Environmental Initial Study and Mitigated Negative Declaration

New Office Building

467 First Street
448 South San Antonio Road
470 South San Antonio Road

Prepared by the
City of Los Altos

October 2013

CONTENTS

Note: *The appendices and calculations for the attached technical reports are available for review at City Hall. Please contact the project planner if you wish to review these documents.*

1. INTRODUCTION AND PURPOSE

This initial study of environmental impacts is being prepared to conform to the requirements of 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. This initial study evaluates the potential environmental impacts which might reasonably be anticipated to result from development of a new office building at 467 First Street, 448 South San Antonio Road and 470 South San Antonio Road.

The City of Los Altos is the Lead Agency under CEQA and has prepared this initial study to address the environmental impacts of implementing the proposed project.

2. PROJECT INFORMATION

PROJECT TITLE

New Office Building at 467 First Street

PROJECT LOCATION

The proposed project site includes the following addresses, which are located in the City of Los Altos, County of Santa Clara:

- 448 South San Antonio Road
- 470 South San Antonio Road
- 467 First Street

The project site is located on the northwest corner of the intersection of South San Antonio Road, First Street and Cuesta Drive.

LEAD AGENCY CONTACT

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PROJECT PROPONENT

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ASSESSOR'S PARCEL NUMBERS

APNs 167-41-014, 167-41-053, 167-41-057, 167-41-058 and a portion of public alley right-of-way (no APN).

GENERAL PLAN AND ZONING DESIGNATIONS

The project site has a General Plan land use designation of *Downtown Commercial* and zoning designations of *Commercial Downtown (CD)* and *Commercial Downtown/Multiple-Family (CD/R3)*. The portion of public alley right-of-way does not have a land use or zoning designation.

The proposed General Plan land use designation for the entire site would be *Downtown Commercial* and the proposed zoning designation for the entire site would be *Commercial Downtown/Multiple-Family (CD/R3)*.

