lot and below noise levels generated by vehicular traffic traveling along El Camino Real, and would not be considered significant.

Mechanical Equipment

The proposed project would include mechanical equipment such as heating, ventilation, and air conditioning systems (HVAC) in an enclosed room within the underground garage. The buildings' condenser, exhaust fans, and boilers would be located on the rooftop. The most substantial noise-generating mechanical equipment proposed for the project is anticipated to be exhaust fans and building air conditioning units. Equipment such as the air conditioning units, located inside or in a fully enclosed room with a roof would not be anticipated to be audible at off-site locations. Typical residential rooftop exhaust fans are anticipated to generate noise levels of 50 to 60 dBA at 50 feet from the equipment, depending on the equipment selected. Shielding from equipment enclosures and surrounding structures would provide 10 to 15 dBA of reduction. The City of Los Altos limits sound levels generated by air-conditioning or air-handling equipment to 50 dBA at residential property lines and 45 dBA at residential patios and building façades. The descriptor for the noise limit is not specified. For consistency with the provisions of the code, a reasonable interpretation of this standard would identify the criteria as an hourly average L_{eq}.

Existing single-family residences are located as close as about 55 feet from the closest proposed project building. Assuming a credible worst-case scenario with unshielded equipment, or equipment that is only visually screened, placed in the center of the townhome building that is nearest to residences to the southwest, exhaust fan noise could reach noise levels as high as 49 to 59 dBA L_{eq} at residences to the southwest and would exceed the 50 dBA L_{eq} limit at the property line and 45 dBA at outdoor patios facing the project site. However, the City requires mechanical equipment to be screened from public view and for the screening to be consistent with the building architecture in form, material and detailing. Mechanical equipment located 150 feet or further from residential property lines or in shielded areas would be anticipated to meet the 50 dBA L_{eq} limit. This is a potentially significant impact.

Mitigation Measures: Implementation of the following mitigation measure would ensure that City requirements are met and noise impacts at adjacent residential properties would be less than significant:

MM NOI-1.1: Prior to the issuance of building permits, mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City's requirements. A qualified acoustical consultant shall be retained by the project applicant to review mechanical noise as the equipment systems are selected in order to determine whether the proposed noise reduction measures sufficiently reduce noise to comply with the City's 50 dBA L_{eq} residential noise limit at the shared property lines, and with the 45 dBA L_{eq} noise limit at residential patios adjoining the site. Noise reduction measures that would accomplish this reduction include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers such as enclosures and parapet walls to block the line of sight between the noise source and the nearest receptors.

By requiring a review of the mechanical equipment selected for the proposed project, as well as its design and location within the site, project mechanical equipment would not generate long-term noise levels in exceedance of residential noise limits.

Project Traffic

Neither the City of Los Altos nor the State of California define the traffic noise level increase that is considered substantial. A significant impact would typically be identified if project generated traffic were to result in a permanent noise level increase of three dBA CNEL or greater in a residential area where the resulting noise environment would exceed or continue to exceed 60 dBA CNEL or result in a permanent noise increase of five dBA Ldn or greater in a residential area where the resulting in a noise environment would continue to be 60 dBA CNEL or less. For reference, a three dBA CNEL noise increase would be expected if the project would double existing traffic volumes along a roadway.

The Traffic Impact Analysis provided by *Hexagon Transportation Consultants, Inc*. was reviewed to calculate potential traffic noise level increases attributable to the project. Traffic volumes were provided for El Camino Real, Rengstorff Avenue, Distel Road, and Clark Avenue. To determine the project-generated traffic noise increase, peak hour volumes for the existing scenario are compared to existing plus project conditions. Based on this comparison, traffic noise levels are calculated to increase by less than one dBA L_{eq} along the roadway network in the project vicinity during peak hour traffic conditions. Traffic noise increases resulting from the proposed project would not result in noise increases of three dBA CNEL or more on the surrounding roadway network; therefore, project-generated traffic would result in a less than significant permanent noise impact.

Construction Noise

Chapter 6.16.070 of the City's Municipal Code 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. The project site is in a commercially zoned area. In addition, where technically and economically feasible, maximum noise levels from construction activities should not exceed those listed in Tables 3 and 4 in Chapter 6.16.070 of the City's Municipal Code.

The City also provides recommended maximum noise level limits, where economically and technically feasible, for mobile construction equipment used on an intermittent basis for less than 10 days and for stationary sources associated with construction when there is long-term, scheduled construction activities. This analysis applies the applicable noise limits to project construction (i.e., the mobile limits to mobile sources that would operate on an intermittent basis for less than ten days and the stationary source limits for long-term stationary sources used during construction). Construction occurring during allowable daytime hours is limited to 75 dBA in the R1 zoning districts, 80 dBA in the PCF and R3 zoning districts, and 85 dBA in all OA and C zoning districts. The project site is in a "C" zoning district. This code is not explicit in terms of the acoustical descriptor associated with the noise level limit. The City has interpreted this standard as an hourly average L_{eq}.

Construction of the proposed project is estimated to take 2.5 years to complete and would include demolition of existing on-site structures and pavement, site preparation, grading and excavation, trenching and foundations, building erection, and paving. Construction is anticipated to occur in three phases, beginning in 2021. Phase I would construct the at-grade, three-story townhomes at the southern end (rear) of the project site. Phase II would construct the five-story condominium building on the northeastern end of the project site and the northeastern half of the below-ground parking garage. Phase III would construct the final five-story condominium building at the northwestern end of the site and the northwestern half of the parking garage. Pile driving is not anticipated as a method of construction.

Noise impacts resulting from construction depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., morning or evening hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time. Table 4.13-3 shows typical ranges of construction noise levels at 50 feet.

Table 4.13-3: Typical Ranges of Construction Noise Levels at 50 Feet, L_{eq} (dBA)

	Domestic Housing		Office Building, Hotel, Hospital, School, Public Works		Industrial Parking Garage, Recreations, Store, Service Station		Public Works Roads & Highways, Sewers, and Trenches	
	I	II	I	II	I	II	I	II
Ground Clearing	83	83	84	84	84	83	84	84
Excavation	88	75	89	79	89	71	88	78
Foundations	81	81	78	78	77	77	88	88
Erection	81	65	87	75	84	72	79	78
Finishing	88	72	89	75	89	74	84	84

I - All pertinent equipment present at site.
II - Minimum required equipment present at site.

Source: USEPA, Legal Compilation on Noise, Vol. 1, p. 2-104, 1973.

As shown in Table 4.13-3 above, noise levels during construction would range from 65 to 88 dBA and, therefore, would exceed noise level standards set forth by the City for "C" zoning districts. Additionally, construction noise would exceed noise level standards for residential areas when located within 50 feet of the shared property line with the single-family dwellings to the south and multiple-family dwellings to the west. This would constitute a significant temporary noise impact.

Mitigation Measures: Implementation of the following mitigation measures would reduce potential construction noise impacts at adjacent residential and commercial properties to less than significant levels:

MM NOI-2.1: Modification, placement, and operation of construction equipment are possible means for minimizing the impact of construction noise on existing sensitive receptors. Construction equipment shall be well-maintained and used judiciously to be as quiet as possible. Additionally, construction activities for the proposed project shall include the following best management practices to reduce noise from construction activities near sensitive land uses:

- Noise generating construction activities shall be limited to the hours between 7:00 a.m. and 5:30 p.m., Monday through Friday, and on Saturdays between 9:00 a.m. and 3:00 p.m., in accordance with the City's Municipal Code for construction in a single-family residential zone. Construction is prohibited on Sundays and holidays, unless permission is granted with a development permit or other planning approval.

- Use of the concrete saw within 50 feet of any shared property line shall be limited.

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.

- Unnecessary idling of internal combustion engines in construction equipment with a horsepower rating of 50 or more shall be strictly prohibited, and limited to five minutes or less, consistent with BAAQMD best management practices.

- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors (residences). If they must be located near sensitive receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.

- Utilize "quiet" air compressors and other stationary noise sources where technology exists.

- A temporary noise control blanket barrier could be erected, if necessary, at the property line or along building facades facing construction sites. This measure would only be necessary if conflicts occurred that were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected.

- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.

- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities and shall send a notice to all adjacent properties with the construction schedule.

- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g. bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post the telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

Implementation of the above best management practices would reduce construction noise levels emanating from the site, limit construction hours beyond what is required in the Municipal Code, and thus minimize disruption and annoyance. With implementation of these measures and recognizing that noise generated by construction activities would occur over a temporary period, the project would result in a less than significant construction noise impact. **(Less than Significant Impact with Mitigation Incorporated)**

4.13.2.3 *Vibration Impacts*

Impact NOI-2:	The project would not result in generation of, excessive groundborne vibration or groundborne noise levels. **(Less than Significant Impact with Mitigation Incorporated)**

The City of Los Altos does not specify a construction vibration limit. For structural damage, the California Department of Transportation recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards, 0.3 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.25 in/sec PPV for historic and some old buildings. The conservative 0.3 in/sec PPV vibration limit would be applicable to properties in the vicinity of the project site, but historic or very old buildings are not known to exist in the immediate project vicinity.

Project construction may generate perceptible vibration when heavy equipment or impact tools (e.g. jackhammers, hoe rams) are used. Construction would occur in three phases over a period of 2.5 years. Construction activities would include demolition, site preparation, grading and excavation, trenching and foundation, building (exterior), interior/ architectural coating and paving. Building construction activities would not occur along the property lines. Pile driving is not required to construct the proposed project.

Table 4.13-4, below, shows typical vibration levels from construction equipment at various distances. Vibration levels would depend on soil conditions, construction methods, and equipment used.

