

Initial Study/Mitigated Negative Declaration

First Street Green Office Building & Public Plaza



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Prepared for



In consultation with



October 2017

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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 for two related projects that include the construction of an office building and the construction of an adjacent public plaza 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.

The project proposes to demolish the existing buildings and portion of an existing surface public parking lot on the site and construct a new three-story commercial office building (approximately 77,000 square feet) with three levels of underground parking and a new public plaza (approximately 22,000 square feet). This Initial Study evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project.

1.2 PUBLIC REVIEW PERIOD

Publication of this Initial Study marks the beginning of a 20-day public review and comment period. During this period, the Initial Study 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 20-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 Initial Study/Mitigated Negative Declaration (MND) for the project at a regularly scheduled public meeting. The City shall consider the Initial Study/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 within 24 hours of receipt at the County Clerk's Office for 30 days. The filing of 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

First Street Green Office Building and Public Plaza

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 APPLICANTS

Office Building Applicant

Los Altos Holdings, LLC
171 Main Street #259
Los Altos, CA 94022

Park Project Applicant

First Street Green Park Foundation
c/o its Fiscal Sponsor
New Venture Fund, Inc.
1201 Connecticut Avenue, NW Suite 300
Washington, DC 20036

2.4 PROJECT LOCATION

101-151 First Street, and the western half of Public Parking Plaza 7 (no situs address)
Los Altos, CA 94022

2.5 ASSESSOR'S PARCEL NUMBER

167-39-032 (portion), 040, 041, 042, 043, 044, 045, 126, 127

2.6 GENERAL PLAN DESIGNATION AND ZONING DISTRICT

General Plan Designations: Downtown Commercial
 Public and Institutional
Zoning Districts: CD/R3 (Commercial Downtown/Multiple-Family)
 CRS (Commercial Retail Sales)

2.7 PROJECT-RELATED APPROVALS, AGREEMENTS, AND PERMITS

Exclusive Negotiating Rights Agreement

Commercial Design Review Application

Master Development Agreement (or similar agreement to facilitate public plaza development)

Building Permits

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The approximately 1.5-acre project site is located on the east side of First Street, between Shasta Street and the existing Plaza 7 public parking lot in downtown Los Altos. The project would demolish the eight existing commercial buildings fronting First Street, and a portion of the existing surface public parking lot prior to construction. The existing uses include a mailing services office, a vault and safe deposit company, a cycling studio, a restaurant and a video game arcade. Three of the buildings are vacant, but were formerly used by an automotive services business and for various office uses. The project location is shown on the following Regional Map (Figure 3.1-1), Vicinity Map (Figure 3.1-2) and Aerial Photograph and Surrounding Land Uses (Figure 3.1-3) exhibits.

The project consists of two components: an office building and a public park/plaza. The office building project includes the construction of a three-story commercial building above a three-level subterranean parking garage. The proposed office building would be approximately 77,000 square feet in size and includes a community room (approximately 1,000 square feet) and a café space (approximately 1,200 square feet), both of which would be on the southern ground floor portion of the structure, adjacent to the public plaza. The project would include 360 total parking spaces, consisting of 245 spaces to serve the office building, 8 spaces for the café, 67 replacement public parking spaces, and 40 new public parking spaces (with the potential to add another 39 spaces) in the parking garage as a community benefit. The proposed project would provide bicycle racks on First Street at the main office entry and around the parameter of the public plaza, and secured bicycle storage would be provided in Level 1 of the parking garage. The project also includes shower and locker facilities on-site for bicycle commuters and a dedicated rideshare drop-off area on Shasta Street.

The public park/plaza is proposed immediately adjacent to the office building and includes approximately 22,000 square feet public park/plaza space. The public park/plaza would host community events such as concerts, movie nights, farmer's markets, and festivals, which would result in increased noise levels associated with musical instruments and loudspeakers occurring during the day on weekends and weekdays, with hours ranging up to 10:00 p.m. The plaza has also been designed to promote bicycle travel and includes amenities such as a public bike repair station and increased bicycle parking. Pedestrian amenities include vegetated walkways, overhead trellising, and tree plantings. Recreational amenities include outdoor seating areas, play areas, a central lawn, and a stage.

The south end of the project site (approximately 15,000 square feet), currently occupied by the Plaza 7 public parking lot, is owned by the City of Los Altos. The project proposes a public access easement covering the portion of the proposed public park/plaza area that extends beyond the City-owned parcel onto the office building property (approximately 7,000 square feet). The easement would allow public access to that area of the public plaza that is on the office property, including the stairs and elevator that lead to and from the underground parking garage.

The proposed public park/plaza would replace 67 existing surface parking spaces located at the southerly end of the site in the Plaza 7 public parking lot. Construction of the project is expected to

commence in 2018 and last for a duration of approximately 24 months. The Conceptual Site Plan and Landscape Plan are shown on Figures 3.1-4 and 3.1-5.

3.2 PARKING AND ACCESS

The project includes a subterranean parking garage with 360 total parking spaces, consisting of 245 spaces to serve the office, eight spaces for the café use, 67 replacement public parking spaces, and 40 new public parking spaces (with the potential to add another 39 public parking spaces) in the parking garage as a community benefit. Vehicle access to the parking garage would be provided from two driveway ramps; one at Shasta Street at the northerly end of the project site and the other in the Plaza 7 parking lot at the southerly end of the project site.

Loading access to the proposed office building would be from the Shasta Street and the alley on the east side of the building. A stairway and elevator on the southern end of the building adjacent to the café would provide public pedestrian access to the garage from the public park/plaza. The project would also extend the curb on the east leg of the First Street/Shasta Street intersection to reduce the crossing distance on Shasta Street.

3.3 SITE GRADING AND DRAINAGE

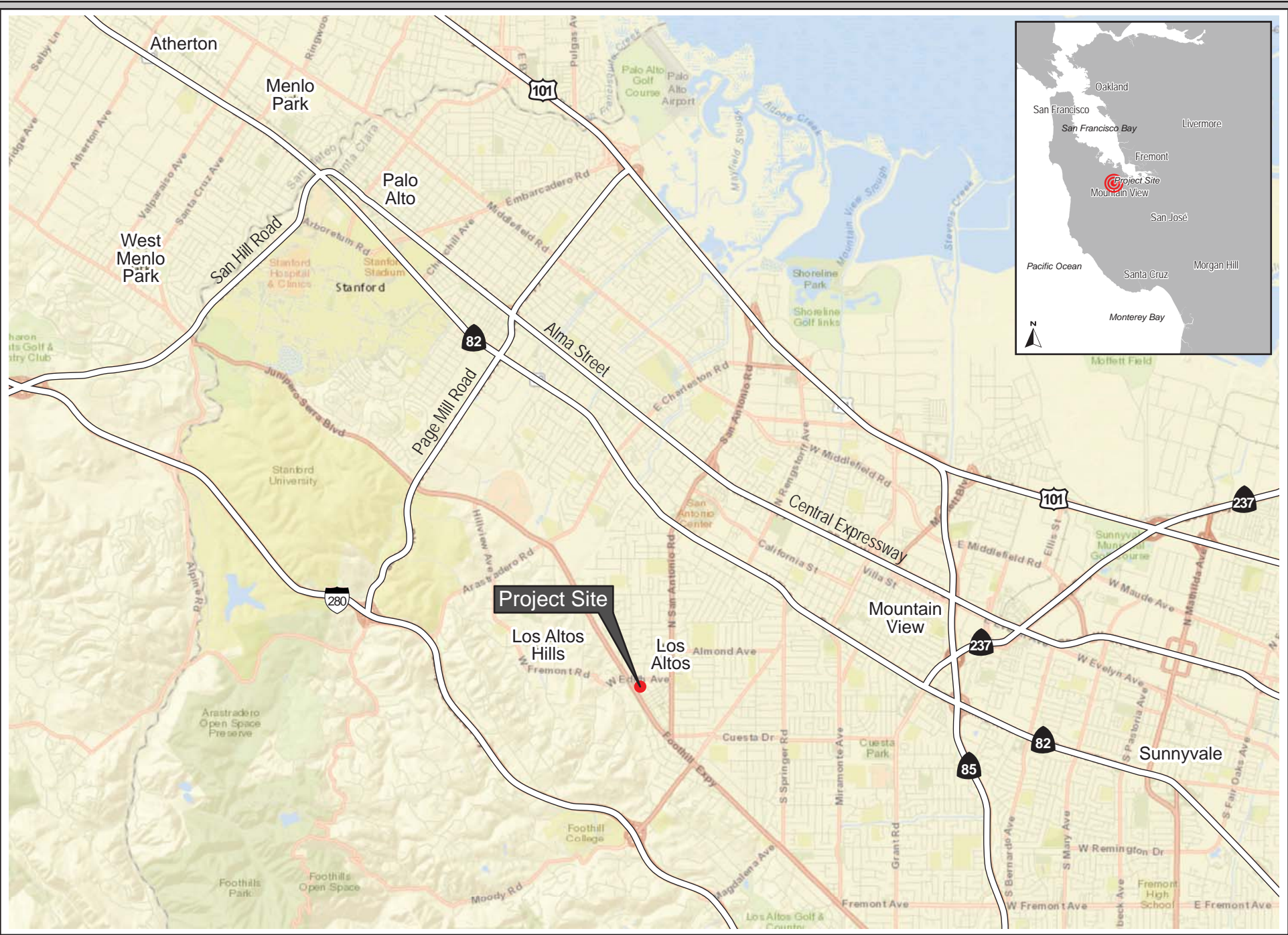
The site is relatively flat, with a gradual slope from southwest to northeast across the site. Approximately 64,400 to 69,000 cubic yards of soil excavation would be required for the construction of the parking garage, depending on the total number of parking spaces. Post-construction stormwater runoff would be treated on-site, in conformance with local NPDES permit regulations. Bioretention areas located throughout the site would treat the runoff and convey it to public storm drains in the adjacent streets.

3.4 BUILDING ARCHITECTURE

The proposed three-story office building would have limestone and wood cladding with recessed windows on the first two stories, with bronze-finished aluminum curtainwalls, steel, clear glass and grey spandrel glass on the upper story. The proposed single-story café at the southern portion of the building would have structurally glazed spandrel glass with recessed steel and glass panels. The second-story roof has pedestrian-accessible balcony areas along the First Street frontage containing pavers and a solar photovoltaic array. A sloped skylight and enclosed mechanical equipment area are located on the third-story roof. The proposed project would be designed to achieve minimum LEED certification. The project will install several EV charging stations, and will also include photovoltaic panels to generate a minimum of 13 percent of annual energy use.

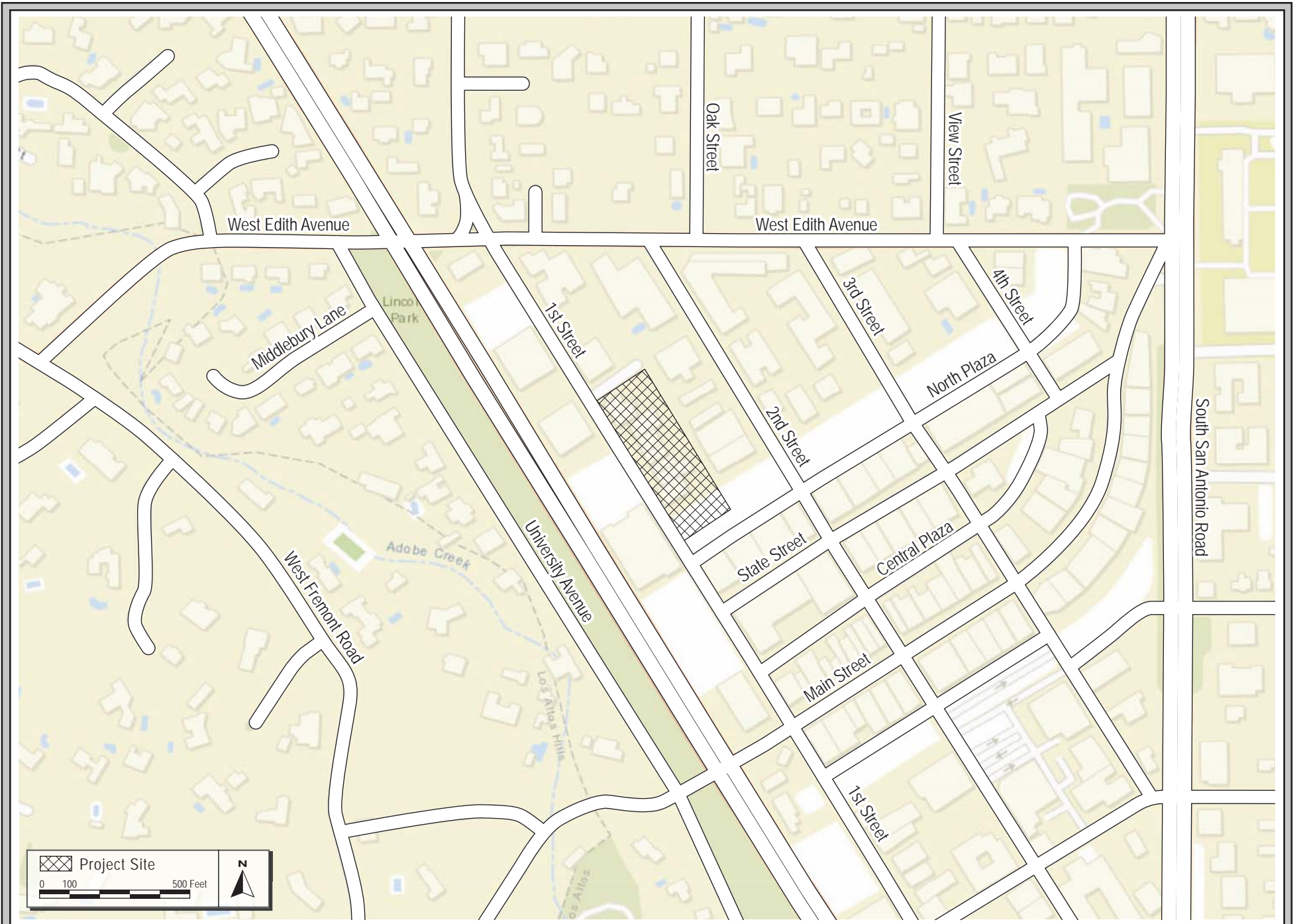
3.5 LANDSCAPING

The project proposes landscaping surrounding the office building on all sides with a mixture of deciduous and evergreen trees, shrubs, and groundcovers. Trees are also proposed to be planted throughout the park/plaza area, and along the edge of the alley that separates the project site from existing residential buildings on the east side of the site. Raised planters are proposed for the second-story roof. A central lawn area is located in the middle of the park/plaza area, and a concrete terrace with a grassy outcrop is located near the southern end of the park/plaza. Bioswales designed to filter stormwater runoff are included in the project landscape plan.



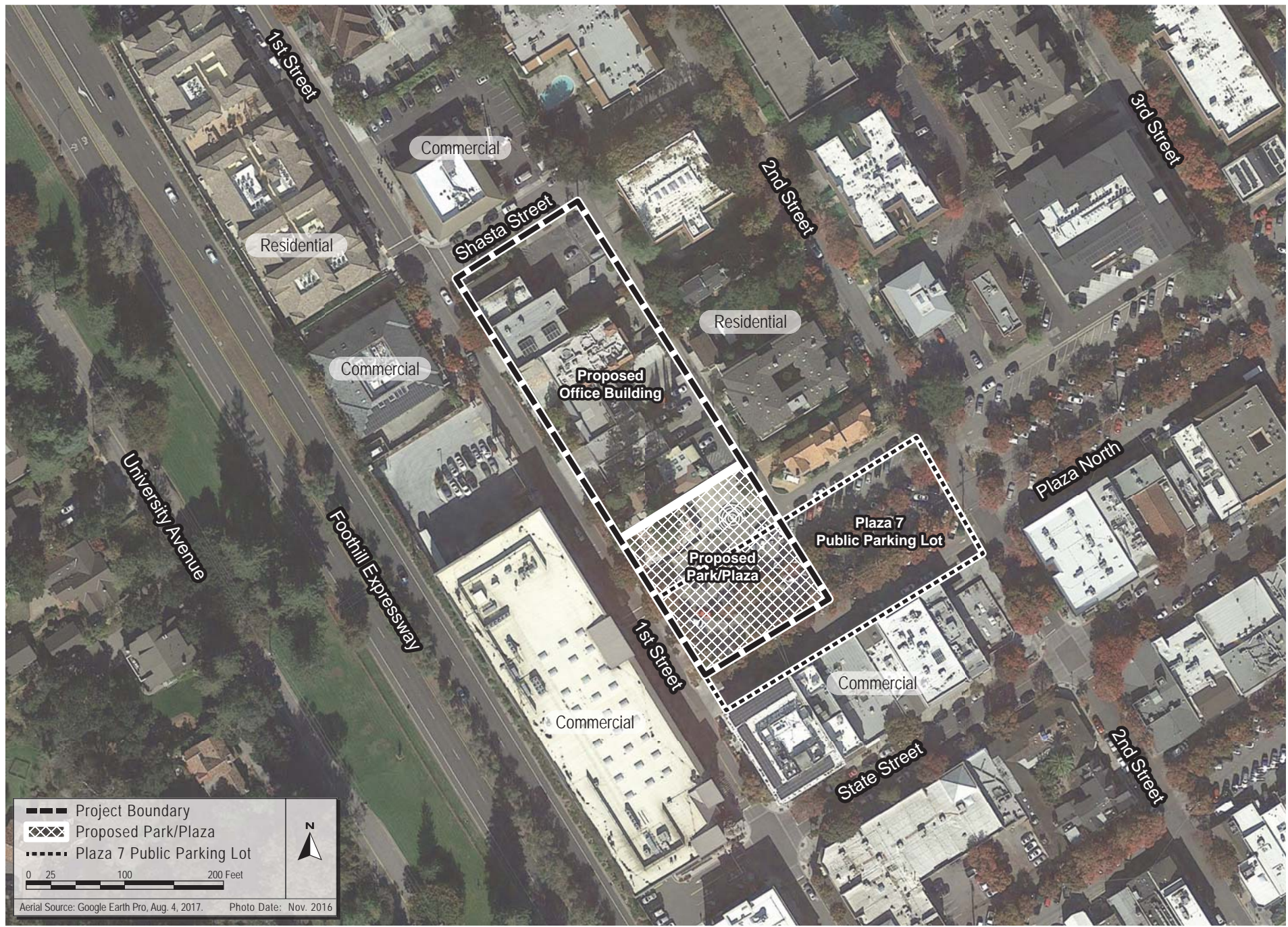
REGIONAL MAP

FIGURE 3.1-1



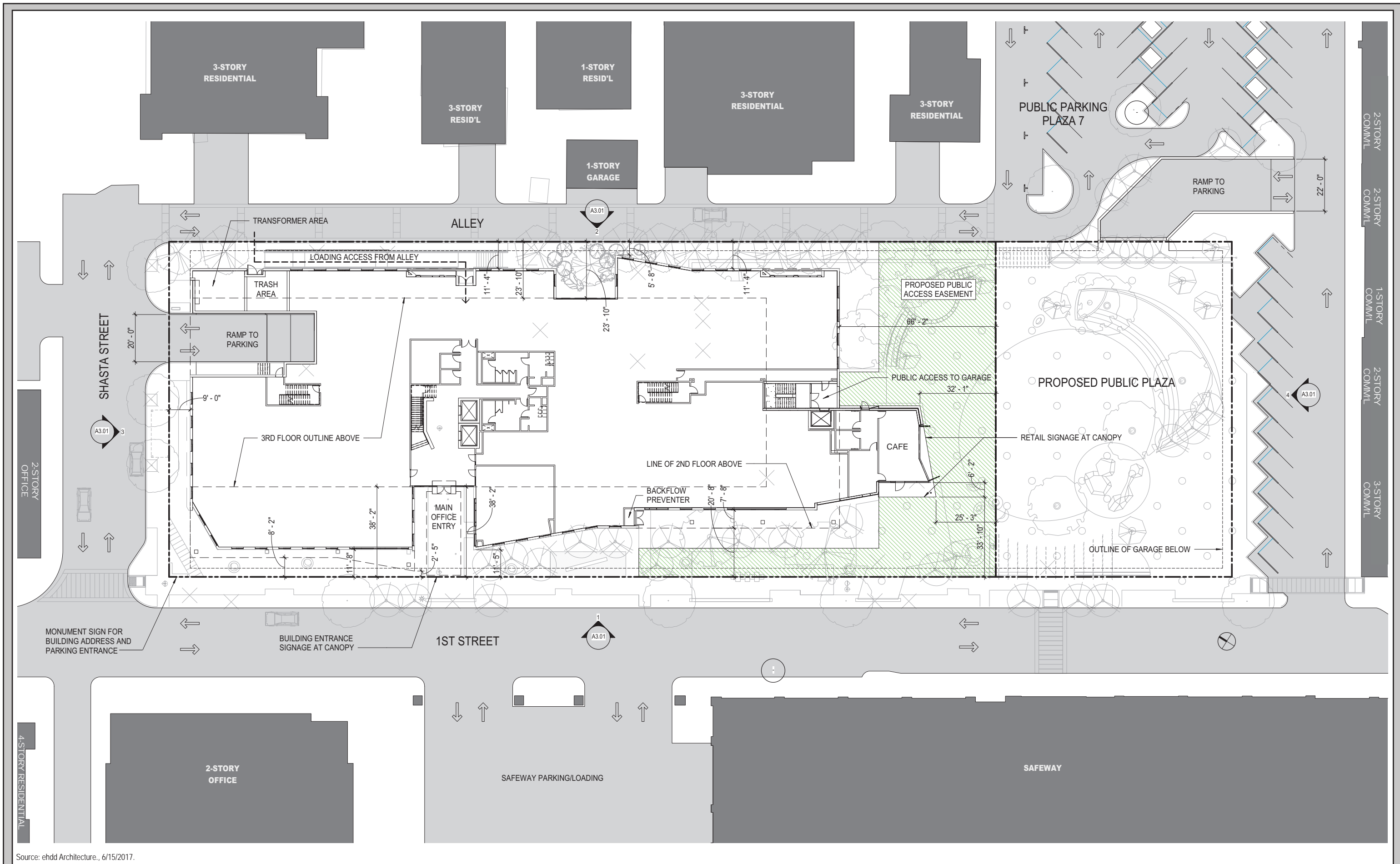
VICINITY MAP

FIGURE 3.1-2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3.1-3



Source: ehdd Architecture., 6/15/2017.

CONCEPTUAL SITE PLAN (FIRST FLOOR)

FIGURE 3.1-4



TREE LEGEND

- | | | | | | | | |
|---|---|--|---|---|---|---|---|
|  | ACER MACROPHYLLUM (BIGLEAF MAPLE) 72" BOX |  | GINKGO BILOBA 'FAIRMOUNT' (GINKGO) 48" OR 60" BOX |  | LAURUS NOBILIS 'SARATOGA' (SARATOGA LAUREL) 60" BOX |  | PRUNUS SERRULATA 'KWANZAN' (FLOWERING CHERRY) 48" BOX |
|  | CARPINUS BETULUS 'FASTIGIATA' (HORNBEEAM) 48" BOX |  | LAGERSTROEMIA INDICA (GRAPE MYRTLE) 48" BOX |  | PISTACIA CHINENSIS (CHINESE PISTACHE) 48" BOX | | |

Source: ehdd., 6/15/17.

CONCEPTUAL LANDSCAPE PLAN

FIGURE 3.1-5

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

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.
- **Checklist and Discussion of Impacts** – This subsection includes a checklist for determining potential impacts and discusses the project’s environmental impact as it relates 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 using an alphanumeric system that identifies the environmental issue. For example, **Impact HAZ-1** denotes the first potentially significant impact discussed in the Hazards and Hazardous Materials section. Mitigation measures are also numbered to correspond to the impact they address. For example, **MM NOI-2.3** refers to the third mitigation measure for the second impact in the Noise section.
- **Conclusion** – This subsection provides a summary of the project’s impacts on the resource.

Important Note to the Reader

The California Supreme Court in a December 2015 opinion [*California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369 (No. S 213478)] confirmed that CEQA, with several specific exceptions, is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project. Therefore, the evaluation of the significance of project impacts under CEQA in the following sections focuses on impacts of the project on the environment, including whether a project may exacerbate existing environmental hazards.

The City of Los Altos currently has policies that address existing conditions (e.g., air quality, noise, and hazards) affecting a proposed project, which are also addressed in this section. This is consistent with one of the primary objectives of CEQA and this document, which is to provide objective information to decision-makers and the public regarding a project as a whole. The CEQA Guidelines and the courts are clear that a CEQA document (e.g., EIR or Initial Study) can include information of interest even if such information is not an “environmental impact” as defined by CEQA.

Therefore, where applicable, in addition to describing the impacts of the project on the environment, this chapter will discuss Planning Considerations that relate to policies pertaining to existing conditions. Such examples include, but are not limited to, locating a project near sources of air emissions that can pose a health risk, in a floodplain, in a geologic hazard zone, in a high noise environment, or on/adjacent to sites involving hazardous substances.

4.1 AESTHETICS

4.1.1 Setting

4.1.1.1 *Existing Conditions*

The approximately 1.5-acre site project site is currently developed with eight structures that house various commercial and retail businesses, and includes a portion of a paved surface public parking lot (Plaza 7 parking lot). The existing buildings are a mix of one- and two-story structures that are oriented toward First Street, with parking at the rear of the buildings accessed via the alley. A detached sidewalk runs the length of the project site on First Street, with street trees and landscaping in the park strip areas. Parking is not allowed on the project side (east side) of First Street. Limited street parking is provided on the opposite side of the street. In addition to the street trees, there are several large mature trees on the site, located toward the southerly end of the site and rows of Chinese pistache trees in the Plaza 7 public parking lot.

4.1.1.2 *Surrounding Land Uses*

Directly across First Street from the site are a large Safeway grocery store and a two-story commercial office building. The grocery store is 40-45 feet in height and features a surface level parking lot with the store located above the parking at the second story level. As part of a development agreement, the grocery store parking lot is available for public use. To the south of the site is the Plaza North drive aisle that provides one-way vehicular access to the Plaza 7 parking lot and to the two- and three-story commercial buildings that front on State Street.

To the east of the site is an existing narrow alley and two- and three-story residential buildings that front on Second Street. To the north, across Shasta Street, is a two-story office building with a surface parking lot. To the north, on the other side of First Street, is a four-story residential building with one level of underground parking. Photos of the project site and surrounding land uses are shown in Figures 4.1-1 through 4.1-3.

4.1.1.3 *Scenic Views and Resources*

The project site and surrounding area is relatively flat and, as a result, the site is only visible from the immediate area. The project is not located within a designated scenic vista or scenic corridor, based on the Los Altos General Plan.

4.1.1.4 *Light and Glare*

Sources of light and glare are abundant in the Downtown urban environment of the project area, including, but not limited to, street lights, parking lot lights, security lights, vehicle headlights, internal and exterior lights on existing buildings, and reflective building surfaces and windows.



Viewing north towards the center of the site from First Street.



Viewing north towards the southwest corner of the site from First Street.



Viewing southeast towards the northwest corner of the site from Shasta Street.



Viewing west along the northerly site boundary from Shasta Street.



Viewing west towards the southeast corner of the site from Plaza North.



Viewing north along the easterly site boundary (alley) from Plaza North.

4.1.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| d) Create a new source of substantial light or glare which will adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |

4.1.2.1 Aesthetic Impacts

Implementation of the project would result in the demolition of the existing commercial buildings and construction of a three-story office building with underground parking, and a public park/plaza. The project area is developed with commercial, office and residential buildings, and has a mix of architectural styles with no particular design aesthetic being dominant. Because there is no particular predominant architectural style, the proposed project would be compatible with the mixed visual character of the area.