FIGURE 1: VICINITY MAP

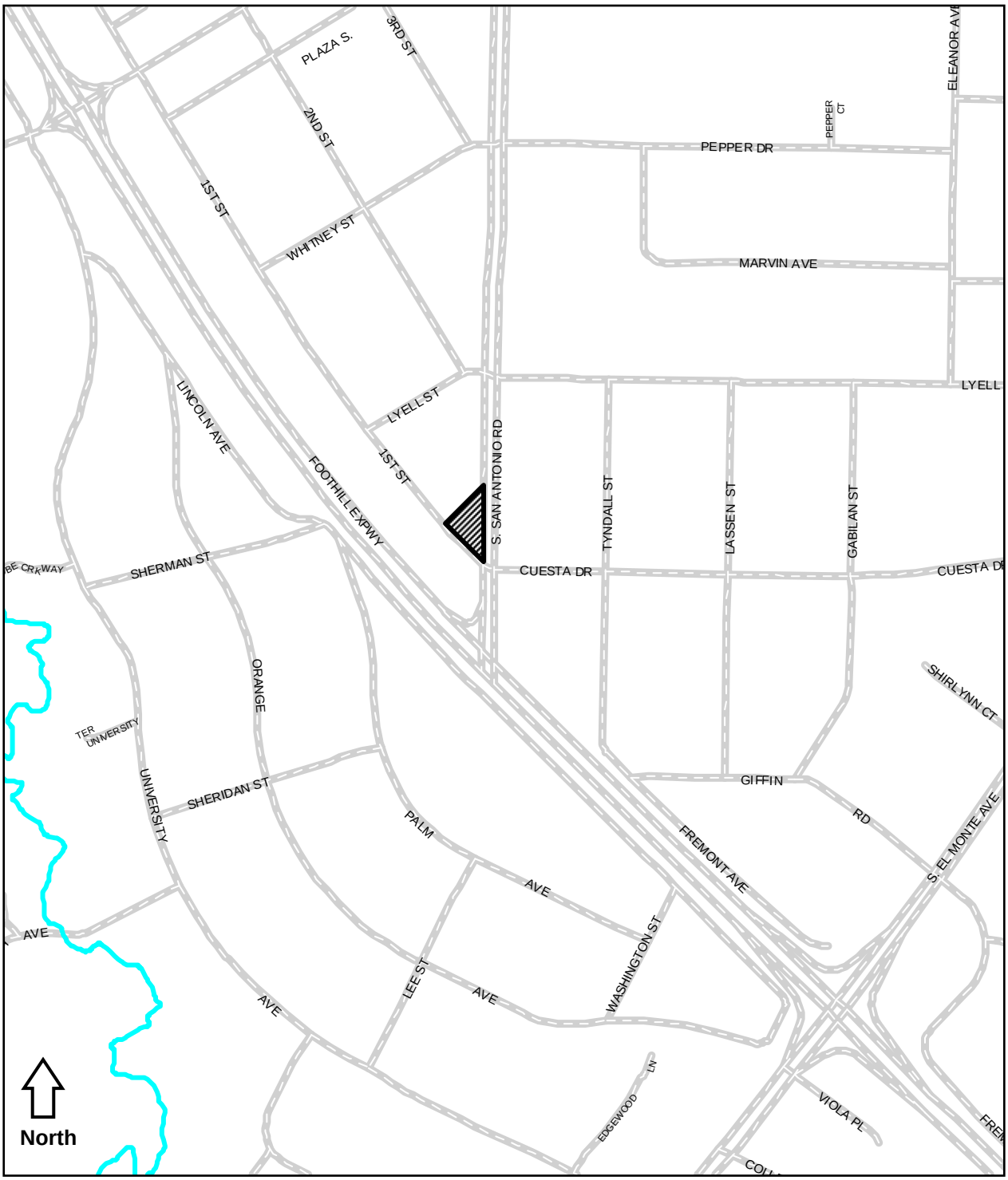
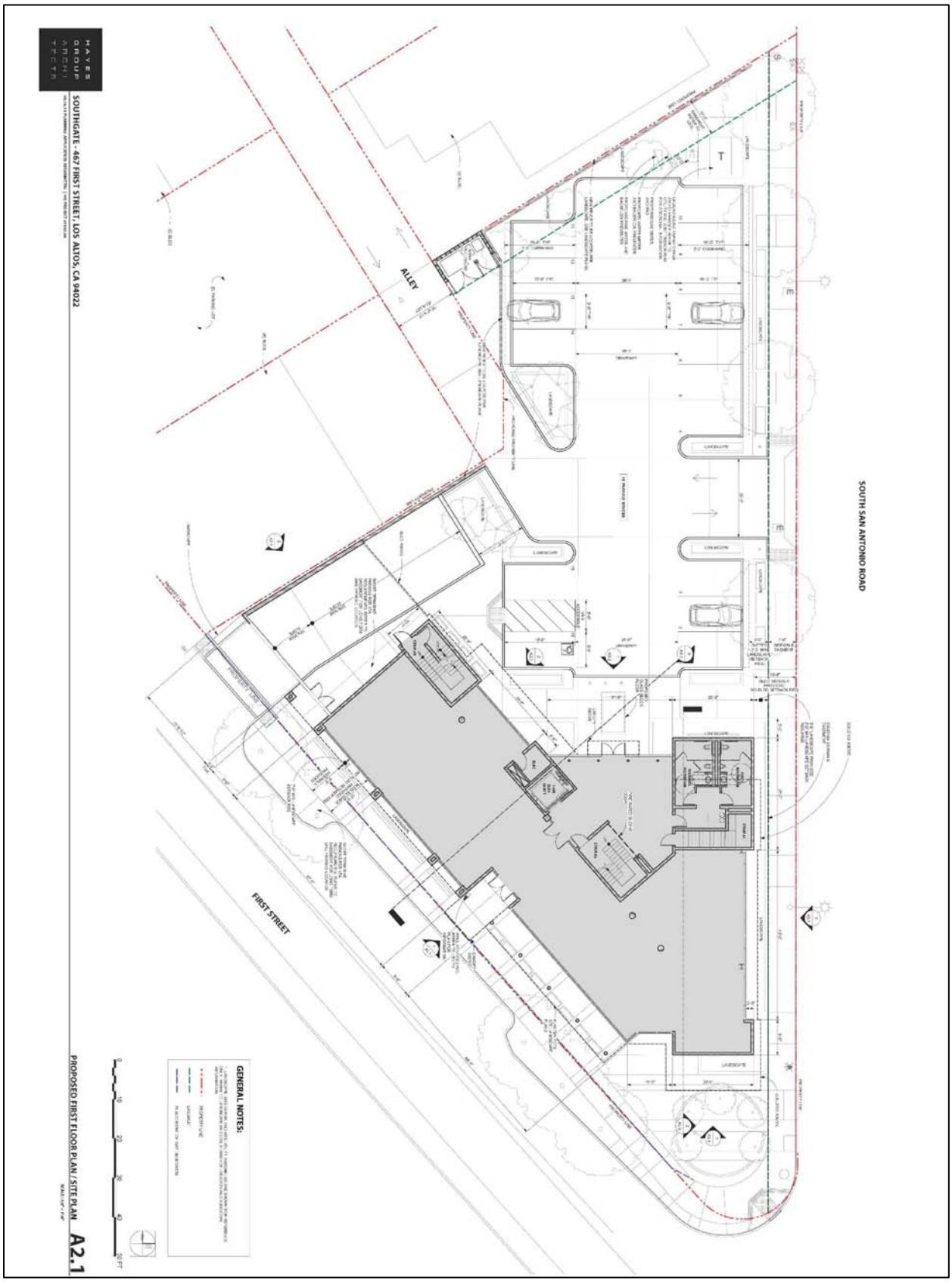