Table 4.13-4: Vibration Levels for Construction Equipment at Various Distances

Equipment		PPV at 10 ft. (in/sec)	PPV at 20 ft. (in/sec)	PPV at 25 ft. (in/sec)	PPV at 35 ft. (in/sec)	PPV at 60 ft. (in/sec)
Clam shovel drop		**0.553**	0.25	0.202	0.140	0.077
Hydromill (slurry wall)	in soil	0.022	0.010	0.003	0.006	0.002
	in rock	0.047	0.022	0.006	0.012	0.004
Vibratory Roller		**0.575**	0.268	0.210	0.145	0.080
Hoe Ram		0.244	0.114	0.089	0.061	0.034
Large bulldozer		0.244	0.114	0.089	0.061	0.034
Caisson drilling		0.244	0.114	0.089	0.061	0.034
Loaded trucks		0.208	0.097	0.076	0.052	0.029
Jackhammer		0.096	0.045	0.035	0.024	0.013
Small bulldozer		0.008	0.004	0.003	0.002	0.001

Source: Transit Noise and Vibration Impact Assessment, United States Department of Transportation, Office of Planning and Environment, Federal Transit Administration, October 2018 as modified by Illingworth & Rodkin, Inc., January 2019.

Project construction activities could generate vibration levels exceeding the threshold of 0.3 in/sec PPV at the adjoining commercial structure to the southeast when clam shovel drops or vibratory rolling are located within ten feet of the shared property line. Such vibration levels would be unlikely

to cause cosmetic, major, or minor structural damage, but are conservatively identified as significant to provide the ultimate level of protection from construction vibration. Project-generated vibration levels would fall below the 0.3 in/sec PPV threshold at structures located 20 feet or further from construction. The existing apartment building to the west, a single-family residence to the southwest, and a commercial building to the southeast would be within 20 feet of the site where heavy construction activities may occur. Heavy construction located within 10 feet of the shared property line would have the potential to exceed the 0.3 in/sec PPV threshold at the nearest structures located approximately 10 feet from the shared property line. Vibration levels at all other buildings in the vicinity are calculated to be below the 0.3 in/sec PPV threshold and would not be anticipated to be impacted by project construction generated vibration.

Mitigation Measures: Implementation of the following mitigation measure would reduce potential construction vibration impacts to a less than significant level at structures located within 20 feet of the west, south, and east property lines of the project:

MM NOI-3.1: A construction vibration-monitoring plan shall be implemented to document conditions at the structure located within 20 feet of proposed construction prior to, during, and after vibration generating construction activities. All plan tasks shall be completed under the direction of a State of California licensed Professional Structural Engineer and be in accordance with industry accepted standard methods. The construction vibration monitoring plan shall include the following tasks:

- Identification of sensitivity to groundborne vibration of the structure located within 20 feet of construction.

- Performance of a photo survey, elevation survey, and crack monitoring survey for the structure located within 20 feet of construction. Surveys shall be performed prior to, in regular intervals during, and after completion of vibration generating activities and shall include internal and external crack monitoring in the structure, settlement, and distress and shall document the condition of the foundation, walls and other structural elements in the interior and exterior of said structure. Interior inspections would be subject to property owners' permission.

- Conduct a post-survey on the structure where monitoring has indicated damage. Make appropriate repairs or provide compensation where damage has occurred as a result of construction activities.

- Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site.

Implementation of the mitigation measures described above would reduce construction vibration impacts to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

4.13.2.4 *Airport Impacts*

Impact NOI-3:	The project would not be 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. The project would not expose people residing or working in the project area to excessive noise levels. **(No Impact)**

There are no airports near the project site that would expose people residing or working in the project area to excessive noise levels. Moffett Federal Airfield, a joint civil-military airport, is located approximately three miles east of the project site. Palo Alto Airport, a general aviation facility, is located approximately 4.2 miles north of the project site. Norman Y. Mineta San José International Airport is located approximately 10 miles east of the project site. **(No Impact)**

4.13.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 *(BIA v. BAAQMD)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of Los Altos has policies that address existing noise conditions affecting a proposed project.

The City of Los Altos sets an acceptable exterior noise level objective of 60 dBA L_{dn} or less for residential uses and a conditionally acceptable exterior noise level objective of 65 dBA Ldn. The General Plan also states that 65 dBA CNEL is the maximum acceptable outdoor noise exposure level for multiple-family residential areas. The City's acceptable interior noise level is 45 dBA L_{dn} for habitable space in a residential use.

Exterior Noise

The primary source of noise affecting the project site is vehicular traffic on El Camino Real, which is a highly trafficked regional roadway. With full build out of the City's General Plan, traffic noise is expected to increase by one dBA L_{dn} along El Camino Real. The proposed project includes outdoor amenities for residences, such as a pool, play area, and bocce ball court, which would be exposed to noise from surrounding roadways. Based on the project site plans, these areas would be setback and well shielded from El Camino Real and, as a result, exposed to noise levels below 60 dBA L_{dn}, which is considered "normally acceptable" by the City.

Interior Noise

As mentioned, residential facades of the condominium buildings facing El Camino Real would be exposed to exterior noise levels of up to 75 dBA L_{dn}. The southwest-facing units (i.e., units facing away from El Camino Real) and the townhome buildings to the rear of the site would be exposed to exterior noise levels below 60 dBA L_{dn}. Interior noise levels would depend upon the design of the buildings and the selected construction materials and methods. Standard residential construction provides approximately 15 dBA of exterior-to-interior noise reduction, assuming the windows are partially open for ventilation. Standard construction with the windows closed provides approximately

20 to 25 dBA of exterior-to-interior noise reduction. Standard construction methods would reduce interior noise levels at the townhomes and southwest-facing condominium units to the City's acceptable noise level of 45 dBA. Where exterior noise levels range from 60 to 70 dBA L_{dn} the inclusion of adequate forced-air mechanical ventilation can reduce interior noise levels to acceptable levels by allowing occupants the option of closing the windows to control noise. In noise environments of 70 dBA L_{dn} or greater, a combination of forced-air mechanical ventilation and sound-rated construction methods is often required to meet the interior noise level limit. Such methods or materials may include a combination of smaller window and door sizes as a percentage of the total building façade facing the noise source, sound-rated windows and doors, sound-rated exterior wall assemblies, and mechanical ventilation so windows may be kept closed at the occupant's discretion.

Conditions of Approval: For consistency with General Plan noise policies, the following Conditions of Approval are recommended for consideration by the City.

- When refining the project's site plan, locate outdoor use areas away from El Camino Real and continue to shield noise-sensitive outdoor spaces with buildings or noise barriers where feasible.

- Provide a suitable form of forced-air mechanical ventilation, as determined by the local building official, for all residential buildings, so that windows can be kept closed to control noise.

- Provide sound-rated windows to northeast, northwest, and southeast facing condominium units to maintain interior noise levels at acceptable levels. Preliminary calculations show that sound-rated windows with minimum STC Rating of 33 to 34 would be satisfactory for units fronting El Camino Real and windows with minimum STC Rating of 28 to 29 would be satisfactory for northwest and southeast facing condominium units to achieve acceptable interior noise levels, assuming a wall construction with STC 46 or greater and 40 percent windows or less. The specific determination of what noise insulation treatments are necessary shall be conducted on a unit-by-unit basis during final design of the project once final building plans and elevations are available.

4.14 POPULATION AND HOUSING

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

State

In order to attain the state housing goal, cities must make sufficient suitable land available for residential development, as documented in an inventory, to accommodate their share of regional housing needs. California's Housing Element Law requires all cities to: 1) zone adequate lands to accommodate its Regional Housing Needs Allocation (RHNA); 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis. The City of Los Altos Housing Element and related land use policies were last updated in 2014.

Regional

The Association of Bay Area Governments (ABAG) allocates regional housing needs to each city and county within the nine-county Bay Area, based on statewide goals. ABAG also develops forecasts for population, households, and economic activity in the Bay Area. ABAG, Metropolitan Transportation Commission, and local jurisdiction planning staff created the Regional Forecast of Jobs, Population and Housing (upon which Plan Bay Area is based), which is an integrated land use and transportation plan looking out to the year 2040 for the nine-county San Francisco Bay Area.

Plan Bay Area is a state-mandated, integrated long-range transportation, land-use and housing plan intended to support a growing economy, provide more housing and transportation choices, and reduce transportation-related pollution and GHG emissions in the Bay Area. Plan Bay Area promotes compact, mixed-use residential and commercial neighborhoods near transit, particularly within identified Priority Development Areas (PDAs) and Transit Priority Areas (TPAs). One of the Plan Bay Area policies that supports this objective is to reduce the cost of building in PDAs and TPAs through eased parking minimums and streamlined environmental clearance. Another objective is to increase the share of affordable housing in PDAs, TPAs, or high-opportunity areas to 15 percent. The project site is not located within a PDA but is located in a TPA.

4.14.1.2 *Existing Conditions*

As of July of 2017, the City of Los Altos had a total population of approximately 30,743 residents.[52] In 2040 it is estimated that the City will have approximately 32,800 residents. [53]

The City of Los Altos had an estimated 1.28 jobs for every employed resident in 2010. Although the General Plan focuses on increased housing and the placement of housing near employment, the overall jobs/employed residents ratio is expected to increase to 1.36 by 2040. Some employees who

[52] U.S. Census Bureau. "QuickFacts". Accessed December 6, 2018. https://www.census.gov/quickfacts/losaltoscitycalifornia
[53] City of Los Altos. *City of Los Altos 2015-2023 Housing Element*. May 26, 2014.

work within the City are, and still would be, required to seek housing outside the community with full implementation of the General Plan.

The project site is currently used for commercial purposes and provides no housing.

4.14.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) 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)?	☐	☐	☒	☐
2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Impact POP-1: The project would not 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). (Less than Significant Impact)

A project can induce substantial population growth by proposing new housing beyond projected or planned development levels, generating demand for housing as a result of new businesses, extending roads or other infrastructure to previously undeveloped areas, or removing obstacles to population growth (e.g., expanding capacity of a wastewater treatment plant beyond that necessary to serve planned growth).

The project site is currently developed with a 78,950 square-foot office building. The project proposes to demolish the existing office building and construct two residential condominium buildings and two townhome buildings. The four buildings proposed for the site would provide 196 residential units in total. In 2018, it was estimated that the number of persons per household in Los Altos was 2.77.[54] Using this metric, and assuming full occupancy, the proposed project would increase the local population by an estimated 543 persons. While the local population would be permanently increased by the project, the increase would not be substantial. The project is consistent with the site General Plan designation and, therefore, is consistent with planned growth set forth in the City's General Plan.