The mass and scale of the proposed three-story building would be compatible with existing buildings in the immediate area. The existing buildings on the site to be demolished are one and two stories tall, while the existing commercial and retail buildings located to the south of the site are two and three stories tall, comparable to the proposed office building. Likewise, the existing Safeway building across First Street from the project site contains two- and three-story height elements that would be comparable to the proposed office building. The existing residential buildings east of the site across the alley are predominantly three stories in height. The existing office building directly across Shasta Street from the site on the north is two stories tall, and the buildings along First Street north of the site range from two to four stories in height. Although the project includes the removal of existing landscaping and mature trees, the project includes the planting new trees, hedges, shrubs and groundcovers.

Since the final design of the project would be subject to the City’s Commercial Design Review process, which includes compliance with the Downtown Design Guidelines and positive design review findings, implementation of the project would not substantially degrade the existing visual character or quality of the site and its surroundings.

There are no designated scenic vistas or scenic resources on-site or in the immediate project area. Implementation of the proposed project would not block views of any designated scenic vistas or scenic resources off-site. Therefore, the project would have no impact on scenic vistas or resources.

4.1.2.2 *Light and Glare*

The project would include outdoor security lighting on-site, along walkways, driveways, and entrance areas and within the parking garage. The public park/plaza would also include exterior lighting features as part of the design for accents and ambiance and for public safety and visibility. The outside lighting would be comparable in brightness to the existing ambient lighting on the site and in the surrounding area. The proposed building would also be lit internally.

As part of the Commercial Design Review approval, the project will be required to design all lighting to ensure that it does not unnecessarily illuminate or substantially interfere with the use or enjoyment of any nearby properties. This Zoning Code requirement will ensure that the project would not adversely affect the visual quality of the area or create a substantial new source of light or glare for adjacent businesses or persons traveling on the local roadways.

4.1.3 Conclusion

Implementation of the project would have a less than significant impact on the visual character of the project area. The proposed project would not significantly increase light or glare. The proposed project would not impact any scenic resources or result in any significant aesthetic impacts. **(Less Than Significant Impact)**

4.2 AGRICULTURAL AND FORESTRY RESOURCES

4.2.1 Setting

The project site is located in a developed, urban area of Los Altos and is surrounded by residential, office and commercial land uses. The *Santa Clara County Important Farmlands 2012 Map* designates the project site as “Urban and Built-Up Land.” Urban and Built-up Land is defined as land with at least six structures per 10 acres. Common examples of “Urban and Built-Up Land” are residential, institutional, industrial, commercial, landfill, golf course, airports, and other utility uses.¹ There are no forest lands on or adjacent to the project site. The site is not subject to a Williamson Act contract.

4.2.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|--|--------------------------------|--|------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| a) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3, 4 |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3, 4 |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| d) Result in a loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

4.2.2.1 *Impacts to Agricultural and Forest Resources*

The project would not convert *Prime Farmland, Unique Farmland, or Farmland of Statewide Importance* to non-agricultural uses. The project would not conflict with existing zoning for

¹ California Natural Resources Agency. *Santa Clara County Important Farmlands 2012*. Accessed August 11, 2017. <<ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/sc112.pdf>>

agricultural operations or facilitate the unplanned conversion of farmland elsewhere in Los Altos to non-agricultural uses. There are no forest lands on or adjacent to the project site and, as a result, the project would not result in the loss of forest lands in Los Altos. For these reasons, the project would not result in impacts to agricultural or forest resources.

4.2.3 Conclusion

Implementation of the project would have no impact on agricultural or forest lands. **(No Impact)**

4.3 AIR QUALITY

The following discussion is based on an air quality impact analysis prepared for the project by LSA. A copy of the report, dated August 2017, is included in Appendix A of this Initial Study.

4.3.1 Setting

4.3.1.1 *Background Information*

Air quality is determined by the concentration of various pollutants in the atmosphere. The amount of a given pollutant in the atmosphere is determined by the amount of pollutants released within an area, transport of pollutants to and from surrounding areas, local and regional meteorological conditions, and the surrounding topography of the air basin.

Bay Area Air Quality Management District (BAAQMD)

The BAAQMD has jurisdiction over most air quality matters in the San Francisco Bay Area Air Basin. The BAAQMD is tasked with implementing certain programs and regulations required by the Federal Clean Air Act and the California Clean Air Act. The BAAQMD prepares plans to attain State and national ambient air quality standards.

The Clean Air Plan guides the region's air quality planning efforts to attain the California Ambient Air Quality Standards (CAAQS). The BAAQMD's 2017 Clean Air Plan, which was adopted on April 19, 2017 by the BAAQMD's Board of Directors, is the current Clean Air Plan which contains district-wide control measures to reduce ozone precursor emissions (i.e., ROG and NO_x), particulate matter and greenhouse gas emissions.

The Bay Area 2017 Clean Air Plan:

- Describes the Air District's plan towards attaining all state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among bay area communities
- Defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious greenhouse gas reduction targets for 2030 and 2050
- Provides a regional climate protection strategy that will put the Bay area on a pathway to achieve Greenhouse Gas (GHG) reduction targets
- Includes a wide range of control measures designed to decrease emissions of air pollutants that are most harmful to Bay Area residents, such as particulate matter, ozone, and toxic air contaminants; 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

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 *Air Pollutants and Health Effects*

Both state and federal governments have established health-based Ambient Air Quality Standards (AAQS) for six criteria air pollutants: carbon monoxide (CO), ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead (Pb), and suspended particulate matter (PM). In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O₃ and NO₂, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO₂, and Pb are considered local pollutants that tend to accumulate in the air locally.

The primary pollutants of concern in the project area are O₃, CO, and PM. Significance thresholds established by an air district are used to manage total regional and local emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual development projects that would contribute to regional and local emissions and could adversely affect or delay the Air Basin's projected attainment target goals for nonattainment criteria pollutants.

4.3.1.3 *Sensitive Receptors*

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with

greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise. The nearest sensitive receptors are the existing residences located adjacent to the east side of the site, across the alley.

4.3.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|--------------------------|---------------------|
| Would the project: | | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 5, 6, 15 |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 5, 6, 15 |
| c) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 5, 6, 15 |
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 5, 6, 15 |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 5 |

4.3.2.1 *Consistency with Existing Air Quality Plans*

The applicable air quality plan is the BAAQMD’s 2017 Clean Air Plan, which was adopted on April 19, 2017. The Clean Air Plan is a comprehensive plan to improve Bay Area air quality and protect public health. The Clean Air Plan defines a control strategy to reduce emissions and ambient concentrations of air pollutants; safeguard public health by reducing exposure to air pollutants that pose the greatest health risk, with an emphasis on protecting the communities most heavily affected by air pollution; and reduce greenhouse gas emissions to protect the climate. Consistency with the Clean Air Plan can be determined if the project does the following: 1) supports the goals of the Clean Air Plan; 2) includes applicable control measures from the Clean Air Plan; and 3) would not disrupt or hinder implementation of any control measures from the Clean Air Plan.

Transportation and Mobile Source Control Measures

The BAAQMD identifies control measures as part of the Clean Air Plan to reduce ozone precursor emissions from stationary, area, mobile, and transportation sources. The Transportation Control Measures are designed to reduce emissions from motor vehicles by reducing vehicle trips and vehicle miles traveled (VMT) in addition to vehicle idling and traffic congestion. The project site is located within walking or cycling distance from several destinations, including downtown Los Altos, the

nearest bus stop (0.3 miles), and the San Antonio CalTrain Station (2.5 miles). Therefore, this proposed project would not conflict with the identified Transportation and Mobile Source Control Measures of the Clean Air Plan.

Land Use and Local Impact Measures

The Clean Air Plan includes Land Use and Local Impacts Measures (LUMs) to achieve the following: promote mixed-use, compact development to reduce motor vehicle travel and emissions; and ensure that planned growth is focused in a way that protects people from exposure to air pollution from stationary and mobile sources of emissions. The LUMs identified by BAAQMD are not specifically applicable to the proposed project as they relate to actions BAAQMD will take to reduce impacts from goods movement and health risks in affected communities. However, the proposed project would provide new office buildings in downtown Los Altos and would locate the development near other office uses as well as near multi-family residential and commercial retail uses. Therefore, the proposed project would not conflict with any of the LUMs of the Clean Air Plan.

Energy Measures

The Clean Air Plan also includes Energy and Climate Control Measures, which are designed to reduce ambient concentrations of criteria pollutants and reduce emissions of CO₂. Implementation of these measures is intended to promote energy conservation and efficiency in buildings throughout the community, promote renewable forms of energy production, reduce the “urban heat island” effect by increasing reflectivity of roofs and parking lots, and promote the planting of (low-VOC-emitting) trees to reduce biogenic emissions, lower air temperatures, provide shade, and absorb air pollutants.

The measures include voluntary approaches to reduce the heat island effect by increasing shading in urban and suburban areas through the planting of trees. The proposed project would include paved areas that could result in a heating effect. In addition, with development of the proposed project, existing trees would be removed. However, the proposed project includes substantial landscaping with trees and shrubs throughout the site, in addition to the new trees and landscaping in the public park/plaza. Therefore the project would not conflict with the Energy and Climate Control Measures.

As discussed above, implementation of the proposed project would not disrupt or hinder implementation of the applicable measures outlined in the Clean Air Plan, including Transportation and Mobile Source Control Measures, Land Use and Local Impact Measures, and Energy Measures.

4.3.2.2 *Air Quality Impacts*

The project would affect air quality both during construction and operation. Operational impacts would be indirect and related to vehicle trips generated by future employees, visitors and park users. To account for existing traffic generated at the site, the air quality analysis evaluated net new average daily trips generated by the proposed project, as well as by special events occurring on outside of regular business hours and on the weekends.

Construction Emissions

During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by excavation, grading, hauling, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, reactive organic gas (ROG), directly-emitted particulate matter (PM_{2.5} and PM₁₀), and toxic air contaminants (TACs) such as diesel exhaust particulate matter. Site preparation and project construction would involve grading, paving, and building activities.

Construction-related effects on air quality from the proposed project would be greatest during the grading phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM₁₀ emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM₁₀ emissions typically depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. BAAQMD has established standard measures for reducing fugitive dust emissions (PM₁₀). With the implementation of these Basic Construction Mitigation Measures and Additional Construction Best Management Practices, fugitive dust emissions from construction activities would not result in adverse air quality impacts.

In addition to dust-related PM₁₀ emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO₂, NO_x, ROG and some soot particulate (PM_{2.5} and PM₁₀) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using the California Emissions Estimator Model (CalEEMod), consistent with BAAQMD recommendations. The project would include the demolition of the existing on-site buildings and approximately 64,400 or 69,000 cubic yards of soil excavation for the parking structure, depending on the total number of parking spaces. To be conservative, 69,000 cubic yards of soil off-haul was included as inputs to the CalEEMod analysis. Other construction activities would be typical for this type of project; therefore, default assumptions (e.g., construction fleet activities) from CalEEMod were used. For purposes of this CalEEMod analysis, the construction schedule for all improvements was assumed to be approximately 24 months, starting in 2018 and ending in 2020. Construction-related emissions are presented in Table 4.3-1.

| Table 4.3-1 Project Construction Emissions (Pounds per Day) | | | | |
|--|------------|-----------------------|--------------------------------|---------------------------------|
| <i>Project Construction</i> | <i>ROG</i> | <i>NO_x</i> | <i>Exhaust PM₁₀</i> | <i>Exhaust PM_{2.5}</i> |
| Average Daily Emissions | 1.8 | 10.6 | 0.2 | 0.2 |
| BAAQMD Thresholds | 54.0 | 54.0 | 82.0 | 54.0 |
| Exceed Threshold? | No | No | No | No |

Source: LSA Associates Inc., June 2017

As shown in Table 4.3-1, construction emissions associated with the project would be less than significant for ROG, NO_x and PM_{2.5} and PM₁₀ exhaust emissions.

The BAAQMD recommends and the City of Los Altos requires the implementation of Basic Construction Mitigation Measures and Additional Construction Best Management Practices to ensure that construction dust impacts are minimized. As a result of these required measures, dust impacts would be reduced to a less-than-significant level. The Basic Construction Mitigation Measures and Additional Construction Best Management Practices are as follows:

- 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 tracked-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.
- 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 2 minutes.
- 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.
- A publicly visible sign shall be posted 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 BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.
- All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.

- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
- Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
- The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel.
- Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOX reduction and 45 percent PM reduction compared to the most recent Air Resources Board (ARB) fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.
- Low VOC (i.e., ROG) coatings shall be used beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).
- All construction equipment, diesel trucks, and generators shall be equipped with Best Available Control Technology for emission reductions of NO_x and PM.
- All contractors shall be required to use equipment that meets ARB's most recent certification standard for off-road heavy duty diesel engines.

The construction best management practices listed above are included in the project to reduce potential construction-related impacts to a less than significant level.

Construction-Related Impacts

A Health Risk Assessment (HRA) was prepared by LSA to supplement the air quality impact assessment, and provides a quantitative analysis of construction-related health risk impacts. LSA conducted additional analysis using the AERMOD dispersion model to determine the estimated health risk to nearby residential units during the construction period. The HRA summarizes cancer risk, chronic non-cancer risk, and PM_{2.5} concentrations. For health risks, significance thresholds are expressed as an excess cancer risk, non-cancer chronic hazard index, or PM_{2.5} concentration. The

HRA also compares the results of the HRA with the BAAQMD recommended threshold for construction health risks.

Existing residents in the vicinity of the project site would be exposed to TAC emissions generated during construction of the project. The comprehensive receptor grid developed for this analysis allows the examination of TAC concentrations throughout the area surrounding the project site, including all residents in the immediate vicinity.

Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be aggravated by exposure to diesel particulate matter. Exposure from diesel exhaust associated with construction activity contributes to both cancer and chronic non-cancer health risks.

Maximum unmitigated and mitigated construction health risk and PM_{2.5} concentrations are shown in Table 4.3-2.

| Table 4.3-2 Inhalation Health Risks from Project Construction to Off-Site Receptors | | | |
|--|--|--|---|
| | Carcinogenic Inhalation Health Risk in One Million with ASF | Chronic Inhalation Hazard Index | Annual PM_{2.5} Concentration (µg/m³) |
| Unmitigated | | | |
| Maximum Exposed Individual Location | 31 | 0.024 | 0.12 |
| BAAQMD Threshold | >10.0 in one million | >1.0 | >0.30 |
| Exceed? | Yes | No | No |
| With Mitigation | | | |
| Maximum Exposed Individual Location | 7.26 | 0.004 | 0.02 |
| BAAQMD Threshold | >10.0 in one million | >1.0 | >0.30 |
| Exceed? | No | No | No |
| ASF = Age Sensitivity Factors Source: LSA Associates, Inc., July 2017 | | | |

Results of the analysis indicate that without mitigation, the highest risk during construction would be 31 in one million for the maximally exposed residents located approximately 50 feet southeast of the project site. This risk level would exceed the BAAQMD cancer risk threshold of 10 in one million. The Chronic Hazard Index would be 0.024, which is below the threshold of 1.0. The results of the analysis also indicate that the maximum PM_{2.5} concentration at a receptor location east of the project site would be 0.12 µg/m³, which would be below the BAAQMD significance threshold of 0.3 µg/m³.

Impact AQ-1: Construction activities would result in a carcinogenic health risk to residents located approximately 50 feet southeast of the project site. This exceeds the BAAQMD thresholds and is a significant impact. **(Significant Impact)**

Mitigation and Avoidance Measures

As indicated in Table 4.3-2, mitigation would be required to reduce potential health risks to a less than significant level. Therefore, the following mitigation measure shall be implemented by the project applicant:

MM AQ-1.1: The project applicant shall utilize Interim Tier 4 off-road equipment or all Tier 0, Tier 1, Tier 2, or Tier 3 off-road equipment used for construction of the project shall be equipped with Level 3 Diesel Particulate Filters.

Implementation of Mitigation Measure MM AQ-1.1 would reduce the construction health risk impacts to a less than significant level. As shown in Table 4.3-2, with implementation of Mitigation Measure MM AQ-1.1, the highest risk during construction would be 7.26 in one million for the maximally exposed residents, which is below the BAAQMD cancer risk threshold of 10 in one million. The Chronic Hazard Index would be 0.004, which is below the threshold of 1.0. The results of the analysis also indicate that the maximum PM_{2.5} concentration at a receptor location east of the project site would be 0.021 µg/m³, which is also below the BAAQMD significance threshold of 0.3 µg/m³. Therefore, with implementation of Mitigation Measures MM AQ-1.1, construction of the project would not expose sensitive receptors in the project site vicinity to health risk levels that would exceed the criteria established by BAAQMD. **(Less Than Significant Impact With Mitigation Incorporated)**

Operational Impacts

Long-term air emission impacts are those associated with area sources and mobile sources involving any change related to the proposed project. In addition to the short-term construction emissions, the project would also generate long-term air emissions, such as those associated with changes in permanent use of the project site. These long-term emissions are primarily mobile source emissions that would result from vehicle trips associated with the proposed project. Area sources, such as natural gas heaters, landscape equipment, and use of consumer products, would also result in pollutant emissions.

PM₁₀ emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM₁₀ occurs when vehicle tires pulverize small rocks and pavement and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other PM emission processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles. Since much of the project traffic fleet would be made up of light-duty gasoline-powered vehicles, a majority of the PM₁₀ emissions would result from entrainment of roadway dust from vehicle travel.

Energy source emissions result from activities in buildings for which electricity and natural gas are used (non-hearth). The quantity of emissions is the product of usage intensity (i.e., the amount of electricity or natural gas) and the emission factor of the fuel source. Major sources of energy demand include building mechanical systems, such as heating and air conditioning, lighting, and plug-in electronics, such as refrigerators or cooking equipment. Greater building or appliance efficiency reduces the amount of energy for a given activity and thus lowers the resultant emissions. The emission factor is determined by the fuel source, with cleaner energy sources, like renewable energy, producing fewer emissions than conventional sources. The proposed project would not include an emergency backup generator. Area source emissions associated with the project would include emissions from water heating and the use of landscaping equipment.

Emission estimates for the project were calculated using CalEEMod. Model results are shown in Table 4.3-3. Trip generation rates for the project were based on the Traffic Impact Analysis prepared for the project by Hexagon Transportation Consultants, Inc. (See Section 4.16, Transportation) which estimates the proposed project, both the office building and the public park/plaza, would typically generate approximately 1,175 net new average daily trips. Special events would also occur occasionally in the public park/plaza, which would increase the daily trip generation to an estimated 1,667 net new daily trips. To ensure that the analysis was conservative in its assumptions, it is assumed that a special event would occur once per week.

| Table 4.3-3 Project Operational Emissions | | | | |
|--|-------------|-----------------------|------------------------|-------------------------|
| Emissions in Pounds per Day | | | | |
| | <i>ROG</i> | <i>NO_x</i> | <i>PM₁₀</i> | <i>PM_{2.5}</i> |
| Area Source Emissions | 2.0 | 0.0 | 0.0 | 0.0 |
| Energy Source Emissions | 0.0 | 0.4 | 0.0 | 0.0 |
| Mobile Source Emissions | 3.7 | 15.5 | 8.6 | 2.4 |
| Total Emissions | 5.7 | 15.9 | 8.6 | 2.4 |
| BAAQMD Threshold | 54.0 | 54.0 | 82.0 | 54.0 |
| Exceed? | No | No | No | No |
| Emissions in Tons per Year | | | | |
| | <i>ROG</i> | <i>NO_x</i> | <i>PM₁₀</i> | <i>PM_{2.5}</i> |
| Area Source Emissions | 0.4 | 0.0 | 0.0 | 0.0 |
| Energy Source Emissions | 0.0 | 0.1 | 0.0 | 0.0 |
| Mobile Source Emissions | 0.4 | 2.0 | 1.1 | 0.3 |
| Total Emissions | 0.8 | 2.1 | 1.1 | 0.3 |
| BAAQMD Threshold | 10.0 | 10.0 | 15.0 | 10.0 |
| Exceed? | No | No | No | No |

The daily emissions associated with project operational trip generation, energy and area sources are identified in Table 4.3-3 for ROG, NO_x, PM₁₀, and PM_{2.5}. The primary emissions associated with the project are regional in nature, meaning that air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the project, emissions are released in other areas of the air basin. Because the resulting emissions are dispersed rapidly and contribute only a small fraction of

the region's air pollution, air quality in the immediate vicinity of the project site would not substantially change compared to existing conditions.

The results shown in Table 4.3-3 indicate the project would not exceed the significance criteria for daily ROG, NO₂, PM₁₀ or PM_{2.5} emissions; therefore, the proposed project would not have a significant effect on regional air quality and mitigation would not be required. **(Less Than Significant Impact)**

Cumulative Impacts

CEQA defines a cumulative impact as two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts. According to BAAQMD, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. Therefore, if daily average or annual emissions of operational-related criteria air pollutants exceed any applicable threshold established by BAAQMD, the proposed project would result in a cumulatively significant impact.

CEQA defines a cumulative impact as two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts. According to BAAQMD, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. Therefore, if daily average or annual emissions of operational-related criteria air pollutants exceed any applicable threshold established by the BAAQMD, the proposed project would result in a cumulatively significant impact. As shown in Table 4.3-3, however, implementation of the proposed project would generate less than significant operational emissions. The project would not result in individually significant impacts and therefore would also not make a cumulatively considerable contribution to regional air quality impacts. **(Less Than Significant Impact)**

Odors

During project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. The proposed project would not include any activities or operations that would generate objectionable odors and once operational, the project would not be a source of odors. Therefore, the proposed project would not create any objectionable odors affecting a substantial number of people. **(Less Than Significant Impact)**

4.3.3 Conclusion

The project would not result in significant operational or construction-related regional or local air quality impacts, conflict with applicable air quality plans and standards, or expose sensitive receptors to substantial pollutant concentrations. **(Less Than Significant With Mitigation Incorporated)**

4.4 BIOLOGICAL RESOURCES

The following discussion is based in part on a biological resources study prepared for the project by *LSA Associates (LSA)* and a tree evaluation prepared for the project by Michael L. Bench, Consulting Arborist. Copies of the reports are contained in Appendices B and C of this Initial Study.

4.4.1 Environmental Setting

4.4.1.1 *Existing Conditions*

LSA staff conducted a reconnaissance-level biological survey on May 25, 2017. The survey involved walking around the site to assess the potential for sensitive biological resources, such as nesting birds, roosting bats, trees, and habitat that may constitute biological constraints or require specific permits from state or federal regulatory agencies.

The project site consists of commercial buildings, parking spaces, and landscaping. The landscaping includes ornamental and native tree species, including walnut, coast redwood, coast live oak, Chinese pistache, crape myrtle, incense cedar, Yarwood sycamore, blackwood acacia, and Italian cypress. Wildlife observed at the site during LSA's field survey consisted of American crow, common raven, mourning dove, chestnut-backed chickadee, and dark-eyed junco. No sensitive habitats, such as wetlands or riparian habitat were determined to occur at the site.

Special Status Species

Special-status species are defined by LSA in their report as: a) species that are listed or formally proposed for listing as threatened or endangered under the federal Endangered Species Act; b) species that are listed, or designated as candidates for listing, as rare, threatened, or endangered under the California Endangered Species Act; c) plant species that are on the California Rare Plant Rank Lists 1B and 2; d) animal species designated as Species of Special Concern by California Department of Fish and Wildlife (CDFW); e) species that meet the definition of rare, threatened, or endangered under Section 15380 of the California Environmental Quality Act guidelines; and f) species considered to be a taxon of special concern by local agencies.

LSA searched the California Natural Diversity Data Base (CNDDDB) for records of special-status species occurring within the vicinity of the project site. The CNDDDB lists 29 special-status plant species within 5 miles of the site, but none of these plant species would occur at the site due to the lack of suitable habitat. The CNDDDB lists 21 special-status animal species within 5 miles of the site, but only four have the potential to occur in the region due to the presence of suitable habitat. The four are white-tailed kite, American peregrine falcon, pallid bat, and Townsend's big-eared bat. Out of these four species, however, the pallid bat is the only species that may occur at the project site. Although the coast redwood trees support nesting habitat for white-tailed kites, no active or inactive kite nests or other large stick nests were observed during LSA's survey and this species is not likely to nest in a commercially developed area.

American peregrine falcons are known to nest on buildings, but the buildings on the project site are likely not tall enough to support nesting peregrine falcons. The buildings proposed for removal appear to be in good condition with no visible access holes or evidence (e.g., guano, urine stains) for roosting

bats. The terracotta roofs of some of the buildings may provide suitable roosting sites for the pallid bat, but are less suitable for the Townsend’s big-eared bat. Townsend’s big-eared bats are unlikely to roost on or near the project site, but pallid bats could roost in the buildings and trees. No suitable habitat for other special-status animal species exists on or near the project site.

Wildlife Movement

The project site does not provide a significant movement corridor for wildlife since it is located in a developed urban area surrounded by commercial development. Wildlife species that currently move through the project site are urban-adapted species that will likely continue to move through the property after project development.

Nursery Sites

The project site may provide nests for special-status or common bird species or roosts for special-status or common bat species, but no evidence of established nursery sites, such as heron rookeries and bat roosts, was observed during LSA’s survey. The eaves of the building at 151 First Street had nesting material from likely either a non-native house sparrow or a native house finch, but no active nesting was observed during the survey. These and other birds could nest in the cypress trees near the project site and within the English ivy growing along the side of the building near 101 First Street.

Trees

An inventory and evaluation of the existing trees on and adjacent to the site was prepared by Michael Bench, Consulting Arborist, in October of 2016, with a supplemental arborist report and tree protection plan prepared in June of 2017. The inventory included 72 trees located on the project site, on the Plaza 7 public parking lot and in the immediate vicinity. There are 23 trees located on the project site (101-151 First Street), 17 trees located in the First Street and Shasta Street right-of-way, five trees located on neighboring properties to the east (directly adjacent to the public alley), and 27 trees located within Plaza 7. The inventory also included three trees located in the Second Street right-of-way (61-63) adjacent to Plaza 7, but these trees are not included in this evaluation due to their distance from the project site.