FIGURE 2: AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3: PROPOSED SITE PLAN



3. PROJECT DESCRIPTION

The proposed project site, which is owned by Southgate Partners LLC, is a total of 22,689 square feet in size (0.52 acres) and is made of four parcels and a portion of public alley right of way. The project site is triangular in shape and located on the northwest corner of the intersection of South San Antonio Road, First Street and Cuesta Drive. It is bordered by commercial uses – an auto mechanic, hardware store fitness studio, restaurant and bank – to the north. To the east, across South San Antonio Road, it is bordered by office buildings and to the southwest, across First Street, it is bordered by an office building and Foothill Expressway. A vicinity map is provided in Figure 1 and a map showing surrounding land uses is provided in Figure 2.

The proposed project is the redevelopment of the site with a new 17,156 square-foot office building and one level of underground parking. The existing site, which includes four separate parcels, is currently developed with a 1,460 square-foot restaurant (Burger Town) at 448 South San Antonio Road, an 840 square-foot dog grooming business (the Barking Lot) at 467 First Street and a vacant lot (formerly a Chevron gas station) at 470 South San Antonio Road. The proposed project would consolidate these parcels, along with a portion of public alley right-of-way, into one site and construct a new three-story building with 16 parking spaces at grade and 29 spaces in a one-level below grade garage. The project would include access via the public alley and South San Antonio Road for the surface parking lot and a driveway off of First Street for the underground parking. The proposed site plan is provided in Figure 3.

The proposed project also includes a General Plan Land Use Map amendment to designate the portion of public alley right-of-way as *Downtown Commercial*, a Zoning Map amendment to designate the entire site as *Commercial Downtown/Multiple-Family (CD/R3)*, and a Variance application to allow 45 onsite parking spaces where 52 onsite parking spaces are required by the City's Zoning Ordinance (Chapter 14.74).

All of the existing utilities (water, sewer, gas, electric, etc.) have the capacity to serve the project without being upgraded.

The project will meet the requirements of the National Pollution Discharge Elimination System (NPDES) permit including provision C.3, Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), as well as other local, state, and federal requirements for stormwater quantity and quality.

4. ENVIRONMENTAL CHECKLIST AND DISCUSSION OF IMPACTS

This section describes the existing environmental conditions on and near the project area, as well as environmental impacts associated with the proposed project. The environmental checklist, as recommended in the California Environmental Quality Act (CEQA) Guidelines, identifies environmental impacts that could occur if the proposed project is implemented. Mitigation measures are identified for all significant project impacts. "Mitigation Measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guideline 15370).

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial 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) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒	☐
4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒	☐

Discussion

While the mass, scale, and building height of the proposed building would be greater than the one-story buildings currently on site, the project is in the context of the existing commercial development in the Downtown area and subject to the City's Commercial Design Review process. For these reasons, the proposed project would not degrade the existing visual character of the surrounding area, and would not impact scenic resources or a scenic vista.