In its 2015-2023 Housing Element, the City estimated that a total of 190 single-family residential units and 552 multi-family residential units would be added through January of 2023. These

[54] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2018*. Sacramento, California, May 2018.

estimates are based on several factors, including historical production, current market forces, pending Zoning Ordinance Amendments, City housing programs, and state laws and guidelines for density bonuses. The project proposes to provide 196 multi-family residential units, which is included within the expected growth in housing detailed in the Housing Element.

The Department of Housing and Community Development establishes housing production targets, known as regional housing needs assessment (RHNA) targets, for each jurisdiction to ensure each jurisdiction is doing its fair share to house Californians. According to the City's Annual Housing Report, provided to the City Council on March 26, 2019, the City has made the following progress towards meeting its RHNA targets for 2023:

	Permits	**RHNA Targets**
Extremely-Low Income	0	84
Very-Low Income	4	85
Low Income	30	99
Moderate Income	2	112
Above Moderate Income	427	97
Total	463	477

The project would help the City meet its RHNA target for Very-Low Income and Moderate Income units by developing 16 Very-Low Income units and 12 Moderate Income units.

The site is served by existing infrastructure and would not extend roads or other infrastructure to undeveloped or unserved areas. For this reason, and those discussed above, the project would not induce substantial unplanned growth in Los Altos. **(Less than Significant Impact)**

Impact POP-2:	The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **(No Impact)**

The existing project site is developed with an office building and provides no housing. Therefore, the project would not displace existing housing or people or require replacement housing to be constructed, and there would be no impact. **(No Impact)**

4.15 PUBLIC SERVICES

4.15.1 Environmental Setting

4.15.1.1 *Regulatory Framework*

State

Quimby Act – Parks

The Quimby Act (California Government Code Sections 66475-66478) was approved by the California legislature to preserve open space and parkland in the State. This legislation was in response to California's increased rate of urbanization and the need to preserve open space and provide parks and recreation facilities for California's growing communities. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions, single-family and multiple-family, to dedicate park land, pay an in-lieu fee, or perform a combination of the two.

School Facilities

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Sections 65995-65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation goes on to say that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

In accordance with California Government Code Section 65996, developers pay a school impact fee to the local school district to offset the increased demands on school facilities caused by their proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Local

City of Los Altos General Plan

The City of Los Altos General Plan Open Space, Conservation, and Community Facilities Element includes the following public services policies that are applicable to the proposed project:

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 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 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 9.2: Work with private developers to offer cultural activities within the community, such as a community theater and cinema.

Policy 11.4: Encourage private sector provision of facilities and/or services.

Parkland Dedication Ordinance

The City of Los Altos has established a Parkland Dedication Ordinance (Chapter 13.24.010 of the Municipal Code) 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 the ordinance is to allow development to occur within the City in a manner that meets the City's parks and recreation goals.

Los Altos Parks Plan

The Los Altos Parks Plan, adopted in May of 2012, is intended to create a clear set of goals, policies, and objectives that will provide direction to the City Council and City staff for the development, improvement, and enhancement of the City's park system for the next twenty to thirty years. The Parks Plan was designed to parallel the General Plan's Open Space, Conservation, and Facilities Element by providing specific direction and recommendations related to parks in Los Altos.

4.15.1.2 *Existing Conditions*

Fire and Police Protection Services

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 closest station to the project site is the Almond Fire Station, located approximately one mile southwest of the site.

Police protection services for the project site are provided by the Los Altos Police Department, headquartered at 1 North San Antonio Road, approximately 1.1 miles southwest of the site. The Department has 30 sworn officers, five reserve officers, and 17 professional civilian staff.

Schools

The project site is in the Los Altos School District and Mountain View Los Altos Union High School District. Elementary school students in the project area attend Almond Elementary School, located approximately 0.7 miles south of the project site. Middle school students in the project area attend Egan Junior High School, located approximately 0.8 miles west of the project site. High school students in the project area attend Los Altos High School, located approximately 0.7 miles southwest of the project site.[55]

[55] Los Altos School District. http://www.myschoollocation.com/losaltossd/ Accessed December 7, 2018.

Parks

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.

The closest public park is Gemello Park, in the City of Mountain View, which is located approximately 0.2 miles southeast of the site. The nearest public parks within the City of Los Altos are the Hillview Community Center Campus, approximately 1.5 miles southwest of the site, and Lincoln Park, approximately 2 miles southwest of the site. Other public park facilities in the vicinity include Rengstorff Park, approximately one-half mile north of the site, Klein Park, approximately one-half mile to the northwest, and Castro Park, approximately one-half mile east of the site; all three of which are located outside of the Los Altos city limits, in the City of Mountain View.

Libraries

The City of Los Altos is served by the Santa Clara County Library District. The closest libraries to the project site include Los Altos Library, located approximately 1.5 miles southwest of the site, and Mountain View Public Library, located approximately one mile east of the site.

Community Centers

There are two community centers located in Los Altos: Hillview Community Center at 97 Hillview Avenue and Grant Park Community Center, located at 1575 Holt Avenue. The Hillview Community Center is located approximately 1.5 miles southwest of the project site.

4.15.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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?	☐	☐	☒	☐

Impact PS-1:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 fire protection services. **(Less than Significant Impact)**

The project proposes to construct four new residential buildings on the site that would provide a total of 196 residential units. Using the 2018 estimated residential occupancy rate of 2.77 persons per household, the project would result in a permanent population increase of 543 persons. As discussed in *Section 4.13, Population and Housing,* the proposed development is included within planned development levels through the year 2023, per the Housing Element. The project would incrementally increase the local population and associated demand on fire protection services. The incremental increase in demand, however, would not, by itself, require new facilities or expansion of existing facilities to provide adequate fire protection services and meet the City's overall service goals. The project would be reviewed by the Santa Clara County Fire District to ensure applicable Fire Code standards to reduce potential fire hazards are included in the project design when construction permits are issued, including sprinklers and smoke detectors. For these reasons, the project would not significantly impact fire protection services. **(Less than Significant Impact)**

Impact PS-2:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 police protection services. **(Less than Significant Impact)**

As mentioned, the project would increase the permanent population of the area by approximately 543 persons. This incremental increase in population would not place a substantial new burden on police protection services in the area. The project would be constructed in conformance with current codes and the project design would be reviewed by the Los Altos Police Department to ensure that it incorporates appropriate safety features to minimize criminal activity. New facilities, or the expansion of existing facilities, would not be required to provide adequate police services to serve the proposed project and meet the City's overall service goals. For these reasons, the project would not significantly impact police protection services. **(Less than Significant Impact)**

Impact PS-3:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 schools. **(Less than Significant Impact)**

The proposed project would introduce an additional 45 students to the area.[56] Students from the proposed project would attend schools in the Los Altos School District and the Mountain View Los Altos Union High School District. While the proposed project would incrementally increase the demand placed on schools in Los Altos, this increase would not be substantial and would not require the construction of new school facilities or the expansion of existing facilities. In accordance with California Government Code Section 65996, the project applicant shall pay applicable school impact fees to offset the increased demand on school facilities generated by the project. For these reasons, the proposed project would not result in a significant impact on school facilities. **(Less than Significant Impact)**

Impact PS-4:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 parks. **(Less than Significant Impact)**

The project would increase the residential population in the project area by 543 persons. The new residents could reasonably be expected to use existing parks and recreational facilities in Los Altos and in adjacent cities. This incremental increase in demand, however, is not expected to create a substantial physical burden on local and regional parks to an extent that would require the expansion of existing facilities or construction of new facilities. In accordance with the City of Los Altos Parkland Dedication Ordinance (Chapter 13.24.010 of the Municipal Code), the project applicant shall pay the applicable parkland dedication in-lieu fee as a condition of project approval. The intent of the ordinance is to allow development to occur within the City in a manner that meets the City's parks and recreation goals. For these reasons, the proposed project would not result in a significant impact on parks. **(Less than Significant Impact)**

Impact PS-5:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 other public facilities. **(Less than Significant Impact)**

Libraries and community centers are located within 1.5 miles of the project site that could reasonably be expected to be used by future residents of the proposed project. The Hillview Community Center is currently undergoing redevelopment, with completion of the new community center anticipated by the end of 2020, which means that the new community center will be completed prior to occupancy of the proposed project. While the project would incrementally increase the demand on these facilities, the project is not expected to create a substantial physical burden to an extent that would require expansion of existing facilities or construction of new facilities. For these reasons, the

[56] Hexagon Transportation Consultants, Inc. *5150 El Camino Real Residential Development – Traffic Impact Analysis.* May 24, 2019.

proposed project would not result in significant impacts to libraries, community centers, or other public facilities. **(Less than Significant Impact)**

4.16 RECREATION

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

City of Los Altos General Plan

The Open Space, Conservation, and Community Facilities Element of the City of Los Altos General Plan contains the following recreation policies applicable to the proposed project:

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 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.

Parkland Dedication Ordinance

The City of Los Altos has established a Parkland Dedication Ordinance (Chapter 13.24.010 of the Municipal Code) 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 the ordinance is to allow development to occur within the City in a manner that meets the City's parks and recreation goals.

Los Altos Parks Plan

The Los Altos Parks Plan, adopted in May of 2012, is intended to create a clear set of goals, policies, and objectives that will provide direction to the City Council and City staff for the development, improvement, and enhancement of the City's park system for the next twenty to thirty years. The Parks Plan was designed to parallel the General Plan's Open Space, Conservation, and Facilities Element by providing specific direction and recommendations related to parks in Los Altos.

4.16.1.2 *Existing Conditions*

The City of Los Altos' Department of Recreation and Community Services is responsible for maintaining various parks and recreation facilities, as well as managing special interest programs and classes, senior programs, and community events. Overall, the City maintains a total of 19 parks, nature preserves, gyms, youth centers, and community centers that serve the community.

Near the project site, there are several public parks, including: Gemello Park, approximately 0.2 miles southeast of the site, Rengstorff Park, approximately one-half mile north of the site, Klein Park, approximately one-half mile to the northwest, and Castro Park, approximately one-half mile east of the site; all of which are located outside of the Los Altos city limits, in the City of Mountain View. The nearest public parks within the City of Los Altos are the Hillview Community Center, approximately 1.5 miles southwest of the site, and Lincoln Park, approximately two miles southwest of the site.