The trees surveyed were given overall condition ratings that ranged from very poor to excellent. Table 4.4-1 lists all of the trees on the project site, on Plaza 7 and in the immediate vicinity of the site identified during the tree survey. Figure 4.4-1 shows the location of the trees with the corresponding numbers from the table and identifies which trees conflict with the proposed project and will need to be removed.

| Table 4.4-1 Tree Survey | | | | | |
|---|--------------------|-----------------------------|--------------------------|--------------------------|---|
| Tree No. | Common Name | Scientific Name | Diameter (inches) | Overall Condition | Conflicts with Construction (removal required) |
| <i>On-Site (101-151 First Street properties)</i> | | | | | |
| 1 | Coast Redwood | <i>Sequoia sempervirens</i> | 25.5 | Fair-Good | Yes |

| Table 4.4-1 Tree Survey | | | | | |
|--|-----------------------|-------------------------------|-------------------|-------------------|--|
| Tree No. | Common Name | Scientific Name | Diameter (inches) | Overall Condition | Conflicts with Construction (removal required) |
| 2 | Coast Redwood | <i>Sequoia sempervirens</i> | 47.4 | Good | Yes |
| 3 | Coast Redwood | <i>Sequoia sempervirens</i> | 16.3 | Good | Yes |
| 4 | Coast Redwood | <i>Sequoia sempervirens</i> | 22.2 | Good | Yes |
| 5 | Coast Redwood | <i>Sequoia sempervirens</i> | 34.4 | Good | Yes |
| 6 | Incense Cedar | <i>Calocedrus decurrens</i> | 32 | Fair | Yes |
| 7 | Flowering Purple Plum | <i>Prunus cerasifera</i> | 4.9 | Good | Yes |
| 8 | Yarwood sycamore | <i>Platanus hispanica</i> | 6 | Excellent | Yes |
| 9 | Yarwood sycamore | <i>Platanus hispanica</i> | 6 | Excellent | Yes |
| 10 | Crape myrtle | <i>Lagerstromia indica</i> | 3.8 | Fair-Good | Yes |
| 11 | Crape myrtle | <i>Lagerstromia indica</i> | 3.9 | Fair-Good | Yes |
| 12 | Chinese pistache | <i>Pistacia chinensis</i> | 5.8 | Fair-Good | Yes |
| 13 | Crape myrtle | <i>Lagerstromia indica</i> | 2 | Good | Yes |
| 14 | Crape myrtle | <i>Lagerstromia indica</i> | 2 | Good | Yes |
| 15 | Fruiting Fig | <i>Ficus carica</i> | 2 | Good | Yes |
| 16 | Crape myrtle | <i>Lagerstromia indica</i> | 1.5 | Good | Yes |
| 17 | Wild Plum | <i>Prunus cerasifera</i> | 2 | Good | Yes |
| 18 | Crape myrtle | <i>Lagerstromia indica</i> | 2 | Good | Yes |
| 19 | Italian Cypress | <i>Cupressus sempervirens</i> | 12.4 | Excellent | Yes |
| 20 | Italian Cypress | <i>Cupressus sempervirens</i> | 7.2 | Excellent | Yes |
| 21 | Italian Cypress | <i>Cupressus sempervirens</i> | 8.2 | Excellent | Yes |
| 22 | Italian Cypress | <i>Cupressus sempervirens</i> | 15.1 | Excellent | Yes |
| 23 | Chinese pistache | <i>Pistacia chinensis</i> | 7 | Good | Yes |
| Off-Site (public right-of-way or adjacent private property) | | | | | |
| 25 | Chinese pistache | <i>Pistacia chinensis</i> | 16.4 | Excellent | No |
| 26 | Chinese pistache | <i>Pistacia chinensis</i> | 2 | Excellent | Yes |
| 27 | Chinese pistache | <i>Pistacia chinensis</i> | 14.8 | Excellent | No |
| 28 | Chinese pistache | <i>Pistacia chinensis</i> | 2.5 | Excellent | Yes |
| 29 | Crape myrtle | <i>Lagerstromia indica</i> | 3.5 | Excellent | Yes |
| 30 | Crape myrtle | <i>Lagerstromia indica</i> | 3 | Excellent | Yes |
| 31 | Chinese pistache | <i>Pistacia chinensis</i> | 4.5 | Excellent | Yes |
| 32 | Chinese pistache | <i>Pistacia chinensis</i> | 3 | Excellent | Yes |
| 33 | Chinese pistache | <i>Pistacia chinensis</i> | 2.5 | Excellent | Yes |
| 34 | Chinese pistache | <i>Pistacia chinensis</i> | 17.9 | Excellent | No |
| 35 | Deodar Cedar | <i>Cedrus deodara</i> | 20 | Excellent | No |
| 36 | Coast Live Oak | <i>Quercus agrifolia</i> | 18 | Good | No |
| 37 | Flowering pear | <i>Pyrus calleryana</i> | 8 | Fair-Good | No |
| 38 | Flowering pear | <i>Pyrus calleryana</i> | 12 | Fair-Good | No |
| 39 | European White Birch | <i>Betula pendula</i> | 6/2 | Good | No |
| 40 | Chinese pistache | <i>Pistacia chinensis</i> | 1.5 | Good | Yes |
| 41 | Chinese pistache | <i>Pistacia chinensis</i> | 3 | Excellent | Yes |

| Table 4.4-1 Tree Survey | | | | | |
|-----------------------------------|-------------------------|-----------------------------|--------------------------|--------------------------|---|
| Tree No. | Common Name | Scientific Name | Diameter (inches) | Overall Condition | Conflicts with Construction (removal required) |
| 42 | California Black Walnut | <i>Juglans hindsii</i> | 15.4 | Fair-Poor | Yes |
| 43 | California Black Walnut | <i>Juglans hindsii</i> | 20.7 | Fair-Poor | Yes |
| 44 | California Black Walnut | <i>Juglans hindsii</i> | 15.2 | Fair-Poor | Yes |
| 45 | California Black Walnut | <i>Juglans hindsii</i> | 10.6 | Very Poor | Yes |
| 46 | California Black Walnut | <i>Juglans hindsii</i> | 17.8 | Poor | Yes |
| Plaza 7 Public Parking Lot | | | | | |
| 24 | Chinese pistache | <i>Pistacia chinensis</i> | 18.3 | Excellent | Yes |
| 47 | Chinese Pistache | <i>Pistacia chinensis</i> | 13.0 | Good | Yes |
| 48 | Chinese Pistache | <i>Pistacia chinensis</i> | 8.4 | Fair | Yes |
| 49 | Chinese Pistache | <i>Pistacia chinensis</i> | 14.7 | Excellent | Yes |
| 50 | Chinese Pistache | <i>Pistacia chinensis</i> | 12.6 | Fair | Yes |
| 51 | Chinese Pistache | <i>Pistacia chinensis</i> | 10.7 | Excellent | Yes |
| 52 | Chinese Pistache | <i>Pistacia chinensis</i> | 14.3 | Good | Yes |
| 53 | Chinese Pistache | <i>Pistacia chinensis</i> | 8.3 | Good | Yes |
| 54 | Coast Redwood | <i>Sequoia sempervirens</i> | 24.1 | Very Poor | Yes |
| 55 | Chinese Pistache | <i>Pistacia chinensis</i> | 11.6 | Good | Yes |
| 56 | Chinese Pistache | <i>Pistacia chinensis</i> | 11.7 | Fair | No |
| 57 | Chinese Pistache | <i>Pistacia chinensis</i> | 11.2 | Excellent | No |
| 58 | Chinese Pistache | <i>Pistacia chinensis</i> | 8.8 | Fair | No |
| 59 | Chinese Pistache | <i>Pistacia chinensis</i> | 11.6 | Fair-Good | No |
| 60 | Chinese Pistache | <i>Pistacia chinensis</i> | 7.3 | Good | No |
| 64 | Chinese Pistache | <i>Pistacia chinensis</i> | 13.6 | Good | No |
| 65 | Chinese Pistache | <i>Pistacia chinensis</i> | 14.8 | Good | No |
| 66 | Chinese Pistache | <i>Pistacia chinensis</i> | 13.0 | Good | No |
| 67 | Chinese Pistache | <i>Pistacia chinensis</i> | 14.4 | Good | Yes |
| 68 | Chinese Pistache | <i>Pistacia chinensis</i> | 13.0 | Good | Yes |
| 69 | Chinese Pistache | <i>Pistacia chinensis</i> | 15.0 | Good | No |
| 70 | Chinese Pistache | <i>Pistacia chinensis</i> | 14.2 | Good | No |
| 71 | Chinese Pistache | <i>Pistacia chinensis</i> | 13.9 | Good | No |
| 72 | Chinese Pistache | <i>Pistacia chinensis</i> | 14.8 | Good | No |
| 73 | Chinese Pistache | <i>Pistacia chinensis</i> | 9.3 | Fair | No |
| 74 | Chinese Pistache | <i>Pistacia chinensis</i> | 14.1 | Good | No |
| 75 | Chinese Pistache | <i>Pistacia chinensis</i> | 17.7 | Good | Yes |



TREE LOCATIONS MAP

FIGURE 4.4-1

4.4.2

Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|--|--------------------------------|--|------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 16 |
| b) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3, 16 |
| c) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3, 16 |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 16 |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 7 |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |

4.4.2.1 Biological Resources Impacts

Because the project vicinity has no open space areas or natural habitat and the project site and surrounding area are developed, no sensitive habitats are present on-site.

Bats

The LSA report did identify potential on-site roosting habitat for special status bats, however, which may roost in the existing buildings and large trees on or adjacent to the project site. The loss of this habitat would constitute a potentially significant impact. Mitigation measures included in the project, identified below, would reduce potential impacts to a less than significant level.

Impact BIO-1: Construction activities associated with the proposed project could result in the loss of roosting habitat for special status bat species. **(Significant Impact)**

Mitigation and Avoidance Measures

To protect roosting bats on or adjacent to the site, the following mitigation measure shall be implemented to reduce potential impacts to a less than significant level:

- MM BIO-1.1:** Prior to the commencement of any demolition or tree removal activities on the site, a qualified biologist shall conduct a survey to determine if and how bats are using buildings or trees on or adjacent to the site.
- If a bat roost is observed, a qualified biologist shall determine the species of bats present and the type of roost (i.e., day roost, night roost, maternity roost, hibernation site).
 - If the bats are identified as common species, and the roost is not being used as a maternity roost or hibernation site, the bats may be evicted from their roost site using methods developed by a qualified biologist experienced in developing and implementing bat mitigation and exclusion plans.
 - If special-status bat species are found to be present or if the roost is determined to be a maternity roost or hibernation site for any species of bat, then a qualified biologist experienced in developing bat mitigation and exclusion plans shall develop a mitigation plan to compensate for the lost roost site. Special-status bats or a maternity roost/hibernation site shall not be disturbed until CDFW approves the mitigation plan.

Implementation of the identified mitigation measures would reduce construction impacts to roosting bats to a less than significant level. **(Less Than Significant With Mitigation Incorporated)**

The project site is not located in proximity to any riparian corridors and, therefore, would have no impact on riparian habitats in the City.

The project site is not located near any wetlands and would not affect any federally protected wetlands.

The project site is not located within an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

Nesting Raptors and Migratory Birds

While the project site is located within an urban environment, the mature trees on-site and adjacent to the site could provide nesting and/or foraging habitat for raptors and migratory birds, including white-tailed kites and American peregrine falcons.

Migratory birds, like nesting raptors, are protected under provisions of the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, and 3500. The California Department of Fish and Wildlife (CDFW) defines “taking” as causing abandonment and/or loss of reproductive efforts through disturbance. Any loss of fertile eggs, nesting raptors, or any activities resulting in nest abandonment would constitute a significant impact.

Impact BIO-2: Construction activities associated with the proposed project could result in the loss of fertile eggs, nesting raptors or other migratory birds, or nest abandonment. **(Significant Impact)**

Mitigation and Avoidance Measures

The following mitigation measures would be implemented during all demolition and construction activities to avoid abandonment of raptor and other protected migratory bird nests:

MM BIO-2.1: If possible, future construction activities should occur outside the bird nesting season (February 1 through August 31). If construction activities during the nesting season cannot be avoided, a qualified biologist should conduct a preconstruction survey of all suitable nesting habitat (i.e., buildings, trees, shrubs) within 250 feet of the project site (where accessible) no more than 7 days prior to the start of work. If the survey indicates the presence of nesting birds, protective buffer zones should be established around the nests, by a qualified biologist in consultation with the California Department of Fish and Wildlife, to avoid impacts to nesting birds. In some cases, the qualified biologist may increase or decrease these buffers depending on the bird species and the level of disturbance that will occur near the nest.

Implementation of the identified mitigation measures would reduce construction impacts to nesting raptors and migratory birds to a less than significant level. **(Less Than Significant With Mitigation Incorporated)**

Trees

As mentioned previously, there are a total of 72 trees on the project site (101-151 First Street), adjacent to the project site and in the Plaza 7 public parking lot. The project would remove a total of 50 trees. This includes all 23 of the trees on the project site, nine trees in the First Street right-of-way, five trees in the Shasta Street right-of-way and 13 trees in Plaza 7. The three large mature Chinese pistache trees along the project’s frontage in the First Street right-of-way (25, 27 and 34), which are in excellent condition, will be preserved.

The City's Tree Protection Ordinance requires a tree removal permit to be obtained prior to removal of any protected trees. All of the trees proposed for removal meet the Ordinance definition of Protected Trees ("Any tree located on property zoned other than single-family residential." and "Any tree located within a public right-of-way."). According to the Los Altos Municipal Code (Chapter 11.08.090), tree removal permit conditions of approval may require that for each tree removed, one or more replacement trees be planted of a species and size and at locations as designated by the City. The project is proposing to plant at least 70 new trees around the office building and public park/plaza, achieving a tree replacement ratio of approximately 1.5:1. Approximate locations of these new trees is shown on the Conceptual Landscape Plan (Figure 3.1-5).

In addition to the tree inventory report, a supplemental Tree Protection Plan was prepared by the project arborist. A copy of the plan is included in Appendix C. The plan provides guidance for the protection and preservation of the trees adjacent to the site and in Plaza 7 that will be preserved during the construction process. It describes in detail the procedures for the installation and maintenance of tree protection fencing, trunk wrap protection, fencing warning signs, and irrigation systems. It also describes procedures for demolition of paving and sidewalks, trenching, tree damage and injury, and provides pruning instructions and pre-construction meeting requirements.

As designed, the project would achieve a tree replacement ratio of approximately 1.5:1, which exceeds the standards outlined in the City's Tree Protection Ordinance and it would implement the measures outlined in the Tree Protection Plan prepared for the project. As a result, the project's impacts to trees would be less than significant.

Habitats and Special Status Species

The project site is not near any wetlands; therefore, implementation of the proposed project would not impact any federally protected wetlands.

The potential loss of raptor nests and/or eggs during construction would be mitigated to a less than significant level.

The potential loss or disturbance of special-status bat roosting habitat during construction would be mitigated to a less than significant level.

The proposed project would plant new trees consistent with City policy. Implementation of the proposed project would not have a significant impact on biological resources.

The project site is not located within an approved local, State, or national habitat conservation plan area.

4.4.3 Conclusion

With the implementation of the mitigation measures to protect roosting bats and nesting raptors and migratory birds described above, and conformance with the City's Tree Protection Ordinance, the project would have less than significant impacts on biological resources. **(Less Than Significant With Mitigation Incorporated)**

4.5 CULTURAL RESOURCES

4.5.1 Setting

Although there are no existing conditions or obvious evidence that would suggest the presence of subsurface historic or prehistoric resources, the project site is located in a culturally sensitive area due to the known prehistoric and historic occupation of the Santa Clara Valley.

4.5.1.1 *Prehistoric Resources*

Native Americans occupied Santa Clara Valley and the greater Bay Area for more than 5,000 years. The exact time period of the Ohlone (originally referred to as Costanoan) migration into the Bay Area is debated by scholars. Dates of the migration range between 3000 B.C. and 500 A.D. Regardless of the actual time frame of their initial occupation of the Bay Area and, in particular, Santa Clara Valley, it is known that the Ohlone had a well-established population of approximately 7,000 to 11,000 people with a territory that ranged from the San Francisco Peninsula and the East Bay, south through the Santa Clara Valley and down to Monterey and San Juan Bautista.

The Ohlone people practiced hunting, fishing, and collecting seasonal plant and animal resources, including tidal and marine resources from San Francisco Bay. The customary way of living, or lifeway, of the Costanoan/Ohlone people disappeared by about 1810 due to disruption by introduced diseases, a declining birth rate, and the impact of the California mission system established by the Spanish in the area in 1777. Native American settlements are commonly associated with the abundant food supply in the Santa Clara Valley and they often established settlements near local waterways.

The project site is located approximately 0.8 miles southeast of Adobe Creek, and 1.9 miles northwest of Hale Creek. The distance between the site and the creeks/rivers decreases the likelihood that subsurface artifacts may be located on-site.

4.5.1.2 *Historic Resources*

The project site is developed with several existing buildings containing various commercial businesses. The following discussion is based on a Historic Resource Evaluation (HRE) prepared for the site by LSA. A copy of the report, dated June 22, 2017, is included in Appendix C of this Initial Study.

The HRE focused on four of the existing buildings (101, 139, 141 and 145 First Street), all of which are over 50 years old, and included background research to provide information about the design, construction history, ownership and prior occupancy of the buildings. It also included a field review by an archaeological historian to document their existing condition. A records search conducted by LSA did not identify any previously recorded built environment cultural resources or previously conducted cultural resource studies of the project site. A review of the Los Altos Historic Resources Inventory indicated that none of the buildings within or adjacent to the project site are designated as Historic Landmarks or Historic Resources.

4.5.1.3 Paleontological Resources

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. Sensitive areas for the presence of paleontological resources are based on the geologic formation. The City of Los Altos is situated on alluvial fan deposits of the Holocene age. Geologic units of Holocene age are generally not considered sensitive for paleontological resources because biological remains younger than 10,000 years are not usually considered fossils.

Holocene sediments have low potential to yield fossil resources or to contain significant nonrenewable paleontological resources; however, these recent sediments overlie sediments of older Pleistocene sediments with high potential to contain paleontological resources. These older sediments, often found at depths of 10 feet or more below the ground surface, have yielded the fossil remains of plants and extinct terrestrial Pleistocene vertebrates.

4.5.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| a) Cause a substantial adverse change in the significance of an historical resource as defined in CEQA Guidelines Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 15 |
| b) Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 15 |
| c) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| d) Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 15 |
| e) 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: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 15, 16 |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|--------------------------|---------------------|
| Would the project: | | | | | |
| 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. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |

4.5.2.1 *Impacts to Historic Resources*

Based on the background research and field review discussed in the HRE, *LSA* concluded that the buildings at 101 First Street, 139 First Street, 141 First Street, and 145 First Street do not appear eligible for inclusion in the California Register of Historical Resources (CRHR) due to a lack of historical significance. They further concluded that these buildings do not appear to be historical resources for the purposes of CEQA, based on a review of the City’s Historic Resource Evaluation Methodology and an evaluation to determine significance pursuant to the Los Altos Historic Preservation Ordinance.

4.5.2.2 *Impacts to Cultural Resources*

Subsurface Prehistoric and Historic Resources

The project site has low potential for containing subsurface archaeological resources due to the lack of recorded cultural resource studies and the lack of evidence of prehistoric or historic occupation on the project site over the last 50 years. Nevertheless, demolition and construction could uncover as yet unrecorded subsurface resources, including artifacts and/or human remains.

Impact CUL-1: Subsurface cultural resources could be uncovered during demolition/construction of the proposed project. **(Significant Impact)**

Mitigation and Avoidance Measures

The following mitigation measures would be implemented during construction to avoid significant impacts to unknown subsurface cultural resources.

MM CUL-1.1: A qualified archaeologist will be on-site to monitor the initial excavation of native soil once all pavement and engineered soil is removed from the project site. After monitoring the initial excavation, the archaeologist will make recommendations for further monitoring if it is determined that the site has cultural resources. If the archaeologist determines that no resources are likely to be found on site, no additional monitoring will be required.

MM CUL-1.2: 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 will be stopped, the Director of Community Development will be notified, and the archaeologist will examine the find and make appropriate recommendations prior to commencement of construction. Recommendations could include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery during monitoring would be submitted to the Director of Community Development.

MM CUL-1.3: 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.

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)**

Paleontological Resources

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 project would construct a three-story office building, café, and public park/plaza, as well as a three-level below grade parking structure.

Although it is improbable that paleontological resources would be discovered on-site due to the distance of the site from the San Francisco Bay, construction activities could potentially result in the accidental destruction and disturbance of paleontological resources and would result in a significant impact to paleontological resources. The City would require the project to comply with all applicable City regulatory programs pertaining to unknown buried paleontological resources including the following Standard Permit Conditions for avoiding and reducing construction related paleontological resources impacts.

Standard Permit Conditions

- 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.

- If vertebrae fossils are discovered during construction, all work on the site shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate treatment. Treatment may include 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. The City will be responsible for ensuring that the recommendations of the paleontological monitor regarding treatment and reporting are implemented.

Because the proposed project would comply with the applicable City policies and regulatory programs related to paleontological resources including the City's Standard Permit Conditions, implementation of the proposed project would have a less than significant paleontological resources impact.

4.5.3 Conclusion

Implementation of the proposed project would have a less than significant impact on historic buildings. **(Less Than Significant Impact)**

With implementation of the identified standard permit conditions and mitigation measures, the proposed project would have a less than significant impact on historic resources, subsurface prehistoric and historic archaeological resources, and paleontological resources. **(Less Than Significant Impact With Mitigation Incorporated)**

4.6 GEOLOGY AND SOILS

The following discussion is based in part upon two geotechnical investigations prepared for the project by *Rockridge Geotechnical*. One was for the proposed office building and the other was for the proposed public park/plaza included in the project. Copies of both reports are contained in Appendix D of this Initial Study.

4.6.1 Environmental Setting

4.6.1.1 *Geology and Soils*

The project site is underlain by Pleistocene-age alluvial deposits, with the upper 12 feet of soil beneath the proposed office building location consisting of medium dense to dense sand with variable amounts of gravel and clay. Below 12 feet, the alluvium generally consists of interbedded layers of dense to very dense sand and gravel with variable amounts of clay and gravel to a depth of 50 feet below ground surface (bgs).

The upper 12 feet of soil beneath the proposed park/plaza area consists of medium dense to dense clayey sand with variable amounts of gravel, hard silt, and very stiff to hard clay with varying amounts of sand. The near-surface clay obtained from the borings was determined to have a low expansion potential. Below a depth of 12 feet bgs, the alluvium generally consists of interbedded layers of hard clay with varying amounts of sand and gravel and dense to very dense sand with variable amounts of clay and gravel to a maximum depth of 45 feet bgs. Groundwater was not encountered in any of the borings on the project site during the subsurface investigation, but was assumed to be at a depth of greater than 50 feet bgs, based on the California Geological Survey's historic high groundwater level records.

4.6.1.2 *Seismicity and Seismic Hazards*

The project site is located in the Coast Ranges geomorphic province of California, which is characterized by northwest-trending valleys and ridges. These features are controlled by folds and faults that resulted from the collision of the Farallon plate and the North American plate, and subsequent strike-slip faulting along the San Andreas Fault system. The San Andreas Fault is more than 600 miles long, and extends from Point Arena in the north to the Gulf of California in the south. The Coast Ranges province is bounded by the Great Valley to the east and on the west by the Pacific Ocean.

The major active faults in the area are the Monte Vista-Shannon, San Andreas, and Hayward faults. Their proximities to the project site are shown in Table 4.6-1.

| Table 4.6-1 Active Faults Near the Project Site | |
|--|---------------------------|
| Fault | Distance from Site |
| Monte Vista-Shannon | 1.9 miles southwest |
| San Andreas | 4.5 miles southwest |
| Hayward | 14.9 miles northeast |

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 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. The site is approximately 1.9 miles from the Monte Vista-Shannon Fault and approximately 4.5 mile from the San Andreas Fault. Therefore, the potential exists for a large earthquake to induce strong to very strong ground shaking at the site during the life of the project.

Historically, ground surface displacements closely follow the trace of geologically young faults. The site is not within an Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the site. The study therefore concluded that the risk of fault offset at the site from a known active fault is very low. In a seismically active area, the remote possibility exists for future faulting in areas where no faults previously existed; however, *Rockridge Geotechnical* concluded that the risk of surface faulting and consequent secondary ground failure from previously unknown faults is also very low.

4.6.1.3 *Liquefaction and Lateral Spreading*

Strong shaking during an earthquake can result in ground failure such as that associated with liquefaction, lateral spreading and cyclic densification.

When a saturated, cohesionless soil liquefies, it experiences a temporary loss of shear strength created by a transient rise in excess pore pressure generated by strong ground motion. Soil susceptible to liquefaction includes loose to medium dense sand and gravel, low-plasticity silt, and some low-plasticity clay deposits. Flow failure, lateral spreading, differential settlement, loss of bearing strength, ground fissures and sand boils are evidence of excess pore pressure generation and liquefaction.

The site is not been mapped within a zone of liquefaction potential as shown on the map titled *State of California, Seismic Hazard Zones, Mountain View Quadrangle, Official Map*, prepared by the California Geological Survey (CGS), dated October 18, 2006.

4.6.2

Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | | |
| 1. 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.)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 8 |
| 2. Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 8 |
| 3. Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 8 |
| 4. Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 8 |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| c) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| d) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 8 |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1 |

4.6.2.2 *Geologic Impacts*

Seismic Hazards

The project site is in the seismically active San Francisco Bay Area which has a 72 percent probability of experiencing at least one magnitude 6.7 earthquake during the next 30 years. The project site would experience intense ground shaking in the event of a large earthquake. While no active faults are known to cross the project site, ground shaking could damage proposed buildings.

The project would be required to adhere to the 2016 California Building Code and site specific geotechnical report to be prepared, as well as utilize standard engineering techniques to increase the likelihood that the project could withstand minor earthquakes without damage and major earthquakes without collapse. The proposed project would not expose people or property to impacts associated with seismically induced ground failures or other geologic conditions on-site.

Groundwater was not encountered in the test borings in very stiff to hard clay and dense to very dense sand, and available historic groundwater information of the site and vicinity indicate historic high groundwater to be greater than 50 feet bgs. *Rockridge Geotechnical* therefore concluded that the potential for liquefaction to occur at the site is very low.

Cyclic densification (also referred to as differential compaction) of non-saturated sand (sand above groundwater table) can occur during an earthquake, resulting in settlement of the ground surface and overlying improvements. The borings indicate there is a layer of medium dense clayey sand in two of the borings taken in the upper 12 feet bgs. Laboratory test results indicate the medium dense sand with clay and gravel at a depth of 10 feet bgs in one of the borings contains about seven percent fines. This layer is susceptible to cyclic densification; however, this soil would be removed during excavation for the below-grade parking garage.

In the other boring, the upper seven feet of soil contain relatively high fines content. Therefore, the study concluded that this clayey sand has a low susceptibility to cyclic densification because of its relative density and relatively high fines content; this soil will also be removed during excavation for the below-grade parking garage. The borings indicate the soil beneath a depth of 12 feet is not susceptible to cyclic densification due to its relatively high fines content and/or high relative density. Therefore, the study concluded that the potential for ground settlement beneath the proposed plaza and parking garage with one to three subterranean levels resulting from cyclic densification is very low.

Soil Hazards

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. As mentioned previously, soils on-site have a low expansion potential. As a result, development of the proposed project would not expose adjacent or nearby properties to soil related hazards.

Septic Tanks

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)**

Erosion

The project would require ground disturbance due to demolition/removal of the existing buildings, grading, and trenching for utilities. Ground disturbance would expose soils and increase the potential for wind or water-related erosion and sedimentation until construction is complete. The following

erosion measures are C.3 requirements under the Municipal Regional Stormwater Permit and will reduce possible construction-related erosion impacts:

- All excavation and grading work would be scheduled in dry weather months or construction sites would be weatherized² 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 less than significant.

4.6.2.3 *Existing Geologic Conditions Affecting the Project – Planning Considerations*

The California Supreme Court in a December 2015 opinion (*BIA v. BAAQMD*) confirmed CEQA is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project; nevertheless the City has policies that address existing conditions (e.g. geologic hazards) affecting a proposed project, which are addressed below.

The policies of the City of Los Altos General Plan have been adopted for the purpose of avoiding or mitigating environmental effects resulting from planned development within the City. Los Altos General Plan Policy 1.1 calls for updating acceptable levels of risk/life safety standards and making sure that buildings are brought up to those standards, consistent with State law, to reduce risk associated with geologic conditions. Soils beneath the project site have moderate to high expansion potential and moderate potential for liquefaction. Consistent with the requirements of the City of Los Altos, the project would comply with a design-specific geotechnical report and the California Building Code to ensure that geologic hazards are adequately addressed. As a result, future site occupants would not be exposed to geologic hazard risks and the project would comply with Policy 5.10.5-P6.

4.6.3 Conclusion

The geotechnical investigations prepared for the project site concluded that the site can be developed as proposed, provided that the recommendations contained in the investigations are incorporated into the project plans and specifications and implemented during construction. Specific recommendations are provided for site preparation and grading, foundation design, seismic design, and various other geotechnical aspects of project construction.

Implementation of the proposed erosion control measures will reduce geologic and soils impacts to a less than significant level. **(Less Than Significant Impact)**

² Weatherized refers to measures that would protect exposed soils from rain and stormwater runoff.

4.7 GREENHOUSE GAS EMISSIONS

4.7.1 Environmental Setting

Unlike emissions of criteria and toxic air pollutants, which have local or regional impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the atmosphere contribute to an increase in temperature of the earth's atmosphere. The principal GHGs contributing to global warming and associated climate change are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated compounds. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, utility, residential, commercial, and agricultural sectors.