4.2 AGRICULTURAL AND FOREST RESOURCES

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial 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?	☐	☐	☐	☒	☐

4.3 AIR QUALITY

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
2) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐	☐
3) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is classified as non-attainment under an applicable federal or state ambient air quality standard including releasing emissions which exceed quantitative thresholds for ozone precursors?	☐	☐	☒	☐	☐
4) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐	☐
5) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒	☐

Discussion of Operational Impacts

The proposed project would demolish two existing commercial buildings (2,300 square feet) and develop a new 17,156 square-foot office building, which would be a net increase of 14,856 square feet. A project that increases the new square footage of commercial/office uses typically results in an increase in traffic, which results in an increase in local and regional pollutant levels. According to *Bay Area Air Quality Management District (BAAQMD) CEQA Air Quality Guidelines*, a project that generates more than 54 pounds per day of reactive organic gas (ROG), nitrogen oxide (NO_x), or fine particulate matter ($PM_{2.5}$); or 82 pounds per day of course particulate matter (PM_{10}) would be considered to have a significant impact on regional air quality. Under these guidelines, an office building of 346,000 square feet or more would meet or exceed the BAAQMD operational screening levels, and would require preparation of an air quality analysis.

Since the size of this office building falls well below BAAQMD's adopted thresholds, the project would have a less than significant impact on regional air quality.

Discussion of Construction Impacts

The proposed project would require excavation and grading of the site in order to construct the underground parking garage, office building and other associated improvements. Excavation of soil has a high potential for creating air pollutants. In addition to the dust created during excavation, substantial dust emissions could be created as debris and soil are loaded into trucks for removal.

After excavation, construction activities would continue to affect local air quality. Construction activities would generate exhaust emissions from vehicles/equipment and fugitive particulate matter emissions that would affect local air quality. Construction activities are also a source of organic gas emissions. Solvents in adhesives, non-water based paints, thinners, some insulating materials and caulking materials evaporate into the atmosphere and contribute to the photochemical reaction that creates urban ozone. Asphalt used in paving is also a source of organic gases for a short time after its application.

During construction, various diesel-powered vehicles and equipment would be used on the site. Health risks from toxic air contaminants are a function of both concentration and duration of exposure. Construction diesel emissions are temporary, affecting an area for a period of days or perhaps weeks. Because of the project's relatively short construction period, health risks from construction emissions of diesel particulates would be a less than significant impact.

According to the *BAAQMD CEQA Guidelines*, emissions of ozone precursors (ROG and NO_x) and carbon monoxide related to construction equipment are already included in the emission inventory that is the basis for regional air quality plans and, as such, are not expected to impede attainment or maintenance of ozone and carbon monoxide standards in the Bay Area. The effects of construction activities would be increased dustfall and locally elevated levels of particulate matter (PM_{10} and $PM_{2.5}$) downwind of construction activity, which would be a significant impact. As a result, construction of the proposed project would result in temporary air quality impacts associated with dust and particulate matter generation at nearby uses.

In order to address this potential impact, the BAAQMD has prepared a list of feasible dust control measures for construction projects. These project-specific mitigation measures will reduce construction impacts to a less than significant level.

Mitigation Measure (AIR MM 1): The following mitigation measures shall be implemented during all phases of construction to prevent visible dust emissions from leaving the project site:

- Water all active construction areas at least twice daily or as often as needed to control dust emissions.
- Cover all trucks hauling soil, sand, and other loose materials and/or ensure that all trucks hauling such materials maintain at least two feet of freeboard.
- Pave, apply water twice daily, or as often as necessary, to control dust, or apply non-toxic soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- Sweep daily, or as often as needed, with water sweepers all paved access roads, parking areas and staging areas at construction sites to control dust.
- Sweep adjacent public streets daily, or as often as needed, to keep streets free of visible soil material.
- Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.
- Enclose, cover, water twice daily or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
- Limit vehicle traffic speeds on unpaved roads to 15 mph.
- Replant vegetation in disturbed areas as quickly as possible.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways.

With the implementation of the proposed mitigation measures, the proposed project would have less than significant impact on air quality impacts associated with the construction.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial 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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
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 California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
3) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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?	☐	☐	☐	☒	☐

Discussion

Based on the highly urbanized and developed nature of the project site, habitats for special status plant and wildlife species are not present on the site.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?	☐	☐	☒	☐	☐

2) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	☒	☐	☐	☐
3) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?	☐	☐	☐	☒	☐
4) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐

Discussion

Based on the proximity of the site to historic Downtown buildings and Adobe Creek, there is the potential that buried historical or prehistoric resources could be present on site, which would be a significant impact if disturbed. Historic-era materials that might be present include backfilled privies, wells, and trash pits; concrete, stone, or adobe walls or foundations; and concentrations of metal, glass, and ceramic domestic refuse.