4.16.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	☐	☐	☒	☐
2) 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?	☐	☐	☒	☐

Impact REC-1: The project would not increase in 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. **(Less than Significant Impact)**

The proposed project would incrementally increase the population in the project area. The incremental increase in population and associated demand upon recreational facilities is consistent with and planned for in the City's General Plan (see *Section 4.14, Population and Housing*). In accordance with the City of Los Altos Parkland Dedication Ordinance (Chapter 13.24.010 of the Municipal Code), the project applicant shall pay the applicable parkland dedication in-lieu fee as a condition of project approval. Additionally, the proposed residential project would provide on-site recreational facilities including a pool, bocce ball court, play area, outdoor grill area, and club house. For these reasons, the proposed project would not increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated. **(Less than Significant Impact)**

Impact REC-2: The project would include recreational facilities and would not require the construction of expansion of recreational facilities which might have an adverse physical effect on the environment. **(Less than Significant Impact)**

As mentioned above, the proposed project includes various on-site recreational amenities including a pool, bocce ball court, play area, outdoor grill area, and club house. The on-site recreational amenities would be built to code and subject to review by the City prior to issuance of building permits. The impacts of the proposed project on the physical environment, including the proposed on-site facilities, are evaluated in this Initial Study. Use of these facilities would be limited to residents of the project and would not result in unintended impacts related to traffic and circulation, energy, or air quality. For these reasons, the proposed project would not require the construction or expansion of recreational facilities to accommodate the needs of new residents, nor would the recreational amenities included as part of the project result in significant environmental impacts. **(Less than Significant Impact)**

4.17 TRANSPORTATION

The following discussion is based on a Transportation Impact Analysis and parking study prepared by *Hexagon Transportation Consultants, Inc.* The report, dated May 2019, is attached to this Initial Study as Appendix F.

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Senate Bill 743

Senate Bill 743 was passed in 2013 and mandated a shift in the metrics used for transportation analysis under CEQA from Levels of Service (LOS) to Vehicle Miles Traveled (VMT). The Governor's Office of Planning and Research (OPR) incorporated this requirement into its *Updates to the CEQA Guidelines* in November 2017. Pursuant to the newly established guidelines, transit-oriented development projects located within one-half mile of an existing major transit stop would have a less than significant impact on VMT.

The proposed project is located along El Camino Real near local bus routes 22 and 522. The nearest bus stop, which serves bus route 22, is located at the El Camino/Rengstorff intersection adjacent to the site. The nearest major bus stop is located at the El Camino Real/Showers Drive intersection, one-half mile west of the project site. The proposed project, therefore, qualifies as a transit-oriented development project and would be exempt from VMT analysis under SB 743. In addition, under SB 743, parking issues would not be considered CEQA impacts.

Regional

Regional Transportation Planning

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including Santa Clara County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2040 in July 2017, which includes the region's Sustainable Communities Strategy (integrating transportation, land use, and housing to meet GHG reduction targets set by CARB) and Regional Transportation Plan (including a regional transportation investment strategy for revenues from federal, state, regional and local sources over the next 24 years).

Congestion Management Program

The Santa Clara Valley Transportation Authority (VTA) oversees the Congestion Management Program (CMP), which is aimed at reducing regional traffic congestion. The relevant state legislation requires that all urbanized counties in California prepare a CMP in order to obtain each county's share of gas tax revenues. State legislation requires that each CMP define traffic LOS standards, transit service standards, a trip reduction and transportation demand management, a land use impact

analysis program, and a capital improvement element. VTA has review responsibility for proposed development projects that are expected to affect CMP designated intersections.

Local

City of Los Altos General Plan

The City of Los Altos has established transportation policies in its General Plan that guide continued development of the circulation system and support planned growth. The following policies, contained in the City's Circulation Element, are applicable to the proposed residential project:

Policy 2.2: Make the most use of existing major streets and roads, minimize the need for additional right-of-way and street widening.

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.

Policy 2.8: Cooperate with adjacent communities to maintain adequate service levels at shared intersections.

Policy 2.17: Maintain adequate emergency access for all land uses.

Policy 2.20: Enhance driving safety in the community.

Policy 3.1: Promote expansion of regional public transportation service and usage to provide alternative means of transportation and help reduce air pollution generated by automobiles.

Policy 4.2: Provide for safe and convenient pedestrian connections to and between Downtown, other commercial districts, neighborhoods and major activity centers within the City, as well as with surrounding jurisdictions.

Policy 4.8: Work with neighboring cities and other jurisdictions to provide safe and adequate pedestrian and bicyclist crossings along major roadways to minimize impediments caused by vehicular traffic, especially along major roadways such as El Camino Real, Foothill Expressway, and San Antonio Road.

Policy 5.1: Continue to encourage off-street parking in residential areas.

Policy 5.3: Reduce the amount of on-street parking in single-family residential neighborhoods caused by adjacent non-residential and multi-family residential uses.

Los Altos Bicycle Transportation Plan

In 2002, the City of Los Altos prepared a Bicycle Transportation Plan that recommended a variety of improvements to complete and enhance bicycle and multi-use bicycle pedestrian paths throughout the City. The Bicycle Transportation Plan was updated by the City in 2012 to present new strategies to improve bicycling conditions and increase bicycling rates in Los Altos. The Bicycle Transportation Plan works to fulfill the City's General Plan Policy 4.1, which calls for the City to develop and maintain a comprehensive and integrated bikeway network.

Los Altos Pedestrian Master Plan

In 2015, the City of Los Altos prepared a Pedestrian Master Plan, which reinforced the City's goals of becoming a more walkable, livable, and healthy city. The Pedestrian Master Plan outlines a broad vision, strategies, and actions for improving the pedestrian environment in Los Altos.

Neighborhood Traffic Management

In 1999, the City of Los Altos established a comprehensive neighborhood traffic management program (NTMP), which has been periodically updated since then. The NTMP specifies a process for implementing traffic calming measures designed to reduce or manage volumes and travel speeds on local streets.

4.17.1.2 *Existing Conditions*

Roadway Network

Regional access to the project site is provided via El Camino Real. Local access to the project site is provided via Rengstorff Avenue, Distel Drive, and Clark Avenue. These roadways are described below.

El Camino Real (SR 82) is a six-lane state arterial that extends from Santa Clara County northerly to San Mateo County. El Camino Real is oriented in an east-west direction in the project vicinity. Near the project site, El Camino Real has a raised, landscaped median with left-turn pockets provided at intersections. The posted speed limit on El Camino Real is 35 mph in the vicinity of the project site.

Rengstorff Avenue is a four-lane arterial that extends between US 101 and El Camino Real. Rengstorff Avenue is oriented in a north-south direction in the project vicinity. There are bike lanes and sidewalks present on both sides of the street. The project driveway is the southern leg of the Rengstorff Avenue and El Camino Real intersection. The posted speed limit on Rengstorff Avenue is 35 mph.

Distel Drive is a two-lane local street that extends between Jardin Drive and El Camino Real. Distel Drive is oriented in a north-south direction in the project vicinity. Distel Drive is a designated bike route from Marich Way to El Camino Real. Distel Drive has discontinuous sidewalks present on both sides of the street south of El Camino Real. The default speed limit on Distel Drive is 25 mph.

Clark Avenue is a two-lane local street that extends between Almond Avenue and El Camino Real. Clark Avenue is oriented in a north-south direction in the project vicinity. There are sidewalks present on both sides of the street from Jardin Drive to El Camino Real and no sidewalks present from Almond Avenue to Jardin Drive. Northbound Clark Avenue allows only right turns when approaching El Camino Real. There are speed bumps, chokers, and a traffic circle along Clark Avenue. Clark Avenue provides access to Almond Elementary School and has a posted speed limit of 25 mph.

Existing Transit Facilities

The Santa Clara Valley Transportation Authority (VTA) operates both bus routes in the project vicinity. Bus routes 22 and 522 provide transit connections along El Camino Real. Local route 22 provides service along El Camino Real between the Palo Alto Transit Center to the Eastridge Transit Center in San Jose, with 15- to 20-minute commute hour headways on weekdays and weekends. Express route 522 provides service between the Palo Alto Transit Center and the Eastridge Transit Center, with 10- to 15-minute commute hour headways on weekdays and 20-minute headways on weekends. Bus stops are located on both sides of El Camino Real in the vicinity of the project site, with the nearest bus stop at the El Camino Real/Rengstorff intersection adjacent to the project site. The nearest major bus stop is located one-half mile west of the site, at the El Camino Real/Showers Drive intersection. The San Antonio Caltrain station is located approximately one-mile northwest of the site. The site is considered to have good transit access.