4.7.2 Regulatory Background

4.7.2.1 *Federal*

Clean Air Act

The US EPA is the federal agency responsible for implementing the Clean Air Act (CAA). The US Supreme Court in its 2007 decision in *Massachusetts et al. v. Environmental Protection Agency et al.*, ruled that carbon dioxide (CO₂) is an air pollutant as defined under the CAA, and that EPA has the authority to regulate emissions of greenhouse gases (GHGs). Following the court decision, EPA has taken actions to regulate, monitor, and potentially reduce GHG emissions (primarily mobile emissions).

4.7.2.2 *State of California*

California Global Warming Solutions Act

Under the California Global Warming Solution Act, also known as Assembly Bill 32 (AB 32), CARB has 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*, that identifies how emission reductions will be achieved from significant GHG sources via regulations, market mechanisms and other actions.

On September 8, 2016, Governor Brown signed Senate Bill (SB) 32 into law, amending the California Global Warming Solution Act. SB 32 requires the California Air Resources Board to ensure that statewide greenhouse gas emissions are reduced to 40 percent below the 1990 level by 2030. As a part of this effort, CARB is required to update the *Climate Change Scoping Plan* to express the 2030 target in terms of million metric tons of carbon dioxide equivalent. CARB has initiated the public process to update the state's *Climate Change Scoping Plan*. The updated plan will provide a framework for achieving the 2030 target and is anticipated to be completed and adopted by CARB in 2017.

Senate Bill 375 – Redesigning Communities to Reduce Greenhouse Gases

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. It builds on AB 32 by requiring CARB to develop regional GHG reduction targets to be achieved from the automobile and light truck sectors for 2020 and 2035 when compared to emissions in 2005. The per capita reduction targets for passenger vehicles in the San Francisco Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.³

Consistent with the requirements of SB 375, MTC partnered with the Association of Bay Area Governments (ABAG), BAAQMD, and the Bay Conservation and Development Commission (BCDC) to prepare the region’s Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP) process. The SCS is referred to as *Plan Bay Area*.

MTC and ABAG adopted *Plan Bay Area* in July 2013 and CARB accepted the technical evaluation of the SCS in April 2014. The strategies in the plan are intended to promote compact, mixed-use development close to public transit, jobs, schools, shopping, parks, recreation, and other amenities, particularly within Priority Development Areas (PDAs) identified by local jurisdictions.

MTC and ABAG are currently updating *Plan Bay Area*. *Plan Bay Area 2040*, released in early 2017, is a limited and focused update that builds upon the growth pattern and strategies developed in the original *Plan Bay Area* but with updated planning assumptions that incorporate key economic, demographic and financial trends from the last four years. MTC and ABAG plan to revise the draft *Plan Bay Area 2040* and prepare a Final Environmental Impact Report with consideration of adoption in July 2017.

4.7.2.3 Regional

Bay Area Air Quality Management District

BAAQMD is the regional, government agency that regulates sources of air pollution within the nine San Francisco Bay Area counties. Several key activities of BAAQMD related to GHG emissions are described below.

- *Regional Clean Air Plans:* BAAQMD and other agencies prepare clean air plans as required under the state and federal Clean Air Acts. The Bay Area 2017 Clean Air Plan (2017 CAP) focuses on two closely related BAAQMD goals: protecting public health and protecting the climate. Consistent with the GHG reduction targets adopted by the State of California, the 2017 CAP lays the groundwork for BAAQMD’s long-term effort to reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The 2017 CAP includes a wide range of control measures designed to decrease 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.

³ The emission reduction targets are for those associated with land use and transportation strategies, only. Emission reductions due to the California Low Carbon Fuel Standards or Pavley emission control standards are not included in the targets.

- *BAAQMD 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. As discussed in the CEQA Guidelines, the determination of whether a project may have a significant effect on the environment calls for careful 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 and other jurisdictions in the San Francisco Bay Area Air Basin often utilize the thresholds and methodology for greenhouse gas emissions developed by BAAQMD. The Guidelines include information on legal requirements, BAAQMD rules, plans and procedures, methods of analyzing greenhouse gas emissions, mitigation measures, and background information.

4.7.2.4 City of Los Altos Climate Action Plan

The City of Los Altos' Climate Action Plan (Climate Action Plan) was adopted in 2013. The 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.

The 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 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 CAP would reduce the City's 2020 emissions by 15,640 metric tons of CO_{2e}, which would help the City achieve a 17 percent reduction in GHG emissions by 2020. The CAP also requires development projects to demonstrate compliance with all applicable best management practices contained in the Plan.

BAAQMD CEQA Guidelines

BAAQMD identifies sources of information on potential thresholds of significance and mitigation strategies for operational GHG emissions from land-use development projects in its CEQA Air Quality Guidelines. BAAQMD's CEQA Guidelines also outline a methodology for estimating GHGs.

BAAQMD CEQA Thresholds of Significance

The 2011 BAAQMD Air Quality Thresholds of Significance for operational-related GHG emissions is 1,100 metric tons (MT) of carbon dioxide equivalent (CO_{2e}) per year or 4.6 MT of CO_{2e} per service population⁴ per year. BAAQMD does not have a threshold of significance for construction-related GHG emissions.

⁴ Service population is the total number of residents and jobs at the project site.

4.7.3 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|--|--------------------------------|--|-------------------------------------|--------------------------|---------------------|
| Would the project: | | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |

An air quality impact analysis was prepared for the project by *LSA* that included an analysis of greenhouse gas impacts related to both construction and operational phases of the project. The following discussion is based on the *LSA* report. A copy of the report is contained in Appendix A of this Initial Study.

4.7.3.1 Greenhouse Gas Impacts

Construction Emissions

Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, CH₄ is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction.

Using CalEEMod, it is estimated that the project would generate approximately 869 metric tons of CO_{2e} during the construction period. Implementation of the BAAQMD Basic Construction Mitigation Measures and Additional Construction Best Management Practices would further reduce GHG emissions during the construction period to ensure impacts remain less than significant.

Operational Emissions

Long-term operation of the proposed project would generate GHG emissions from area and mobile sources as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated vehicle trips associated with trips to the project site. Area-source emissions would be associated with activities such as landscaping and maintenance of proposed land uses, and other sources.

Operational emissions estimates for the proposed project are discussed below and were calculated using a method that is consistent with methodology recommended in BAAQMD's *CEQA Air Quality Guidelines*. The methodology is based on four sources of GHG emissions: transportation; electricity and natural gas; water use; and solid waste disposal, as described below.

Transportation associated with the proposed project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips. Transportation is the largest source of GHG emissions in California and represents approximately 38 percent of annual CO₂ emissions in the state. For land use development projects, vehicle miles traveled (VMT) and vehicle trips are the most direct indicators of GHG emissions associated with the proposed project. The proposed project would typically generate approximately 1,175 net new average daily trips. Special events would occur occasionally in the public open space, which would increase the daily trip generation to an estimated 1,667 net new daily trips. To ensure that the analysis was conservative in its assumptions, it is assumed that special events would occur once per week.

Buildings represent 39 percent of United States primary energy use and 70 percent of electricity consumption. Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. The project is anticipated to increase the use of electricity and natural gas; however, as part of the project's compliance with the latest California Building Code standards, the project is expected to be relatively energy efficient and would incorporate green building measures in compliance with the latest CALGreen's standard building measures for residential buildings and Title 24 requirements.

Water and wastewater related GHG emissions are based on water supply and conveyance, water treatment, water distribution, and wastewater treatment. Each element of the water use cycle has unique energy intensities (kilowatt hours [kWh]/million gallons). Recognizing that the actual energy intensity in each component of the water use cycle will vary by utility, the California Energy Commission (CEC) assumes that approximately 3,950 kWh per million gallons are consumed for water that is supplied, treated, consumed, treated again, and disposed of in northern California.

Solid waste generated by the project could contribute to GHG emissions in a variety of ways. Land filling and other methods of disposal use energy for transporting and managing the waste, and these activities produce additional GHGs to varying degrees. Land filling, the most common waste management practice, results in the release of CH₄ from the anaerobic decomposition of organic materials. CH₄ is 25 times more potent a GHG than CO₂. However, landfill CH₄ can also be a source of energy. In addition, many materials in landfills do not decompose fully, and the carbon that remains is sequestered in the landfill and not released into the atmosphere.

When calculating project GHG emissions to compare to the thresholds of significance, the BAAQMD recommends that the Lead Agency consider project design features, attributes, and local development requirements as part of the project as proposed and not as mitigation measures. Consistent with BAAQMD guidance, GHG emissions were estimated using CalEEMod.

Table 4.7-1 shows the calculated GHG emissions for the proposed project. Mobile source emissions are the largest category, at approximately 73 percent of total CO₂e emissions, followed by energy source emissions at approximately 22 percent of the total. Waste and water source emissions are

approximately 3 percent and 2 percent of the total respectively. Additional calculation details are provided in Appendix A.

| Table 4.7-1 GHG Emissions (Metric Tons Per Year) | | | | | |
|---|------------------------------|-----------------------|-----------------------|------------------------|-------------------------|
| Emissions Source | Operational Emissions | | | | Percent of Total |
| | CO₂ | CH₄ | N₂O | CO₂e | |
| Area Source Emissions | 0.0 | 0.0 | 0.0 | 0.0 | 0 |
| Energy Source Emissions | 380.1 | 0.0 | 0.0 | 382.4 | 22 |
| Mobile Source Emissions | 1,258.0 | 0.1 | 0.0 | 1,259.3 | 73 |
| Waste Source Emissions | 17.4 | 1.0 | 0.0 | 43.0 | 3 |
| Water Source Emissions | 26.1 | 0.5 | 0.0 | 41.4 | 2 |
| Total Emissions | | | | 1,726.1 | 100 |

Source: LSA Associates, Inc., June 2017.

As discussed above, according to BAAQMD, a project would have less than significant GHG emissions if it would meet one or more of the following criteria: result in operational-related greenhouse gas emissions of less than 1,100 metric tons of CO₂e a year, or result in operational-related greenhouse gas emissions of less than 4.6 metric tons of CO₂e per service population (residents plus employees). Based on the analysis results, the proposed project would generate approximately 1,726.1 metric tons of CO₂e which would exceed the BAAQMD’s numeric threshold of 1,100 metric tons CO₂e.

The project would consist of a three-level office building with approximately 77,000 square feet of office space with a 1,200 square feet of café space. According to the project applicant’s development management consultant, the proposed office building is anticipated to host approximately 400 employees, while the café would employ 3 people resulting in a total service population of 403 people. Therefore, the project’s GHG emissions would result in a GHG efficiency of 4.3 metric tons CO₂e per service population, which is below the BAAQMD’s threshold of 4.6. Therefore, because the project results in emissions below the 4.6 metric tons of CO₂e per service population, the project would not have a significant effect on the environment related to greenhouse gas emissions.

Consistency with Greenhouse Gas Reduction Plans

The City of Los Altos’ Climate Action Plan³⁴ (CAP) was adopted in 2013. The 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.

The CAP requires development projects to demonstrate compliance with all applicable best management practices outlined in the New Development Climate Action Plan Checklist, as shown in Table 4.7-2, below.

Table 4.7-2 New Development Climate Action Plan Checklist

| Best Management Practice | Applicable To | Project Compliance |
|--|---|---|
| 1.1 Improve Non-Motorized Transportation | | |
| Provide end-of-trip-facilities to encourage alternative transportation, including showers, lockers, and bicycle racks. | Nonresidential projects over 10,000 square feet | <i>Consistent.</i> The proposed project would provide bicycle racks on First Street at the main office entry and near the park/plaza, and secured bicycle storage would be provided in Level 1 of the parking garage. The project would also provide shower and locker facilities on-site. |
| Connect to and include non-motorized (bicycle and pedestrian) infrastructure on-site | Nonresidential projects over 10,000 square feet | <p><i>Consistent.</i> The proposed project is well served by the existing pedestrian and bicycle facilities. Sidewalks are located along all roadways in the downtown area. The project would provide sidewalks along the entire project frontage and enhance the pedestrian network within the project site. The project would also extend the curb on the east leg of the First Street/Shasta Street intersection to reduce the crossing distance on Shasta Street.</p> <p>Within the project vicinity, designated bike lanes are present along Foothill Expressway, San Antonio Road, Los Altos Avenue, El Monte Avenue, and westbound Edith Avenue. Eastbound Edith Avenue and Cuesta Drive are marked as bike routes. Local streets in downtown, such as First Street and State Street, are not marked as bike lanes or routes, but they carry low traffic volumes and are conducive to bicycling.</p> |
| Where appropriate, require new projects to provide pedestrian access that internally links all surrounding uses. Applicable to all new commercial and multiple-family development. | Nonresidential projects over 10,000 square feet | <i>Consistent.</i> Pedestrian facilities within the project area are in the form of sidewalks, and signalized, and unsignalized crossings. The project would provide sidewalks along the project’s frontages on First Street and Shasta Street and extend the curb on the east leg of the First Street/Shasta Street intersection to reduce the crossing distance on Shasta Street. It would also provide public open space and terrace space in the eastern portion of the project site with crosswalks on First Street and the Plaza North driveway. Within the project site, pedestrian access would be provided between the surrounding streets, the project building, and the parking garage |

| Table 4.7-2 New Development Climate Action Plan Checklist | | |
|--|--|---|
| Best Management Practice | Applicable To | Project Compliance |
| | | via sidewalks, the park/plaza, and parking garage stairwells. |
| 1.2 Expand Transit and Commute Options | | |
| Develop a program to reduce employee vehicle miles traveled (VMT). | Nonresidential projects over 10,000 square feet (or over 50 employees) | <i>Consistent.</i> Employee VMT would be reduced by the existing pedestrian and bicycle facilities. The project would include shower and locker facilities to promote active commuters. The plaza has also been designed to promote bicycle travel and includes amenities such as a public bike repair station and increased bicycle parking. Pedestrian amenities include vegetated walkways, overhead trellising, and tree plantings. The project also includes a dedicated rideshare drop-off area. Additionally, the project is served by existing transit service via the VTA bus route 40. As noted in the Traffic Impact Analysis prepared for the project, the project would result in an 11 percent reduction in vehicle trips over typical projects of this land use type due to internal mixed use trips in the Downtown area. The project includes a café which would reduce VMT by reducing the need to travel off-site for employee dining options. |
| 1.3 Provide Alternative-Fuel Vehicle Infrastructure | | |
| Provide electric vehicle (EV) pre-wiring and/or charging stations. | All projects | <i>Consistent.</i> The project will install several EV charging stations consistent with this measure. |
| 2.2 Increase Energy Efficiency | | |
| Install higher-efficiency appliances. | All new construction | <i>Consistent.</i> The project would incorporate high-efficiency appliances where applicable. The building will incorporate an energy efficient building skin and abundant daylighting, combined with efficient mechanical systems, resulting in an approximate 70 percent more efficiency over typical existing office buildings. The project will also include photovoltaic panels to generate a minimum of 13 percent of annual energy use. |
| Install high-efficiency outdoor lights. | All new construction | <i>Consistent.</i> All outdoor lighting would be high-efficient. Light pollution would be controlled through the selection of site lighting fixtures. |

| Table 4.7-2 New Development Climate Action Plan Checklist | | |
|--|-------------------------------------|--|
| Best Management Practice | Applicable To | Project Compliance |
| Obtain third-party heating, ventilating, and air conditioning (HVAC) commissioning. | All new nonresidential construction | To Be Demonstrated. Current plans for the project do not provide sufficient detail to demonstrate the use of third-party HVAC commissioning. Construction plans would be reviewed for HVAC features prior to building permit issuance. The project applicant would comply with this measure. |
| 3.1 Reduce and Divert Waste | | |
| Develop and implement a Construction and Demolition (C&D) waste plan. | All new projects | Consistent. Current plans for the project indicate 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's landscaping and irrigation would be required to comply with the City's Water Efficient Landscape Ordinance. In addition, the proposed project would include water-efficient landscaping. The plant palate would include a combination of native and non-native, non-invasive, and non-toxic plants. |
| 3.3 Use Carbon-Efficient Construction Equipment | | |
| Implement applicable BAAQMD construction site and equipment best management practices. | All new projects | Consistent. The proposed project would implement the BAAQMD Basic Construction Mitigation Measures and Additional Construction Best Management Practices. |
| 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 public open space and extensive landscaping around the office building. |
| Establish a carbon sequestration project or similar off-site mitigation strategy. | Projects over 10,000 square feet | Consistent. Stormwater would be cleaned and slowed by bioswales and planting to improve water quality being sent to the Bay. |
| Plant at least one well-placed shad tree per dwelling unit. | New residential projects | Not Applicable. |

Source: City of Los Altos, 2014.

In addition to implementation of the CAP best management practices identified in Table 4.7-2 above, the proposed project would seek registration with the United States Green Building Council (USGBC) and would seek Leadership in Energy and Environmental Design (LEED) Gold certification under New Construction – Core and Shell.

The City of Los Altos adopted the Model Water Efficient Landscape Ordinance in December 2015 to increase water efficiency standards for new and rebuild landscapes through more efficient irrigation systems, increased use of greywater systems, on-site storm water capture, and limits on the amount of

new turf area. 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 Planning review of the project.

The proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. 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.

4.7.4 Conclusion

Based on the analysis presented above, GHG emissions released during construction and operation of the project are estimated to be lower than significance thresholds, and would not be cumulatively considerable. Therefore, the proposed project would not result in significant GHG impacts. **(Less Than Significant Impact)**

4.8 HAZARDS AND HAZARDOUS MATERIALS

The following discussion is based on two Phase I Environmental Site Assessments (Phase I ESAs) prepared for the project by *West Environmental Services & Technology (West)* in June 2017. One Phase I ESA covered the proposed office building portion of the project site, and the other covered the proposed public park/plaza portion of the project site. Copies of both reports are contained in Appendix E of this Initial Study.

4.8.1 Setting

The project site is located along the northeast side of First Street in Downtown Los Altos. It is bounded by Shasta Street to the north, an alley to the east, City of Los Altos Plaza parking lot to the south, and First Street to the west. The site is currently developed with nine single-story and two-story buildings for commercial retail and office use.

4.8.1.1 *Historical Uses of the Project Site*

Portions of the site were undeveloped between the 1920's and the 1950's, with the exception of a residence located at 145 First Street. Other uses of the site included a garbage company between the 1950's and the 1970's, and an automobile repair shop between the 1950's and the 2010's. Several other commercial businesses operated on the site between the 1960's and the 2010's, including a carpet cleaning business, blue print shop, garden equipment shop, glass replacement business, jewelry repair, nail salon, retail flooring shop, cycling studio, development company, restaurants, commercial offices, and a gaming arcade.

The Plaza parking property located adjacent to 151 First Street, a portion of which is included in the proposed project, was occupied by a residence, a grain and feed warehouse with an earthen floor, and a separate rectangular building between the 1920's and the 1960's, when the structures were removed and the current parking lot was developed.

4.8.1.2 *On-Site Sources of Contamination*

During *West's* site reconnaissance, a backup diesel generator was observed on the roof of 121 First Street, and staining of the roof was observed near the generator. An elevator was also reportedly installed at 127 First Street, and fill material was reported to be present at 129 First Street during construction in the 2000's. These on-site sources of contamination are described below, and their locations are shown on Figure 4.8-1.

The Phase I report also noted that underground fuel storage tanks (USTs) were formerly located at 101/111 First Street and 141 First Street. In the 1960's, an approximately 1,000-gallon gasoline UST and associated fuel island were installed at 101/111 First Street. The UST was reportedly slurry-filled and closed in-place in October 1985 with oversight from the Santa Clara County Department of Environmental Health (SCCDEH). In June 2007, the UST was excavated and removed with oversight from the SCCDEH. Soil samples collected following the removal of the UST reportedly did not detect total petroleum hydrocarbons as gasoline or volatile organic compounds, including benzene, above laboratory reporting limits. In the late 1970's, a flammable liquids permit was obtained for a 2,000-gallon gasoline UST located at the rear of the property. In August 1990, the



Source: West Environmental Services & Technology, June 2017.

HISTORICAL SITE USES

FIGURE 4.8-1

UST was removed under permit from the SCCDEH. Soil samples collected in August 1990 following the removal of the UST did not detect TPHg, benzene, toluene, ethyl benzene or xylenes above laboratory reporting limits. The file was considered closed by the SCCDEH in 1991.

In June 2010, a Phase II Environmental Site Assessment (Phase II ESA) was prepared for the property at 145 First Street to characterize potential impacts from the former UST on the neighboring property at 141 First Street. Soil and soil gas samples were taken from the property at 145 First Street, and the laboratory analysis for two of the samples collected did not reveal VOCs or TPHg above the laboratory reporting limits. The analysis for two other samples detected the presence of tetrahydrofuran and TPHg.

Lead-Based Paint in Buildings

In 1978, the Consumer Products Safety Commission banned paint and other surface coating materials containing lead. The Phase I report determined that, based on the age of the former buildings at 145 and 151 First Street, there is the potential for lead-based paint in the soil. There is also the potential for lead-based paint in the soil at the Plaza Parking Lot, due to the age of the former buildings on the site and possible deposition from the adjacent property at 151 First Street, prior to the paving of the site for the parking lot.

4.8.1.3 *Off-Site Sources of Contamination*

Potential off-site sources of contamination in the project area include the former Southern Pacific Railroad right-of-way, located on the west side of First Street west of the project site, and the existing sanitary sewers located in First Street adjacent to the site and in the alley adjacent to the northeast side of the site. These off-site sources of contamination are described below, and their locations are shown on Figure 4.8-1.

Southern Pacific Railroad (SPRR) maintained a right-of-way (ROW) along the west side of First Street up until the early 1960's that featured rail lines, an electrical substation, wood piles, hay and coal storage sheds, a freight depot building, and other buildings. The ROW area was redeveloped in the late 1960's with commercial uses and the construction of Foothill Expressway along the railroad track ROW on the west side. The site is now occupied by the expanded Safeway grocery store. The Phase I report stated that information regarding the types of operations conducted by SPRR, hazardous materials used and stored, hazardous waste management practices and soil, soil gas and groundwater conditions were not reasonably ascertainable.

There are sanitary sewers located on both sides of the project site. Historical land uses along First Street and State Street south of the site have included gasoline service stations, a dry cleaning operation, carpet cleaning, coin-operated laundry, and commercial offices. The dry cleaning operation had used petroleum-based cleaning solvents since the year 2000, but may have been using tetrachloroethene (PCE) prior to that time. The dry cleaning use is still operating at 392 First Street (Los Altos Cleaners), approximately 0.3 mile from the project site, and is listed as an Active State

Response cleanup site on the State Hazardous Waste and Substances Site List.⁵ Information regarding the sewer line flow direction and integrity were not reasonably ascertainable, according to the Phase I report. The depth to groundwater near the site was reported to have been measured at between 100 and 130 feet below ground surface, with a flow direction to the northeast.

4.8.1.4 *Soil and Soil Gas Samples*

Based on the findings of the Phase I ESAs, additional investigations were conducted to further characterize the site conditions. For this reason, in August 2017, soil borings were taken and Phase II Environmental Site Assessment (Phase II ESA) soil and soil gas sampling and laboratory analysis was conducted at the site. Twenty-seven borings were taken at the various properties that comprise the site. The Phase II ESAs are included as appendices to the Phase I ESAs. As summarized in Table 4.8-1 and listed below, hazardous substances were detected in the soil and/or soil gas samples above RWQCB Environmental Screening Levels (ESL) for unrestricted use, but below commercial use and construction worker screening levels:

- **121 1st Street** - Cobalt was detected in soil samples at a concentration of 24.7 mg/kg, which is above the RWQCB unrestricted use ESL of 23 mg/kg, but below the commercial use and construction worker ESL.
- **121 1st Street** - Ethyl benzene was detected in soil gas samples at 1,410 µg/m³, which is above the RWQCB indoor air protection ESL of 560 µg/m³, but below the commercial use and construction worker ESL.
- **129 1st Street** - Cobalt was detected in soil samples at a concentration of 28.7 mg/kg, which is above the RWQCB unrestricted use ESL of 23 mg/kg, but below the commercial use and construction worker ESL.
- **139 1st Street** - Cobalt was detected in soil samples at a concentration of 25.5 mg/kg, which is above the RWQCB unrestricted use ESL of 23 mg/kg, but below the commercial use and construction worker ESL.
- **139 1st Street** - Tetrachloroethene (PCE) was detected in soil gas samples at 299 µg/m³, which is above the RWQCB unrestricted use indoor air protection ESL of 240 µg/m³, but below the commercial use and construction worker ESL.
- **145 1st Street** - Lead was detected in soil samples at a concentration up to 98.6 mg/kg, which is above the RWQCB unrestricted use ESL of 80 mg/kg, but below the commercial use and construction worker ESL.
- **145 1st Street** - Ethyl benzene was detected in soil gas samples at 1,210 µg/m³, which is above the RWQCB indoor air protection ESL of 560 µg/m³, but below the commercial use and construction worker ESL.
- **151 1st Street** - Lead was detected in soil samples at a concentration up to 99.1 mg/kg, which is above the RWQCB 80 mg/kg unrestricted use ESL, but below the commercial use and construction worker ESL.
- **SPRR Railroad Right-of-Way and Sanitary Sewers** - Ethyl benzene was detected in soil gas samples at 1,410 µg/m³, which is above the RWQCB indoor air protection ESL of 560 µg/m³, but below the commercial use and construction worker ESL.

⁵ California Department of Toxic Substances Control. "EnviroStor". 2017. Accessed: August 9, 2017. Available at: http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60002524

| Table 4.8-1 Suspected On-site RECs and Sampling Results | | |
|--|---|--|
| Location | Known or Suspect Environmental Conditions | Sampling Results |
| 101/111 First Street | <p>Potential presence of hazardous substances in soil and soil gas from historical hazardous material storage.</p> <p>Potential presence of hazardous substances and petroleum products in soil gas from historical UST use</p> | No hazardous substances detected above applicable commercial use and construction worker screening levels. |
| 121 First Street | <p>Potential presence of hazardous substances and petroleum products in soil, soil gas and groundwater from historical garbage company and garden equipment operations.</p> <p>Potential presence of petroleum products in soil near roof drains due to diesel spills from the roof-mounted backup generator.</p> | No hazardous substances detected above applicable commercial use and construction worker screening levels. |
| 127 First Street | <p>Potential presence of hazardous substances and petroleum products in soil, soil gas and groundwater from historical glass replacement operations.</p> <p>Potential presence of petroleum products and polychlorinated biphenyls (PCBs) in soil from elevator hydraulic fluid releases.</p> | <p>No hazardous substances detected above applicable commercial use and construction worker screening levels.</p> <p>Due to limited access to conduct sampling, and lack of information regarding elevator maintenance, potential releases from the elevator represents a suspect REC.</p> |
| 129 First Street | Potential presence of hazardous substances and petroleum products within the fill material. | No hazardous substances detected above applicable commercial uses and construction worker screening levels. |
| 139 First Street | Potential presence of hazardous substances and petroleum products in soil and soil gas from historical automotive repair and service operations. | No hazardous substances detected above applicable commercial uses and construction worker screening levels. |
| 141 First Street | <p>Potential presence of VOCs in soil gas from the former UST.</p> <p>Potential presence of petroleum products in soil from hazardous material storage.</p> | No hazardous substances detected above applicable commercial use and construction worker screening levels, and the UST case is reported closed. |
| 145 First Street | <p>Presence of petroleum hydrocarbons and VOCs in soil gas.</p> <p>Potential presence of lead in soil from lead-based paint.</p> | No hazardous substances detected above applicable commercial use and construction worker screening levels. |
| 151 First Street | Potential presence of lead in soil from lead-based paint. | No hazardous substances detected above applicable commercial use and construction worker screening levels. |

| Table 4.8-1 Suspected On-site RECs and Sampling Results | | |
|---|---|--|
| Location | Known or Suspect Environmental Conditions | Sampling Results |
| Plaza Parking Lot | Potential presence of lead in soil from lead-based paint that might have been deposited on 151 First Street. | No hazardous substances detected above applicable commercial use and construction worker screening levels. |
| Former SPRR Right-of-Way | Potential for releases of petroleum products and hazardous substances from the former SPRR ROW operations to migrate to the site. | No hazardous substances detected above applicable commercial use and construction worker screening levels. |
| Sanitary Sewers – First Street and Alley | Potential vapor encroachment condition (VEC) from potential releases of wastewater from the sanitary sewer that contain hazardous substances and petroleum products from gasoline service stations and dry cleaning operations. | No hazardous substances detected above applicable commercial use and construction worker screening levels. |

4.8.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 9 |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 9 |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| d) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 9 |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, will the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| f) For a project within the vicinity of a private airstrip, will the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| h) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |

4.8.2.1 *On-Site Hazardous Materials Impact*

As discussed in Section 4.8.1.2 and shown in Table 4.8-1 above, the results of the Phase I and Phase II ESAs completed for the project site indicate hazardous substances are not present on the project site at levels that exceed applicable commercial use and construction worker screening levels. For these reasons, construction of the proposed project is not anticipated to result in a significant hazard to people or the environment. Despite these findings, if hazardous substances are encountered during construction activities at levels above applicable human health or environmental protection screening levels, then they must be managed in accordance with applicable local, state and federal law. In addition, soil generated from constructions activities will be characterized and managed in accordance with applicable regulations prior to reuse or offsite disposal.