Prehistoric cultural remains might include chert and obsidian flaked-stone tools (such as projectile points, knives), midden (culturally darkened soil containing heat-affected rock, artifacts, animal bone, shell), and/or stone milling equipment such as portable or bedrock mortars (food grinding holes in bedrock or boulders), pestles, hand stones, etc. As a result, construction of the proposed project could result in impacts to buried cultural resources.

In order to address this potential impact, the project includes the implementation of the following avoidance measures to reduce impacts to buried cultural resources to a less than significant level, should any be discovered on site.

Mitigation Measure (CR MM 1): In the event of the discovery of unanticipated buried prehistoric or historic era cultural materials during project construction, work will halt within 30 feet of the discovery until it has been inspected by a qualified archaeologist. If it appears that additional construction related earthmoving will affect a potentially significant resource, the archaeologist shall submit a plan for the evaluation of the resource to the Los Altos Planning Department for approval. Evaluation normally takes the form of limited hand excavation of the suspected cultural deposit to determine if it contains information and/or materials that make it eligible for placement on the California Register of Historic Resources (CRHR).

If it is determined that construction activity will impact an eligible resource, the City of Los Altos shall prepare a plan for mitigation of impacts to the resource before work is allowed to recommence in the zone designated as archaeologically sensitive. Mitigation can take the form of additional hand excavation coupled with limited hand excavation to ensure that significant archaeological materials and information are retrieved for analysis and report preparation as required by CEQA.

Mitigation Measure (CR MM 2): If human remains are discovered during construction, construction activities that could disturb the remains and any associated artifacts would halt and the project sponsor will contact the local Coroner's Office and the Native American Heritage Commission (NAHC). The NAHC would then name a Most Likely Descendant (MLD) to advise the project sponsor on the manner of exposure and removal of burials and associated grave goods, and to help designate a place for the reburial of these materials.

With the implementation the mitigation measures, the project will have a less than significant cultural resources impact.

4.6 GEOLOGY

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
a) Rupture of a known earthquake fault, as described 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.)	☐	☐	☒	☐	☐
b) Strong seismic ground shaking?	☐	☐	☒	☐	☐
c) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
d) 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 1802.3.2 of the California Building Code (2007), creating substantial 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?	☐	☐	☐	☒	☐

Discussion

The project site would not be exposed to slope instability, erosion, or landslide related hazards due to the relatively flat topography of the site and surrounding areas. The proposed project will be designed and constructed in accordance with standard engineering safety techniques and in conformance with design-specific geotechnical reports prepared for the site. With the use of standard engineering and seismic design techniques, construction of the proposed project would result in less than significant geology or soils impacts, and would not significantly expose people or structures to adverse seismic risks.

4.7 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Generate greenhouse gas 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 greenhouse gases?	☐	☐	☒	☐	☐

Discussion

BAAQMD's *CEQA Air Quality Guidelines* include thresholds for greenhouse gas emissions. Under these thresholds, if a project would result in operational-related greenhouse gas emissions of 1,100 metric tons (or 4.6 metric tons per service population) of carbon dioxide equivalents a year or more, it would make a cumulatively considerable contribution to greenhouse gas emissions and result in a cumulatively significant impact to global climate change. As outlined in Table 3-1 of the *Air Quality Guidelines,* an office building of 53,000 square feet or more would meet or exceed the BAAQMD operational greenhouse gas emission screening levels and would require preparation of a greenhouse gas emission analysis. Since the size of this office building falls well below this threshold, the project would have a less than significant impact on the emission of greenhouse gases.

4.8 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial 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?	☐	☒	☐	☐	☐
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, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
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, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒	☐
6) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒	☐
7) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒	☐
8) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒	☐

Discussion

The site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List). The site is approximately ½ mile west of the nearest school (Covington Elementary School), over five miles south of the Palo Alto Airport, and is approximately four miles southwest of Moffett Federal Airfield. The project site is not within safety zones or planning areas for these airports. The project site is located in a developed urban area, and would not expose people or structures to wildland fires.