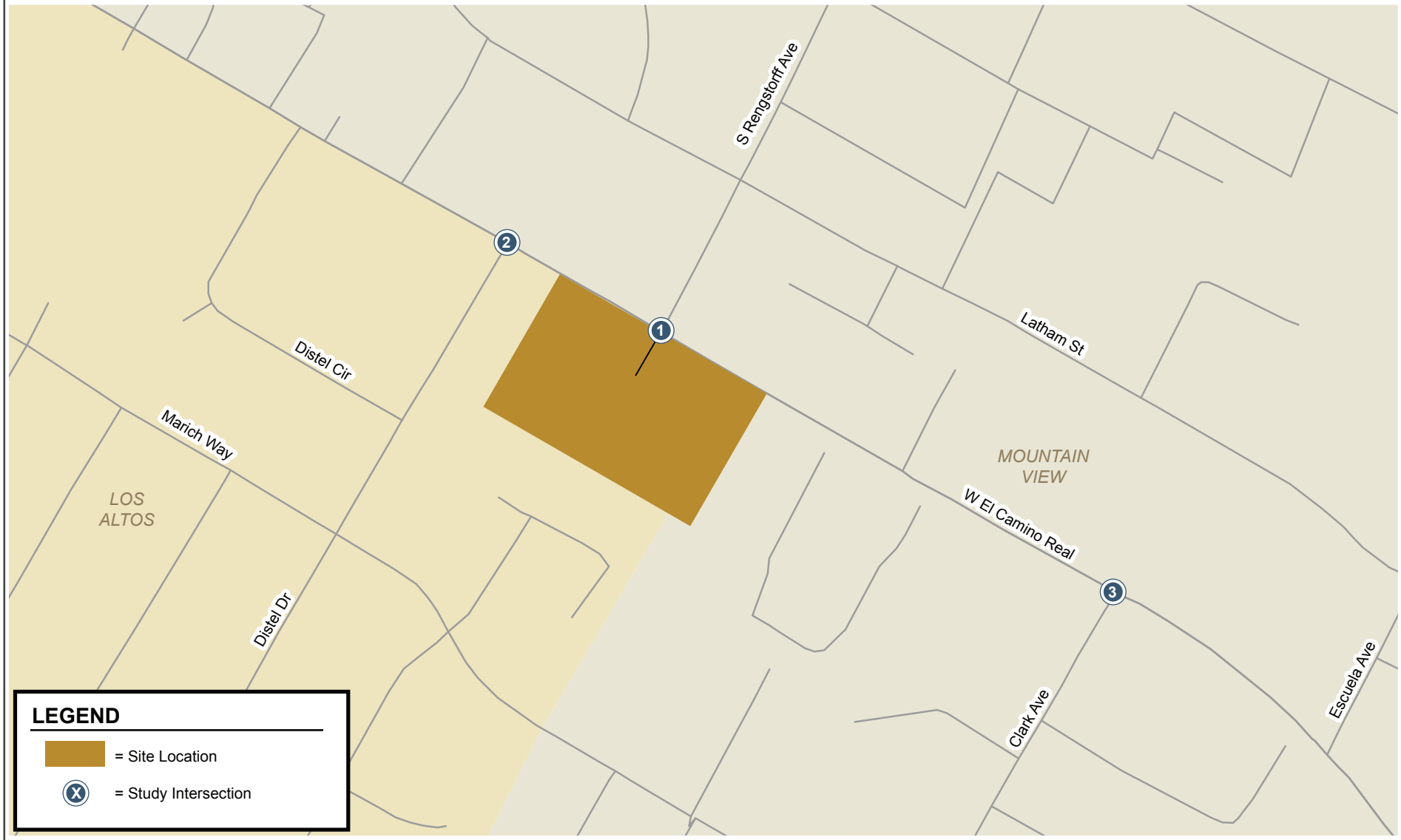
Existing Pedestrian and Bicycle Facilities

Pedestrian facilities in the vicinity of the project site are provided via sidewalks and signalized crossings. Sidewalks are found on both sides of the three study intersections included in the traffic impact analysis. Crosswalks with pedestrian signal heads and push buttons are located at all the study intersections.

Bicycle facilities in the vicinity of the project site include bike lanes and a bike route. Bike lanes are lanes on roadways designated for use by bicycles with special lane markings, pavement legends, and signage. Bike routes are existing rights-of-way that accommodate bicycles but are not separate from the existing travel lanes. Routes are typically designated only with signs or pavement markers. Bike lanes (Class II bikeway) are provided on Rengstorff Avenue, and Distel Avenue is a designated bike route (Class III bikeway) marked with “sharrows”.

4.17.1.3 *Study Methodology*

A Transportation Impact Analysis was prepared for the project by *Hexagon Transportation Consultants, Inc.* The study evaluated intersection levels of service for General Plan and CMP consistency, impacts to bicycle, pedestrian, and transit facilities, and site access, on-site circulation, vehicle queuing, and parking demand. Three study intersection were included in the analysis and evaluated for weekday AM and PM peak hour traffic conditions using TRAFFIX software to determine existing and project levels of service. The AM peak hour of adjacent street traffic is generally between 7:00 and 9:00 AM, and the PM peak hour of adjacent traffic is generally between 4:00 and 6:00 PM. On an average weekday, it is during these times that the most congested traffic conditions occur. The intersections analyzed within the traffic impact study to determine General Plan and CMP consistency are listed below and shown in Figure 4.17-1.



SITE LOCATION AND STUDY INTERSECTIONS | FIGURE 4.17-1

1) El Camino Real and Rengstorff Avenue (CMP designated intersection)

2) Distel Drive and El Camino Real

3) Clark Avenue and El Camino Real

Traffic conditions at each of the study intersections were evaluated under the following scenarios:

Scenario 1: Existing Conditions. Existing AM and PM peak hour traffic volumes were based on new traffic counts collected in October and November 2018. Existing PM peak hour traffic volumes at the CMP intersection were obtained from the 2016 CMP Annual Monitoring Report.

Scenario 2: Existing Plus Project Conditions. Existing plus project conditions reflect the projected traffic volumes on the existing roadway network with completion of the project. Existing plus project traffic volumes were estimated by adding to existing traffic volumes the additional traffic generated by the project. The estimated traffic generated by the proposed project was evaluated relative to existing traffic conditions to determine consistency with LOS standards in the General Plan and CMP.

Scenario 3: Background Conditions. Background traffic conditions are represented by background traffic volumes on the planned roadway network. Background traffic volumes were estimated by adding to existing traffic counts the additional traffic generated by approved but not yet constructed developments in the area. The study uses a conservatively high growth factor of two percent per year until the project opening date to represent traffic growth on El Camino Real.

Scenario 4: Background Plus Project Conditions. Background plus project traffic volumes were estimated by adding to background traffic volumes the additional traffic generated by the proposed project. Background plus project conditions were evaluated relative to background conditions in order to determine consistency with LOS standards in the General Plan and CMP.

Data required for the analysis was obtained from new traffic counts, field observations, the City of Los Altos, the CMP Annual Monitoring Report, and previous traffic studies. These sources provided the data used to determine intersection traffic volumes, intersection lane configurations, and intersection signal timing and phasing.

4.17.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?	☐	☐	☒	☐
2) For a land use project, conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1)?	☐	☐	☒	☐
3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)?	☐	☐	☒	☐
4) Result in inadequate emergency access?	☐	☐	☒	☐

4.17.2.1 *Thresholds of Significance*

The traffic impacts of the project are evaluated against the above-listed criteria to determine whether the impacts are significant. For criterion (2), the CEQA Guidelines provide that projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor (i.e., in a TPA) should be presumed to cause a less than significant transportation impact.

City of Los Altos General Plan Consistency

A development project in Los Altos would be inconsistent with the Circulation Element of the General Plan if for either peak hour, either of the following conditions occurs at a signalized intersection:

- The level of service at the intersection drops below its respective level of service standard (LOS D or better for local intersections) when project traffic is added, or
- An intersection that operates below its level of service standard under no-project conditions experiences an increase in delay of four or more seconds, and the volume-to-capacity ratio (v/c) is increased by one percent (0.01) or more when project traffic is added.

CMP Consistency

A development project would be inconsistent with the CMP if the development project results in the level of service at a CMP intersection dropping below LOS E when project traffic is added.

4.17.2.2 *Transportation Impacts*

Impact TRN-1:	The project would not conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths. **(Less than Significant Impact)**

Trip Generation, Distribution and Assignment

The magnitude of traffic produced by a new development and the locations where that traffic would appear are estimated using a three-step process: (1) trip generation, (2) trip distribution, and (3) trip assignment. In determining project trip generation, the magnitude of traffic entering and exiting the site is estimated for the AM and PM peak hours. As part of the project trip distribution, an estimate is made of the directions to and from which the project trips would travel. In the project trip assignment, project trips are assigned to specific streets and intersections.

Standard trip generation rates were applied for the proposed development in accordance with the Institute of Transportation Engineers (ITE) manual entitled *Trip Generation,* 10th edition. The trip rates for a Multiple-family Housing – Low-Rise land use were used for this project to estimate total trips generated by the four proposed multi-family housing buildings. Total trips generated by the proposed project were then evaluated against estimated trips generated by the existing businesses on-site. Trips generated by the existing businesses were estimated based on driveway counts conducted in October and November 2018. Project trip generation estimates are shown in Table 4.17-1 below.

Table 4.17-1: Project Trip Generation

		AM Peak Hour Trips				PM Peak Hour Trips				Daily Rate	Daily Trips
Land Use	**Size**	**Rate**	**In**	**Out**	**Total**	**Rate**	**In**	**Out**	**Total**		
Proposed Condominiums/ Townhomes[1]	196 units	0.46	21	69	90	0.56	69	41	110	7.32	1,435
Existing Office Building[2]	78,950 s.f.	-	53	4	57	-	105	60	165	-	1,110
Net Project Trip Generation			**-32**	**65**	**33**		**-36**	**-19**	**-55**		**325**

Notes:

[1] Low-Rise Multifamily Housing (Land Use 220). ITE Trip Generation Manual, 10th Edition (2017), average rates for General Urban/Suburban settings are used.

[2] Existing use trips based on peak-hour driveway counts conducted on 10/18/18 and 11/13/18. Daily traffic estimated based on peak hours.

The trip distribution pattern for net trips generated by the proposed project was estimated based on existing travel patterns on the surrounding roadway system and the locations of complementary land uses. The new net trips that the project would generate were assigned to the roadway system based on the directions of approach and departure, the roadway network connections, and the locations of project driveways.

Level of Service

Project consistency with the General Plan and CMP's LOS thresholds was evaluated relative to both existing traffic and background traffic volumes. For the existing plus project scenario, the levels of service at the three study intersections were evaluated for the current traffic conditions and the traffic conditions expected to result from added vehicular trips under the proposed project. For the background plus project scenario, background peak-hour traffic volumes were estimated by adding the estimated traffic from the approved but not yet constructed developments to existing volumes. The traffic study used a conservatively high growth factor of two percent per year through the year 2023 to represent background traffic growth on El Camino Real. The project was then evaluated using the City's LOS standards for its contributions to traffic volumes under background conditions.

As shown in Tables 4.17-2 and 4.17-3 below, the three signalized study intersections would continue to operate at acceptable levels of service under both existing plus project and background plus project conditions. In some instances, the average delay would decline at an intersection because the proposed project would result in a reduction of traffic volumes at an intersection relative to the traffic generated by the existing office use of the site.

Table 4.17-2: Existing Plus Project Intersection Levels of Service

Intersections	Peak Hour	Existing		Existing + Project	
		Average Delay (sec)	LOS	Average Delay (sec)	LOS
1. Rengstorff Avenue & El Camino Real*	AM PM	30.9 24.0	C C	31.4 23.1	C C
2. Distel Drive & El Camino Real	AM PM	31.3 20.8	C C	31.5 20.7	C C
3. Clark Avenue & El Camino Real	AM PM	28.4 19.0	C B	28.3 18.9	C B
Note: * Denotes the CMP designated intersection.					