Asbestos/Lead-based Paint

An asbestos and lead-based paint survey was not conducted as part of the ESA. Due to the age of the existing structures on the site, it is reasonable to assume that both asbestos and lead-based paint are still present within the structures.

Because the project proposes to demolish the existing structures, an asbestos survey must be conducted under National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines. In addition, NESHAP guidelines require that all potentially friable ACMs be removed prior to building demolition or renovation that may disturb the ACMs.

If lead-based paint is still bonded to the building materials, its removal is not required prior to demolition. It will be necessary, however, to follow the requirements outlined by Cal-OSHA Lead in Construction Standard, Title 8, California Code of Regulations (CCR) 1532.1 during demolition activities; these requirements include employee training, employee air monitoring, and dust control. If lead based paint is peeling, flaking, or blistered, it should be removed prior to demolition. It is assumed that such paint will become separated from the building components during demolition activities and must be managed and disposed of as a separate waste stream. Any debris or soil containing lead paint or coating must be disposed of at landfills that are permitted to accept such waste. Demolition of the existing structure on the project site could expose construction workers or residents in the vicinity of the project site to harmful levels of ACMs or lead.

Standard Measures

The project is required to conform to the following regulatory programs and to implement the following standard measures to reduce impacts due to the presence of ACMs and/or lead-based paint:

- In conformance with State and local laws, a visual inspection/pre-demolition survey, and possible sampling, shall be conducted prior to the demolition of on-site buildings to determine the presence of asbestos-containing materials and/or lead-based paint.
- Prior to 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 would be disposed of at landfills that meet acceptance criteria for the waste being disposed.
- All potentially friable ACMs shall be removed in accordance with National Emissions Standards for Hazardous Air Pollutants (NESHAP) guidelines prior to any building demolition or renovation that may disturb the materials. All demolition activities will be undertaken in accordance with Cal/OSHA standards contained in Title 8 of CCR, Section 1529, to protect workers from exposure to asbestos.
- A registered asbestos abatement contractor shall be retained to remove and dispose of ACMs identified in the asbestos survey performed for the site in accordance with the standards stated above.
- Materials containing more than one percent asbestos are also subject to BAAQMD regulations. Removal of materials containing more than one percent asbestos shall be completed in accordance with BAAQMD requirements.

The proposed project, in conformance with the aforementioned regulatory requirements and standard measures, would result in a less than significant impact from ACMs and lead.

4.8.2.2 *Off-Site Hazardous Materials*

As discussed in Section 4.8.1.3 and shown in Table 4.8-1 above, the results of the Phase I and Phase II ESAs completed for the project site indicate potential off-site sources of contamination have not substantially affected soil and groundwater beneath the project site. Hazardous substances are not present on the project site at levels that exceed applicable commercial use and construction worker

screening levels. For these reasons, construction of the proposed project is not anticipated to result in a significant hazard to people or the environment.

4.8.2.3 *Future Operations*

Operation of the proposed office uses would likely include the on-site use and storage of cleaning supplies and maintenance chemicals in small quantities. The small quantities of cleaning supplies and maintenance chemicals used on-site would be comparable to the operations of adjacent facilities and would not pose a risk to adjacent land uses.

4.8.2.4 *Other Hazards*

Schools

The project site is not located within one-quarter mile of any proposed or existing school. Therefore, implementation of the proposed project would not result in a hazardous materials impact to schools in the project area.

Airport Operations

The project site is not located near any public airport or private air strip. The nearest airport is Moffett Field, a joint civil-military airport, located approximately 5.6 miles northeast of the site. Palo Alto Airport, a general aviation facility, is located approximately 7.5 miles north of the site. Norman Y. Mineta San José International Airport is located approximately 18 miles east of the project site. The project site is not located within a Comprehensive Land Use Plan (CLUP)-defined safety zone or within the Norman Y. Mineta San José International Airport Influence Area (AIA), which is a composite of the areas surrounding the airport that are affected by noise, height, and safety considerations. Therefore, implementation of the proposed project would not result in safety hazard impacts due to airport activities.

Emergency Response Plans

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. The proposed project is not anticipated to create any conflicts with the implementation of the Emergency Preparedness Plan. Therefore, the proposed project would not impair or interfere with the implementation of an adopted emergency response plan or emergency evacuation plan.

Wildland Fires

The project site is in a developed urban area and it is not adjacent to any wildland areas that would be susceptible to fire. Therefore, implementation of the proposed project would not expose future site users or the proposed building to wildland fires.

4.8.3 Conclusion

The proposed project includes regulatory requirements and standard measures to reduce hazardous materials impacts to a less than significant level. **(Less Than Significant Impact)**

4.9 HYDROLOGY AND WATER QUALITY

4.9.1 Environmental Setting

4.9.1.1 *Flooding*

Based on the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps, the project site is located in 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.⁶

4.9.1.2 *Dam Failure*

The project site is not within any dam failure inundation zone.

4.9.1.3 *Seiches, Tsunamis, and Mudflows*

There are no landlocked bodies of water near the project site that would affect the site in the event of a seiche. There are 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 mountains in proximity that would affect the site in the event of a mudflow.

4.9.1.4 *Storm Drainage System*

The City of Los Altos owns and maintains the municipal storm drainage system which serves the project site. The lines that serve the project site drain into Adobe Creek. Adobe Creek flows northeasterly, carrying the effluent from the storm drain system into San Francisco Bay. There is no overland release of stormwater directly into any waterbody from the project site.

Currently, the project site is developed with eight one- and two-story commercial buildings surrounded by surface parking and sidewalks. The site is comprised of approximately 90 percent impervious surfaces. There are existing storm drain lines in First Street that convey storm flows from the project site.

4.9.1.5 *Water Quality*

As mentioned previously, stormwater from the project site drains into Adobe Creek. Stormwater from urban uses contains litter and contaminants that are washed off of impervious surfaces and carried into storm drains. Common stormwater pollutants include sediment, metals, pesticides, herbicides, oil, grease, and animal waste.

⁶ Federal Emergency Management Agency. *Flood Insurance Rate Map. Map Number 06085C0038H*. May 18, 2009.

4.9.1.6 *Water Quality Regulatory Background*

Regulatory Framework

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 have been developed to fulfill the requirements of this legislation. EPA's regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by water quality control boards, which for the Los Altos area is the San Francisco Bay Regional Water Quality Control Board (RWQCB).

Under Section 303(d) of the 1972 Clean Water Act, states are required to identify impaired surface water bodies and develop total maximum daily loads (TMDLs) for contaminants of concern.⁷ The TMDL is the quantity of pollutant that can be safely assimilated by a water body without violating water quality standards. Listing of a water body as impaired does not necessarily suggest that the water body cannot support the beneficial uses; rather, the intent is to identify the water body as requiring future development of a TMDL to maintain water quality and reduce the potential for future water quality degradation.

In February 2009, the California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), recommended listing 26 Bay Area waterways as "trash-impaired" under Section 303(d) of the federal Clean Water Act, including the creeks of the Lower Peninsula Watershed in which the project site is located. Pending approval by the federal Environmental Protection Agency (EPA), this listing would require locally funded remediation programs for the affected waterways.

NPDES Permit Programs

The State Water Resources Control Board has implemented a National Pollution Discharge Elimination System (NPDES) General Construction Permit for the State of California. Dischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit – Order 2009-0009-DWQ). Construction activity subject to this permit includes clearing, grading, and ground disturbances such as stockpiling or excavation. 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.⁸

⁷ California State Water Resources Control Board, "[Total Maximum Daily Load Program](http://www.swrcb.ca.gov/water_issues/programs/tmdl/303d_lists2006_approved.shtml)," http://www.swrcb.ca.gov/water_issues/programs/tmdl/303d_lists2006_approved.shtml, viewed September 14, 2017.

⁸ State Water Resources Control Board, "Construction Storm Water Program," https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed July 11, 2017.

Once grading begins, the SWPPP must be kept on-site and updated as needed while construction progresses. The SWPPP details the site-specific Best Management Practices (BMPs) to control erosion and sedimentation and maintain water quality during the construction phase. The SWPPP also contains a summary of the structural and non-structural BMPs to be implemented during the post-construction period, pursuant to the stormwater control practices and procedures encouraged by the City of Los Altos and the RWQCB.

The City of Los Altos is required to operate under an NPDES permit to discharge stormwater from the City's storm drain system to surface waters. The Municipal Regional Stormwater Permit (MRP) adopted by the San Francisco Bay Regional Water Quality Control Board in 2015 (Order No. R2-2015-0049) covers 76 Bay Area municipalities and county agencies as co-permittees, including the City of Los Altos.

The MRP mandates that the co-permittees use their planning and development review authority to require that stormwater management measures such as Site Design, Pollutant Source Control and Treatment measures be included in new and redevelopment projects to minimize and properly treat stormwater runoff. Provision C.3 of the MRP regulates the following types of development projects:

- Projects that create or replace 10,000 square feet or more of impervious surface; and
- Special Land Use Categories that create or replace 5,000 square feet or more of impervious surface.

The MRP requires regulated projects to incorporate Low Impact Development (LID) practices, which are intended to reduce runoff and mimic a site's predevelopment hydrology by minimizing disturbed areas and impervious cover and then infiltrating, storing, detaining, evapotranspiring, and/or biotreating stormwater runoff close to its source. LID employs principles such as preserving and recreating natural landscape features and minimizing imperviousness to create functional and appealing site drainage that treats stormwater as a resource, rather than a waste product. Practices used to adhere to these LID principles include measures such as rain barrels and cisterns, green roofs, permeable pavement, preserving undeveloped open space, and biotreatment through rain gardens, bioretention units, bioswales, and planter/tree boxes. The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

Hydromodification

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 (per the Cities of Los Altos and Los Altos Hills HMP Applicability Map).

4.9.2

Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there will 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 will drop to a level which will not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| c) 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 will result in substantial erosion or siltation on-or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| d) 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 will result in flooding on-or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| e) Create or contribute runoff water which will exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| g) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3, 10 |
| h) Place within a 100-year flood hazard area structures which will impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3, 10 |
| i) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3, 11 |
| j) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |

4.9.2.1 *Water Quality*

Operational Impacts

Under existing conditions, the project site is covered with approximately 57,350 square feet (90 percent) of impervious surfaces. The proposed project would decrease impervious surfaces by approximately 8,905 square feet (15.5 percent).

The project would add or replace more than 10,000 square feet of impervious surface area, making it subject to conformance with Provision C.3 of the MRP. The Stormwater Control Plan prepared for the project includes appropriate source control and treatment control measures to meet LID requirements for reducing impervious surface area and removing pollutants from runoff entering the storm drainage system. In order to comply with the LID treatment requirements of the MRP, the project proposes to incorporate on-site bioretention basins. The proposed bioretention facilities would be designed to adequately treat the stormwater runoff on-site before discharging it to the City storm drainage system. In addition, the project will be required to maintain all post-construction treatment control measures, as outlined below, throughout the life of the project.

Standard Measures

The following standard measures, based on the RWQCB Best Management Practices (BMPs) and City requirements, are 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 General Permit for Construction will be filed with the RWQCB and the City of Los Altos. 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 shall prepare an Operations & Maintenance Agreement for the City's review and approval, which will be recorded at the County of Santa Clara.
- 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. Copies of the schedule and record must be provided to the City upon request and must be made available for inspection on-site at all times.

The City would review the project's Stormwater Control Plan (SWCP) to ensure that the project would not exceed the capacity of the local drainage system and ensure compliance with the MRP requirements to reduce post-construction water quality impacts. Therefore, installation and maintenance of the proposed stormwater treatment systems would result in a less than significant impact on water quality.

Construction Impacts

Demolition and construction would temporarily increase the amount of debris on-site and grading activities could increase erosion and sedimentation that could be carried by runoff into Adobe Creek. Because the proposed project would disturb more than one acre of land, the project would be required to comply with the general stormwater permit and prepare a SWPPP for construction activities. In addition, the following measures (based on RWQCB recommendations) have been included as a condition of project approval to reduce potential construction-related water quality impacts:

Standard Construction 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 NPDES General Construction Permit, construction of the proposed project would have a less than significant impact on water quality.

4.9.2.1 *Storm Drainage Impacts*

The proposed project would result in a 15.5 percent decrease in impervious surface area on-site. The decrease in impervious surfaces on-site would result in a general decrease in stormwater runoff.

In addition, the project incorporates site design measures such as aggregated landscaped open space areas, and LID-based treatment controls such as bioretention basins to reduce stormwater runoff. As a result, runoff from the project site would not exceed the capacity of the local drainage system.

4.9.2.2 *Drainage Pattern Impacts*

The proposed project would not substantially alter the existing drainage pattern of the site or area through the alteration of any waterway. As a result, the project would not substantially increase erosion or increase the rate or amount of stormwater runoff.

4.9.2.3 *Groundwater*

The project site does not currently contribute to recharging of groundwater aquifers. The depth to groundwater at the project site is greater than 50 feet below ground surface (bgs).⁹ Development of the proposed project would include trenching for utilities and excavation for the proposed subterranean parking garage. The maximum depth of excavation would not exceed 39 feet bgs. The project would not use groundwater, deplete groundwater supply, or interfere with groundwater recharge. Therefore, the project would not interfere with groundwater flow. **(Less Than Significant Impact)**

4.9.2.4 *Existing Flooding Conditions Affecting the Project*

The California Supreme Court in a December 2015 opinion (*BIA v. BAAQMD*) confirmed CEQA is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project; nevertheless the City has policies that address existing conditions (e.g. flooding) affecting a proposed project, which are addressed below.

The project site is located within Flood Zone X; areas of two percent annual chance flood, areas with one percent chance of annual flood with average depths of less than one foot or with drainage areas less than one square mile, and areas protected by levees from a one percent annual flood. Based on the FEMA flood insurance rate maps, the project site is outside the 100-year floodplain. In addition, due to the location of the project site, the project would not be subject to inundation by seiche, tsunami, or mudflow. As a result, implementation of the project would not expose people or structures to significant flood hazards.

The project site is within the Lexington Dam failure inundation hazard zone and outside the Anderson Dam failure inundation zone. Part of the California Department of Water Resources (DWR), the Division of Safety of Dams, is responsible for regular inspection of dams in the area and minimizing the risk of dam failure. Implementation of the project would not expose people or structures to significant flooding risks due to dam failure. **(Less Than Significant Impact)**

4.9.3 Conclusion

Implementation of the identified construction stormwater BMPs would reduce construction-related impacts to water quality. The project would not result significant impacts to water quality or flooding. **(Less Than Significant Impact)**

⁹ Rockridge Geotechnical. *Geotechnical Investigation First Street Green Development Western Plaza*. June 21, 2017.

4.10 LAND USE AND PLANNING

4.10.1 Setting

4.10.1.1 *Existing Land Uses on the Project Site*

The approximately 1.5-acre site is located along the east side of First Street, between Shasta Street and Plaza North in the City of Los Altos. The project is currently developed with several one- and two-story commercial buildings, sidewalks and paved parking areas. The commercial uses include a mailing office, a vault and safe deposit company, a restaurant, and a cycling studio. Access to the site is from First Street, the Plaza 7 parking area, and an alley on the east side of the site.

4.10.1.2 *Surrounding Land Uses*

The project site is located in the City's Downtown district. Surrounding land uses are primarily commercial/retail, with a row of retail shops with office uses above located to the south of the site along State Street, and a large two-story Safeway grocery store located across First Street from the site. There are multiple-story residential and office buildings located on First Street, opposite and to the north of the site. East of the site, across the adjacent alley, are two- and three-story residential buildings that take access from Second Street. The row of surface public parking stalls and the drive aisle (Plaza North) on the south end of Plaza 7 that serve the commercial buildings along First Street and State Street will be maintained.

4.10.1.3 *Existing Land Use Designation and Zoning*

The project site has two land use designations on the City's General Plan Land Use Policy Map. The *Commercial Downtown* designation covers the private property portion of the project site (proposed office building location), and the Plaza 7 public parking lot is designated *Public and Institutional*. The *Commercial Downtown* designation allows general retail uses and services, commercial recreational, cultural, and office uses that serve local residents. The *Public and Institutional* designation allows governmental, institutional, academic, group residence, church, and community service uses. Lands having this designation also contain easements, rights-of-way, facilities of public and private utilities, and parking facilities.

The private property portion of the project site, currently occupied by commercial uses, is zoned *CD/R3 (Commercial Downtown/Multiple Family District)*, and the Plaza 7 public parking lot is zoned *CRS (Commercial Retail Sales)*. The intent of the *CD/R3 District* is to promote the implementation of the Downtown Design Plan, retain and enhance the downtown atmosphere, and to allow creative design and architectural variety. It also is intended to encourage pedestrian-oriented amenities and usable outdoor spaces such as paseos, passageways, and outdoor seating, as well as improving the visual appeal and upgrading of building exteriors in the Downtown area. The vision for the *CRS District* is to retain and enhance the downtown village atmosphere and seek to attract businesses to the village.

4.10.1.4 *Applicable Plans, Policies, and Regulations*

City of Los Altos General Plan Policies

The Los Altos General Plan contains several policies that support the Plan’s Community Design goals, including the following, which are applicable to the proposed project.

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

Policy 1.2: Encourage the addition of a variety of trees and landscaping to enhance streetscape and slow traffic.

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

Policy 1.6: Continue to provide for site planning and architectural design review within the City, with a focus on mass, scale, character, and materials.

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

Policy 1.9: Promote diverse opportunities for public gathering and celebrations that foster a feeling of community.

In addition to the Community Design goals, the following policies support the General Plan’s goals to increase the appeal of Downtown to pedestrians and shoppers.

Policy 3.2: Encourage the maintenance, upgrading, and new design of building exteriors, signs, passageways, and streetscape elements that enhance the pedestrian experience, reflect quality design, present a diversity of appearances, and contribute to the architectural and historical interest of the village.

Policy 3.4: Encourage the use of open space in the Downtown for community events and public gatherings.

Policy 3.6: Evaluate the public benefit of City-owned parking plazas and the best use thereof, while preserving or increasing public parking Downtown.

In addition to the General Plan Policies, the City’s Downtown Zoning Vision and Purpose Statements, Downtown Design Guidelines, and a Downtown Design Plan all contain elements that are applicable to the proposed project. As part of the Commercial Design Review application process, the project will be evaluated to determine compliance with the Zoning Code, *CD/R3* and *CRS* district Design Controls, Downtown Design Plan and the Downtown Design Guidelines.

4.10.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|--------------------------|---------------------|
| Would the project: | | | | | |
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| b) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |

4.10.3 Land Use Impacts

4.10.3.1 Consistency with the General Plan Land Use Designation and Zoning

The project site is currently designated *Downtown Commercial* and *Public Institutional* on the City’s General Plan. As stated above, the intent of these designations are to allow retail, commercial, cultural and office uses that serve local residents, and to allow governmental, institutional, academic, group residence, church, and community service uses, respectively. The proposed project would include an office building with a café, and a public park/plaza. The primary hours of the office building would be between 8:00 a.m. and 6:00 pm, Monday through Friday. The café would have similar hours, and would also likely be open on the weekend. The public park/plaza would host community events such as concerts, movie nights, farmer’s markets, and arts-and-crafts festivals which would occur during the day on weekends and weekdays.

The proposed office building, café and public park/plaza uses are consistent with the allowed uses of the CD/R3 and CRS districts, and meet or exceed to the minimum setback and parking requirements. The project provides 40 public parking spaces (and possibly an additional 39 spaces) in excess of the minimum required by the Municipal Code.

Section 14.52.100 of the Municipal Code (Zoning Code) limits the height of commercial structures to 30 feet in the CD/R3 District. The maximum height of the proposed building is approximately 47 feet, which exceeds the Zoning Code limit. However, under Section 14.52.160, exceptions to setbacks, on-site parking and development or building standards may be granted if all of the following findings are made:

- The granting of the exception will not be detrimental to the public health, safety or welfare or materially injurious to properties or improvements in the area;

- The benefit to the city derived from granting the exception is an appropriate mitigation when considered against the cost to the developer;
- The project and mitigation will result in a public benefit to the Downtown;
- The resultant project and mitigation are consistent with the General Plan and promote or accomplish objectives of the Downtown Design Plan.

The project as proposed is consistent with the General Plan and Downtown Design Plan, and would not be detrimental to the public health, safety or welfare or materially injurious to properties or improvements in the area. Since the project is offering public restrooms, a community meeting space, and 40 additional public parking spaces, it would also be consistent with Criteria #3 (public benefit to the Downtown). The development of the public park/plaza is a component of this project, but it is not being offered as a public benefit in exchange for the building height exception.

4.10.3.2 *Land Use Compatibility*

The project area is comprised of commercial, office and residential uses. The proposed project would replace eight existing commercial buildings and a portion of a surface public parking lot with a new office building, public park/plaza, and a subterranean parking garage. The project would be consistent with the existing commercial building (Safeway) located immediately to the west across First Street in terms of mass and scale, and with existing office development to the north and northwest along First Street. The proposed office use, which would be occupied during daytime hours and not require off-site surface parking, would be compatible with adjacent residential uses east of the site, as well. Redevelopment of the project site with a new office building and public open space that replaces surface public parking with underground parking would not result in a land use compatibility impact.

4.10.3.3 *Other Land Use Impacts*

The project would be constructed on a developed, urban site and would not divide an established community. The project would not conflict with any habitat conservation plan or natural community conservation plan.

4.10.4 **Conclusion**

The proposed project would be compatible with the General Plan and all adjacent and nearby land uses. The project would not result in significant land use impacts. **(Less Than Significant Impact)**

4.11 MINERAL RESOURCES

4.11.1 Environmental Setting

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 City is relatively flat and there are no significant mineral resources. The project site is not located in an area containing known mineral resources.

4.11.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| a) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |

4.11.2.1 *Impacts to Mineral Resources*

The proposed project is located within a developed urban area and does not contain any known or designated mineral resources.

4.11.3 Conclusion

The project would not result in a significant impact from the loss of availability of a known mineral resource. **(No Impact)**

4.12 NOISE AND VIBRATION

The following discussion is based on a noise impact analysis prepared by *LSA*. A copy of the report, dated August 2017, is included in Appendix F of this Initial Study.

4.12.1 Setting

4.12.1.1 *Fundamentals of Noise*

Noise is typically defined as unwanted sound. Noise is usually objectionable because it is disturbing or annoying. The objectionable nature of sound can be caused by its pitch or its loudness. There are several noise measurement scales which are used to describe noise in a particular location. A decibel (dB) is a unit of measurement which indicates the relative amplitude of a sound. Sound levels are calculated on a logarithmic basis. There are several methods of characterizing sound. The most common in California is the A-weighted sound level or dBA. This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events. This energy-equivalent sound/noise descriptor is called L_{eq} . The most common averaging period is hourly, but L_{eq} can describe any series of noise events of arbitrary duration.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can measure environmental noise levels within about plus or minus one dBA. Since the sensitivity to noise increases during the evening and at night, 24-hour descriptors have been developed that incorporate artificial noise penalties added to quiet-time noise events. The Community Noise Equivalent Level (CNEL) is a measure of the cumulative noise exposure in a community, with a five dB penalty added to evening between 7:00 PM and 10:00 PM and a 10 dB addition to nighttime between 10:00 PM and 7:00 AM. The Day/Night Average Sound Level, L_{dn} , is the average A-weighted noise level during a 24-hour day, obtained after the addition of 10 dB to noise levels measured in the nighttime between 10:00 PM and 7:00 AM.

4.12.1.2 *Regulatory Framework*

The State of California and the City of Los Altos have established guidelines, regulations, and policies designed to limit noise exposure at noise sensitive land uses. Appendix E of the State CEQA Guidelines and the City's Natural Environment and Hazards Element of the General Plan present the following applicable criteria:

State CEQA Guidelines

CEQA contains guidelines to evaluate the significance of effects resulting from a proposed project. These guidelines have been used in this Initial Study as thresholds for establishing potentially significant noise impacts and are listed under Section 4.12.2.1 *Thresholds of Significance*.

City of Los Altos General Plan

The City of Los Altos addresses Noise in the Natural Environment and Hazards Element of the General Plan. The Natural Environment and Hazards Element sets outdoor noise and land use compatibility guidelines, as shown in Table 4.12-1.

| Table 4.12-1 Community Noise Exposure L_{dn} or CNEL, dB | | | | | | |
|--|----|--|----|----|----|----|
| | 55 | 60 | 65 | 70 | 75 | 80 |
| Residential | | | | | | |
| Transient Lodging – Motels, Hotels | | | | | | |
| Schools, Libraries, Churches, Hospitals, Nursing Homes | | | | | | |
| Auditoriums, Concerts, Halls, Amphitheaters | | | | | | |
| Sports Area, Outdoor Spectator Sports | | | | | | |
| Playgrounds, Neighborhood Parks | | | | | | |
| Golf Courses, Riding Stables, Water Recreation, Cemeteries | | | | | | |
| Office Buildings, Businesses Commercial and Professional | | | | | | |
| Industrial, Manufacturing Utilities, Agriculture | | | | | | |
| Normally Acceptable | | Specified land use is satisfactory, based upon the assumption that any buildings involved meet conventional Title 24 construction standards. No special noise insulation requirements. | | | | |
| Conditionally Acceptable | | New construction or development shall be undertaken only after a detailed noise analysis is made and noise reduction measures are identified and included in the project design. | | | | |
| Normally Unacceptable | | New construction or development is discouraged. If new construction is proposed, a detailed analysis is required, noise reduction measures must be identified, and noise insulation features included in the design. | | | | |
| Clearly Unacceptable | | New construction or development should not be undertaken. | | | | |

Commercial land uses, including offices, are considered compatible with the CNEL noise levels up to 65 dBA and acceptable with design and insulation techniques in areas with CNEL noise levels up to 75 dBA.

The Natural Environment and Hazards Element 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 a 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 4.12-2.

| Table 4.12-2 Exterior Noise Limits | | |
|---|------------------------|--------------------------|
| Receiving Land Use Category | Time Period | Noise Level (dBA) |
| All R1 Zoning Districts | 10:00 p.m. – 7:00 a.m. | 45 |
| | 7:00 a.m. – 10:00 p.m. | 55 |
| All R3 Zoning Districts | 10:00 p.m. – 7:00 a.m. | 50 |
| | 7:00 a.m. – 10:00 p.m. | 55 |
| All OA Zoning Districts | 10:00 p.m. – 7:00 a.m. | 55 |
| | 7:00 a.m. – 10:00 p.m. | 60 |
| All C Zoning Districts | 10:00 p.m. – 7:00 a.m. | 60 |
| | 7:00 a.m. – 10:00 p.m. | 65 |

Source: City of Los Altos, 2017

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.