The former Chevron gas station site at 470 South San Antonio Road had underground fuel storage tanks leaks that were the source of groundwater contamination. A case was opened up to remediate the groundwater contamination with the State Water Resources Control Board and the Santa Clara Valley Water District in 1994. The case was subsequently transferred to the Santa Clara County Department of Environmental Health. In 1998, after the gas station had been closed, the underground fuel tanks were removed, the gas station buildings were demolished and all pavement and impervious surfaces were removed from the site. Between 1994 and 2010, actions were taken to remediate the groundwater contamination issue.

On June 2, 2010 the Santa Clara County Department of Environmental Health issued a case closure letter, noting that the investigation and cleanup at the site had been completed. The case closure letter, which includes a summary of the case and the actions taken to remediate the fuel tank leak and groundwater contamination, is included in Appendix A.

However, the case closure letter noted that residual contamination in the soil remains at the site and could pose an unacceptable risk under certain site development activities such as site grading or excavation. Therefore, the proposed project shall implement the following mitigation measure to reduce hazardous materials impacts related to the possible presence of contaminated soil at the site to a less than significant level.

Mitigation Measure (MM HAZ MM 1): A Soil Management Plan (SMP) shall be prepared for the proposed project, prior to the start of any ground disturbance activities on the site. The SMP shall be subject to review/approval by the Director of Public Works and the County Department of Environmental Health and shall be implemented during construction of the project. The SMP shall establish management practices for handling contaminated soil, if contaminated soil is encountered during development of the project. The SMP shall include a discussion of the on-site contaminants of concern and the steps to be taken if suspect soil is encountered, procedures for removing and/or isolating contaminated soil, a list of parties to be notified if contaminated soil is encountered, and a sampling plan for excess soil planned for off-site disposal.

With the implementation the above listed mitigation measure, the project will have a less than significant hazards and hazardous materials impact.

4.9 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐	☐
2) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒	☐
3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on-or off-site?	☐	☐	☐	☒	☐
4) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site?	☐	☐	☐	☒	☐
5) 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?	☐	☒	☐	☐	☐
6) Otherwise substantially degrade water quality?	☐	☐	☒	☐	☐
7) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒	☐
8) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐	☐
9) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒	☐
10) Be subject to inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒	☐

Discussion

Implementation of the proposed project would require some excavation and paving and grading of the site. Construction activities would temporarily increase the amount of unconsolidated materials on-site, and grading activities could increase erosion and sedimentation that could be carried by runoff into natural waterways, which could increase sedimentation impacts to local creeks or San Francisco Bay. The proposed project, when completed, would not significantly increase the amount of runoff or pollutants flowing into the storm drain system. Construction and excavation activities could, however, temporarily increase pollutant loads, resulting in a significant impact. As a result, construction activities could degrade water quality downstream of the site.

To reduce potential construction-related and post-construction water quality impacts, the following measures, based on Regional Water Quality Control Board (RWQCB) requirements, have been included in the project:

Mitigation Measure (HYDRO MM 1): The proposed project shall comply with the requirements of the MRP, as well as other local, state, and federal requirements. Specifically, the project shall comply with provision C.3 of the Municipal Regional Permit (MRP), which provides enhanced performance standards for the management of stormwater for new development.

Mitigation Measure (HYDRO MM 2): The project will implement Best Management Practices (BMPs) for reducing the volume of runoff and pollution in runoff to the maximum extent practicable per MRP. These BMPs may include source control measures, site design elements, and post-construction treatment measures such as the following:

- Vegetated swales and flow-through areas;
- Bioretention areas or basins;
- Disconnected downspouts that are directed into landscape areas;
- Minimization of impervious surfaces and increased use of permeable pavement;
- Location of all storm drain inlets to be stenciled with, "No Dumping! Flows to Bay" to discourage illegal dumping;
- Location and design of trash enclosures (all shall be covered) and materials handling areas;
- Use effective, site-specific erosion and sediment control methods during post-construction periods.