Table 4.17-3: Background Plus Project Intersection Levels of Service

Intersections	Peak Hour	Background		Background + Project	
		Average Delay (sec)	LOS	Average Delay (sec)	LOS
1. Rengstorff Avenue & El Camino Real	AM PM	31.9 24.5	C C	32.4 23.6	C C
2. Distel Drive & El Camino Real	AM PM	32.6 21.2	C C	32.7 21.1	C C
3. Clark Avenue & El Camino Real	AM PM	29.6 19.7	C B	29.4 19.6	C B

The proposed project would not result in a substantial increase in traffic volumes at affected intersections. The City of Los Altos' circulation system would continue to operate effectively following implementation of the project. Traffic volumes at the one CMP-designated intersection, Rengstorff Avenue and El Camino Real, would not be increased beyond the acceptable standards set forth by the CMP. Therefore, traffic generated by the proposed project would be consistent with the General Plan and the CMP. **(Less than Significant Impact)**

Pedestrian Facilities

The proposed project would provide sidewalks along the El Camino Real frontage and includes landscaped paseos and walking pathways throughout the interior of the site and connecting to the sidewalks on El Camino Real. Existing pedestrian facilities in the project area are sufficient to serve the project. For these reasons, pedestrian circulation would not be inhibited by the proposed project and the project would not conflict with the Los Altos Pedestrian Master Plan. The Pedestrian Master Plan includes goals, policies and actions for improving the pedestrian environment in Los Altos, including planning for pedestrian accommodation and facilities that serve people of all ages and abilities, developing a safe pedestrian network, and increasing pedestrian mode share. The proposed project would include pedestrian access points to existing facilities and would not prevent the City from implementing the goals of the Pedestrian Master Plan. **(Less than Significant Impact)**

Bicycle Facilities

The proposed project would provide 84 long-term and 14 short-term bicycle parking spaces, located on the basement floor of the below-ground parking garage. In addition, the project proposes new bicycle lanes along the project frontage on El Camino Real. The addition of bicycle lanes would improve bicycle circulation throughout the surrounding areas

The City of Mountain View's El Camino Real Streetscape Plan proposes to implement bicycle lanes along El Camino Real west of Calderon Avenue, which would replace the existing on-street parking. While the City of Los Altos does not have a Streetscape Plan, the proposed bicycle lanes are expected to begin just south of the project site and that the City of Mountain View will require their continuation to the intersection at Distel Drive to create a logical transition. The proposed project is consistent with the Streetscape Plan and would not interfere with planned bicycle facilities in the area. The proposed project would not preclude the continued use of existing bicycle facilities in the project area nor would it conflict with Los Altos General Plan policies promoting continued and expanded bicycle use. **(Less than Significant Impact)**

Transit Facilities

The project site is proximate to bus stops for VTA routes 22 and 522, with the nearest bus stop located at the El Camino Real/Rengstorff Avenue intersection. The site is considered to have good transit access and the project would not conflict with Los Altos General Plan policies encouraging the use of public transit. The project would not cause substantial transit delays. **(Less than Significant Impact)**

Impact TRN-2:	The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1). **(Less than Significant Impact)**

Senate Bill 743 was passed in 2013 and mandated a shift in the metrics used for transportation analysis under CEQA from Levels of Service (LOS) to Vehicle Miles Traveled (VMT). CEQA Guidelines Section 15064.3, subdivision (b) (1) establishes that VMT is the metric to use to analyze transportation impacts of land use projects. The Guidelines state that generally projects within ½-mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.

The proposed project site is located along El Camino Real, a highly traveled transit corridor which extends from Santa Clara County to San Mateo County. The site is proximate to VTA bus routes 22 and 522. Bus stops are located on both sides of El Camino Real with the nearest stop at the El Camino Real/Showers Drive intersection, ½ mile west of the project site. The proposed project, therefore, qualifies as a transit-oriented development project and would have a less than significant transportation impact per CEQA Guidelines Section 15064.3. **(Less than Significant Impact)**

Impact TRN-3:	The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **(Less than Significant Impact)**

On-site circulation was evaluated for the project driveways and underground parking garage. Three driveways onto El Camino Real (i.e., a western, central, and eastern driveway) would provide vehicular access to the project site. The western and eastern driveways would connect to the perimeter road, providing access to the townhome building's garages and visitor parking. The eastern driveway would provide both ingress and egress and the western driveway would provide only egress (i.e., only right turn out). The central driveway functions as the southern leg of the Rengstorff Avenue and El Camino Real signalized intersection and would provide access to the below-ground parking structure. All driveways meet the City's driveway width standards (26 feet and 12 feet for two-way and one-way driveways, respectively) and Caltrans' site distance requirements. The project would provide 90-degree parking spaces throughout the garage, and the driveway would be adequately sized per City standards. The site is surrounded by residential and commercial development. For these reasons, the proposed project would not substantially increase hazards due to a geometric design feature or due to incompatible uses. **(Less than Significant Impact)**

Impact TRN-4:	The project would not result in inadequate emergency access. **(Less than Significant Impact)**

The perimeter access road is designed to provide on-site emergency vehicle access. The perimeter road would provide a minimum 26-foot wide emergency vehicle access to the western, southern, and eastern sides of the proposed residential development. The perimeter road would provide adequate emergency vehicles access to both the condominiums and townhomes. **(Less than Significant Impact)**

4.17.3 Operational Transportation Issues Not Required Under CEQA

The following information is not required under CEQA but is provided here to help the public and the decision-makers in their consideration of the project.

Parking

Parking is typically considered a non-CEQA issue and parking issues are not CEQA impacts in TPAs; however, City policy may direct development projects to analyze whether there is adequate parking provided during the development review process. The proposed project is eligible for reduced parking requirements due to the provision of affordable housing units per Municipal Code Section 14.28.040 (G). Reduced on-site parking can sometimes lead to restricted site access and overflow into adjacent neighborhoods and commercial parking lots, which would conflict with Policy 5.3 of the City's Circulation Element. The following discussion analyzes whether on-site parking, as provided by the project, is sufficient to meet demand.

The project proposes to provide 236 parking spaces in the underground parking garage (including 88 tandem spaces), 48 townhome parking spaces, and six surface guest parking spaces for the townhomes. In total, the project would provide 290 on-site parking spaces. The proposed parking supply was evaluated *Hexagon Transportation Consultants* as part of the transportation impact analysis completed for the project (refer to Appendix F). The evaluation is based on a parking supply study completed by *Fehr & Peers* that determined the average parking demand rates for similar multiple-family residential developments in Mountain View, Palo Alto, Sunnyvale, and Santa Clara, including 14 market rate and three affordable housing developments. The *Fehr & Peers* parking supply study is included as Appendix D to the transportation impact analysis. Based on the parking supply study, the parking demand for affordable housing developments was found to be 0.65 spaces per bedroom and the parking demand for market rate developments was found to be 0.70 spaces per bedroom. Using these parking rates, the proposed project should provide a total of 236 parking spaces, as shown in Table 4.17-4, below.

Table 4.17-4: Parking Demand Analysis

Proposed Unit Types		*Number of Units*	*Bedrooms*	*Study Rate (per bedroom)*	*Parking Demand (Spaces)*	*Parking Provided*
Condominiums						
Affordable	1-bedroom	12	12	0.65	8	
	2-bedroom	13	26	0.65	17	
Market Rate	1-bedroom	68	68	0.70	48	
	2-bedroom	77	154	0.70	108	
	3-bedroom	2	6	0.70	4	
Total		**172**			**185**	**236**
Townhomes						
Affordable	2-bedroom	2	4	0.65	3	
	3-bedroom	1	3	0.65	2	
Market Rate	2-bedroom	2	4	0.70	3	
	3-bedroom	15	45	0.70	32	
	4-bedroom	4	16	0.70	11	
Total		**24**			**51**	**54**
Total					**236**	**290**

As shown in the table, the proposed project would provide adequate parking to meet the demand of future residents and guests. Therefore, the project would be consistent with Policies 5.1 and 5.3 of the City's Circulation Element.

4.18 TRIBAL CULTURAL RESOURCES

The follow discussion is based, in part, on an archaeological literature search prepared for the project site by *Holman & Associates.* The report, dated January 17, 2019, is available for review at the Los Altos Planning Department by qualified personnel during regular business hours.

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

State

Assembly Bill (AB) 52, effective July of 2015, established a new category of resources for consideration by public agencies when approving discretionary projects under CEQA, called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or when it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
    - Included or determined to be eligible for inclusion in the California Register of Historic Resources[57]
    - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)
- A resource determined by the lead agency to be a TCR.

No tribes have contacted the City of Los Altos requesting notification per AB 52.

Local

Los Altos General Plan

The City of Los Altos General Plan contains the following policies in its Community Design and Historic Resources Element which relate to tribal cultural resources and the proposed project.

Policy 6.4: Preserve archaeological artifacts and sites found in Los Altos or mitigate disturbances to them, consistent with their intrinsic value.

[57] See Public Resources Code section 5024.1. The State Historical Resources Commission oversees the administration of the CRHR and is a nine-member state review board that is appointed by the Governor, with responsibilities for the identification, registration, and preservation of California's cultural heritage. The CRHR "shall include historical resources determined by the commission, according adopted procedures, to be significant and to meet the criteria in subdivision (c) (Public Resources Code, Section 5024.1 (a)(b)).

Policy 6.5: Require an archaeological survey prior to the approval of significant development projects near creeksides or identified archaeological sites.