4.12.1.3 Existing Noise Environment

Ambient Noise Levels

Certain areas within Los Altos are subject to high noise levels. The primary noise source impacting Los Altos results from transportation-related activities, especially along major transportation corridors. Other noise sources not related to transportation include construction, business operation, recreational activities, and property maintenance. Noise from motor vehicles is generated by engine vibrations, the interaction between the tires and the road, and the exhaust systems. Airport related noise levels are primarily associated with aircraft engine noise made while aircraft are taking off, landing, or running their engines while still on the ground. The San Jose International Airport is the closest major airport and is located approximately 18 miles southeast of the project site. Aircraft noise is occasionally audible at the project site; however, no portion of the project site lies within the 65 dBA CNEL noise contours of the airport.

To assess existing noise levels, LSA conducted two short-term noise measurements on the project site on May 18, 2017. The short-term 15-minute noise measurements were recorded at different locations on-site between 3:15 p.m. and 3:47 p.m. Noise measurements at these times show the typical baseline ambient noise level. LSA also conducted two long-term noise measurements at two locations on the project site between August 24, 2017 and August 27, 2017. The long-term noise measurements captured hourly L_{eq} data as well as CNEL data, which incorporates the nighttime hours. Noise measurement data collected during the short-term and long-term noise monitoring is summarized in Table 4.12-3.

Table 4.12-3 Ambient Noise Monitoring Results, dBA

| Location | Location Description | Start Time | Leq^a / CNEL^b | Lmax^c | Lmin^d | Primary Noise Sources |
|-----------------|--|-----------------------|---|-------------------------|-------------------------|---|
| ST-1 | Existing parking lot, southern corner of project site. | 3:15 p.m. | 60.0 | 76.1 | 48.2 | Traffic on First Street, pedestrians in area, parking lot activity. |
| ST-2 | Across from parking/loading docks of Safeway. Patio of 127 First Street | 3:32 p.m. | 59.5 | 68.9 | 46.3 | Traffic on First Street, loud passbys on Foothill Expressway. |
| LT-1 (weekday) | Alley between First and Second Streets, approx. 130 feet northwest of Plaza N. | 2:00 p.m., August 24 | 74.0/ 70.5 | 89.3 | 45.3 | Traffic |
| LT-1 (weekend) | Alley between First and Second Streets, approx. 130 feet northwest of Plaza N. | 12:00 p.m., August 27 | 68.4/ 59.1 | 84.0 | 47.2 | Traffic |
| LT-2 (weekday) | Alley between First and Second Streets, approx. 175 feet southeast of Shasta Street. | 2:00 p.m., August 24 | 62.0/ 59.5 | 74.6 | 42.0 | Traffic |
| LT-2 (weekend) | Alley between First and Second Streets, approx. 175 feet southeast of Shasta Street. | 12:00 p.m., August 27 | 59.6/ 56.5 | 75.1 | 44.4 | Traffic |

^a L_{eq} represents the average of the sound energy occurring over the measurement time period for the short-term noise measurements.

^b CNEL is the Community Noise Equivalent Level (CNEL) which is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly Leq for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as evening hours) and a 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours).

^c L_{max} is the highest sound level measured during the measurement time period.

^d L_{min} is the lowest sound level measured during the measurement time period.

As shown in Table 4.12-3, the short-term noise measurements indicate that ambient noise in the project site vicinity ranges from approximately 59.5 to 60 dBA L_{eq} . The long-term noise measurements ranged from 56.5 dBA to 70.5 dBA CNEL. Traffic on First Street was reported as the primary noise source.

4.12.1.4 *Sensitive Receptors in the Project Area*

Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The project site is located within an area that is predominantly developed with commercial, retail uses and multi-family residential uses. The closest sensitive receptors include the multi-family residential buildings, which are located across the alley to the east of the project site.

4.12.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| Would the project result in: | | | | | |
| a) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 13 |
| b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 13 |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 13 |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 13 |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, will the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3, 13 |
| f) For a project within the vicinity of a private airstrip, will the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3, 13 |

4.12.2.1 *Thresholds of Significance*

The CEQA Guidelines state that a project would normally be considered to have a significant impact if noise levels conflict with adopted environmental standards or plans, or if noise levels generated by the project would substantially increase existing noise levels at noise-sensitive receivers on a permanent or temporary basis. CEQA does not define what noise level would be substantial. For the purposes of this analysis, the project would result in a significant noise impact if it would:

- Expose persons to or generate noise levels in excess of standards established in the City of Los Altos Noise Ordinance or policies in the Los Altos General Plan for construction and/or operation of the project;
- Expose persons to or generate excessive groundborne vibration or groundborne noise levels;
- Result in a substantial permanent increase of over 3 dBA in ambient noise levels in the project vicinity above levels existing without the project;
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project and in excess of standards established in the General Plan or Noise Ordinance, or applicable standards of other agencies; or
- Result in noise impacts associated with proximity to nearby airports.

4.12.2.2 *Project-Generated Noise Impacts*

Long-Term Impacts

Mobile Sources

Motor vehicles with their distinctive noise characteristics are the dominant noise source in the project vicinity. The amount of noise varies according to many factors, such as volume of traffic, vehicle mix (percentage of cars and trucks), average traffic speed, and distance from the observer. Implementation of the proposed project would result in new daily trips on local roadways in the project site vicinity.

The project would generate an estimated 1,175 net new average daily vehicle trips, with 114 trips occurring during the AM peak hour (between 7:00 a.m. and 9:00 a.m.) and 174 trips occurring during the PM peak hour (between 4:00 p.m. and 6:00 p.m.). Special events would occur occasionally in the public park/plaza, which could increase the daily trip generation up to approximately 1,667 net new daily trips.

The project would not have on-site circulation as parking would be provided underground. The adjacent First Street carries approximately 4,020 average daily trips. A characteristic of sound is that a doubling of a noise source is required in order to result in a perceptible (3 dBA or greater) increase in the resulting noise level. Project daily trips would not result in a doubling of traffic volumes along any roadway segment in the project vicinity, and therefore, would not result in a perceptible increase in traffic noise levels at receptors in the project vicinity.

HVAC Equipment

HVAC equipment could be a primary noise source associated with residential and commercial uses. HVAC equipment is often mounted on rooftops, located on the ground, or located within mechanical rooms. The noise sources could take the form of fans, pumps, air compressors, chillers, or cooling towers. HVAC operations would be required to meet all noise standards. Precise details of HVAC equipment, including future location and sizing, are unknown at this time; however, for purposes of this analysis, 75 dBA at three feet was assumed to represent HVAC-related noise.¹⁰ Some off-site noise-sensitive receptors would be within 50 feet of the proposed office buildings. Adjusted for distance to the nearest off-site sensitive receptors, the off-site residences could be exposed to a noise level of up to 51 dBA L_{max} generated by HVAC equipment.

It is assumed that, as a worst-case scenario, HVAC equipment would operate continuously through the day, evening, and night. In order to reduce noise levels associated with HVAC equipment, design considerations and shielding must be implemented to ensure that the HVAC equipment will be located, enclosed, shielded, or otherwise designed to create the greatest possible distance between HVAC-related noise sources and nearest off-site sensitive receptors. Placing HVAC equipment on the rooftop and/or including a parapet creates a natural noise barrier that reduces noise levels from these HVAC units by 8 dBA or more, which would reduce the HVAC noise level to approximately 43 dBA L_{max} .

Standard Measures

The project will include the following standard measures to ensure that noise levels generated by the HVAC would be below the City's noise level criterion.

- Prior to the issuance of building permits, the City should review HVAC system placement and product specifications to ensure noise levels would meet the performance standards outlined in the City's Noise Control Ordinance.
- Consistent with the Ordinance, all HVAC units associated with the project must not exceed 45 dBA at the center of a neighboring patio or 55 dBA outside the neighborhood living area window nearest the equipment location.

Parking Lot Activities

Parking lot noise, including engine sounds, car doors slamming, car alarms, loud music, and people conversing, would occur as a result of the proposed project at the project site and on nearby streets. Typical parking lot activities, such as people conversing or doors slamming, generates approximately 60 dBA to 70 dBA L_{max} at 50 feet. Existing sensitive receptors are located approximately 80 feet from the proposed parking garage entry. Adjusted for distance, the nearest off-site residences would be exposed to a noise level of 56 to 66 dBA L_{max} generated by parking lot activities. However, the parking garage is proposed to be provided via a subterranean parking garage. The parking garage's underground location would shield the adjacent residences from project-related parking lot noise. In

¹⁰ Trane. Sound Data and Application Guide for the New and Quieter Air-Cooled Series R Chiller. 2002.

addition, the proposed parking garage would replace the existing at-grade parking lots on east side of the project site. The proposed project would not be expected to substantially increase parking lot noise over existing noise levels, and therefore, the proposed project would not result in significant parking lot noise.

Truck Delivery and Loading/Unloading

Additional on-site stationary noise sources would include delivery trucks and loading noise. Of the on-site stationary noise sources, noise generated by delivery truck activity would generate the highest maximum noise levels. Delivery truck loading and unloading activities would result in maximum noise levels from 75 dBA to 85 dBA L_{max} at 50 feet.

There are generally two types of loading that would occur on the site: small deliveries like parcels and packages, and large deliveries such as retail items or weekly food deliveries for dining facilities. The former are typically made via passenger car, van, or single-unit truck. These activities are potential noise sources that could affect noise-sensitive receptors in the project site vicinity. Loading docks are currently located on Shasta Avenue, near the existing off-site sensitive receptors; therefore, this analysis assumes a worst case scenario of noise levels from 75 to 85 dBA L_{max} at the closest off-site receptor. Loading dock and delivery noise is permitted by the Municipal Code when activities occur between the hours of 7:00 a.m. and 10:00 p.m.

Peak noise levels from loading and unloading would be intermittent and when averaged over a one hour period would be much lower than the peak noise levels that currently exist. In addition, the existing uses on the project site currently generate loading dock and delivery noise. Currently there are approximately five trash pickup sites and implementation of the proposed project would consolidate to one trash pickup site, located off the alley in the northeast corner of the site. Therefore, the proposed project is not expected to result in an increase in loading- and delivery-related noise sources at the nearest off-site receptors.

Public Park/Plaza

The proposed project would include an office building with a café, and a public park/plaza. The primary hours for the office building would be 8:00 a.m. and 6:00 pm, Monday through Friday. The café would have similar hours, and would also likely be open on the weekend. The public park/plaza would host community events, such as concerts, movie nights, farmer's markets, and arts-and-crafts festivals, which could result in increased noise levels associated with musical instruments and loudspeakers during the day on weekends and weekdays, with hours ranging up to 10:00 p.m.

The public park/plaza activities could result in increased noise levels associated with musical instruments and loudspeakers. The project does not include any programming of specific events or musical acts. The project also does not include any fixed speakers, amplifiers, or public address systems. However, the project incorporates a stage area and would include design features, such as specifications for future use of the site indicating that all amplified equipment would face away from residential uses. The project would construct a barrier behind the stage between the entertainment and residential uses.

The degree to which noise levels associated with amplified music would attenuate at the nearest noise sensitive receptors would depend on the distance between the concert amplifier and receptors, intervening structures, the direction in which the amplifiers face, and wind speed and direction. Assuming the amplifiers are placed at the edge of the stage, the closest distance between the amplifiers and the nearest noise sensitive receptor would be the residences located 40 feet east of the project site, approximately 60 feet from the event stage.

Noise associated with musical instruments is allowed by the Municipal Code when activities occur between the hours of 7:00 a.m. and 10:00 p.m. Monday through Friday and between the hours of 8:00 a.m. and 10:00 p.m. Saturday and Sunday. In addition, noise associated with loudspeakers and amplified sound is permitted by the Municipal Code when activities occur between the hours of 7:00 a.m. and 10:00 p.m. daily. During the nighttime hours of 10:00 p.m. to 7:00 a.m. these activities are allowed if they do not create a disturbance at any neighboring property. For the purposes of this analysis, it is assumed that during nighttime hours, noise that is audible at an adjacent property would be considered a disturbance.

The nearest residential use is located 60 feet away from the proposed stage, and is located on a property in the CD/R3 District. Based on the City's standards, daytime noise level impacts at all R3 zoning districts are required to remain below the 55 dBA L_{eq} and 75 dBA L_{max} daytime standard. Existing noise levels at the adjacent sensitive receptors are 57.5 dBA L_{eq} on the weekend and 74.0 dBA L_{eq} during the weekdays. Therefore, compliance with the Municipal Code for amplified music would result in noise levels that are below existing ambient noise conditions.

To meet the 55 dBA L_{eq} standard at the closest receptor locations, assuming an increase of 6 dBA per halving of distance, noise levels generated by the musical instruments or amplified sound would need to be limited to a level of approximately 80 dBA L_{eq} when measured at three feet assuming that the source is facing the receptor.

As noted, the project only includes the development of a stage and amplifiers are not included in the project. Due to the varying noise levels that may be generated depending on the particular event, the number of instruments being used, the type of music, and most importantly the speaker volume from the amplification equipment used, precise noise levels associated with future events would vary, but could exceed the City's exterior noise level requirements.

Impact NOI-1: Noise generated by amplified music during public events at the public park/plaza could exceed the City's exterior noise threshold requirements.
(Significant Impact)

Mitigation and Avoidance Measures

Implementation of the following measures would ensure that noise levels generated do not create noise impacts on the residential uses in the vicinity of the project site:

MM NOI-1.1: Prior to the use of amplifiers, the system shall be set up early enough to enable alignment and orientation to be optimized to minimize noise disturbance. A sound test prior to each event shall be conducted to ascertain

the maximum level that can be set in order to meet the Noise Ordinance standards.

MM NOI-1.2: During the first three events that utilize amplified speakers and are representative of typical future events, noise monitoring shall be conducted at adjacent receptor locations such that compliance with the noise ordinance be determined and verified. If it is discovered that noise level impacts exceed the City's exterior noise level requirements of the noise ordinance (55 dBA L_{eq}), additional noise reduction would be recommended by an acoustical engineer, which may include, but shall not limited to, speaker noise level restriction and/or additional or expanded noise barriers.

MM NOI-1.2: All amplified sound shall be prohibited between the hours of 10:00 p.m. and 8:00 a.m., as any amplified music on the site could be audible at adjacent properties.

With implementation of these measures, operational noise would not result in a substantial increase in noise levels. **(Less Than Significant With Mitigation Incorporated)**

4.12.2.3 *Construction-Generated Noise Impacts*

Short-Term Impacts

The proposed project is located adjacent to multi-family residential uses. Project construction would result in temporary noise impacts on these adjacent land uses. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from one day to several days depending on the phase of construction. The entire construction duration is expected to occur for approximately 24 months. The level and types of noise impacts that would occur during construction are described below.

Short-term noise impacts would occur during grading and site preparation activities. Table 4.12-4 lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 feet between the equipment and a noise receptor. Construction-related short-term noise levels would be higher than existing ambient noise levels currently in the project area but would no longer occur once construction of the project is completed.

| Table 4.12-4 Typical Construction Equipment Maximum Noise Levels, L_{max} | | |
|--|--|--|
| Type of Equipment | Range of Maximum Sound Levels (dBA at 50 Ft.) | Suggested Maximum Sound Levels for Analysis (dBA at 50 Ft.) |
| Pile Drivers | 81 to 96 | 93 |
| Rock Drills | 83 to 99 | 96 |
| Jackhammers | 75 to 85 | 82 |
| Pneumatic Tools | 78 to 88 | 85 |
| Pumps | 74 to 84 | 80 |
| Scrapers | 83 to 91 | 87 |
| Haul Trucks | 83 to 94 | 88 |
| Cranes | 79 to 86 | 82 |
| Portable Generators | 71 to 87 | 80 |
| Rollers | 75 to 82 | 80 |
| Dozers | 77 to 90 | 85 |
| Tractors | 77 to 82 | 80 |
| Front-End Loaders | 77 to 90 | 86 |
| Hydraulic Backhoe | 81 to 90 | 86 |
| Hydraulic Excavators | 81 to 90 | 86 |
| Graders | 79 to 89 | 86 |
| Air Compressors | 76 to 89 | 86 |
| Trucks | 81 to 87 | 86 |
| Forklift | 75 to 85 | 75 |
| Welder/Torch | 73 to 74 | 74 |

Source: Bolt, Beranek & Newman, 1987. Noise Control for Buildings and Manufacturing Plants.

Two types of short-term noise impacts could occur during construction of the proposed project. The first type involves construction crew commutes and the transport of construction equipment and materials to the site for the proposed project, which would incrementally increase noise levels on roads leading to the site. As shown in Table 4.12-4, there would be a relatively high single-event noise exposure potential at a maximum level of 87 dBA L_{max} with trucks passing at 50 feet.

The second type of short-term noise impact is related to noise generated during excavation, grading, and construction on the project site. Construction is performed in discrete steps, or phases, each with its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Table 4.12-4 lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 feet between the equipment and a noise receptor. Typical maximum noise levels can range up to 91 dBA L_{max} at 50 feet during the noisiest construction phases, when pile driving and rock drills are not used. It is not anticipated that construction of project would require the use of rock drills or pile drivers. The site preparation phase, including excavation and grading of the site, tends to generate the highest noise levels because earthmoving machinery is the noisiest construction equipment. Earthmoving equipment includes

excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

The nearest sensitive receptors are the multi-family residential uses located approximately 50 feet east of the project site. Project construction would result in short-term noise impacts on these adjacent uses. Based on the combination of equipment proposed by the project applicant, at a distance of 40 feet, the closest off-site sensitive receptors may be subject to short-term construction noise reaching 90 dBA L_{max} when construction is occurring at the project site boundary.

Based on this maximum noise level and assuming a crane, forklift, tractor, welder, and air compressor would be used at the same time during the noisiest phase of construction, the proposed project would result in construction noise levels of 86 dBA L_{eq} . This noise level would be higher than the peak L_{eq} measured at the nearest receptor locations of 74 dBA L_{eq} . However, although the total construction period would be about two years, construction equipment would operate at various locations within the 1.5 acre project site and would only generate this maximum noise level when operations are occur at the boundary of the project site closest to the receptor location.

As discussed above, construction noise would result in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. As noted above, the City's ordinance indicates noise levels should be limited to 80 dBA when feasible; therefore, noise reduction measures should be implemented.

Impact NOI-2: Noise generated by construction of the project would result in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. **(Significant Impact)**

Mitigation and Avoidance Measures

Implementation of the following mitigation measures during project construction would reduce potential construction-period noise impacts for the adjacent noise sensitive receptors:

MM NOI-2.1: Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards. Equipment should also utilize the best available noise control techniques (e.g., use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds, wherever feasible).

MM NOI-2.2: Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active project site.

MM NOI-2.3: Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all project construction.

- MM NOI-2.4:** Install temporary noise barriers around stationary noise sources (such as compressors) and locate stationary noise sources as far from adjacent or nearby sensitive receptors as possible.
- MM NOI-2.5:** Prohibit extended idling time of internal combustion engines.
- MM NOI-2.6:** All noise producing construction activities shall be limited to the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between the hours of 9:00 a.m. and 6:00 p.m. on Saturday. No construction activity shall be allowed on Sundays and holidays.
- MM NOI-2.7:** Designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler) and would determine and implement reasonable measures warranted to correct the problem.

Implementation of the following measures would provide quantifiable reductions of construction noise levels, by generally lowering construction noise by 5 to 10 dBA, depending on effectiveness. The Federal Highway Administration (FHA) has identified best practices for calculating the estimated reduction from shielding.¹¹ Based on FHA documentation, the following reductions can be achieved:

- 3 dBA reduction for a noise barrier or other obstruction (like a dirt mound) that breaks the line-of-site between the noise source and the receptor.
- 8 dBA reduction if the noise source is completely enclosed or completely shielded with a solid barrier located close to the source. 5 dBA reduction if the enclosure and/or barrier have some gaps in it.
- 10 dBA reduction if the noise source is completely enclosed and completely shielded with a solid barrier located close to the source.
- 15 dBA reduction if a building stands between the noise source and receptor and completely shields the noise source.
- 5 dBA reduction if noise source is enclosed or shielded with heavy vinyl noise curtain material (e.g., SoundSeal BBC-13-2 or equivalent).

Implementation of these measures would reduce construction noise levels by 5 to 10 dBA, resulting in maximum construction noise levels ranging from approximately 80 to 85 dBA L_{max} .

Implementation of these measures would be consistent with the City’s requirement to implement feasible noise reduction measures when noise levels exceed 80 dBA. Additionally, the measure would restrict construction operations to the permissible hours established by the City. Therefore, with mitigation, construction noise impacts would be reduced to a less-than-significant level. **(Less Than Significant With Mitigation Incorporated)**

¹¹ Federal Highway Administration, *Roadway Construction Noise Model, User’s Guide*. January 2006. Available online at www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf.

Vibration

Vibration refers to groundborne noise and perceptible motion. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Vibration energy propagates from a source, through intervening soil and rock layers, to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by the occupants as the motion of building surfaces, rattling of items on shelves or hanging on walls, or as a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less. This is an order of magnitude below the damage threshold for normal buildings.

Typical sources of groundborne vibration are construction activities (e.g., pavement breaking and operating heavy-duty earthmoving equipment), and occasional traffic on rough roads. In general, groundborne vibration from standard construction practices is only a potential issue when within 25 feet of sensitive uses. Groundborne vibration levels from construction activities very rarely reach levels that can damage structures; however, these levels are perceptible near the active construction site. With the exception of old buildings built prior to the 1950s or buildings of historic significance, potential structural damage from heavy construction activities rarely occurs. When roadways are smooth, vibration from traffic (even heavy trucks) is rarely perceptible.

The streets surrounding the project area are paved, smooth, and unlikely to cause significant groundborne vibration. In addition, the rubber tires and suspension systems of buses and other on-road vehicles make it unusual for on-road vehicles to cause groundborne noise or vibration problems. It is, therefore, assumed that no such vehicular vibration impacts would occur and, therefore, no vibration impact analysis of on-road vehicles is necessary. Additionally, once constructed, the proposed project would not contain uses that would generate groundborne vibration.

Construction Vibration

The proposed project is located adjacent to multi-family residential uses. The construction vibration impact analysis discusses the level of human annoyance using vibration levels in VdB and assesses the potential for building damage using vibration levels in PPV (in/sec.) This is because vibration levels calculated in RMS are best for characterizing human response to building vibration, while vibration level in PPV is best used to characterize potential for damage. The Federal Transit Administration (FTA)) *Transit Noise and Vibration Impact Assessment*¹² guidelines indicate that a vibration level up to 102 VdB (an equivalent to 0.5 in/sec in PPV) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 94 VdB (0.2 in/sec in PPV).

Table 4.12.-5 shows the PPV and VdB values at 25 feet from a construction vibration source. As shown in Table 4.12-5, bulldozers and other heavy-tracked construction equipment (except for pile

¹² Federal Transit Administration (FTA). 2006. Office of Planning and Environment. Transit Noise and Vibration Impact Assessment. FTA-VA-90-1003-06. May.

drivers and vibratory rollers) generate approximately 87 VdB of groundborne vibration when measured at 25 feet, based on the Transit Noise and Vibration Impact Assessment. At this level, groundborne vibration would result in potential annoyance to residences and workers, but would not cause any damage to the buildings. Construction vibration, similar to vibration from other sources, would not have any significant effects on outdoor activities (e.g., those outside of residences and commercial/office buildings in the project vicinity). Outdoor site preparation for the project is expected to use a bulldozer and loaded truck. The greatest levels of vibration are anticipated to occur during the site preparation phase. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project boundary (assuming the construction equipment would be used at or near the project boundary) because vibration impacts occur normally within the buildings. The formula for vibration transmission is provided below.

$$L_{v\text{dB}}(D) = L_{v\text{dB}}(25 \text{ ft}) - 30 \text{ Log}(D/25)$$

$$PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.5}$$

| Table 4.12-5 Vibration Source Amplitudes for Construction Equipment | | |
|--|---|---------------------------------------|
| <i>Equipment</i> | <i>Reference PPV/L_v at 25 Feet</i> | |
| | <i>PPV (in/sec)</i> | <i>L_v(VdB)¹</i> |
| Pile Driver (Impact), Typical | 0.644 | 104 |
| Pile Driver (Sonic), Typical | 0.170 | 93 |
| Vibratory Roller | 0.210 | 94 |
| Hoe Ram | 0.089 | 87 |
| Large Bulldozer² | 0.089 | 87 |
| Caisson Drilling | 0.089 | 87 |
| Loaded Trucks | 0.076 | 86 |
| Jackhammer | 0.035 | 79 |
| Small Bulldozer | 0.003 | 58 |

Sources: Transit Noise and Vibration Impact Assessment (FTA 2006).

¹ RMS vibration velocity in decibels (VdB) is 1 μin/sec.

² Equipment shown in bold is expected to be used on site.

μin/sec = micro-inches per second

PPV = peak particle velocity RMS = root-mean-square

FTA = Federal Transit Administration

RMS = root-mean-square

in/sec = inches per second

VdB = vibration velocity decibels

L_v = velocity in decibels

For typical construction activity, the equipment with the highest vibration generation potential is the large bulldozer, which would generate 87 VdB at 25 feet. The closest residential structures are located 40 feet from the project construction boundary. Based on distance attenuation, the closest residences would experience vibration levels of up to 81 VdB (0.044 PPV [in/sec]). This vibration level at the closest residential structures from construction equipment would not exceed the FTA threshold of 94 VdB (0.2 in/sec PPV) for building damage when bulldozers and loaded trucks operate within 50 feet of the project construction boundary. This level is also below the FTA’s “barely perceptible” human response criteria of 0.04 PPV for transient sources of vibration events. Therefore,

groundborne vibration impacts from project-related construction activities would be considered less than significant.

4.12.2.4 Existing Noise Conditions Affecting the Project

The California Supreme Court in a December 2015 opinion (*BIA v. BAAQMD*) confirmed CEQA is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project; nevertheless the City of Los Altos has noise standards governing the project site that include the Natural Environment and Hazards Element of the City's General Plan and Municipal Code. The Natural Environment and Hazards Element 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 dominant source of noise in the project vicinity is traffic on First Street and Foothill Expressway. As shown in Table 4.12-3, the short-term noise monitoring on the project site measured 59.5 dBA and 60.0 dBA L_{eq} . The normally acceptable exterior noise level for commercial and recreational uses set forth by the City is 70 dBA L_{dn} . Therefore, the exterior noise levels meets the City's "normally acceptable" noise level standard for office land uses and the project is consistent with the City's applicable noise policies.

Airport Noise

The proposed project is not located within two miles of a public or public use airport. The general aviation facility Palo Alto Airport is located approximately 7.5 miles from the site, but the San Jose Mineta International Airport is the closest major airport and is located approximately 18 miles southeast of the project site. Aircraft noise is occasionally audible at the project site; however, no portion of the project site lies within the 65 dBA CNEL noise contours of any public airport nor does any portion of the project site lie within two miles of any private airfield or heliport. Therefore, the proposed project would not result in the exposure of sensitive receptors to the excessive noise levels from aircraft noise sources.

4.12.3 Conclusion

As described in the analysis above, construction of the proposed project would result in short-term noise impacts on adjacent multi-family residential uses; however, construction noise would be short-term and implementation of the recommended mitigation measures for project construction would reduce the construction noise impacts to the extent feasible. In addition, the proposed project would not result in a substantial increase in traffic volumes, therefore, the proposed project would not result in a substantial long-term traffic noise level increase. Implementation of the proposed project would also generate various on-site stationary noise sources, including HVAC equipment, occasional event noise, parking lot activities, and loading dock operations. However, design considerations and shielding would reduce potential stationary source noise impacts to a less than significant level.
(Less Than Significant With Mitigation Incorporated)

4.13 POPULATION AND HOUSING

4.13.1 Setting

As of January 2017, the City of Los Altos had a total population of approximately 31,402 residents.¹³ In 2040 it is estimated that the City will have approximately 32,800.¹⁴

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

4.13.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| a) 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |

4.13.2.1 *Population and Housing Impacts*

The project site is currently developed with commercial land uses. The project proposes to demolish the existing commercial buildings and construct a three-story, approximately 77,000-square foot office building with a ground-floor cafe, and a public park/plaza.