Mitigation Measure (HYDRO MM 3): The proposed project shall comply with all City of Los Altos ordinances, policies, and processes regarding the post-construction treatment of stormwater runoff. Specifically, a Stormwater Management Plan (SWMP) will be developed prior to issuance of building

permits for project construction, to ensure compliance with City of Los Altos and MRP requirements. The SWMP will meet the criteria for stormwater protection outlined in Chapters 10.16 of the Los Altos Municipal Code. The purpose of the SWMP is to:

- Identify the pollutants of concern
- Identify the site constraints that could limit the types of BMPs and site design measures that can be implemented
- Incorporate site design measures to minimize imperviousness and redirect runoff from impervious surfaces to less pervious surfaces.
- Select BMPs (both source and treatment control measures) for those impervious areas that cannot be served by site design measures.

Mitigation Measure (HYDRO MM 4): The proposed project will file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to commencement of construction. The project's SWPPP shall include measures for:

- Soil stabilization,
- Sediment control,
- Sediment tracking control,
- Wind erosion control, and
- Non-storm water management and waste management and disposal control.

Mitigation Measure (HYDRO MM 5): BMPs shall be implemented for reducing the volume of runoff and pollution in runoff to the maximum extent practicable during site excavation, grading, and construction. All measures shall be included in the project's SWPPP and printed on all construction documents, contracts, and project plans.

- Restrict grading to the dry season or meet City requirements for grading during the rainy season.
- Use effective, site-specific erosion and sediment control methods during the construction periods. Provide temporary cover of all disturbed surfaces to help control erosion during construction. Provide permanent cover as soon as is practical to stabilize the disturbed surfaces after construction has been completed.
- Cover soil, equipment, and supplies that could contribute non-visible pollution prior to rainfall events or perform monitoring of runoff. Cover stockpiles with secure plastic sheeting or tarp.
- Implement regular maintenance activities such as sweeping driveways between the construction area and public streets. Clean sediments from streets, driveways, and paved areas on-site using dry sweeping methods. Designate a concrete truck washdown area.
- Dispose of all wastes properly and keep site clear of trash and litter. Clean up leaks, drips, and other spills immediately so that they do not contact stormwater.
- Place fiber rolls or silt fences around the perimeter of the site. Protect existing storm and sewer inlets in the project area from sedimentation with filter fabric and sand or gravel bags.

With implementation of the mitigation measures included in the project, the project will have a less than significant impact on stormwater quality. The project will not deplete the groundwater supply, increase stormwater runoff, or expose people or structures to flood hazards.

4.10 LAND USE

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Physically divide an established community?	☐	☐	☐	☒	☐
2) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒	☐
3) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒	☐

Discussion

The General Plan Land Use Map amendment would designate the portion of public alley right-of-way included in the project site as *Downtown Commercial* (it is currently undesignated) and the Zoning Map amendment would rezone the site as *Commercial Downtown/Multiple Family (CD/R3)* to match the surrounding land use and zoning designations in the Downtown Triangle and along First Street. These proposed changes are consistent with the City's General Plan and Zoning Ordinance, would not physically divide an established community, conflict with applicable plans or policies, or result in other significant land use impacts.

4.11 MINERAL RESOURCES

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

4.12 NOISE

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project result in:					
1) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
2) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project result in:					
3) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
4) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
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, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒	☐
6) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒	☐

Discussion

The project site is located in the southern end of the Downtown triangle area of Los Altos. Roadways adjacent to the site include First Street, San Antonio Road and Foothill Expressway. The predominant source of noise in the project area is vehicle traffic on these downtown streets and Foothill Expressway. The project site is not located within an airport land use plan or within the vicinity of a private airstrip or public use airport.

Construction on the site would generate noise, and would temporarily increase noise levels at adjacent land uses. Construction-related noise levels are normally highest during the demolition phase and during the construction of project foundations and framing. These phases of construction require heavy equipment that normally generates the highest noise levels over extended periods of time. Typical hourly average construction generated noise levels are about 81 dBA to 88 dBA Leq measured at a distance of 50 feet from the center of the site during busy construction periods (e.g., earth moving equipment, impact tools, etc.). Construction-related noise levels are normally less during building framing, finishing, and landscaping phases. There would be variations in construction noise levels on a day-to-day basis depending on the actual activities occurring at the site. Construction generated noise levels drop off at a rate of about six dBA per doubling of distance between the source and receptor.