4.18.1.2 *Existing Conditions*

The project site is developed with an office building and associated surface parking and landscaping. The site is within the territory of the Ohlone and Muwekma Indian tribes, who had settlements along creeks in the project area. The site is located on a large valley terrace approximately 0.45 miles west of Permanente Creek. There are no documented cultural resources within or adjacent to the project site. Due to the distance between the site and the nearest creek (i.e., 0.45 miles) and lack of documented cultural resources within or adjacent to the site, site has a low potential for Native American archaeological deposits and/or cultural materials.[58]

4.18.2 Impact Discussion

	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 Public Resources Code Section 21074 as either a site, feature, place, 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:				
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)?	☐	☒	☐	☐
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 this criteria, the significance of the resource to a California Native American tribe shall be considered.	☐	☒	☐	☐

Impact TCR-1:	**The project would not cause a substantial adverse change in the significance of a tribal cultural resource 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). (Less than Significant Impact with Mitigation Incorporated)**

[58] Holman & Associates. *Results of a CEQA Archaeological Literature Search for 5150 El Camino Real.* January 2019.

No tribes have contacted the City of Los Altos requesting notification per AB 52. There are no documented cultural resources within or adjacent to the project site. Due to the distance between the site and the nearest creek (i.e., 0.45 miles) and lack of documented cultural resources within or adjacent to the site, site has a low potential for Native American archaeological deposits and/or cultural materials. For these reasons, no tribal cultural resources are expected to occur on the project site. As discussed in *Section 4.5, Cultural Resources*, construction activities at the project site have the potential to disturb as-yet undiscovered archaeological resources at the site, which could include tribal cultural resources. The previously described mitigation measures (**MM CUL-1.1 – MM CUL-1.3**) detail the appropriate process to be followed to ensure that project implementation does not significantly impact archaeological resources. Any resources that are uncovered during construction activities will be analyzed for their potential local or statewide significance and properly documented prior to the commencement of construction. If human remains are uncovered, the Santa Clara County Coroner will be notified and, if the remains are determined to be Native American, the NAHC will be consulted to determine the appropriate burial procedure. Adhering to the mitigation measures previously described in *Section 4.5, Cultural Resources* would ensure that project implementation does not result in adverse changes to potentially significant tribal cultural resources. **(Less than Significant Impact with Mitigation Incorporated)**

Impact TCR-2:	**The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is 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. (Less than Significant Impact with Mitigation Incorporated)**

In the event archaeological resources are discovered during project construction, **MM CUL-1.2** requires construction activity within a 50-foot radius of the find to stop, the Director of Community Development to be notified and an archaeologist to assess the find and make appropriate recommendations, if warranted. The Director's involvement in the process would allow for the City to make a determination of significance regarding any resources that are uncovered during project construction, including tribal cultural resources. By following the archaeologist's recommendations, impacts to these resources would be mitigated to a less than significant level. Therefore, the proposed project would not result in a substantial adverse change to tribal cultural resources that are determined by the City to be significant. **(Less than Significant Impact with Mitigation Incorporated)**

4.19 UTILITIES AND SERVICE SYSTEMS

4.19.1 Environmental Setting

4.19.1.1 *Regulatory Framework*

State and Regional

Urban Water Management Plan

Pursuant to the State Water Code, municipal water suppliers serving more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The California Water Service adopted its most recent UWMP for the Los Altos Suburban District in June 2016.

Wastewater

The San Francisco Bay Regional Water Quality Board (RWQCB) includes regulatory requirements that each wastewater collection system agency shall, at a minimum, develop goals for the City's Sanitary Sewer System Master Plan to provide adequate capacity to convey peak flows. The City of Los Altos last updated its Sanitary Sewer Master Plan in February of 2013.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or Assembly Bill 939 (AB 939), established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

Assembly Bill (AB) 341 sets forth the requirements of the statewide mandatory commercial recycling program in the Public Resources Code. All businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Senate Bill 1383

Senate Bill (SB) 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025.

California Green Building Standards Code

In January 2010, the State of California adopted the California Green Building Standards Code, establishing mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality.

Local

The City of Los Altos General Plan contains policies pertaining to utilities and service systems in its Infrastructure and Waste Disposal Element. The relevant policies are listed below.

Policy 1.3: Review development proposals to determine whether adequate water pressure exists for existing and new development.

Policy 2.2: Review development proposals to ensure that if a project is approved, adequate sewage collection and treatment capacity is available to support such proposals.

Policy 4.1: Continue to work with infrastructure providers to ensure that the community's current and future infrastructure needs are met.

Policy 4.2: Maintain accurate records of infrastructure usage and needed infrastructure improvements.

Policy 4.3: Continue to require utilities in new developments to be placed underground.

4.19.1.2 *Existing Conditions*

Water Service

The project site is served by the California Water Service Company (Cal Water) and is located within Cal Water's Los Altos Suburban (LAS) District. Water supply for the project site is sourced from a combination of groundwater and purchased water. Approximately 35 percent of the LAS District's provided water comes from primary groundwater production and 65 percent comes from water purchases from the SCVWD, sourced from underground aquifers, reservoirs, and the San Joaquin-Sacramento River Delta. The Cal Water system includes 297 miles of mains, 65 booster pumps, and 46 storage tanks.[59] The LAS District 2015 UWMP found that Cal Water has more than sufficient well capacity to meet the demands unserved by SCVWD purchases through 2040.
The project site is currently developed with a 78,950-square foot office building and associated paved surface parking and landscaping. The water demand of the existing on-site office development is estimated to be approximately 22.6 million gallons per year, or 62,007 gallons per day.[60] The project site is served by an existing eight-inch water main in El Camino Real.

[59] California Water Service. *2016 Water Quality Service Report.* https://www.calwater.com/docs/ccr/2016/las-las-2016.pdf. Accessed December 21, 2018.
[60] California Emissions Estimator Model. *Appendix D – Table 9.1 Water Use Rates.* September 2016.

Sanitary Sewer/Wastewater Treatment

The City of Los Altos' Department of Public Works is responsible for the wastewater collection system within the City. Wastewater is conveyed to the Palo Alto Regional Water Pollution Control Plant (PARWQCP) for treatment and disposal. The PARWQCP serves the wastewater management needs of the communities of Palo Alto, Los Altos, Mountain View, East Palo Alto, Los Altos Hills, Stanford University and East Palo Alto Sanitary District. The City owns and maintains the collection system within the City and its sphere of influence and the trunk sewer that connects the City to the PARWQCP master metering station. The City's collection system includes approximately 140 miles of sewer pipes, most of which are six-inch and eight-inch vitrified clay pipe.[61]

The PARWQCP has an annual treatment capacity of 40 million gallons per day (mgd), with the City of Los Altos allocated 3.6 mgd of the plant's treatment capacity (nine percent). In 2015, the average dry weather flow to the PARWQCP was 18.4 mgd, with Los Altos contributing 3.47 mgd.[62]

An existing six-inch sewer main in El Camino Real serves the project site. The existing office building on the project site is estimated to generate approximately 19.21 mgd of wastewater per year, or 52,706 gallons per day.[63]

Storm Drainage

Runoff from the project site flows into the City of Los Altos' municipal storm drainage system. The existing on-site storm drainage system captures and conveys runoff from the project site to the City's storm drain system. An existing 12-inch storm drain line serving the project area crosses through the central portion of the project site within an existing easement. Flows from the project site are discharged to Adobe Creek and ultimately, the San Francisco Bay.

Solid Waste

Solid waste collection in the City of Los Altos is provided by Mission Trail Waste Systems through a contract with the City. Mission Trail Waste Systems provides residential, commercial and industrial collection services for garbage, recycling and organics for the City. Mission Trail Waste Systems operates a transfer station at 1313 Memorex Drive in Santa Clara. The City of Los Altos is served by the Newby Island Landfill, located at 1601 Dixon Landing Road in Milpitas. Newby Island Landfill provides disposal capacity to the cities of San Jose, Milpitas, Santa Clara, Cupertino, Los Altos, and Los Altos Hills. As of May 17, 2018, Newby Island Landfill had approximately 16.9 million cubic yards of capacity remaining and an estimated closure in 2039.[64]

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[61] City of Los Altos. "Public Works – Sanitary Sewer." https://www.losaltosca.gov/publicworks/page/sanitary-sewer-0. Accessed December 20, 2018.

[62] California Water Service Company. *2015 Urban Water Management Plan – Los Altos Suburban District.* June 2016.

[63] Based on the California Emissions Estimator Model (CalEEMod) standard wastewater generation rate of 85 percent of total water usage. CalEEMod is a statewide land use emissions computer model designed to quantify criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects.

[64] Kelapanda, Achaya. Environmental Manager, Republic Services, Inc. Personal Communication. May 17, 2018.

The existing office building on the project site is estimated to generate approximately 73.4 tons of solid waste per year.[65]

4.19.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
4) 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?	☐	☐	☒	☐
5) Negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
6) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact UTL-1: The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (Less than Significant Impact)

[65] California Emissions Estimator Model. Appendix D – Table 10.1 Solid Waste Disposal Rates. September 2016.

Sanitary Sewer Facilities

The proposed project would connect to the City's existing sanitary sewer system. The existing sanitary sewer lines in El Camino Real would be utilized by the project to convey wastewater flows from the project to the PARWQCP. The City's Sanitary Sewer System Master Plan (SSMP) Update determined that less than five percent of the 121 miles of inspected sewer pipes in the City and in its immediate vicinity were in poor condition. No deficient pipe segments were located directly adjacent to the project site. Overall, the City's sewer system was determined to be in good condition, with several recommended improvements noted in the SSMP Update to be included in the Capital Improvement Program (CIP) to address deficiencies.[66] The proposed project would not require expansion of off-site facilities or the construction of new sewer lines aside from lateral lines required to connect to the existing sewer in El Camino Real. **(Less than Significant Impact)**

Storm Drainage Facilities

Implementation of the proposed project would marginally decrease the impervious surface area on-site, resulting in a net reduction of runoff volumes and rates. Installation of the proposed flow-through planters and bioretention areas would further reduce post-construction runoff flows, minimizing the project's impacts to the existing storm drain system.