Development of the proposed project would increase jobs citywide. The increase in jobs would incrementally increase the overall jobs/housing imbalance within the City. The additional workers on-site are, however, part of the planned growth in the General Plan. As a result, the project would have a less than significant impact on population and housing in Los Altos.

¹³ U.S. Census Bureau. <http://quickfacts.census.gov/qfd/states/06/0669084.html> Accessed August 11, 2017.

¹⁴ City of Los Altos. City of Los Altos 2015-2023 Housing Element. May 26, 2015.

The project site is not currently used for residential purposes; therefore, the proposed project would not displace existing housing or people or require replacement housing to be constructed.

4.13.3 Conclusion

Implementation of the proposed project would have a less than significant impact on population and housing. **(Less Than Significant Impact)**

4.14 PUBLIC SERVICES

4.14.1 Setting

4.14.1.1 *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 Street; and Loyola Fire Station located at 765 Fremont Avenue. The closest station to the project site is Almond Fire Station, located approximately 0.7 miles northeast of the project site.

Police protection services for the project site are provided by the Los Altos Police Department, headquartered at 1 North San Antonio Road, approximately 0.4 miles east of the project site. The Department has 30 sworn officers, five reserve officers, and 17 professional civilian staff.

4.14.1.2 *Schools*

The project site is located in the Los Altos School District. Students in the project area attend Gardner Bullis School (K-8).¹⁵ The site is located within the Mountain View Los Altos High School District, and high school students in the project area attend Los Altos High School.¹⁶

4.14.1.3 *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.

Nearby City park facilities include Lincoln Park, approximately three hundred feet west of the project site across Foothill Expressway, Shoup Park, 0.3 miles southwest of the project site, and Village Park, 0.4 miles east of the project site.

4.14.1.4 *Libraries*

The City of Los Altos is served by the Santa Clara County Library District. The closest library to the project site is the Los Altos Library, located approximately 0.4 miles east of the project site. The Woodland Branch Library is located approximately 3.5 miles southeast of the site.

¹⁵ Los Altos School District. <http://www.myschoollocation.com/losaltossd/>. Accessed August 11, 2017.

¹⁶ Mountain View Los Altos High School District. <http://www.mvla.net/District/>. Accessed August 11, 2017.

4.14.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| Would the project | | | | | |
| a) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| - Police Protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| - Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| - Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| - Other Public Facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |

4.14.2.1 Impacts to Public Services

Fire Protection Services

The project proposes to construct a three-story, approximately 77,000 square foot office building with an attached café building, a public park/plaza area, and a three-level below-ground parking structure. The proposed development would increase the total population of Los Altos during regular business hours, but would not permanently increase the resident population because housing is not proposed as part of the project. The project is part of the planned growth under the General Plan and the project, by itself, would not require new facilities or expansion of current facilities to provide adequate fire protection services to serve the project and meet the City’s overall service goals. The proposed project would be built to applicable Fire Code standards in use when construction permits are issued, including sprinklers and smoke detectors, and would include features that would reduce potential fire hazards.

Police Protection Services

The proposed project would increase the total population of Los Altos during standard business hours, but would not permanently increase the resident population because housing is not proposed as part of the project. 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 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.

School Impacts

The proposed project would construct a new office building, café, and public park/plaza, and would not include any residential uses. Implementation of the proposed project would not generate new students. Therefore, the proposed project would have no impact on school facilities or capacities in the City of Los Altos.

Park Impacts

The project proposes to construct a new office building, café, and public park/plaza and would not include any residential uses. An increase in the daily employee population in the City would not result in a substantial increase in usage of local recreational facilities. Although future employees might use City parks or trails, weekday employees are unlikely to place a major physical burden on existing parks. Future employees would likely use the proposed public park and plaza area during daytime business hours, further reducing the burden on existing facilities. Therefore, the proposed project would not have any impact on park facilities in the City of Los Altos.

Library Impacts

The proposed project would construct a new office building, café, and public park/plaza and would not include any residential uses. Therefore, the proposed project would not impact library facilities in the City of Los Altos.

4.14.3 Conclusion

The project would not result in significant impacts to public services in the City of Los Altos or require the construction of new facilities or the expansion of existing facilities to serve the resident population of the City. The project would not impact existing schools, parks, or libraries. **(Less Than Significant Impact)**

4.15 RECREATION

4.15.1 Setting

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.

4.15.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |

4.15.2.1 *Recreational Impacts*

The proposed project would construct an office building, café, and a new 22,000 square-foot public park/plaza and does not include any residential uses. A net increase in the daily employee population in the City would not result in a substantial increase in usage of local recreational facilities. Although future employees may use City parks, trails, or other recreational facilities, weekday employees would not place a major physical burden on existing facilities that would result in substantial physical deterioration of these facilities. In addition, the project proposes a new public park/plaza area that features outdoor seating areas, play areas, a central lawn, and a stage. Since the proposed project would construct a new park/plaza that will be added to the City’s recreational facilities, the project would not increase the usage of existing parks and recreation facilities.

The project includes a new public park facility that could generate additional noise and traffic in the surrounding area. The potential impacts of such outdoor use are addressed in Sections 4.12 and 4.16, respectively, of this Initial Study. Mitigation measures included in the project would reduce potential noise impacts to a less than significant level.

4.15.3 Conclusion

The proposed project would not result in significant impacts to recreational facilities in Los Altos. **(Less Than Significant Impact)**

4.16 TRANSPORTATION

The following discussion is based on a Transportation Impact Analysis prepared by *Hexagon Transportation Consultants, Inc.* in August 2017. The report can be found in Appendix G of this Initial Study.

4.16.1 Existing Setting

4.16.1.1 *Roadway Network*

Regional access to the project site is provided via Interstate 280 (I-280) and Foothill Expressway. Local access to the project site is provided via San Antonio Road, Edith Avenue, and First Street. These facilities are described below.

I-280 is an eight-lane freeway in the study area. It is considered to run north-south between San Francisco and San Jose although in the project area it runs east-west. In the project vicinity, I-280 has an interchange serving Los Altos at El Monte Avenue and further south at Magdalena Avenue.

Foothill Expressway is a four-lane divided expressway that extends between Cupertino and Palo Alto through Los Altos. It has eight points of access within the Los Altos city limits including an interchange at I-280. The access to the project site from Foothill Expressway is via Edith Avenue, Main Street, and San Antonio Road.

San Antonio Road is a north-south arterial that extends northward from Foothill Expressway to US 101. In the project vicinity, it is four lanes wide and has landscaped medians with left-turn pockets at intersections and bike lanes and sidewalks on both sides of the street. San Antonio Road provides access to the project site via Edith Avenue and First Street.

Edith Avenue is an east-west local street that extends eastward from Fremont Road, through Foothill Expressway, to San Antonio Road. It is two lanes wide with a westbound bike lane and sidewalks on both sides of the street. Edith Avenue provides access to the project site via First Street.

First Street is a two-lane local street that runs parallel to and east of Foothill Expressway between San Antonio Road and Edith Avenue. East of San Antonio Road it becomes Cuesta Drive, and north of Edith Avenue it becomes Los Altos Avenue. First Street provides access to the project site via the project driveways on Shasta Street and in Plaza 7.

Shasta Street is a short two-lane local street that extends between First Street and the alley behind the project site. It mainly serves the office building on the street and residential buildings on the alley. Access to the project site is proposed via a driveway on Shasta Street.

Shasta Street Alley is a two-way alley at the end of Shasta Street that connects to the nearby public parking plaza. This alley provides access to the backs of the existing buildings and also provides access to the existing multi-family residential uses east of the site.

4.16.1.2 *Pedestrian and Bicycle Facilities*

Pedestrian facilities within the study area consist of sidewalks, signalized crossings, and unsignalized crossings. Sidewalks are found along virtually all previously-described local roadways in the study area and along the commercial streets and collectors near the site. Crosswalks with pedestrian signal heads and push buttons are located at all signalized study intersections. Crosswalks are also present at the unsignalized study intersections and on First Street at Plaza 7. Overall, the existing network of sidewalks and crosswalks has good connectivity. Existing pedestrian counts were conducted as part of the peak-hour intersection turning movement counts for the project.

Based on the counts and field observations, pedestrian traffic is high on First Street between Shasta Street and Main Street with the highest pedestrian counts at the First Street/State Street and First Street/Main Street intersections in the PM peak hour. The pedestrian counts were relatively low along Edith Avenue and San Antonio Road and at all other study intersections during the peak commute hours. The pedestrian crossing counts at the First Street/Main Street intersection was 92 pedestrians and at the First Street/State Street intersection was 186 pedestrians during the PM peak hour.

Bicycle facilities in the study area 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. Within the project study area, bike lanes are provided along San Antonio Road, Los Altos Avenue, El Monte Avenue, and westbound Edith Avenue. Foothill Expressway is not marked as a bike route by the City, but it has wide shoulders appropriate for biking. Eastbound Edith Avenue and Cuesta Drive are marked as bike routes. Local streets in downtown, such as First Street and State Street, are not marked as bike lanes or routes, but they carry low traffic volumes and are conducive to bicycling.

4.16.1.3 *Transit Services*

Existing transit service to the study area is provided by the Valley Transit Authority (VTA). Local route 40 provides service between Foothill College in Los Altos Hills and La Avenida Street in Mountain View via San Antonio Road, with 30-minute commute hour headways Monday through Saturday and 60-minute headways on Sundays. In the project vicinity, bus stops are located on both sides of San Antonio Road between Edith Avenue and Lyell Street. The distance between the project site and these bus stops is approximately 2,400 feet, which is beyond the ¼-mile walking distance guideline to define transit accessibility. Therefore, the site is considered to have poor transit access.

4.16.1.4 *Scope of the Traffic Study*

Traffic impact analyses have traditionally focused on the identification of traffic impacts and potential roadway improvements based on delay to relieve traffic congestion that may result from proposed/planned growth. With the recent adoption of Senate Bill 743, public agencies will soon be

required to evaluate transportation impacts based on vehicle miles traveled (VMT) rather than level of service (LOS), which typically uses delay as its metric. The change in measurement is intended to better evaluate the effects on the State's goals for climate change and multi-modal transportation. However, revisions to the CEQA Guidelines necessary to make this change and establish thresholds of significance have not yet been adopted by the State. Therefore, most local agencies, including the City of Los Altos, are continuing to use LOS to evaluate traffic impacts while in the process of developing the framework for new policies based on the implementation of VMT as the primary measure of impacts.

The traffic analysis for the subject project uses the LOS methodology. It includes an analysis of weekday AM and PM peak-hour traffic conditions and determines the traffic impacts of the proposed office development on ten key intersections in the vicinity of the site, listed below. Their locations are shown on Figure 4.16-1.

1. Foothill Expressway and Edith Avenue
2. Foothill Expressway and Main Street (CMP)
3. Foothill Expressway and San Antonio Road (CMP)
4. Foothill Expressway and El Monte Avenue (CMP)
5. San Antonio Road and First Street/Cuesta Drive
6. San Antonio Road and Edith Avenue
7. Los Altos Avenue/First Street and Edith Avenue
8. Main Street and First Street
9. State Street and First Street (unsignalized)
10. Shasta Street and First Street (unsignalized)

Traffic conditions at the study intersections were analyzed for the weekday AM and PM peak hours of traffic. Locally, the AM peak hour of traffic is usually between 7:00 and 9:00 AM, and the PM peak hour is typically between 4:00 and 6:00 PM. It is during these periods that the most congested traffic conditions occur on an average weekday. The study also includes an operations analysis, based on vehicle queuing at selected intersections, an evaluation of potential impacts to bicycle, pedestrian, and transit facilities, and a review of site access, on-site circulation, and parking demand. Traffic conditions were evaluated for the following scenarios:

- ***Existing Conditions.*** Existing AM and PM peak-hour traffic volumes at study intersections were based on new traffic counts collected in April 2017. Existing PM peak-hour traffic volumes at the CMP intersections were obtained from the 2016 CMP Annual Monitoring Report.
- ***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.
- ***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.

- **Background Plus Project Conditions.** Background plus project conditions reflect the projected traffic volumes on the planned roadway network with completion of the project and approved developments. Background plus project traffic volumes were estimated by adding to background traffic volumes the additional traffic generated by the project. Background plus project conditions were evaluated relative to background conditions in order to determine potential project impacts.
- **Cumulative Conditions.** Cumulative conditions represent future traffic conditions with the proposed project and the addition of expected growth in the area. Traffic volumes under cumulative conditions were estimated by applying a compound growth factor of one percent per year to existing traffic volumes for 10 years and adding trips from approved developments. The cumulative with project volumes were estimated by adding the project trips to the cumulative traffic volumes. Cumulative with project conditions were evaluated relative to cumulative conditions in order to determine the project's cumulative impacts.

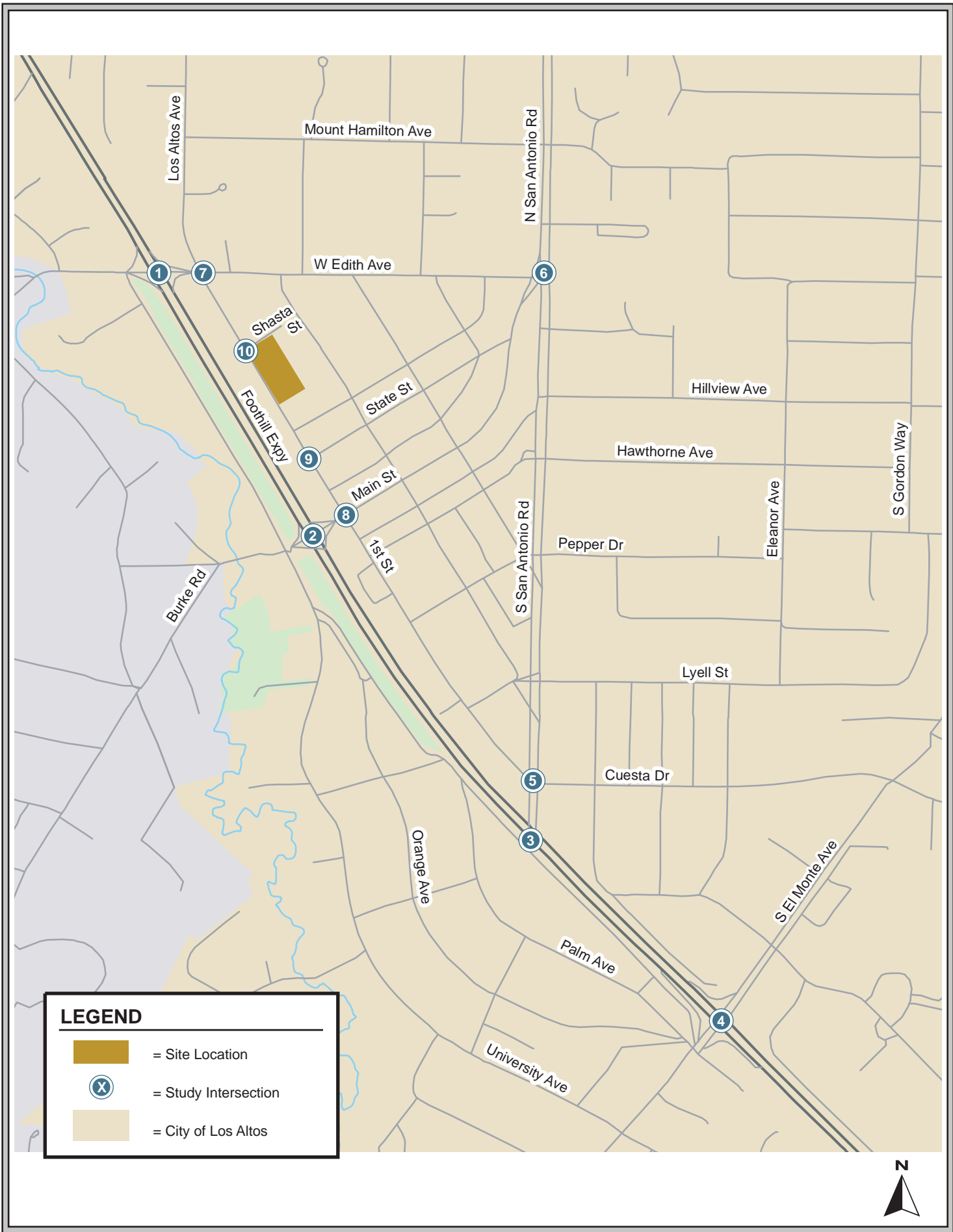
4.16.1.5 Analysis Methodologies

The data required for the traffic analysis were obtained from new traffic counts, field observations, the City of Los Altos, the CMP Annual Monitoring Report, and previous traffic studies. The data collected from these sources included intersection traffic volumes, intersection lane configurations, intersection signal timing and phasing, and approved project trips.

Signalized Intersection Level of Service

Traffic conditions at the study intersections were evaluated using level of service (LOS). Level of service is a qualitative description of operating conditions ranging from LOS A, or free-flow conditions with little or no delay, to LOS F, or jammed conditions with excessive delays. The City of Los Altos evaluates intersection levels of service using the TRAFFIX software, which is based on the Highway Capacity Manual (HCM) 2000 method for signalized intersections. Since TRAFFIX is the level of service methodology for the CMP-designated intersections, the City of Los Altos employs the CMP defaults values for the analysis parameters. This HCM method evaluates signalized intersection operations on the basis of average control delay time for all vehicles at the intersection. This average delay can then be correlated to a level of service.

The City of Los Altos level of service standard for signalized intersections is LOS D or better. Three of the study intersections are CMP intersections. The CMP level of service standard for signalized intersections is LOS E or better.



STUDY INTERSECTION LOCATIONS

FIGURE 4.16-1

Unsignalized Intersection Level of Service

Level of service analysis at unsignalized intersections is generally used to determine the need for modification in the type of intersection control (i.e., all-way stop or signalization). As part of the evaluation, traffic volumes, delays, and traffic signal warrants are evaluated to determine if the existing intersection control is appropriate.

For unsignalized intersections, level of service depends on the average delay experienced by vehicles on the stop-controlled approaches. Thus, for all-way stop controlled intersections, level of service is determined by the average delay for all movements through the intersection. For side street stop-controlled intersections (two-way or T-intersections), operations are defined by the average control delay experienced by vehicles entering the intersection from the stop-controlled approaches on minor streets or from left-turn approaches on major streets. For two-way or T-intersections, the level of service is reported based on the average delay for the worst approach. This study utilizes the TRAFFIX software to determine intersection levels of service based on the 2000 HCM methodology for unsignalized intersection.

The City of Los Altos does not have an adopted level of service standard for unsignalized intersections. For the purpose of this study, the minimum acceptable level of service for unsignalized intersections is LOS D. The level of service definitions for signalized and unsignalized intersections are included in the traffic study (See Appendix G.)

4.16.1.6 Existing Traffic Conditions

Intersection Levels of Service

The intersection level of service analysis results show that all study intersections currently operate at acceptable levels of service during both AM and PM peak hours under existing conditions (see Table 4.16-1).

| Table 4.16-1 Existing Intersection Levels of Service | | | | | | |
|---|---------------------|-------------------------|------------------|-------------------|-------------------|------------|
| Intersection | LOS Standard | Existing Control | Peak Hour | Count Date | Ave. Delay | LOS |
| Foothill Expwy & Edith Avenue | D | Signal | AM | 4/18/17 | 29.7 | C |
| | | | PM | 4/18/17 | 25.8 | C |
| Foothill Expwy & Main Street | E | Signal | AM | 4/18/17 | 12.0 | B |
| | | | PM | 10/06/16 | 20.1 | C |
| Foothill Expwy & San Antonio Road | E | Signal | AM | 4/18/17 | 12.3 | B |
| | | | PM | 1/31/17 | 46.1 | D |
| Foothill Expwy & El Monte Avenue | E | Signal | AM | 4/18/17 | 52.6 | D |
| | | | PM | 10/06/16 | 74.7 | E |
| San Antonio Rd & First St/Cuesta Drive | D | Signal | AM | 4/18/17 | 27.3 | C |
| | | | PM | 4/18/17 | 22.2 | C |

| | | | | | | |
|---|---|--------|----------|--------------------|--------------|--------|
| San Antonio Rd & Edith Avenue | D | Signal | AM PM | 4/18/17 4/18/17 | 17.3 46.5 | B D |
| Los Altos Ave/First Ave & Edith Avenue | D | Signal | AM PM | 4/18/17 4/18/17 | 17.8 13.4 | B B |
| Main Street & First Street | D | Signal | AM PM | 4/18/17 4/18/17 | 20.8 30.9 | C C |
| State Street & First Street | D | AWSC | AM PM | 4/18/17 4/18/17 | 8.0 8.7 | A A |
| Shasta Street & First Street | D | TWSC | AM PM | 4/18/17 4/18/17 | 9.2 10.7 | A B |
| Notes: AWSC = all-way stop-controlled intersection TWSC = two-way stop-controlled intersection | | | | | | |

Observed Traffic Conditions

Traffic conditions in the field were observed in order to identify existing operational deficiencies and to confirm the accuracy of calculated levels of service. The purpose of this effort was (1) to identify any existing traffic problems that may not be directly related to intersection level of service, and (2) to identify any locations where the level of service analysis does not accurately reflect level of service in the field. Overall the study intersections operated adequately during both the AM and PM peak hours of traffic, and the level of service analysis appears to accurately reflect actual existing traffic conditions. Field observations showed that some operational issues occurred between the closely-spaced intersections on Edith Avenue, Main Street, and San Antonio Road and at the San Antonio Road/Edith Avenue intersection. However, the operational issues did not result in operational deficiencies at the intersections.

4.16.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|--------------------------|---------------------|
| Would the project: | | | | | |
| a) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 12 |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|---------------------|
| Would the project: | | | | | |
| b) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 12 |
| c) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 1, 2, 3 |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 12 |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3, 12 |

4.16.2.1 *Impacts to Study Intersections*

Significant Impact Criteria

Significance criteria are used to establish what constitutes a traffic/transportation impact. For this analysis, the criteria used to determine significant impacts on signalized intersections are based on City of Los Altos Level of Service standards. Impacts to the unsignalized study intersections were identified based on engineering judgment.

City of Los Altos Signalized Intersections

According to City of Los Altos level of service standard, a development is said to create a significant adverse impact on traffic conditions at a signalized intersection if for either peak hour, either of the following conditions occurs:

1. 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

2. An intersection that operates below its level of service standard under no-project conditions experiences an increase in critical-movement delay of four (4) 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.

A significant impact at a signalized intersection is said to be satisfactorily mitigated when measures are implemented that would restore intersection operations back to background (without the project) conditions or better.

CMP Signalized Intersections

The definition of a significant impact at a CMP intersection is the same as for the City of Los Altos, except that the CMP standard for acceptable level of service at a CMP intersection is LOS E or better. A significant impact by CMP standards is said to be satisfactorily mitigated when measures are implemented that would restore intersection conditions to background conditions or better.

Unsignalized Intersections

The City of Los Altos has not established significant impact criteria for unsignalized intersections. Unlike signalized intersections, which typically represent constraint points for the roadway network, unsignalized intersections rarely limit the potential capacity of a roadway. The determination of appropriate improvements to unsignalized intersections typically includes a qualitative and quantitative analysis of movement delay, movement traffic volumes, intersection safety, and need for signalization. For this reason, significant impacts and the associated improvements to unsignalized intersections are frequently determined on the basis of professional judgment.

Trip Generation

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, the project trips are assigned to specific streets and intersections. These procedures are described below.

The project consists of approximately 77,000 square feet of office space, 1,200 square feet of café space, and approximately 22,000 square feet of public open space (park/plaza). The project would also provide 40 extra public parking spaces (with the potential to add another 39 spaces) in the parking garage as a community benefit. Under the typical day-to-day use, it is expected that the open space would mostly serve the residents, employees, and customers already in the Downtown area and would normally generate minimal new trips. However, the public park/plaza could also be used for

events, such as a market, fair, concert, or movie night, that would generate additional vehicle trips (The existing Los Altos Farmers Market takes place on Thursdays from 4 PM to 8 PM, May to September, on State Street. If the farmers market is relocated to the project site, it is not expected to result in new trips).

It is expected that the events would be infrequent and mostly held on weekends. Although these events have not been programmed, events could be held on weekdays, but would mostly occur in the off-peak hours. Therefore, on most typical weekdays, the events would not add new peak-hour vehicle trips to the study area. It is expected that, very infrequently, events would start at 7 PM on weekdays and would add some inbound trips to the PM peak hour (5-6 PM). For the study, the project trips were estimated for (1) typical weekdays, (2) typical weekdays with additional 40 public spaces, and (3) a special event day during a weekday.

Daily and peak-hour project trip generation were estimated based on trip rates published in the ITE Trip Generation Manual, 9th Edition, for the existing and proposed uses. For typical weekdays, the ITE trip rates for office buildings, coffee/donut shops, city parks, and specialty retail/shopping centers were used to estimate the vehicle trips generated by the proposed office building, café, public park/plaza, and public parking spaces, respectively. The trip generation for the 1,000 square-foot community room is included in the office trip generation.

It is expected that the café would mostly serve employees working at the proposed office building, park/plaza users and customers visiting nearby businesses. Therefore, the number of vehicle trips directly associated with the café would be small, and the vehicle trips generated by the café were adjusted accordingly.

The project would provide a total of 107 public parking spaces on the first level of the underground garage – 67 spaces to replace the surface spaces displaced by the park/plaza and 40 new public parking spaces as a community benefit. For trip estimates, it was conservatively assumed the parking spaces would induce demand and therefore result in new vehicle trips generated by the project. The parking spaces were converted to an equivalent 8,000 square feet of retail space based on the Los Altos parking requirement of one space per 200 square feet for retail uses.

The ITE trip rates for office buildings, post offices, mini-warehouses, health/fitness clubs, restaurants, and specialty retail stores were used to estimate the vehicle trips generated by the existing commercial uses on the project site. The trip estimates accounted for trip reductions due to internal mixed-use trips in the downtown area, based on the EPA's MXD model (mixed-use trip generation model) as recommended by the VTA TIA Guidelines. Trip reduction rates of 11%, 8%, and 12% were applied to daily, AM peak-hour, and PM peak-hour trips. With the existing trip credits and mixed-use trip reduction, on typical weekdays, the project would generate 871 net new daily trips, with 107 net trips (94 in and 13 out) occurring during the AM peak hour and 128 net trips (29 in and 99 out) occurring during the PM peak hour.

Although the project is proposing to add 40 public spaces in the parking garage as a community benefit, there is the potential for an additional 39 spaces for a total of 79 public spaces. For trip estimates, the parking spaces were converted to an equivalent 15,800 square feet of retail space based on the Los Altos parking requirement of one space per 200 square feet for retail uses. On typical weekdays with the 39 additional public parking spaces, the project would generate 1,178 net new daily trips, with 114 net trips (97 in and 17 out) occurring during the AM peak hour and 175 net trips (52 in and 123 out) occurring during the PM peak hour.

For the weekdays with special events in the evening, it is estimated that the public park/plaza could hold up to 500 attendees. It is anticipated that some of the events would start at 7 PM, which would add some inbound trips to the PM peak hour (5-6 PM). For those events, it was assumed 25% of the attendees would come during the PM peak hour (75% would come after the peak hour), and there would be an average of 2 persons per vehicle; therefore, the events could add up to 63 inbound trips ($500 \times 25\% / 2$).

Therefore, on a special event day with 39 additional parking spaces, the project would generate 1,667 net new daily trips, with 114 net trips (97 in and 17 out) occurring during the AM peak hour and 235 net trips (113 in and 122 out) occurring during the PM peak hour (see Table 6).

The estimated daily, AM peak-hour, and PM peak-hour trips are 796 trips, 7 trips, and 107 trips, respectively, more than the trips estimated for typical weekdays. Although the scenario would rarely occur, the estimated trips for the special event day were used to evaluate intersection levels of service and traffic operations in the study. Therefore, the traffic study presents a very conservative analysis.