Typically, projects do not generate significant noise impacts when standard construction noise control measures are enforced at the project site and when the duration of the noise generating construction period is limited to one construction season (typically one year) or less. Construction noises associated with projects of this type are disturbances that are necessary for the construction or repair of buildings and structures in urban areas. Limiting the hours when construction can occur to daytime hours is often a simple method to reduce the potential for noise impacts.

Noise levels generated by construction activities on the site would not be expected to adversely affect adjacent land uses provided standard construction best management practices are implemented at the site and the duration of construction noise is limited to one construction season or less.

4.13 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Induce substantial 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 housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	☐
3) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	☐

Discussion

The project would not result in an increase in housing units or result in the displacement of substantial numbers of people. The project would develop a new 17,156 square-foot office building, which would result in a small increase in new jobs in the City of Los Altos. Although it would result in a slight increase in jobs, the project would not induce substantial population growth in the City, and would therefore result in a less than significant population and housing impact.

4.14 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) 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:					
Fire Protection?	☐	☐	☒	☐	☐
Police Protection?	☐	☐	☒	☐	☐
Schools?	☐	☐	☐	☒	☐
Parks?	☐	☐	☐	☒	☐
Other Public Facilities?	☐	☐	☐	☒	☐

Discussion

The project may incrementally increase the demand for fire and police protection services in the City. The project would not result in adverse physical impacts associated with a need for new public safety, recreational or educational facilities in order to maintain acceptable levels of service.

4.15 RECREATION

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒	☐
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?	☐	☐	☐	☒	☐

4.16 TRANSPORTATION AND TRAFFIC

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐	☐
2) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐	☐
3) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒	☐
4) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)?	☐	☐	☐	☒	☐
5) Result in inadequate emergency access?	☐	☐	☐	☒	☐
6) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒	☐

Discussion

The project site's two primary access points are via driveways off of South San Antonio Road for the onsite surface parking lot and off of First Street for the underground parking garage. The office building's main pedestrian entrance faces the onsite surface parking lot of off South San Antonio Road with a secondary entrance that connects to the sidewalk along First Street.

A Transportation Impact Analysis (TIA) was prepared for the project by Hexagon Transportation Consultants (Appendix B). The TIA used a 20,000 square-foot office building to evaluate potential impacts so the findings are considered conservative. As outlined in the TIA, the existing uses on the site (the Barking Lot and Burger Town) generate 11 AM peak-hour trips and 13 PM peak-hour trips. Factoring in the existing uses, the proposed office use project is estimated to generate 20 net new AM peak-hour trips and 17 net new PM peak-hour trips.

The TIA included an evaluation of the existing conditions, existing conditions with the project, background conditions and projected cumulative conditions for all streets and intersections that would receive an increase in traffic as a result of the project. Based on the relatively small number of net new trips that the project would add during the peak-hours, the TIA concluded that the proposed project would have a less than significant impact on all studied intersections.

The transit, bicycle, and pedestrian facilities in the area would be adequate to serve the project site, and would not be adversely impacted by the additional employees and customers. Overall, the proposed project would have a less than significant transportation and traffic impact.

4.17 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
Would the project:					
1) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐	☐
2) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
3) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
4) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐	☐
5) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
6) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
7) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

Discussion

In accordance with City policies and requirements, the project will be designed to conserve water to the greatest extent feasible. The new office building would not substantially increase water use or wastewater discharge from the site. The existing sewer lines that currently serve the site would have capacity to serve the proposed building. The proposed project would also not require additional landfills or waste

facilities.

The project proposes to maintain the existing stormwater runoff patterns that flow to the City's storm drainage system. The proposed project will increase the amount of impervious area on the site, which could increase the volume and rate of stormwater runoff generated by the project site. However, prior to discharge into the City's storm drainage system, runoff would be directed to on-site landscaping and/or treatment areas, which would help reduce the volume and rate of runoff from the site. For these reasons, the proposed project would not contribute runoff water which would exceed the capacity of the existing stormwater drainage system, and would not require the construction of new or expanded off-site storm drain facilities.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Beneficial Impact
1) Does the project have the potential to 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, 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?	☐	☒	☐	☐	☐

Discussion

The project could result in temporary air quality, noise, and water quality impacts during construction. The project could also result in impacts to cultural resources, should they be discovered on site. The project could also result in post-construction hydrology and water quality impacts. With the implementation of the mitigation measures included in the project and described in the specific sections of this Initial Study, the proposed project would not result in significant environmental impacts.