The City of Los Altos' Storm Water Management Master Plan identified various deficiencies in the City's storm drainage system and provided recommendations for follow-up actions to address these deficiencies. The project site is not located adjacent to, or in the vicinity of, identified deficiencies in the storm drainage system. The proposed project would not exacerbate existing storm drainage deficiencies and, compared to existing on-site conditions, would reduce the demand placed on the City's storm drainage system by reducing impervious surfaces and implementing BMPs to treat stormwater runoff generated at the site, per the Municipal Regional Permit. For these reasons, the proposed project would not require the construction of new storm drainage infrastructure. The project proposes to relocate the existing City storm drain line that passes through the project site. The new alignment would follow the proposed perimeter drive along the southern and eastern project boundaries. The on-site relocation of the storm drain would not result in significant environmental impacts. For these reasons, the proposed project would not result in a significant impact to storm drainage facilities. **(Less than Significant Impact)**

Water Facilities

The proposed project would connect to existing eight-inch water main in El Camino Real. The project would not require expansion of off-site facilities or the construction of new water mains aside from lateral lines required to connect to the existing water main in El Camino Real. **(Less than Significant Impact)**

Electric Power, Natural Gas, and Telecommunication Utilities

The site is currently served by electric power, natural gas, and telecommunication utilities. The proposed redevelopment of the site would not require the expansion of these utilities. Therefore, the

[66] City of Los Altos. *Sanitary Sewer System Master Plan Update.* February 2013.

proposed project would not result in a significant impact due to the expansion or relocation of electric power, natural gas, or telecommunication facilities. **(Less than Significant Impact)**

Impact UTL-2:	**The project would not have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. (Less than Significant Impact)**

The proposed project would redevelop a site includes the construction of 196 multi-family residential units in two condominium buildings and two townhome buildings. The proposed project would generate a gross water demand of approximately 20.82 million gallons per year[67], which is a net decrease in water consumption from the site's current use. Project water use would be further minimized by adherence to the 2016 CALGreen Code and Chapter 12.36 of the Municipal Code, which adopts water efficient landscape regulations. Because the proposed project would incrementally decrease site water demand compared to existing conditions, and the Cal Water LAS District did not identify any substantial supply deficiencies through 2040, the proposed project would not result in significant impacts to water supply. **(Less than Significant Impact)**

Impact UTL-3:	**The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. (Less than Significant Impact)**

The PARWQCP has capacity to treat 40 mgd of dry weather flows from cities within its service area, with 3.6 mgd of dry weather flow allocated to serve the City of Los Altos' wastewater disposal needs. In 2015, it was estimated that the City of Los Altos generated 3.47 mgd for treatment at the PARWQCP, slightly below the capacity allocated to it at the plant. The proposed residential project is estimated to generate approximately 17.7 million gallons of wastewater per year, or 48,493 gallons per day. Similar to the estimated water demand for the project, the estimated wastewater generation from the project would slightly decrease from the current office building use on the site. The PARWQCP currently has sufficient capacity to provide wastewater treatment for the cities within its service area, and the proposed project would not inhibit the PARWQCP from meeting wastewater treatment requirements. **(Less than Significant Impact)**

Impact UTL-4:	**The project would not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure. (Less than Significant Impact)**

Solid waste generated by the proposed project would be disposed of at Newby Island Landfill in Milpitas. As of May 17, 2018, Newby Island Landfill had approximately 16.9 million cubic yards of capacity remaining and an estimated closure in 2039.[68] The proposed project is estimated to generate approximately 90.2 tons of solid waste per year.[69] This amounts to a net increase of 16.8 tons of solid

[67] California Emissions Estimator Model. *Appendix D – Table 9.1 Water Use Rates.* September 2016.
[68] Kelapanda, Achaya. Environmental Manager, Republic Services, Inc. Personal Communication. May 17, 2018.
[69] CalEEMod. *Appendix D – Table 10.1 Solid Waste Disposal Rates.* September 2016.

waste per year compared to the waste generated by the existing office building on the site. While the proposed project would increase the solid waste generated on-site, the project would be served by a landfill with adequate capacity to support growth expected in the region. **(Less than Significant Impact)**

Impact UTL-5:	**The project would not negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals. (Less than Significant Impact)**

The project would be required to provide three streams of waste – solid waste, recyclable materials and organic materials – per the City's Solid Waste Collection and Recycling Ordinance. The Ordinance is intended to support the City's target of achieving a 78 percent waste diversion rate. The project would also be required to comply with Municipal Code Chapter 6.14 to reduce construction and demolition waste. By diverting waste per City policies, the net increase in the amount of solid waste generated by the proposed project would be reduced. Overall, the proposed project would not result in a significant increase in solid waste and recyclable materials generated within the City of Los Altos and would not prevent the City from meeting its solid waste reduction goals. **(Less than Significant Impact)**

Impact UTL-6:	**The project would not be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste. (Less than Significant Impact)**

Compliance with the City's Solid Waste Collection and Recycling Ordinance would ensure that project operation meets state and federal solid waste statutes and regulations. Additionally, the project would be required to collect, recycle and dispose of waste generated from construction and demolition activities per Municipal Code Chapter 6.14. Diversion of construction and demolition materials would further the City's efforts to reduce waste and comply with AB 939, AB 32, AB 341 and help achieve the State 75 percent waste diversion goal by 2020 and the City's 78 percent waste diversion goal. Therefore, the proposed project would not conflict with federal, state, and local solid waste statutes and regulations. **(Less than Significant Impact)**

4.20 WILDFIRE

4.20.1 Environmental Setting

4.20.1.1 *Regulatory Framework*

4.20.1.2 *Existing Conditions*

The project site is in an urbanized area. The site is not located within an identified Very High Fire Hazard Severity Zone in a State Responsibility Area (SRA) or a Local Responsibility (LRA).[70] [71] The project site is not located near wildlands that could present a fire hazard.

4.20.2 Impact Discussion

	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:				
1) Impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
2) 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?	☐	☐	☐	☒
3) 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?	☐	☐	☐	☒
4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, the project would not result in wildfire impacts. **(No Impact)**

[70] CAL FIRE. *Santa Clara County Fire Hazard Safety Zone Map – State Responsibility Area*. November 2007.
[71] CAL FIRE. *Santa Clara County Fire Hazard Safety Zone Map – Local Responsibility Area.* October 2008.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

4.21.1 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1) 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?	☐	☒	☐	☐
2) 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)?	☐	☒	☐	☐
3) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Impact MFS-1: The project does not 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. **(Less than Significant Impact with Mitigation Incorporated)**

As discussed in the prior sections of this Initial Study, the proposed project would not degrade the quality of the environment, substantially affect biological resources or eliminate important examples of California history or prehistory with implementation of the identified standard measures, conditions of approval, and mitigation measures. As discussed in *Section 4.3, Air Quality,* implementation of standard measures and mitigation measures (**MM AIR-2 and 3**) for impacts during project construction would reduce potentially significant air quality impacts to a less than significant level. As discussed in *Section 4.4, Biological Resources,* implementation of mitigation measures (**MM BIO-1.1 – 1.3)** for impacts to nesting birds and adherence to the City of Los Altos' Tree Preservation Ordinance measures would reduce potentially significant impacts to biological

resources to a less than significant level. As discussed in *Section 4.5, Cultural Resources,* with implementation of the identified standard measures and mitigation measures (**MM CULT-1.1 – 1.3**), the project would result in a less than significant impact on archaeological, historic, and paleontological resources. Significant project-level impacts can all be mitigated to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Impact MFS-2:	The project does not have impacts that are individually limited, but cumulatively considerable. **(Less than Significant Impact with Mitigation Incorporated)**

Under Section 15065(a)(3) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects "that are individually limited, but cumulatively considerable." As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

The proposed development would result in temporary water quality, biological, greenhouse gas and noise impacts during construction. With the implementation of the identified Standard Permit Conditions, BMPs, mitigation measures, and consistency with adopted City policies, construction impacts would be mitigated to a less than significant level. Because the nature of the identified impacts is temporary and would be mitigated, the proposed project would not have a cumulatively considerable impact on water quality, biological resources, greenhouse gas and noise.

Implementation of the proposed project could result in the loss of trees on and adjacent to the site. Any trees removed would be replaced in accordance to the City's Tree Protection Ordinance. The project would have no long-term effect on the urban forest or the availability of trees as nesting and/or foraging habitat. Therefore, the project would not have a cumulatively considerable long-term impact on biological resources.

Earthmoving activities may result in the loss of unknown subsurface prehistoric and historic resources on-site. Because the project would implement the Standard Permit Conditions as a condition of approval, and **MM CUL-1.1** to **MM CUL-1.5**, the proposed project would not have a cumulatively considerable impact on cultural resources in the project area.

The project's cumulatively considerable impact on air quality and transportation are discussed below. As discussed in the respective sections, the proposed project would have no impact or a less than significant impact on aesthetics, agriculture and forestry resources, geology and soils, mineral resources, population and housing, public services, recreation, and utility and service facilities. The cumulative impacts to utilities, public services, and population and housing are accounted for in the City's long-term infrastructure service planning. The project would not have a cumulatively considerable impact on these resource areas.

Cumulative Air Quality Impacts

As discussed in *Section 4.3, Air Quality*, , BAAQMD cumulative source thresholds would be exceeded when considering the combined emissions of TACs from El Camino Real and project construction. However, implementation of Mitigation Measures **MM AIR-3** would reduce the cumulative risk of air pollutant exposure to the MEI to a less than significant level.

Cumulative Transportation Impacts

The Traffic Impact Analysis prepared for the project included an evaluation of intersection levels of service (LOS). One of the scenarios evaluated was Background Plus Project Conditions, which consisted of existing traffic plus additional traffic generated by approved but not yet constructed developments in the area, plus the additional traffic generated by the proposed project. The results of the LOS analysis indicated that all study intersections would operate at acceptable levels of service under all analysis scenarios, including Background Plus Project Conditions, which represents the cumulative scenario. Cumulative traffic impacts of the project would therefore be less than significant.

Impact MFS-3:	The project does not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. **(Less than Significant Impact with Mitigation Incorporated)**

Consistent with Section 15065(a)(4) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include construction air quality, hazards and hazardous materials and noise. The proposed project would adhere to General Plan policies and implement mitigation measures to reduce potential impacts to a less than significant level. As discussed in *Section 4.3, Air Quality*, with implementation of mitigation measure **MM AIR-3***,* project construction activities would not expose sensitive receptors in the project area to health risks associated with mobile and stationary sources of toxic air contaminants above CEQA significance thresholds. No other direct or indirect adverse effects on human beings have been identified.

SECTION 5.0 REFERENCES

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SECTION 6.0 LEAD AGENCY AND CONSULTANTS

6.1 LEAD AGENCY

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