Intersection Levels of Service

Existing Plus Project Conditions

The intersection level of service analysis results show that all study intersections would operate at acceptable levels of service during both AM and PM peak hours under existing plus project conditions. It should be noted that, at some study intersections, the average delay under project conditions is shown to be better than under no-project conditions. This occurs because the intersection delay is a weighted average of all intersection movements. When project traffic is added to movements with delays lower than the average intersection delay, the average delay for the entire intersection can decrease.

Background Conditions

Background (baseline) conditions are defined as conditions just prior to completion of the proposed development. Traffic volumes for background conditions comprise volumes from existing traffic counts plus traffic generated by other approved developments in the vicinity of the site.

The roadway network under project conditions would be the same as the existing roadway network with the exception of the Foothill Expressway/El Monte Avenue and Foothill Expressway/San Antonio Road intersections. The intersection improvements are part of the Foothill Expressway improvement project that would widen Foothill Expressway between El Monte Avenue and San Antonio Road by adding auxiliary lanes in each direction. The intersection improvements would include the addition of a second through lane on westbound El Monte Avenue while keeping the dedicated right-turn pocket, possibly a third left-turn lane from eastbound El Monte Avenue to northbound Foothill Expressway, elimination of right-turn islands, and slip ramps on selected corners of the Foothill Expressway/El Monte Avenue intersection to improve bicycle and pedestrian safety. Modification of traffic signals would also occur. The improvements are expected to increase roadway capacity and improve traffic flow on Foothill Expressway between San Antonio Road and El Monte Avenue. Construction is anticipated to be completed by 2018.

Background peak-hour traffic volumes were estimated by adding to existing volumes the estimated traffic from the approved but not yet constructed developments. As advised by the City staff, the approved developments in the Cities of Mountain View and Los Altos were reviewed. Based on the locations and the trip assignment of the approved developments, the following approved developments were considered under background conditions because they would contribute background trips to the study intersections:

- The Village at San Antonio Center Phase 2 (Mountain View) – a 167-room hotel, 54,184 square feet of retail space, 392,853 square feet of office space, 28,502 square feet of commercial space, 35,358 square feet of restaurant space, and a cinema with 1,710 seats.
- 400 San Antonio Road Mixed-Use Development (Mountain View) – 600 apartment units and 11,171 square feet of commercial space.
- 467 First Street Office Development (Los Altos) – 20,000 square feet of office space.
- 342 First Street (Los Altos) – an addition of 3,000 square feet and renovation to the existing Draeger's grocery store.

The results of the level of service analysis under background conditions show that all of the study intersections would operate at an acceptable level of service. The intersection levels of service at the Foothill Expressway/San Antonio Road and Foothill Expressway/El Monte Avenue intersections reflect the Foothill Expressway improvement project described above, which is expected to increase roadway capacity on Foothill Expressway between San Antonio Road and El Monte Avenue. Therefore, the southbound capacity adjustments that apply to these intersections in the TRAFFIX software for the existing PM peak hour were adjusted accordingly

Background Plus Project Conditions

Traffic conditions that would occur when the project is complete are described as background plus project conditions. Impacts caused by the project under background plus project conditions were

evaluated relative to background conditions in order to determine potential project impacts. The roadway network under background plus project conditions would be the same as the background roadway network because the project would not alter the existing intersection lane configurations. Based on the previously determined project trip generation estimates, the project trips were estimated for (1) typical weekdays, (2) typical weekdays with an additional 39 public parking spaces, and (3) a special event day on a weekday with an additional 39 public parking spaces. On a special event day, the project would generate 1,667 net new daily trips, with 114 net trips (97 in and 17 out) occurring during the AM peak hour and 235 net trips (113 in and 122 out) occurring during the PM peak hour.

The estimated daily, AM peak-hour, and PM peak-hour trips are 796 trips, 7 trips, and 107 trips, respectively, more than the trips estimated for typical weekdays. Although the scenario would rarely occur (and may never occur if the additional 39 spaces are not included in the project), the estimated trips for the special event day were used to evaluate intersection level of services and traffic operations in the study.

Background plus project traffic volumes were estimated by adding to background traffic volumes the net project trips. The results of the level of service analysis under background plus project conditions show that all of the study intersections would operate at an acceptable level of service (see Table 4.16-2). **(Less than Significant Impact)**

| Table 4.16-2 Background Plus Project Intersection Levels of Service | | | | | | | | | |
|--|--------------|----------------------|-----------|------------------------|--------|------------------------|--------|--------------------------------------|--------------------------------------|
| Intersection | LOS Standard | Control ¹ | Peak Hour | Background | | Background + Project | | | |
| | | | | Avg Delay ² | LOS | Avg Delay ² | LOS | Incr. in Critical Delay | Incr. in Critical V/C |
| Foothill Expwy. & Edith Ave. | D | Signal | AM PM | 29.7 25.8 | C C | 30.7 25.9 | C C | 1.4 0.2 | 0.015 0.003 |
| Foothill Expwy. & Main Street* | E | Signal | AM PM | 12.2 20.2 | B C | 12.1 20.3 | B C | 0.0 0.0 | 0.000 0.000 |
| Foothill Expwy. & San Antonio Rd.* | E | Signal | AM PM | 12.3 44.7 | B D | 12.3 45.4 | B D | -0.1 1.1 | 0.011 0.017 |
| Foothill Expwy. & El Monte Ave.* | E | Signal | AM PM | 53.0 70.2 | D E | 53.7 71.7 | D E | 1.0 1.4 | 0.013 0.011 |
| San Antonio Rd. & First St./Cuesta Drive | D | Signal | AM PM | 27.2 22.0 | C C | 27.3 22.1 | C C | 0.1 0.1 | 0.003 0.004 |
| San Antonio Rd. & Edith Avenue | D | Signal | AM PM | 17.3 46.0 | B D | 16.9 46.6 | B D | -0.3 0.7 | 0.015 0.019 |
| Los Altos Ave./First St. & Edith Avenue | D | Signal | AM PM | 17.8 13.4 | B B | 17.8 14.4 | B B | 0.0 2.2 | 0.000 0.053 |
| Main Street & First Street | D | Signal | AM PM | 20.9 31.3 | C C | 21.8 32.4 | C C | 1.4 1.2 | 0.026 0.036 |
| State Street & First Street | D | AWSC | AM PM | 8.1 8.8 | A A | 8.3 9.4 | A A | N/A ³ N/A ³ | N/A ³ N/A ³ |

| | | | | | | | | | |
|---|---|------|----------|-------------|--------|-------------|--------|--------------------------------------|--------------------------------------|
| Shasta St. & First Street | D | TWSC | AM PM | 9.2 10.8 | A B | 9.9 12.4 | A B | N/A ³ N/A ³ | N/A ³ N/A ³ |
| Notes: ¹ Intersection control under existing conditions. Signal = signalized intersection, AWSC = all-way stop controlled, TWSC = two-way stop controlled ² Overall weighted average control delay (seconds per vehicle) is reported for signalized and AWSC intersections. ³ Changes in critical delay and v/c are not applicable to unsignalized intersections. * Denotes VTA CMP intersection | | | | | | | | | |

4.16.2.2 Vehicle Queuing

A vehicle queuing analysis was conducted as part of *Hexagon's* traffic report. The vehicle queuing analysis indicated that the estimated maximum queues would exceed the left-turn storage capacity on Main Street at the First Street/Main Street and Foothill Expressway/Main Street intersections under existing and project conditions in both AM and PM peak hours. Site observations indicated that vehicle queues on Main Street occasionally extended between the First Street/Main Street and Foothill Expressway/Main Street intersections during red lights. However, because the traffic signals at the two intersections appeared to be coordinated, the queued vehicles were not observed to block or extend past any downstream intersections. The vehicle queues also dissipated quickly during green lights. Although the project is expected to slightly increase the maximum vehicle queues (one to two vehicles), because the signals are coordinated, the left-turn vehicle queues are not expected to adversely affect the traffic operations at these two intersections.

Field observations indicated that traffic flow was smooth on First Street between Edith Avenue and Main Street during both AM and PM peak hours. There were vehicle queues on First Street at Edith Avenue and Main Street during red lights, but the vehicle queues did not block the upstream intersections and cleared quickly during green lights. Although there were occasional pedestrian crossings at the First Street/Plaza 7 crosswalk and the Plaza Central crosswalk, traffic flow on First Street was not adversely affected, and the vehicle queues dissipated quickly after pedestrians crossed.

The project would not add a substantial amount of traffic on First Street. The added project trips would only slightly increase the vehicle delay at these study intersections on First Street. Therefore, the project traffic is not expected to result in a noticeable increase in vehicle queues or travel delay on First Street.

Two of the study intersections are unsignalized. The First Street/State Street intersection is all-way stop-controlled, and the First Street/Shasta Street intersection is two-way stop-controlled on the eastbound and westbound movements. Based on the level of service analysis results, the intersections would operate at LOS B or better under all study scenarios. There were no existing queuing or sight distance issues identified at these intersections. The vehicle queuing analysis also showed that with the project traffic, the westbound vehicle queue on Shasta Street would not block the project driveway to the parking garage and the back alley. Therefore, it is concluded that the project traffic would not result in the need for intersection improvements or modification of traffic control at the intersections. **(Less Than Significant Impact)**

4.16.2.3 *Site Access and On-Site Circulation*

Hexagon reviewed the project site plan to determine whether adequate site access and on-site circulation would be provided, using commonly accepted transportation planning principles and traffic engineering standards. This review was based on the site plan prepared by EHDD dated June 6, 2017. Generally, the proposed plan would provide adequate connectivity through the site and parking areas for pedestrians, bicycles, and vehicles.

The project would provide sidewalks along the project's frontages on First Street and Shasta Street and extend the curb on the east leg of the First Street/Shasta Street intersection to reduce the crossing distance on Shasta Street. Within the project site, pedestrian access would be provided between the surrounding streets, the project building, and the parking garage via sidewalks, the park/plaza, and parking garage stairwells.

Vehicle access to the parking garage would be provided via two driveways: a full access driveway on Shasta Street and a full access driveway that connects to a one-way northbound driving aisle in the Plaza 7 parking lot. Vehicles accessing the garage driveway via the Plaza 7 driving aisle would enter using First Street and exit using Second Street. Given the low traffic volume and low travel speed on Shasta Street and the Plaza 7 driving aisle, the entering vehicles are not expected to cause a noticeable delay on these streets or cause queuing issues at the project driveways. The outbound vehicles would not experience excessive delay and would be able to find sufficient gaps to exit the driveways. It is expected that future occupants of the office building would primarily use the Shasta Street driveway to access the garage, while the general public would more likely use the Plaza 7 aisle driveway.

The project driveways should be free and clear of any obstructions to optimize sight distance, thereby ensuring that exiting vehicles can see pedestrians on the sidewalk and other vehicles traveling on the street. Any landscaping, parking, and signage should be located in such a way to ensure an unobstructed view for drivers entering and exiting the site. Street parking is allowed on Shasta Street and could obstruct the vision of exiting drivers if there are cars parked next to the driveways. Therefore, *Hexagon* recommends prohibiting street parking within 15 feet of both driveways by installing red curbs on either side of the driveway.

The site plan shows that a trash room would be located at the northeast corner of the building facing the back alley and the building would have a delivery entrance facing the alley. Therefore, it is presumed that all garbage and delivery trucks would perform their operations outside of the building in the back alley at this location. This would result in less congestion in the alley than the present situation, where all existing businesses on the eight commercial properties utilize the alley for their on-site parking, deliveries and trash pickup.

Generally, the site plan shows good circulation through the parking garage except for the three parking spaces near the ramp in the parking levels 1 and 2. Vehicles exiting the parking stalls would

need to back out to the ramp which could cause safety issues for upcoming vehicles on the ramp. It is recommended to install mirrors in these locations to help drivers make turns safely. (**Less Than Significant Impact**)

4.16.2.4 *Impacts on Pedestrians, Bicycles and Transit Services*

Overall, the project is well served by the existing pedestrian and bicycle facilities. Sidewalks are found along virtually all local roadways in downtown area. Crosswalks with pedestrian signal heads and push buttons are located at all signalized study intersections. Crosswalks are also present at the unsignalized study intersections and on First Street mid-block at Plaza 7.

The signalized study intersections on Foothill Expressway, although having crosswalks with pedestrian signal heads and push buttons, all have slip lanes that are uncontrolled. Therefore, pedestrians need to cross the slip lane with caution. Among these intersections, the Foothill Expressway/Edith Avenue intersection has a higher number of pedestrian crossings. To improve the pedestrian crossings, the Los Altos Pedestrian Master Plan (2015) proposes to remove the slip lanes at the Foothill Expressway/Edith Avenue intersection and to improve the slip lane crossings with raised crosswalks, markings, and signs at the Foothill Expressway/Main Street intersection.

Within the project vicinity, designated bike lanes are present along San Antonio Road, Los Altos Avenue, El Monte Avenue, and westbound Edith Avenue. Eastbound Edith Avenue and Cuesta Drive are marked as bike routes. Foothill Expressway is not a designated bike route, but it has wide shoulders appropriate for biking. Local streets in Downtown, such as First Street and State Street, are not marked as bike lanes or routes, but they carry low traffic volumes and are conducive to bicycling. The Los Altos Bicycle Transportation Plan (2012) proposes bike routes with shared lane markings (“sharrows”) on streets in and around downtown, including First Street and State Street. Currently, the segment of First Street between State Street and Main Street is striped with sharrows.

Existing transit service to the study area is provided via the VTA bus route 40 with bus stops on both sides of San Antonio Road between Edith Avenue and Lyell Street. Because the project traffic would only result in a small increase in vehicle delay at the study intersections, the project traffic is not expected to result in a noticeable increase in transit travel time in the study area.

4.16.2.5 *Other Transportation Impacts*

Airport

The physical distance between the project site and Norman Y. Mineta San José International Airport is approximately 18 miles. Due to the height of the proposed structures and the distance from the airport, the proposed project would not result in a change in air traffic patterns or obstruct airport operations. The project also would not be expected to impact air traffic patterns or airport operations at Palo Alto Airport, located approximately 7.5 miles north of the site.

Emergency Access

Based upon a review of the conceptual site plan and the findings of the *Hexagon* report, the proposed project would provide adequate site access for vehicles. No hazards due to the design of the buildings, parking garage, or parking lot were identified. The design of the project and access would not result in inadequate emergency access.

4.16.3 Conclusion

Implementation of the project would not result in significant transportation, airport, or emergency access impacts. **(Less Than Significant Impact)**

4.17 UTILITIES AND SERVICE SYSTEMS

4.17.1 Setting

4.17.1.1 *Water Service*

Water is provided to the site by California Water Service Company (Cal Water). The Los Altos Suburban District service area, in which the project site is located, consists of the City of Los Altos and parts of Los Altos Hills, Cupertino, Mountain View and Sunnyvale. Water sources include a combination of local groundwater and purchased water, which is treated surface water from the Santa Clara Valley Water District reservoirs and the San Joaquin-Sacramento River Delta. The Cal Water system includes 297 miles of mains, 65 booster pumps, and 46 storage tanks.¹⁷

4.17.1.2 *Wastewater Service*

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 (Regional Plant) for treatment and disposal. The City has rights to discharge up to 3.6 million gallons per day (mgd) average annual dry weather flow to the Regional Plant. 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 master metering station for the Regional Plant. The City's collection system includes approximately 140 miles of sewer pipes of which most are six-inch and eight-inch vitrified clay pipe.¹⁸

4.17.1.3 *Storm Drainage*

Runoff from the project site flows into the City of Los Altos municipal storm drainage system. There are existing storm drain lines adjacent to the site that are available to serve the project.

4.17.1.4 *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 of Los Altos. 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.

¹⁷ California Water Service. 2016 *Water Quality Service Report*. <https://www.calwater.com/docs/ccr/2016/las-las-2016.pdf>. Accessed August 16, 2017.

¹⁸ City of Los Altos. Public Works – Sanitary Sewer. <https://www.losaltosca.gov/publicworks/page/sanitary-sewer-0>. Accessed August 16, 2017.

4.17.1.5 Existing Conditions

4.17.2 Checklist and Discussion of Impacts

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|---|--------------------------------|--|-------------------------------------|--------------------------|---------------------|
| Would the project: | | | | | |
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| b) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| c) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| e) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1, 2, 3 |

4.17.2.1 Water Services Impacts

The project would demolish the existing commercial buildings and construct a three-story, approximately 77,000-square foot office building with a 1,200 square-foot café and a 22,000 square-foot public park/plaza. The proposed office building would generate a gross water demand of approximately 7,700 gpd.¹⁹ The net increase in demand would be smaller, due to the existing buildings' water usage. The project's landscape areas and the public park/plaza will be required to comply with the City's Water Efficient Regulations. The additional 7,700 gallons of water per day

¹⁹ The project's water demand is based on a water demand of 0.1 gallons per day per square foot for office space. The water demand does not include landscape irrigation.

would not exceed the capacity of Cal Water to provide water services to the project site. There is an eight-inch water main located in First Street that is available to serve the site. Therefore, the project would have a less than significant impact on water supply. **(Less Than Significant Impact)**

4.17.2.2 Wastewater Services Impacts

Palo Alto Regional Water Pollution Control Plant

Wastewater is conveyed through the City's sanitary sewer system to the Regional Plant for treatment and disposal. The City has rights to discharge up to 3.6 million gallons per day (mgd) average annual dry weather flow to the Regional Plant, with an average daily flow projection of 2.73 mgd.²⁰ The proposed project would not increase the need for wastewater treatment beyond the capacity of the Regional Plant. The Regional Plant has the ability to treat wastewater generated by the proposed project and, as a result, the project would not have a significant impact on its treatment capacity. **(Less Than Significant Impact)**

4.17.2.3 Storm Drainage Impacts

Under existing conditions, the storm drainage system has sufficient capacity to convey runoff from the site. Implementation of the project would reduce the amount of impervious surfaces on-site by approximately one percent. The amount of stormwater runoff would be slightly reduced compared to existing conditions. There are no known capacity issues with the City storm drain systems in the project area.

Because implementation of the project would not result in an increase in impervious surfaces and would be required to comply with the MRP, the total volume of stormwater runoff would not increase. As a result, impacts related to increases in surface runoff would not require the construction of new storm drainage infrastructure nor alteration of the existing system to handle increased site runoff. **(Less Than Significant Impact)**

Sanitary Sewer

The proposed project would connect to existing sewer lines in the project area. There is an eight-inch sewer main in First Street that has sufficient capacity to serve the project.²¹ No upgrades to any existing sewer mains are anticipated as a result of the project. Implementation of the project would have a less than significant impact on the capacity of the existing sanitary sewer system. **(Less Than Significant Impact)**

²⁰ City of Los Altos. Public Works – Sanitary Sewer. <https://www.losaltosca.gov/publicworks/page/sanitary-sewer-0>. Accessed August 22, 2017.

²¹ Sandis, preliminary sewer capacity calculations, provided August 18, 2017 and Sept. 25, 2017.

4.17.2.4 *Solid Waste Impacts*

The Newby Island Landfill, located in Milpitas, has disposal capacity through 2024. It is permitted to accept up to 4,000 tons of municipal solid waste per day. The proposed project would generate approximately 462 pounds of solid waste per day (gross).²² The net increase in solid waste generated by the project would be less when factoring in the waste generated by the existing businesses on the site. However, this estimate is a gross number that does not account for the waste that is currently generated by the existing buildings on the site. In addition, the project will 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 to support the City’s target of achieving a 76 percent waste diversion rate. Therefore, the net increase in the amount of solid waste generated by the proposed project would be significantly less than 462 pounds per day.

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 require that new landfill facilities be contracted with or constructed to serve the proposed project. **(Less Than Significant Impact)**

4.17.3 Conclusion

The project would not result in any utility or service facility exceeding current capacity or require the construction of new infrastructure or service facilities to support the project. **(Less Than Significant Impact)**

²² The project’s solid waste generation is based on a solid waste generation rate of six pounds per 1,000 square feet per day for office space.

4.18

MANDATORY FINDINGS OF SIGNIFICANCE

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact | Checklist Source(s) |
|--|--------------------------------|--|-------------------------------------|--------------------------|---------------------|
| a) 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1 - 14 |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1 - 14 |
| c) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1 - 14 |
| d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1 - 14 |

4.18.1 Project Impacts

The proposed project would not degrade the quality of the environment with the implementation of identified mitigation measures. As discussed in *Section 4.4 Biological Resources*, the project would not impact sensitive habitat or species. In addition, implementation of the identified mitigation measures in *Section 4.4 Biological Resources* would reduce construction impacts to nesting birds and roosting bats. Identified mitigation measures in *Section 4.5 Cultural Resources* would avoid or reduce impacts to unknown subsurface cultural resources. Implementation of the identified mitigation measures as discussed in *Section 4.6 Geology and Soils*, would reduce possible constructed-related erosion impacts. Implementation of the identified mitigation measures in *Section 4.12 Noise and Vibration* would reduce the noise exposure impacts to nearby residences from operational and construction noise.

4.18.2 Cumulative Impacts

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 project would not impact agricultural and forest resources, mineral resources, or recreational resources. Therefore, the project would not contribute to a significant cumulative impact on these resources.

The proposed project would result in temporary air quality, geology and soils, noise, water quality, and biological impacts during construction. With implementation of General Plan policies and Municipal Code requirements, as well as identified mitigation measures, the construction impacts would be mitigated to a less than significant level. As a result, the project would not have a cumulatively considerable impact on air quality, geology and soils, noise, water quality, and biological resource impacts in the project area.

Implementation of the project would result in the removal of 50 trees. However, the project would plant at least 70 new trees, resulting in a replacement ratio of approximately 1.5:1. The project would not have a long-term effect on the urban forest or the availability of trees as nesting and/or foraging habitat in an urban environment. Therefore, the project would not have a cumulatively considerable impact on biological resources.

There are no known subsurface cultural resources on or adjacent to the project site; however, measures are included to reduce impacts, in the event subsurface resources were discovered as part of project construction. The potential for cultural resource impacts from implementation of the project would be mitigated and would be localized and isolated to the project site itself as there are no known buried cultural resources that extend beyond the project site boundaries. No other resources would be impacted by other approved, pending or probable development in the area; therefore, the proposed project would not have a cumulatively considerable impact on cultural resources in the project area.

The project site has the potential for soil contamination due to past agricultural uses and undocumented fill on-site. In addition, the existing buildings likely contain asbestos and/or lead based paint. With conformance of the regulatory requirements and the identified mitigation measures, the project would not result in a cumulatively considerable impact. Furthermore, any hazardous materials impacts would be localized and isolated to the project site itself as there are no

known contaminants that extend beyond the project site boundaries and that would be impacted by other approved, pending or probably development in the area.

4.18.2.1 *Cumulative Air Quality and Greenhouse Gas Impacts*

CEQA defines a cumulative impact as two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts. According to the BAAQMD, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself; result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. Therefore, if daily average or annual emissions of operational-related criteria air pollutants exceed any applicable threshold established by the BAAQMD, the proposed project would result in a cumulatively significant impact.

Table 4.3-2 shows that implementation of the proposed project would generate less than significant operational emissions. The proposed project would not result in individually significant impacts and therefore would also not make a cumulatively considerable contribution to regional air quality impacts.

Project GHG emissions would be consistent with the City's Climate Action Plan, and therefore, would not preclude the City or State from meeting GHG emission reduction goals by the year 2020. The operational criteria air pollutant and GHG emissions thresholds are by their very nature an indication whether a project would generate a cumulatively considerable contribution to cumulative impacts, as no one project could individually cause a significant (regional) criteria air pollutant or (global) greenhouse gas impact.

4.18.2.2 *Cumulative Intersection Level of Service Impacts*

Traffic volumes under cumulative conditions reflect traffic volumes on the planned transportation network associated with reasonably foreseeable future conditions. For this project, the *Hexagon* report estimated the cumulative no project traffic volumes by applying a compound growth factor of one percent per year to existing traffic volumes for 10 years and adding trips from approved developments. The one percent annual growth factor is a typical growth assumption for traffic studies in Santa Clara County and reflects conservative assumptions for reasonably foreseeable future conditions. Cumulative plus project traffic volumes were estimated by adding to cumulative no project traffic volumes the net project trips.

The results of the analysis show that, measured against the City of Los Altos level of service standards, all of the non-CMP signalized intersections would operate at acceptable LOS D or better under cumulative no project conditions. All CMP signalized intersections would operate at acceptable LOS E or better under cumulative conditions.

4.18.2.3 *Cumulative Noise Impacts*

As described in the Section 4.12 above, construction of the proposed project would result in short-term noise impacts on adjacent multi-family residential uses; however, construction noise would be short-term and implementation of the recommended measures for project construction would reduce the construction noise impacts to the extent feasible. In addition, the proposed project would not result in a substantial increase in traffic volumes, therefore, the proposed project would not result in a substantial long-term traffic noise level increase. Implementation of the proposed project would also generate various on-site stationary noise sources, including HVAC equipment, occasional event noise, parking lot activities, and loading dock operations. However, design considerations and shielding would reduce potential stationary source noise impacts to a less-than-significant level. The proposed project would not result in individually significant impacts and therefore would also not make a cumulatively considerable contribution to noise impacts in the community.

4.18.3 Short-Term Versus Long-Term Environmental Goals

Construction of the proposed project would not result in the conversion of a greenfield site to urban uses or otherwise commit resources in a wasteful or inefficient manner. The project proposes to redevelop an infill location in Los Altos and it is anticipated that short-term effects resulting from construction would be substantially off-set by meeting the long-term environmental goals (such as increased building energy efficiency) for this site.

The operational phase would consume energy for multiple purposes including building heating and cooling, lighting, and electronics. Energy, in the form of fossil fuels, would be used to fuel vehicles traveling to and from the project site. The project would result in an increase in demand upon nonrenewable resources; however, the project is required to comply with CALGreen. The proposed project would be designed to achieve minimum LEED certification consistent with CALGreen. The project shall incorporate a variety of design features including community design and planning, site design, landscape design, building envelope performance, and material selections to reduce energy use and conserve water. The project is not expected to produce significant emissions that would affect nearby sensitive receptors, and GHG emissions released during construction and operation of the project are estimated to be below the significance thresholds.

With implementation of the standard and mitigation measures included in the project and compliance with City General Plan policies, the proposed project does not have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.

4.18.4 Direct or Indirect Adverse Effects on Human Beings

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 hazardous materials and noise. Implementation of mitigation measures and General Plan policies would, however, reduce these impacts to a less than significant level. No other direct or indirect adverse effects on human beings have been identified.

Checklist Sources

1. CEQA Guidelines – Environmental Thresholds (professional judgement and expertise and review of project plans).
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7. Michael L. Bench, Consulting Arborist – *An Evaluation of the Existing Trees, SRGNC, LLC Project, First Street, 100 Block, Los Altos, California*. September 28, 2016; October 12, 2016.
8. Rockridge Geotechnical. *Geotechnical Investigation First Street Green Development, Western Plaza, Los Altos, California*. June 21, 2017.
9. West Environmental Services & Technology. *Phase I Environmental Site Assessment, 101-151 First Street, Los Altos, California*. June 2017. *Phase I Environmental Site Assessment, Plaza Parking Lot, Los Altos, California*. June 2017.
10. Federal Emergency Management Agency. *Flood Hazard Maps*. 2009.
11. Santa Clara Valley Water District. *Flood Inundation Maps*. 2009.
12. Hexagon Transportation Consultants, Inc. – *First Street Office Development Traffic Impact Analysis*. June 22, 2017.
13. LSA. *Noise Impact Analysis, First Street Green Project, City of Los Altos, California*. June 2017.
14. LSA. *Air Quality Impact Analysis, First Street Green Project, City of Los Altos, California*. June 2017.
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SECTION 5.0 LEAD AGENCY AND CONSULTANTS

5.1 LEAD AGENCY

City of Los Altos

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Jon Biggs, Community Development Director
Zachary Dahl, Planning Services Manager

5.2 CONSULTANTS

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Demetri Loukas, Senior Project Manager
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